

EXHIBIT D

Law Offices
LAMM RUBENSTONE LLC

Tax I.D. #23-2295378

PLEASE REMIT TO:

3600 Horizon Boulevard, Suite 200
Trevose, PA 19053
(215) 638-9330

July 26, 2010

Michael E. Robbins and Holly S.
437 Hidden River Road
Penn Valley , PA 19072-1112

Re: v. Lower Merion School District, et al.
I.D. 16608-00003- MSH

Invoice # 847672

For Services Rendered Through July 26, 2010

Current Fees	316,707.50	
Current Disbursements	102,143.10	
Total Due		\$ 418,850.60

Timekeeper	Hours	Rate/Hour	Amount
Lynne M. Starkman	0.2	\$ 0.00	\$ 0.00
Lynne M. Starkman	5.5	\$ 150.00	\$ 825.00
Monique Denton	0.3	\$ 150.00	\$ 45.00
Michael P. Trainor	0.3	\$ 225.00	\$ 67.50
Stephen David	0.2	\$ 250.00	\$ 50.00
Master Julie B.	42.3	\$ 250.00	\$ 10,575.00
Frank Schwartz	279.3	\$ 275.00	\$ 76,807.50
Debra Klebanoff	23.9	\$ 275.00	\$ 6,572.50
Jennifer D. Gould	1.0	\$ 300.00	\$ 300.00
Stephen Levin	55.1	\$ 350.00	\$ 19,285.00
Edward H. Rubenstone	2.4	\$ 375.00	\$ 900.00
Mark S. Haltzman	473.6	\$ 425.00	\$ 201,280.00

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Date	Description of Services	Atty	Hours	Amount
11-13-09	Review Lower Merion website re: computer policies and conferences with partners re: same	JDG	1.0	300.00
11-13-09	Various conferences re: class action lawsuit; review Complaint; telephone conferences (3) with Holly Robbins re: same.	MSH	3.1	1,317.50
11-13-09	Conference with partners re: potential class action; Legal research re: possible causes of action and applicable state and federal statutes	FS	5.9	1,622.50
11-20-09	Legal research re: right to pre-complaint discovery in state and federal courts	FS	0.9	247.50
01-14-10	Conference with S. Levin re: addition of 1983 claim; Legal research re: section 1983 of Civil Rights Act and in loco parent is issues; Revise draft Complaint to add counts for violations of section 1983, Pennsylvania Wiretapping and Electronic Surveillance Act, Fourth Amendment and Pennsylvania common law.	FS	5.3	1,457.50
01-15-10	Draft Class Action Complaint	FS	5.8	1,595.00
01-15-10	Revise draft Complaint	FS	6.2	1,705.00
01-16-10	Teleconference with M Robbins and M Haltzman re: confirmation of School			

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Date	Description of Services	Atty	Hours	Amount
01-17-10	Districts remote activation of web cams; Legal research re: ex parte communication with putative class members by defendants; Draft letter to Schools District re: prohibition of ex parte communication with potential class members; Draft letter to School District re: preservation of all electronic data	FS	7.3	2,007.50
01-18-10	Telephone conference with Holly Robbins regarding conversations with school; conference with Steve Levin. Review and revise Complaint and research re: causes of action; Review and revise letters to School District re: electronic discovery and communications with Class Members.	MSH	0.8	340.00
01-19-10	Revise Class Action Complaint	MSH	6.1	2,592.50
01-20-10	Revise electronic data preservation letter; Revise ex parte communication letter; Conference with S. Levin re: constitutional claims; Research re: cases involving web cams	FS	0.5	137.50
01-21-10	Review and revise Class Action Complaint	FS	1.2	330.00
01-26-10	Telephone conference with	MSH	3.9	1,657.50

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Date	Description of Services	Atty	Hours	Amount
02-02-10	client regarding status of case and possible outcome. Conference with M. Haltzman re: class discovery needed to support Motion to Certify Class; Research re: scope of class discovery	MSH	0.8	340.00
02-03-10	Legal research re: scope of permissible pre-certification discovery and content of Interrogatories	FS	0.8	220.00
02-11-10	Conference with M. Haltzman re: possible count for possession of child pornography; Legal research re: federal and state laws prohibiting possession of child pornography; Review and revise Class Action Complaint; Revise Notice Letter of Class Action to School District	FS	1.6	440.00
02-12-10	Draft Class Action Interrogatories	FS	3.3	907.50
02-16-10	Draft and revise Class Action Interrogatories and Requests for Production of Documents	FS	1.6	440.00
02-17-10	Revise Class Action Discovery; Conference with M. Haltzman re: Class Action Discovery	FS	1.6	440.00
02-17-10	Receipt and review of electronic notification of	FS	0.5	137.50

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Date	Description of Services	Atty	Hours	Amount
02-18-10	filing of Complaint and updated file to reflect current status	LMS	0.2	30.00
02-18-10	Revise and send Letters re: preservation of evidence and ex parte communication with class members; Online research re: remote activation of web-cams	FS	2.3	632.50
02-18-10	Review and respond to all emails and voice mail messages regarding interviews; telephone conference with Lower Merion counsel; review and revise letters to School District; review and revise Request for Injunction; review articles and blogs from students and parents; review additional research regarding legal issues and liability; review emails regarding service of Complaint; review and revise litigation hold letters.	MSH	8.8	3,740.00
02-19-10	Draft and revise TRO in federal court, especially factual assertions. Review Brief to be attached to TRO. Conference with originating partner and associate assigned to draft Brief. Arrange for electronic filing of TRO request.			

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Date	Description of Services	Atty	Hours	Amount
02-19-10	Teleconference with federal court judge.	SL	7.2	2,520.00
02-19-10	Reviewed and prepared Motion for Temporary Restraining Order with Brief, Proposed Order and Certificate of Service to be electronically filed and electronically filed same	LMS	0.5	75.00
02-19-10	Legal research re: section 1983 actions against School Board; Draft Motion for Emergency Temporary Restraining Order and Memorandum of Law in Support	FS	5.7	1,567.50
02-19-10	Conference with Steve Levin and Frank Schwartz re: Motion for Temporary Restraining Order and Preliminary Injunction; review and revise Motion; telephone conferences (4) with clients regarding various issues; research regarding computer software; meeting with clients regarding interviews; respond to inquiries regarding interviews; review Lower Merion School District web site.	MSH	8.1	3,442.50
02-19-10	Legal research re: emotional distress - potential claim. Discuss with FS.	EHR	1.8	675.00
02-20-10	Review and respond to emails			

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Date	Description of Services	Atty	Hours	Amount
	from Hank Hockeimer regarding Temporary Restraining Order and Injunction; additional research regarding injunction issues; telephone conference with ACLU attorney regarding various issues and desire of ACLU to file Amicus Brief; emails and telephone conferences with various potential forensic experts to use in case.	MSH	5.4	2,295.00
02-21-10	Online research of information to discover webinar of IT professional that assisted in setting up the software in the computer and the information that the software takes a photo every 15 minutes when activated.	SL	0.8	280.00
02-21-10	Respond to emails from Hank Hockeimer; telephone conferences (2) with clients regarding various issues; prepare for TRO Hearing on Monday, February 22.	MSH	3.8	1,615.00
02-22-10	Receipt of electronic notification of hearing and updated file to reflect same and filings by other parties	LMS	0.2	30.00
02-22-10	Emails re: TRO Hearing and revisions to proposed agreed Order; Review and revise			

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Date	Description of Services	Atty	Hours	Amount
	proposed agreed Order; Travel to and from Federal Courthouse for Hearing; Conference with John Steinbauch re: various issues; Attend Hearing in Federal Court for Temporary Restraining Order; Revise agreed Order; Telephone conferences (5) with clients re: status of various issues.	MSH	9.2	3,910.00
02-22-10	Legal research re: scope of expectation of privacy, intent requirement under ECPA and need to use least intrusive means to accomplish legitimate goal; Attend Preliminary Injunction Hearing	FS	9.8	2,695.00
02-22-10	Draft and revise proposed Order to be submitted to Court as an Agreed Order with factual premises and agreements of counsel in lieu of an injunction. Review various web and blog sites regarding nature of the software and its potential for use and abuse. Travel to and from Philadelphia for hearing on Motion for Injunction. Attend Injunction Motion and obtain Order.	SL	6.6	2,310.00

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02-23-10	Legal research re: standard applicable to motions to dismiss and for pleading of 1983 actions	FS	2.6	715.00
02-23-10	Draft and revise proposed letter to opposing counsel re: proposed meeting that LMSD intends have with parents. Research on latest web blogs and Internet information re: the LanRev software. Review open letter to parents and send to originating partner. Teleconference with originating partner re: wording of open letter and originating partner's response to open letter.	SL	6.1	2,135.00
02-23-10	Review blogs regarding issues raised in Complaint; conference with Judge Dubois and opposing counsel regarding Assistant Vice Principal Public Statement; telephone conference with counsel for Assistant Vice Principal, Dennis Abramson, regarding issues; email to Hank Hockeimer regarding various issues; review emails from parents and students; telephone conferences with parents regarding issues; review of			

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Date	Description of Services	Atty	Hours	Amount
	Press Release regarding upcoming meeting by Principal; email to Hank Hockeimer regarding same; discuss issues with forensics expert; conference with Hank Hockeimer and forensic experts regarding status of copying; telephone conferences (6) with clients regarding various issues; review emails from parents and students.	MSH	8.2	3,485.00
02-23-10	Updated file with various electronic filing notifications including Order by Court regarding Defendant's deadline for a response to the Complaint and report to the Court	LMS	0.2	30.00
02-24-10	Legal research re: good faith defenses under ECPA	FS	1.3	357.50
02-24-10	Telephone conference with client regarding various issues; review Matsko Statement; telephone conference with clients regarding response; assist clients in preparation of response; meeting with clients regarding response; review form to request Court Hearing Transcript; review and respond to Art Makadon regarding letter to parents.	MSH	6.2	2,635.00

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Date	Description of Services	Atty	Hours	Amount
02-25-10	Legal research re: FERPA statute and regulations; Draft letter to School Principal requesting inspection of education records; Legal research re: possible good faith defenses under ECPA; Conference with S. Levin re: results of legal research and possible amendment of Complaint	FS	5.2	1,430.00
02-25-10	Discuss strategy with MS	EHR	0.6	225.00
02-26-10	Conference with S. Levin re: amendment of Class Action Complaint; Email to M. Haltzman and S. Levin re: legal issues to be addressed prior to amendment; Legal research re: possible damage caps	FS	1.9	522.50
02-26-10	Draft master list of issues for Amended Complaint and other issues to consider. Miscellaneous research issues and strategy discussions.	SL	2.6	910.00
02-26-10	Review Motion for Expedited Discovery; email Hank Hockeimer regarding IT personnel; review local rules regarding discovery; dictate memo to file regarding FBI investigation.	MSH	3.8	1,615.00
02-28-10	Review Rule 34 of the Federal Rules regarding			

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Date	Description of Services	Atty	Hours	Amount
	Production of Documents and Things. Draft and revise Motion to Expedite Discovery to allow Issuance of Subpoena to IT employees of the school.	SL	2.5	875.00
02-28-10	Conference with client regarding various issues, including Blake's computer; emails to Hank Hockeimer regarding Blake's computer and IT personnel personal computers; review Perfix blog.	MSH	3.2	1,360.00
03-01-10	Reviewed Court Order, updated file to reflect deadline and prepared email regarding same	LMS	0.2	30.00
03-01-10	Telephone conference with Hank Hockeimer and Paul Lanieri regarding Rule 26(f) Conference; telephone conference with Marc Neff regarding Michael Prebix; review and revise Emergency Discovery Motion; review parent web site regarding meeting; draft letter to organizers; revise 26(f) Disclosures.	MSH	6.1	2,592.50
03-01-10	Meet with M. Haltzman re: assignment; Review complaint and other materials; Begin researching various issues including standard of care			

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Date	Description of Services	Atty	Hours	Amount
03-02-10	of school district; and sovereign immunity	DK	3.1	852.50
03-02-10	Meet with MSH re: various issues.	SD	0.2	50.00
03-02-10	Obtained Federal Court Subpoenas for Deposition and provided to responsible attorney and staff with instructions for completion	LMS	0.2	30.00
03-02-10	Draft and revise letter to parents. Draft and revise Declaration of forensic consultant for attachment to Motion to Expedite Discovery.	SL	5.3	1,855.00
03-02-10	Continue researching re: various issues.	DK	1.8	495.00
03-02-10	Revise Rule 26(f) Conference Memo; telephone conference with Defendants' counsel re: same; telephone conference with Forensic consultant re: electronic discovery; review Judge DuBois Pretrial and Trial Procedures information; telephone conference with Parents re: lawsuit; respond to emails re: lawsuit.	MSH	5.1	2,167.50
03-03-10	Reviewed file to determine status of report to be provided to Chambers and prepared email regarding same	LMS	0.2	30.00
03-03-10	Telephone conference with			

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Date	Description of Services	Atty	Hours	Amount
03-04-10	Larry Silver re: Parents Meeting; telephone conference with Matthew Desharnais of Absolute Software; review research on discovery; drafting subpoenas; telephone conferences (5) with clients re: various issues; review research on various claims; telephone conference with Absolute Software re: issues	MSH	6.4	2,720.00
03-04-10	Draft and revise attachments to subpoenas for Matsko, Cafiero, Perbix and DiMedio. Accurint search for addresses for Perbix, Cafiero and Matsko. Revise Subpoenas to reflect new addresses and revise attachments.	SL	3.8	1,330.00
03-04-10	Telephone conference with David Arnold regarding litigation; telephone conference with various parents re: class action; conference with associates re: subpoenas; conference with associate regarding further research on discovery issues and protective order; revise subpoenas; conference with associates re: further research; review case law on			

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Date	Description of Services	Atty	Hours	Amount
03-04-10	discovery stays. Review and revise Absolute Subpoena and document request.	MSH	8.2	3,485.00
03-05-10	Research grounds to oppose discovery stay pending disposition of motion to dismiss and summarize in email	DK	1.9	522.50
03-08-10	Telephone conference with clients regarding various matters; email to defense counsel regarding subpoena; telephone conference with Hank Hockeimer; revise subpoena; review case law; telephone conference with Judge DuBois; email to attorney for Carol Cafiero. Conference with M. Haltzman re: status of case and settlement prior to class certification; Review Joint Rule 26f Conference Report; Legal research re: settlement prior to class certification	MSH	6.8	2,890.00
03-08-10	Review emails re: Court Order to extend time; review documents supplied by Absolute Software; review and revise proposed Order; review voice mail message from Hank Hockeimer; telephone conference with John Steinbach regarding	FS	1.5	412.50

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Date	Description of Services	Atty	Hours	Amount
	computer discovery; letter to Judge DuBois re: discovery; telephone conference with David Arnold re: litigation; telephone conference with Parent Group; telephone conference with clients.	MSH	6.4	2,720.00
03-08-10	Research damages issues including available damages under Civil Rights Act, implications of sovereign immunity and Pa. Political Subdivision Tort Claims Act.	DK	2.0	550.00
03-09-10	Review and revise letter to opposing counsel regarding proposed consensual discovery.	SL	0.6	210.00
03-09-10	Multiple emails regarding proposed Order to extend time; revise proposed Order; telephone conference with FBI regarding status of investigation; letter to Hank Hockeimer; review letter to Judge DuBois; emails regarding meeting to discuss proposed Order; conference with associate regarding research on various causes of action; telephone conference with John Steinbach regarding information meeting.			
03-09-10	Research remedies under	MSH	4.8	2,040.00

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Date	Description of Services	Atty	Hours	Amount
03-10-10	Civil Rights Act and other related issues.	DK	2.3	632.50
03-10-10	Legal research re: class action pre-certification and issues to be addressed in class action settlement	FS	5.6	1,540.00
03-10-10	Telephone conference with Hank Hockeimer and Paul Lantieri regarding Stipulated Order; revise Stipulated Order; telephone conference with Judge DuBois regarding Order; review research regarding member class definition; review research regarding civil rights claims and damages.	MSH	4.6	1,955.00
03-10-10	Research liability and damages issues. Begin drafting memorandum summarizing research.	DK	2.4	660.00
03-11-10	Research and draft Memorandum to M. Haltzman and S. Levin re: issues relating to pre-certification settlement of class claims	FS	5.2	1,430.00
03-11-10	Review and respond to emails regarding updating "special need" computers; telephone conference with computer consultants regarding same; review research on class and settlement; telephone conference with Absolute			

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Date	Description of Services	Atty	Hours	Amount
03-12-10	Software regarding various issues.	MSH	5.9	2,507.50
03-12-10	Meeting with John Steinbach and L-3 representatives regarding understanding LanRev software in connection with updates; travel to and from Vestige office for conference call; review Absolute Software Document Production; email to Hank Hockeimer regarding same.	MSH	4.9	2,082.50
03-12-10	Conference with M. Haltzman re: statutory attorney fees	FS	0.7	192.50
03-12-10	Continue researching remedies and claims issues.	DK	1.2	330.00
03-15-10	Legal research re: requirement of exhaustion of administrative remedies in 1983 class actions; Draft Memorandum re: results of legal research	FS	5.3	1,457.50
03-15-10	Telephone conference with FBI regarding issues; telephone conferences (3) with client regarding status; review LanRev documents for document production; email associate regarding research.	MSH	4.1	1,742.50
03-15-10	Continue research and drafting memorandum summarizing research.	DK	3.0	825.00
03-16-10	Reviewed Court Order and			

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Date	Description of Services	Atty	Hours	Amount
03-16-10	updated litigation events and calendar to reflect new deadlines	LMS	0.2	30.00
03-16-10	Conference with M. Haltzman re: recovery of expert fees in 1983 actions and need to research damages recoverable under Pennsylvania Constitution	FS	0.3	82.50
03-17-10	Review and respond to FBI e-mail; review responses to questions to L-3; respond to questions; conference with Steinbach; review Lower Merion Procedures for record.	MSH	3.9	1,657.50
03-17-10	Legal research re: possible claims for invasion of privacy under Pennsylvania Constitution and remedies available; Conference with M. Haltzman re: monetary damages pursuant to Pennsylvania Constitution; Legal research re: personal property exception to sovereign immunity of Commonwealth actors; Draft Memorandum re: scope of exception to sovereign immunity	FS	6.8	1,870.00
03-17-10	Research impact of state immunity on federal claim.	DK	0.4	110.00
03-17-10	Research Rule 37(a) of the Federal Rules of Civil			

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Date	Description of Services	Atty	Hours	Amount
03-17-10	Procedure. Draft and revise Motion to Compel Deposition of Carol Cafiero. Meeting with originating partner to review draft and make revisions.	SL	3.0	1,050.00
03-18-10	Conference with associate re: exceptions of Sovereign Immunity; review case law re: same; review memo from associate; telephone conference with Mandrachia re: compliance with subpoena; draft Motion to Compel Deposition of Carol Cafiero	MSH	3.1	1,317.50
03-18-10	Review Motion to Intervene, Compliant in Intervention and Brief in Support filed by parents group; Legal research re: Rules of Professional Conduct implicated by Motion to Intervene; Draft Memorandum re: use of RPCs to oppose Motion to Intervene; Legal research re: cases supportive of denial of Motion to Intervene	FS	5.5	1,512.50
03-18-10	Further revisions to Motion to Compel Deposition of Carol Cafiero. Assemble exhibits. Review proposed order. Draft Certification of Counsel. Conduct Accurint			

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03-18-10	search for hoime address of Cafiero. Review Motion to Intervene as Plaintiff filed by certain putative class members. Confer with originating partner.	SL	3.6	1,260.00
03-19-10	Finalize Motion to Compel; Review Motion to Intervene; Review research re: Motion to Intervene; Review case law re: disqualification of counsel.	MSH	4.2	1,785.00
03-19-10	Revise Motion for Extension of Time to Respond to Motion for Intervention; Review Cafiero Motion to Quash Subpoena	FS	1.1	302.50
03-22-10	Conference with Hank and Paul re: upcoming conference call with Judge DuBois; Conference with Judge DuBois re: Motions recently filed; draft Motion for Extension of Time; research intervention case law.	MSH	4.3	1,827.50
03-22-10	Revise Motion for Extension of Time; Review LMSD response to Motion to Intervene; Conference with M. Haltzman re: possibly discontinuing class action	FS	0.7	192.50
03-22-10	Finalize and file Motion to Extend time to respond to Motion to Intervene; Conference with Hank and			

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Michael E. Robbins and Holly S.

Re: v. Lower Merion School District, et al.
I.D. 16608-00003 - MSH

Date	Description of Services	Atty	Hours	Amount
03-23-10	Paul re: discovery; E-mail Hank re: discovery; Conference with client re: discovery and Motion to Intervene; Conference with Larry Silver re: parents Motion to Intervene; Research re: Cafiero Motion to Quash.	MSH	4.1	1,742.50
03-23-10	Reviewed deadlines and reminders for the week and prepared email to attorneys regarding same, reviewed docket to determine status of Initial Disclosures	LMS	0.3	45.00
03-23-10	Review response from Parents Group re: Motion to Intervene; Telephone conference with client re: status; E-mail Hockemeir; Conference with all attorneys re: Motion to Intervene; Review Document Production of e-mails and LanRev pictures; Draft initial disclosures; Conference with attorney Perrone re: settlement.	MSH	4.4	1,870.00
03-23-10	Review Intervenors Opposition to Motion for Extension of Time	FS	0.3	82.50
03-23-10	Research issue whether webcam images constitute "educational records" under FERPA.	DK	1.4	385.00

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Date	Description of Services	Atty	Hours	Amount
03-24-10	Conference with M. Haltzman re: response to Motion to Quash Cafiero subpoena	FS	0.2	55.00
03-24-10	Conference with Hank re: additional discovery and to discuss email; Draft response to Motion to Quash subpoena; Conference with clients	MSH	4.2	1,785.00
03-24-10	Continue FERPA research.	DK	0.5	137.50
03-25-10	Finalize initial disclosures; Review Response to Motion to Quash; Conference with Larry Silver; Conference with Hank re: document production; Telephone conference with Silver re: class status; Begin review of hundreds of emails.	MSH	4.4	1,870.00
03-25-10	Review Cafiero Motion to Quash Subpoena; Review and revise Brief in Opposition to Motion to Quash	FS	1.6	440.00
03-25-10	Review and Revise "Statement to Community" for introduction into Senator Spector's committee hearing. Review and revise email communication to Perbix' counsel.	SL	1.0	350.00
03-25-10	Draft memorandum summarizing FERPA research.	DK	2.0	550.00
03-26-10	Prepared reminders regarding upcoming deadlines	LMS	0.1	15.00

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Date	Description of Services	Atty	Hours	Amount
03-26-10	Legal research re: cases establishing burden of proof required to quash subpoena for use in Brief in Opposition to Cafiero Motion to Quash Subpoena; Revise Brief in Opposition to Motion to Quash Subpoena; Conference with M. Haltzman re: revisions to Brief	FS	3.2	880.00
03-26-10	Conference with Judge DuBois re: extensions; Continued review of hundreds of emails ; Review response to Motion to Quash.	MSH	4.8	2,040.00
03-26-10	Review final set of e-mail production.	MSH	3.8	1,615.00
03-29-10	Review Cafiero Response in Opposition to Motion to Compel Attendance at Deposition; Review Cafiero Memorandum of Law in Opposition to Motion to Compel ; Legal research re; cases cited in Cafiero Memorandum of Law; Teleconference with M. Haltzman re: cases cited by Cafiero and response thereto; Revise Plaintiff's Memorandum of Law in Opposition to Cafiero Motion to Quash Subpoena	FS	3.3	907.50
03-30-10	Review client's Response, Memorandum in Opposition,			

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Date	Description of Services	Atty	Hours	Amount
	proposed Order and Certificate of Service, prior to filing of record; Electronically file client's Response to Motion to Quash Subpoena, and its related papers of record, and confirm same by review of the docket	MD	0.3	45.00
03-30-10	Teleconference with M. Haltzman re: Brief in Opposition to Cafiero Motion to Quash Subpoena; Revise, file and serve Brief in Opposition	FS	1.1	302.50
03-30-10	Research to determine time for responding to discovery motion	MPT	0.3	67.50
03-30-10	Conference with Harkmeir re: meeting with Intervenor and Meeting between Vestige and L3; Conference with John re: same (twice)	MSH	0.8	340.00
03-31-10	Review Order granting extension of time to respond to Motion to Intervene	FS	0.1	27.50
03-31-10	Updated case file with filings received in case, prepared email and telephone call to lead attorney in preparation for telephone conference	LMS	0.4	60.00
03-31-10	Conference with Judge DuBois; Telephone conference with Hank re: meeting with			

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Date	Description of Services	Atty	Hours	Amount
	Intervenors; Conference with Steinbach re: L3 meeting.	MSH	1.8	765.00
04-01-10	Review of Court Order	LMS	0.2	30.00
04-01-10	Review Order denying Cafeiro Motion to Quash	FS	0.2	55.00
04-01-10	Conference with Steinbach re: meeting with L3.	MSH	0.7	297.50
04-02-10	Review second set of e-mail production.	MSH	4.1	1,742.50
04-03-10	Conference with Harkmeir re: reviewing documents and images; Review of e-mails; E-mail Shapiro re: Intervenor Motion.	MSH	5.1	2,167.50
04-05-10	Review docket to determine details of Motion to Intervene filed by ACLU for one parent to prevent transmission of illegally obtained photos.	SL	0.3	105.00
04-05-10	Conference with M. Haltzman re: document discovery; Review ACLU Motion to Intervene, Brief in Support and Complaint in Intervention; Conference with M. Haltzman re: response to Motion to Intervene	FS	2.4	660.00
04-05-10	Prepared reminder regarding deadline from Court Order	LMS	0.1	15.00
04-05-10	Review e-mails set 3; Telephone conference with Lawhard re: various issues; Conference with Abramson re:			

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Date	Description of Services	Atty	Hours	Amount
04-06-10	deposition; Review Motion to Intervene by ACLU; Prepare for depositions Pertix, Cafiero and Matsko.	MSH	5.7	2,422.50
04-06-10	Prepared reminder regarding response date to Petition to Intervene	LMS	0.1	15.00
04-06-10	Review Order of Judge Dubois re: response to Emergency Motion to Intervene; Conference with M. Haltzman re: request for additional time to respond; Draft letter to Judge Dubois requesting additional time to respond	FS	0.6	165.00
04-07-10	Prepare for depositions of Matsko; Telephone conference with Silver re: various issues; Review and revise letter to Court re: extension of time to respond; Conference with Harkemeir re: various matters, including scheduling of O'Brien deposition.	MSH	5.1	2,167.50
04-07-10	Review School District response to Emergency Motion for Intervention; Conference with M. Haltzman re: District response and Matzko deposition	FS	0.4	110.00
04-07-10	Prepare for and conduct deposition of Matsko.	MSH	5.5	2,337.50

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Date	Description of Services	Atty	Hours	Amount
04-08-10	Attend deposition of Michael Perbix.	SL	3.6	1,260.00
04-08-10	Prepare for 3 upcoming depositions (Pertix, O'Brien & Cafiero); E-mail Cafiero Counsel re: deposition; Telephone conference with Judge DelRicci Chambers re: Mandraccia hearing before him; Conference with Steinbach re: computer issues and questions related to same; Pertix deposition; e-mail Lower Merion School District counsel re: issues and documents.	MSH	10.5	4,462.50
04-09-10	Prepare for and take depositions of Kyle O'Brien and Cafiero, including conference with Judge Dubois; Further discussions with Lower Merion School District counsel re: resolutions of dispute and other issues.	MSH	8.5	3,612.50
04-12-10	Review draft Motion for Expedited Discovery re: personal computers of Perbix and Cafiero; Conference with M. Haltzman re: class certification options and re definition of class; Legal research re: class certification options and bifurcation for use in			

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Date	Description of Services	Atty	Hours	Amount
	Motion for Class Certification	FS	7.5	2,062.50
04-12-10	Reviewed Court Order to confirm deadline dates and prepared reminder email regarding same	LMS	0.2	30.00
04-12-10	Review and respond to various e-mails with Hockemeir; Conference with client re: status; Conference with Hockemeir re: various issues; Telephone conference with Kyle O'Brien and Jon Riba re: "green light" issue; Review of video of depositions of Perbix and Matsko; E-mail Silver in response to his e-mail.	MSH	4.8	2,040.00
04-13-10	Legal research Third Circuit decisions re: class certification requirements and grant of class certification in civil rights cases for use in Motion for Class Certification	FS	4.8	1,320.00
04-13-10	Conference with Silver re: status and his issues for injunction; Telephone conference with Hank re: same; In office conference with clients to discuss status of case and settlement issues; Review			

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Date	Description of Services	Atty	Hours	Amount
04-14-10	research on issue of damages; Review of L3 letter re: Lan Rev.	MSH	5.2	2,210.00
04-14-10	Draft Motion for class Certification; Conference with M. Haltzman re: use of sub-class; Draft Memorandum of Law in Support of Motion for Class Certification	FS	7.6	2,090.00
04-14-10	Conference with Judge re: various issues; E-mail Hank re: discovery issues; Review voice messages; Draft Motion to Sanction.	MSH	3.1	1,317.50
04-15-10	Review of Court's Order and updated litigation events and calendar to reflect deadlines associated with same	LMS	0.4	60.00
04-15-10	Legal research re: application of 5th Amendment privilege to personal computers in relation to Motion for Sanctions against Cafiero; Conference with M. Haltzman re: research findings and Motion for Sanctions; Draft Memorandum of Law in Support of Motion for Class Certification	FS	8.3	2,282.50
04-15-10	Conference with client re: status; Review and revise Motion for Sanctions; Review prior Order and Subpoena; Review Cafiero e-mails.	MSH	4.1	1,742.50

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Date	Description of Services	Atty	Hours	Amount
04-16-10	Research re: jury verdict awards in invasion of privacy cases; Draft memorandum of Law in support of Class Certification	FS	6.4	1,760.00
04-16-10	Meeting with Intervenor (Boni and Silver); Travel to/from Bala Cynwyd; Travel to/from Bala Cynwyd; Conference with Silver twice re: various issues; Conference with Judge DuBois; Review case law re: damages; Review Motion to Certify Class.	MSH	7.2	3,060.00
04-19-10	Draft Brief in Support of Class Certification; Draft Affidavit of F. Schwartz in Support of Appointment as Class Counsel	FS	5.3	1,457.50
04-19-10	Meeting Ballard Spahr with other Counsel, ACLU and Boni re: proposed injunctive relief; Conference with Judge Dubois; Travel to/from Philadelphia; Conference with client re: same	MSH	4.9	2,082.50
04-19-10	Research whether there is statutory limit on compensatory damages for section 1983 action.	DK	1.4	385.00
04-20-10	Revise Brief in Support of Motion for Class Certification	FS	4.7	1,292.50
04-20-10	Review Response to Motion to			

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Date	Description of Services	Atty	Hours	Amount
	Compel Cafiero to produce computer; Conference with client re: same; E-mail Hockemier re: various issues.	MSH	3.1	1,317.50
04-20-10	Continue research on issues under section 1983 claim.	DK	0.5	137.50
04-21-10	Review Cafiero Response to Motion for Sanctions and Brief in Support; Legal research re: cases cited in Cafiero Brief; Legal research re: 5th amendment adverse inference in civil cases; Legal research re: whether unauthorized use of computer negates expectation of privacy; Revise Motion for Class Certification and Brief in Support	FS	6.9	1,897.50
04-21-10	Review Class Certification Motion in preparation for dictating Certification containing biography for the court's consideration.	SL	0.6	210.00
04-21-10	Conference with Judge Reuter re: various issues; Conference with Judge Dubois; Travel to/from Federal Courthouse; Conference with client re: issues discussed	MSH	6.1	2,592.50
04-22-10	Conference with M. Haltzman re: Motion for Class Certification and status of			

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Date	Description of Services	Atty	Hours	Amount
	settlement talks.	FS	0.3	82.50
04-22-10	Prepared reminder regarding upcoming deadline	LMS	0.1	15.00
04-22-10	Review e-mail from Mandracchia re: Cafiero computer; Reply to e-mail re: same; E-mail Hank re: upcoming Settlement Conference; Telephone conference with Judge Reuter re: Monday Settlement Conference; Letter to Judge Dubois re: Cafiero computer; Telephone conference with client re: status.	MSH	3.8	1,615.00
04-23-10	Conference with M. Haltzman re: argument on Motion for Sanctions against Cafiero; Review US Motion to Modify Court Order	FS	0.6	165.00
04-23-10	Review prior pleading and prepare for hearing; Hearing (telephone) with Mandracchia, Hockeimer and Court re: Cafiero; Draft from of Stipulated Order; Review Motion for Class Certification and Memorandum of Law; Review letter from Boni re: press coverage; Review federal government findings; Telephone conference with Mandracchia office; Conference with client re: same.	MSH	3.6	1,530.00

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Date	Description of Services	Atty	Hours	Amount
04-26-10	Conference with M. Haltzman re: Motion to Certify Settlement Class; Conference call with Judge Dubois and defense counsel re: protective order, injunction, response to US Motion to Modify Order and Boni Letter; Legal research re: standards for certification of settlement class, approval of proposed settlement and notice required in 23(b)(2) actions.	FS	6.7	1,842.50
04-26-10	Review revised Cafiero Order; Meeting with John Steinbach re: Cafiero Agreement; Conference with Judge Dubois; Review of final Order re: Cafiero; Conference with Judge Dubois re: sealed documents; Conference with client re: status; Review rules re: letter to Dubois; Review rules re: class notice of settlement.	MSH	4.4	1,870.00
04-27-10	Draft Motion for Provisional Certification of Settlement Class, Proposed Form of Order and Memorandum of Law in Support	FS	5.2	1,430.00
04-27-10	Review Motion for Class Certification. Draft and			

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Date	Description of Services	Atty	Hours	Amount
04-27-10	revise Certification of counsel to accompany Motion for Class Certification. Review and revise Cafiero Stipulated Order for computer; Conference with Mandracchia and Hockeimer re: changes; E-mails re: meeting to discuss Preliminary Injunction; Draft response to Boni letter.	SL	2.2	770.00
04-28-10	Complete draft Memorandum of Law in Support of Certification of Settlement Class and Approval of Class Settlement; Revise Motion for Provisional Certification of Settlement Class, proposed Order and Memorandum of Law in Support; Conference with M. Haltzman re: Motion for Certification of Settlement Class; Conference call with M. Haltzman, M. Boni and H. Hockeimer re: intervenors request for limitations on speech and press	MSH	3.1	1,317.50
04-28-10	Updated litigation events to reflect Court Orders and changes in deadlines	FS	4.9	1,347.50
04-28-10	Review revised Order; E-mail to Hank and Paul re: various issues, including L-3	LMS	0.2	30.00

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Date	Description of Services	Atty	Hours	Amount
	progress with recovering pictures; Revise Order; Conference with Boni re: his letter; Conference with ACLU re: revised Order and Boni letter; Conference with client re: form of proposed Order; Conference with Steinbach re: imaging computer; Review Order granting certification of class.	MSH	4.8	2,040.00
04-29-10	Conference with M. Haltzman re: possible consent to intervention of ACLU; Review ACLU letter in response to Boni request for prior restraints; Conference with M. Haltzman re: plaintiffs' response to Boni letter; Review and revise draft response to Boni letter	FS	0.9	247.50
04-29-10	Review and suggest revisions to Motion seeking class certification	SL	1.3	455.00
04-29-10	Review letter to court in response to letter by parents group's counsel.	SL	0.3	105.00
04-29-10	Review letter from ACLU re: response to Boni letter; Review Dubois letter re: Boni based on ACLU letter; e-mail Hank re: various issues including letter to Dubois and Amended Order;			

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Date	Description of Services	Atty	Hours	Amount
04-30-10	Conference with client re: various issues.	MSH	4.6	1,955.00
04-30-10	Revise Motion for Certification of Settlement Class	FS	0.7	192.50
04-30-10	Finalize letter to Dubois re: Boni; Review e-mails re: Cafiero and DiMedio; e-mail Hank re: meeting; Conference with client re: meeting and other issues; Review revised Motion for Class Certification.	MSH	3.9	1,657.50
05-03-10	Conference with M. Haltzman re: grounds to object to intervention; Legal research re: solicitation of class members	FS	2.2	605.00
05-03-10	E-mail Hockeimer re: revised Court Order; Conference with client re: same; Revise Motion to Intervene; Begin draft of Motion in Opposition to Boni Group Intervention; Review LMSD report and L-3 report; Conference with Steinbach re: report and conclusions.	MSH	6.4	2,720.00
05-04-10	(NO CHARGE) Telephone call with the Court regarding Order's received and notified lead attorney of printing instructions for same	LMS	0.2	0.00
05-04-10	Review Report of Ballard			

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Date	Description of Services	Atty	Hours	Amount
05-04-10	Investigation; Review Lower Merion School District Forensics Analysis by L-3 Services; Analyze Motion to Intervene of Wortley et al in order to oppose Motion.	FS	5.3	1,457.50
05-05-10	Revise proposed Form of Order; Conference with Lantieri re: same; Review mark up from Lantieri; Revise Lantieri changes; Review Boni further changes; Conference with Lantieri re: same; Letter to Judge DuBois; Review O'Brien e-mails.	MSH	4.4	1,870.00
05-05-10	Conference with M. Haltzman re: response to motions to intervene and voluntary dismissal of class damage claims; Draft Memorandum of Law in Response to Motions to Intervene	FS	7.5	2,062.50
05-05-10	Respond to e-mails from Defendants; Draft Motion to Modify re: Order for Injunction; Prepare to Government Motion to Modify; Conference with associate re: response to Boni Motion to Intervene; Review Boni letter to client; Conference with associate re: Objection to Motion to Intervene.	MSH	5.1	2,167.50
05-05-10	Strategy meeting to discuss			

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Date	Description of Services	Atty	Hours	Amount
05-06-10	possible Motion to Revise Consent Order for Injunction. Redraft Motion to Revise Consnet Injunction. Review and redraft Response to Government's Motion to Revise prior court order and permit Government access to all data collected by the LMSD use of the LANRev software.	SL	3.7	1,295.00
05-06-10	Legal research re: Rules of Professional Conduct pertaining to solicitation, conflict of interest and independent professional judgement for use in opposition to Boni Motion to Intervene; Draft Memorandum of Law in Response to Motions to Intervene	FS	7.4	2,035.00
05-07-10	Conference with Centrella re: deposition of DiMedio; Review Motion in Opposition to Boni letter; Conference with associate re: Motion; Begin review of DiMedio documents; Review of Appendix to District report; E-mail Mandracchia re: deposition of Cafiero three times.	MSH	4.1	1,742.50
05-07-10	Conference with M. Haltzman re: draft Memorandum of Law			

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Date	Description of Services	Atty	Hours	Amount
05-07-10	In Response to Motions to Intervene; Revise Memorandum of Law Revise Objection to Motion to Intervene; Letter to Judge DuBois; e-mails to Paul Lantieri; Conference with Judge DuBois; Prepare for deposition of Cafiero and DiMedio; E-mail Centralla re: DiMedio deposition; Telephone conference with Mandracchia re: deposition and document; Conference with client re: status of case and conference with Judge.	FS	3.8	1,045.00
05-09-10	Meeting at client's (and Blake) home to discuss ongoing strategy; Class certification and other issue; Travel to/from client's home.	MSH	6.1	2,592.50
05-10-10	E-mail Hank re: Friday conference with Judge; E-mail Paul re: various issues; Telephone conference with Paul re: revised Court Order and L-3 image production; Conference with Mandracchia re: Cafiero deposition; Conference with Steinbach re: L-3; Letter to Court re: extension to file Class Certification;	MSH	4.1	1,742.50

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Date	Description of Services	Atty	Hours	Amount
05-10-10	Telephone conference in Rueter Chambers re: correspondence; E-mail Centrella re: change of deposition; Conference with client re: status and strategy.	MSH	4.1	1,742.50
05-11-10	Revise Memorandum of Law in Response to Motions to Intervene	FS	1.2	330.00
05-11-10	E-mails to Lantieri re: various issues; Review revised Notices to Judge Reuter; Conference with Lantieri re: same; E-mail Lantieri re: Boni Intervenors; Conference with Court re: setting up conference; Conference with Lantieri re: conference with Court; Review and revise Opposition to Motion to Intervene; Review revised Court Order; Review long e-mail from ACLU re: form of Notice and Guardian Ad Liteum; Review all DiMedio e-mails to prepare for deposition; Re-review report to prepare for deposition; Conference with Centrella re: deposition; Draft deposition questions; Conference with client re: status and meaning of news			

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Re: v. Lower Merion School District, et al.
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Date	Description of Services	Atty	Hours	Amount
05-11-10	reports; Review on line video of Board Meetings. Revise, file and serve Response to Motions to Intervene; Review Defendant's Response to Motions to Intervene	MSH	8.7	3,697.50
05-12-10	Review video taped deposition of V. DiMedio	FS	7.1	1,952.50
05-12-10	Prepare for and attend deposition of Virginia DeMedio; Conference with Nick Centrella; Conference with client re: same.	FS	0.6	165.00
05-13-10	Review Defendant's DiMedio's video deposition.	MSH	6.4	2,720.00
05-13-10	Review Boni letter to Judge; Review of Hockeimer letter to Judge; Letter to Judge re: conference and Intervenors; Telephone conference with Judge and Hockeimer re: Boni Intervenors; Email Intervenors re: conference; Travel to/from Courthouse for conference; Conference with Judge, Hockeimer, Lantieri, Boni and ACLU; Conference with judge Hockeimer re: agreement of defense to certification of equitable class; Review revised Order and email District re: same; Review	FS	1.6	440.00

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Date	Description of Services	Atty	Hours	Amount
05-14-10	transcript of DiMedio deposition. Revise Court Order re: notification of students; Conference with Lantieri re: same; Conference with Judge Rueter re: process; Review procedures for equitable class certifications; Conference with Hockeimer re: Kline talking to students; Conference with client re: Order entered; Conference with Steinbach re: conversation with L-3.	MSH	6.1	2,592.50
05-17-10	E-mail Mandracchia re: deposition and status of L-3 documents twice; Voice message from Mandracchia; E-mail Steinbach re: conversation with L-3 on document retrieval; Conference with client re: Cafiero deposition and related status.	MSH	4.6	1,955.00
05-18-10	E-mail Mandracchia re: Cafiero deposition; Review e-mail from client re: issues; Conference with John re: conversations with L-3 and strategy.	MSH	1.9	807.50
05-19-10	Meeting client re: status of case and strategy moving forward; Conference with Steinbach re: access to	MSH	2.1	892.50

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Date	Description of Services	Atty	Hours	Amount
05-21-10	computer; E-mail Steinbach. E-mail Hockeimer re: examining Perbix computer; Review reply and e-mail re: same; Conference with clients.	MSH	3.5	1,487.50
05-24-10	Conference with Steinbach re: security vulnerability in LanRev in light of article in paper (twice); Review Ballard report and L-3 report re: same; Conference with Steinbach re: review of Perbix computer and method to compare; E-mail Hockeimer re: same.	MSH	1.3	552.50
05-25-10	Conference with Hockeimer re: review of L-3 work; E-mail Hockeimer re: same; Telephone conference with Lantieri; Conference with Steinbach re: investigation and review of L-3 report; Conference with Judge DuBois re: Motion; Begin dictating Motion to Modify Order.	MSH	2.4	1,020.00
05-26-10	Conference with client re: status and results of Conference with Judge; E-mail Cafiero counsel re: status of L-3 review.	MSH	4.3	1,827.50
05-27-10	Review Motion to Modify Order to ACLU for investigation of L-3	MSH	1.8	765.00

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Date	Description of Services	Atty	Hours	Amount
05-28-10	findings. Telephone conference with FBI re: independent investigation.	MSH	2.9	1,232.50
05-28-10	Review of L-3 report of Cafiero computer; Revise Motion; Conference with US Attorney's office re: Motion to Modify; Review Worley Motion to file Reply Brief.	MSH	3.6	1,530.00
06-01-10	Review of Intervenors Motion to file Reply Brief and Reply Brief	FS	0.4	110.00
06-01-10	Review and analyze complaint in preparation of motions and research; Review and analyze Ballard Spahr report in preparation of motions and research; Analyzed need for preparation of motion with MH and required review needed; Reviewed and analyzed draft motion to modify verification order; reviewed and analyzed email re: L-3 summary of methodology; reviewed and analyzed L-3 report; reviewed and analyzed stipulated order in preparation of draft motion; reviewed and analyzed deposition of V. DiMedio to segregate contradictions with Ballard Spahr report for preparation of draft			

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Date	Description of Services	Atty	Hours	Amount
06-01-10	motion; Attend meeting with computer forensic consultant John Steinbach; Prepare summary report of meeting with John Steinbach; follow up with John Steinbach	JBM	9.6	2,400.00
06-01-10	Meeting with Steinbach re: Cafiero and verification of L-3 finding including review of Lantieri e-mail and L-3 report of Cafiero computer; Telephone conference with Lantieri re: same.	MSH	3.6	1,530.00
06-01-10	Revise Motion for Class Certification and Brief in Support	FS	1.8	495.00
06-02-10	Review and analyze several news articles and L-3 report on Perbix images; Continue analysis and segregation of quotations of deposition of V. DiMedio in preparation of motion; legal research on recent case on intervention issue; draft proposed order re: Steinbach's proposal as to viewing additional LANrev images; legal research analysis cont'd re: speculative damages	JBM	5.0	1,250.00
06-02-10	Review proposed Stipulated Order; Review e-mail re: meeting with Steinbach; Review e-mail from Hank re: Reuter meeting; Conference			

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Date	Description of Services	Atty	Hours	Amount
06-03-10	with Mandracchia re: Cafiero deposition. Revise Class Certification Motion; Revise possible Stipulated Order re: inspection of Perbix computer; Conference with Steinbach; Review research; Review and respond to emails re: meeting	MSH	2.1	892.50
06-03-10	Conference with M. Haltzman re: draft motion for class certification	MSH	4.8	2,040.00
06-04-10	Meeting with L-3 re: Steinbach access to Perbix computer to do independent investigation; Travel to/from Horsham; Revise Class Certification Motions; Revise Proposed Stipulated Order; Conference with Hockeimer re: same; Conference with Lantieri and review e-mail re: change.	FS	0.3	82.50
06-04-10	Revise Brief in Support of Motion for Class Certification	MSH	5.3	2,252.50
06-07-10	Review and edit Memorandum of Law in Support of Motion for Class Certification; Travel to/from Court for conference with Magistrate Judge Rueter; Attend conference with Magistrate Judge Rueter; Revise form of	FS	0.6	165.00

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Date	Description of Services	Atty	Hours	Amount
06-07-10	proposed Order in support of Motion for Class Certification; Organize and collate pleadings, discovery and correspondence in file	JBM	7.1	1,775.00
06-07-10	Conference with Judge Reuter at Courthouse re: follow up on persons who did not respond to letters about images; Travel to/from Courthouse; Prepare for deposition of Cafiero; Conference with Mandracchia re: deposition; Review Class Certification Motion; Review deposition transcript of Perbix to prepare for Cafiero; Draft deposition questions for Cafiero.	MSH	7.2	3,060.00
06-07-10	Revise, file and serve Motion for Class Certification, proposed Order and Brief in Support	FS	1.3	357.50
06-08-10	Organize and collate pleadings in file inclusive of faxed copies from Court, download missing items from Pacer, create pleadings binder indexes.	JBM	4.3	1,075.00
06-08-10	Prepare for and conduct deposition of Carol Cafiero; Conference with clients after deposition re: strategy.	MSH	9.2	3,910.00
06-09-10	Conference with Mandracchia			

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Date	Description of Services	Atty	Hours	Amount
06-09-10	re: Cafiero and additional material; Conference with Steinbach re: Court Order and contact with L-3; Conference with client re: settlement of Class Action; Review research.	MSH	2.1	892.50
06-09-10	Organize and collate file including pleadings, discovery, attorney notes, correspondence, deposition transcripts, Ballard Spahr reports; legal research and analysis of necessity for proof of damages or bar to recovery if speculative	JBM	4.7	1,175.00
06-10-10	Prepared Entry of Appearance for Mark in the Graphic Arts case against Blake Robbins, prepared same to be electronically filed and electronically filed same	LMS	0.5	75.00
06-10-10	Extensive research and analysis and preparation of a memorandum of cases and statutes regarding the issue of speculative damages in the context of invasion of privacy and the fear of future disclosure.	JBM	8.4	2,100.00
06-10-10	Conference with Steinbach re: Cafiero report and L-3 report re: deleted images; E-mail Hockeimer re: various issues; Review of research			

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Date	Description of Services	Atty.	Hours	Amount
06-11-10	re: open issues. Research and analysis and preparation of memorandum to file re: ability to attain attorney fees as prevailing party in settlement without necessity of adjudicating prevailing party status.	MSH	2.1	892.50
06-11-10	Conference with Hockeimer and Lantieri re: extension to respond to Motion for Class Certification; Review all previous Orders to create consolidated Order.	JBM	3.2	800.00
06-14-10	Conference with Steinbach re: efforts to recover pictures; e-mail Hockeimer re: investigation; conference with client status.	MSH	2.2	935.00
06-15-10	Conference with Steinbach re: progress of Perbix (3x); Conference with client re: status; Review and respond to e-mail re: letter to Judge; e-mail re: external device review.	MSH	1.8	765.00
06-16-10	Updated file to reflect Court Order granting Defendants extension to respond to class certification	MSH	2.3	977.50
06-16-10	Discuss with associates issues related to Perbix deposition; Draft Motion to	LMS	0.1	15.00

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Date	Description of Services	Atty	Hours	Amount
06-17-10	Allow access to Perbix computer re: external devices; Review Court Order; Conference with Steinbach re: status.	MSH	3.1	1,317.50
06-17-10	E-mail client re: information needed; listen to voice message.	MSH	0.5	212.50
06-18-10	Conference with Hockeimer and Lantieri re; status and progress and open issues; Conference with Steinbach re: investigation; conference with client re: same.	MSH	2.7	1,147.50
06-21-10	E-mail Steinbach re: status; Conference with Steinbach re: status; Conference with client re: status and findings; Review Default Judgment; Review and revise Answer to Graphic Art Complaint.	MSH	2.2	935.00
06-22-10	Conference with client re: issues related to forensic investigation and internet search for pictures; Conference with Steinbach re: issues related to investigation (3x). Review e-mail from client re: meeting; Telephone conference with Hockeimer re: student who would not return laptop; Conference	MSH	1.2	510.00

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Date	Description of Services	Atty	Hours	Amount
06-23-10	with Steinbach re: progress. Telephone conference with client re: status; Conference with Steinbach re: progress; Review e-mail re: unknown address and proposed script; Revise script and reply to e-mail.	MSH	1.2	510.00
06-24-10	Telephone conference with Steinbach re: status of report (3x).	MSH	2.2	935.00
06-24-10	Telephone Hank Hockeimer re: status of discussions with Board; Meeting with clients; Conference with Steinbach.	MSH	0.9	382.50
06-25-10	Conference with John Steinbach re: findings (2x); Prepare Motion to Compel based on information from Steinbach.	MSH	3.2	1,360.00
06-25-10	Legal research re: applicable statutes of limitation (.6)	MSH	2.7	1,147.50
06-28-10	Conference with John Steinbach re: findings (2x); Prepare Motion to Compel based on information from Steinbach.	FS	0.6	165.00
06-29-10	Review Motion for Judgment on the Pleadings and Memo of Law; telephone conference with Steinbach regarding status; email to Hockeimer regarding Images.	MSH	2.7	1,147.50
07-01-10	Receipt and reievow of	MSH	2.9	1,232.50

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Date	Description of Services	Atty	Hours	Amount
07-01-10	electronic notification of Hearing, updated file and calendar to reflect same Telephone conference with Steinbach regarding findings; review Court Order regarding scheduling in Graphic Arts matter.	LMS	0.2	30.00
07-06-10	Telephone conference with John Steinbach regarding findings and need for additional information; review letter from Paul Lantieri; respond to Judge Dubois regarding extension of time.	MSH	2.1	892.50
07-06-10	Conference with M. Haltzman re: District's request for extension of time to respond to Motion for Class Certification; Conference call with Judge DuBois re: extension request; Conference with M. Haltzman re: response to grant of extension of time	MSH	2.8	1,190.00
07-07-10	Receipt of Court Order granting extension for Defendants to object to class certification and updated file to reflect same	FS	1.0	275.00
07-07-10	Research regarding effect of Class Action Certification being denied; conference with associate regarding	LMS	0.1	15.00

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Date	Description of Services	Atty	Hours	Amount
07-08-10	same. Telephone conference with client regarding update on recent Court Order regarding extension of time.	MSH	2.1	892.50
07-12-10	Legal research re: Statute of Limitations issues upon denial of class certification	MSH	0.8	340.00
07-12-10	Telephone conference with client regarding various issues.	FS	1.6	440.00
07-13-10	Conference with M. Haltzman re: motion for interim attorneys fees; Legal research re: application for interim attorneys fees	MSH	0.4	170.00
07-13-10	Telephone conference with Michael Levy regarding status of forensic investigation; conference with Frank Schwartz regarding effect of no class action; telephone conference with client regarding status.	FS	2.8	770.00
07-14-10	Legal research re: interim attorneys fees and attorney fee petitions	MSH	2.1	892.50
07-15-10	Legal research re: cases in support of Motion for Attorney's Fees (4.7)	FS	2.8	770.00
07-15-10	Telephone conference with Mark Centrella regarding status updates and Ballard	FS	4.7	1,292.50

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Date	Description of Services	Atty	Hours	Amount
07-16-10	report; telephone conference with client regarding various issues.	MSH	0.8	340.00
07-16-10	Draft Brief in Support of Motion for Award fo Interim Attorneys Fees (7.7);	FS	7.7	2,117.50
07-16-10	Telephone conference from another victim, Jalil Hasan's mom, Fatima, regarding viewing of pictures; review Response to Motion for Class Certification and Cross-Motion; research regarding permanent injunctive relief; review Motion for Interim Fees.	MSH	4.6	1,955.00
07-19-10	Reviewed Response in Opposition to Class Certification in Lower Merion case filed by Defendants, updated litigation events to reflect same and prepared email regarding a response, reviewed Court Order in Graphic Arts case granting an extension to respond to the Motion for Judgment on the Pleadings and updated litigation events and calendar to reflect deadline	LMS	0.4	60.00
07-19-10	Draft Brief in Support of Motion for Interiim Attorney's Fees (6.8); Draft			

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Date	Description of Services	Atty	Hours	Amount
07-19-10	Certifications in Support of Motion (1.3); Telephone conference with Hank Hockeimer regarding status of resolving various issues; review Response to Motion for Class Certification.	FS	8.1	2,227.50
07-20-10	Conference with M. Haltzman re: draft Motion for Interim Attorney's Fees ; Legal research re: revcovery of expert costs; Revise Brief and Certifications in support of Motion for Interim Attorney's Fees; Conference with M. Haltzman re: possible additional plaintiff	MSH	2.9	1,232.50
07-20-10	Telephone conference with Hank Hockeimer regarding various issues; review and revise Fee Application.	FS	8.4	2,310.00
07-21-10	Prepared reminder regarding deadline to response to Motion for Judgment on the Pleadings	MSH	3.1	1,317.50
07-21-10	Revise Brief and Certifications in Support of Motion for Interim Attorney's Fees	LMS	0.1	15.00
07-21-10	Review and revise Application for Interim Fees; telephone conference with Judge DuBois regarding	FS	1.6	440.00

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07-22-10	scheduling. Legal rresearch re: prevailing party status at preliminary injunction stage (2.3)	MSH	4.1	1,742.50
07-22-10	Research regarding Buchannan and review Third Circuit cases.	FS	2.3	632.50
07-23-10	Legal research re: prevailing party status; review all Court Orders granting injunctive relief; Conference with M. Haltzman re;; revision of Brief in Support of Motion for Interim Fees; Revise Brief	MSH	2.7	1,147.50
07-23-10	Verified that information regarding Court ordered Status Conference was placed into litigation events and on calendar	FS	8.4	2,310.00
07-23-10	Review and revise Interim Fee Application; email to Hank Hockeimer.	LMS	0.1	15.00
		MSH	2.6	1,105.00
	Total Fees			\$ 316,707.50

Date	Disbursement Description	Amount
12-29-09	Computer/Westlaw Connect Time; Research on 11/2009.; West Group	370.32
02-11-10	Filing Fee; Filing of Complaint.; Clerk, United States District Court	350.00

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03-08-10	Over Night Mail; UPS delivery to US District Court on 2/11/10-Worldwide inv.# 737419; American Express	15.04
04-14-10	97 ; Consulting fee for Joe Baxter.; IT Acceleration	15.00
04-15-10	Expenses; Consulting services (inv.# 121).; IT Acceleration	404.23
04-15-10	Deposition Fee; Videotape deposition on 4/7/10 (inv.# CR015729).; B & R Services for Prof.,Inc.	685.00
04-15-10	Deposition Fee; Videotape deposition on 4/9/10 (inv.#CR015731).; B & R Services for Prof.,Inc.	790.00
04-19-10	Service Fee; Cancelled service to Lower Merion High School on 3/12/10.; Rufus Clark	75.00
05-03-10	Over Night Mail; UPS delivery to Ballard Spahr, LLP on 3/23/10-Worldwide inv.# 821483 (billed to Tony Lamm's amex).; American Express	12.22
05-03-10	Over Night Mail; UPS delivery to Vestige Digital Investigation on 3/24/10-Worldwide inv.# 821483 (billed to Tony Lamm's amex).; American Express	12.22
05-06-10	Computer/Westlaw Connect Time; Westlaw Research for February 2010 (inv.# 820164756).; West Group	615.99
05-12-10	Computer/Westlaw Connect Time; Research in March 2010 (inv.# 820349160).; West Group	1,452.66
05-17-10	Over Night Mail; UPS service to Citizens Bank on 4/26/10-Worldwide inv.# 890928 (billed to Tony Lamm's amex).; American Express	14.94
06-11-10	Travel Expense; Parking and mileage to Philadelphia on 6/7/10; mileage to Horsham, PA on 6/4/10.; Mark S. Haltzman	69.20

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06-11-10	Travel Expense; Parking and travel to Philadelphia for Hearing on 5/6/10 and Conference on 5/13/10.; Mark S. Haltzman	84.00
06-16-10	Deposition Fee; Videotaped deposition on 5/12/10 (inv.# 10-0512-2).; Video Deps	440.00
06-16-10	Computer/Westlaw Connect Time; Research: April 2010; West Group	658.18
07-14-10	Deposition Fee; Videotape Deposition on 4/8/10 (inv.# CR015730).; B & R Services for Prof.,Inc.	685.00
07-14-10	Deposition Fee; Videotape deposition of Kyle O'Brien on 4/9/10 (inv.# CR015871).; B & R Services for Prof.,Inc.	575.60
07-14-10	Deposition Fee; Videotape Deposition of Lynn Matsko on 4/7/10 (inv.# CR015876).; B & R Services for Prof.,Inc.	848.15
07-14-10	Deposition Fee; Appearance fee for Carol Cafiero on 4/9/10 (inv.# CR015906).; B & R Services for Prof.,Inc.	135.00
07-14-10	Deposition Fee; Videotape depositon of Michael Perbix on 4/8/10 (inv.# CR015878); B & R Services for Prof.,Inc.	812.60
07-16-10	Computer consultants, Steinbach; Steinbach	87,925.00
07-22-10	Deposition Fee; Deposition fee (inv.# CR016153).; B & R Services for Prof.,Inc.	870.00
07-22-10	Deposition Fee; Deposition fee (inv.# CR016149).; B & R Services for Prof.,Inc.	1,187.35
07-22-10	Deposition Fee; Deposition fee (inv.# CR016051).; B & R Services for Prof.,Inc.	761.80
	Photo Copies	2,278.60
	Total Disbursements	----- \$ 102,143.10

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