IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BLAKE J. ROBBINS, a Minor, by his Parents

and Natural Guardians, MICHAEL E. ROBBINS and HOLLY S. ROBBINS.

Individually, and on Behalf of all Similarly

Situated Persons,

Plaintiffs,

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CIVIL ACTION

NO. 2:10-cv-00665-JD

LOWER MERION SCHOOL DISTRICT,

and

THE BOARD OF DIRECTORS OF THE LOWER MERION SCHOOL DISTRICT.

and

CHRISTOPHER W. McGINLEY,

Superintendent of Lower Merion School

District.

Defendants.

STIPULATED ORDER

It is hereby stipulated and agreed by and among plaintiffs, Blake J. Robbins, Michael E. Robbins, and Holly S. Robbins, and defendants, Lower Merion School District ("LMSD"), the Board of Directors of LMSD, and Christopher W. McGinley, subject to the approval of the Court, as follows:

Plaintiffs' computer forensic expert, John Steinbach, shall be provided the 1. opportunity to verify a subset of the findings reported by Defendants' forensic consultant, L-3 Services, Inc. (hereinafter "L-3"). Mr. Steinbach's review will be performed at L-3's offices at a mutually agreed upon time and date, it being agreed that such review will begin during the week of June 7, 2010. In performing this review, Mr. Steinbach will bring his own independent forensic work station with an external docking station to permit the loading of the L-3-supplied mirror image of the hard drive of the Perbix

Computer (as defined below) with no disassembly of equipment required. None of the supplied equipment shall be connected to any L-3 equipment or networks and the equipment will be "air gapped." At the conclusion of the analysis, the mirror image will be returned to L-3.

- 2. To verify the completeness of L-3's findings, Mr. Steinbach will run his own software on a mirror image of the MacPro utilized by Michael Perbix (the "Perbix Computer") for the purpose of determining the number of images contained on the Perbix Computer. L-3 shall provide Steinbach with a mirror image copy of the hard drive from the Perbix Computer, which Mr. Steinbach will attach to his forensic work station to allow him to run his tests. It is understood that Mr. Steinbach's testing will not require him to actually view any images, but rather only the computer-generated code (i.e., hash values) related to such images. Furthermore, except as provided in paragraph 4, Mr. Steinbach shall not view any images contained on the mirror image copy of the hard drive from the Perbix Computer.
- 3. In order for Mr. Steinbach to be able to compare his findings with the findings obtained by L-3, within 3 business days of the date of this Order, L-3 shall provide to Mr. Steinbach a full and complete list of the hash values of the images that L-3 recovered from the Perbix Computer.
- 4. In order for Mr. Steinbach to independently determine if there are specific "signatures" of a LANrev-generated image, Mr. Steinbach will be provided with a representative sampling of digital copies of screenshots and webcam pictures that do not contain any personal information or any images of any person and that L-3 previously identified as having been obtained using the LANrev software. L-3 shall also provide Mr. Steinbach with information that it determined represents the "signature" of a LANrev-generated image for each image supplied. Mr. Steinbach may also use the sample images to determine whether the "LANrev signature" can be altered if the

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original LANrev image is subsequently saved using photo editing software.

5. This Stipulated Order shall not be deemed a waiver of any of the rights of Plaintiffs, including the right of Plaintiffs to request the right to review all of the Lower Merion School District computers which were imaged by L-3 as part of the procedure established in connection with the Order of Court entered on February 22, 2010, or of any of the rights of Defendants, including the right of Defendants to object to any formal or informal discovery request made by Plaintiffs.

By: 🗸

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Attorneys for Defendants

ORDERED AND APPROVED ON THIS

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DAY OF JUNE, 2010

BY THE COURT:

JAN E. DUBOIS, U.S.D.J.

6-9-10 faxes to All counsel