

EXHIBIT E

**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, :

CIVIL ACTION

v. :

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. :

CERTIFICATION OF MARK S. HALTZMAN

I, Mark S. Haltzman, Esquire, of full age and according to law, do hereby certify as follows:

1. I am a partner in the law firm of Lamm Rubenstone LLC, counsel to Plaintiffs in the above captioned matter, and am personally familiar with the facts set forth herein.

2. I make this Certification in support of Plaintiffs' Motion for Interim Attorney's Fees Pursuant to 42 U.S.C. §1988.

3. I have been admitted to practice in the Commonwealth of Pennsylvania since 1983 and in the State of New Jersey since 1984, and am currently in good standing in both states.

4. I am admitted to practice before the United States District Court for the

Eastern District of Pennsylvania, the United States District Court for the District of New Jersey, the United States Court of Federal Claims, and the United States Court of Appeals for the Third Circuit and am currently in good standing before such Courts.

5. After becoming an attorney, in 1990 I received a MBA from Temple University.

6. Since being admitted in 1983, my law practice has emphasized complex litigation, including the litigation of claims under the Racketeering and Corrupt Organization Act, ("RICO"), fraud actions, commercial disputes, §1983 litigation, employment disputes (including sexual discrimination and age discrimination), claims for invasion of privacy, and defamation claims. I have tried numerous matters in both Federal and State Court. As a result of my 27 years of practice, I am experienced in the handling of the legal matters raised in the proposed class action.

7. In the present matter, I have already invested over 425 hours in representing the interests of the putative class and have achieved significant results in furtherance of their interests, including, but not limited to:

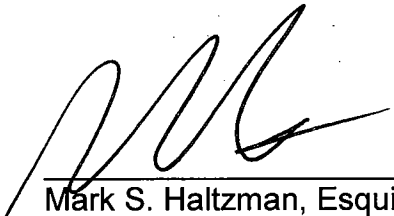
- Successfully obtaining injunctive relief which ensured that the LANrev software which was used to take web cam pictures and images of students in their homes was disabled and any reactivation strictly prohibited without further order of Court.
- Successfully obtaining a Court Order to insure the preservation of evidence needed to determine the extent to which the LANrev technology was actually activated, which subsequently resulted in disclosure of the existence of in excess of 60,000 images.
- The engagement of a computer forensic consultant to immediately negotiate with Defendants to insure that the methodology used to preserve the various Lower Merion School District computers would be done in a manner as to prevent any corruption of evidence.

- Setting up a procedure with Defendants to allow for the immediate exchange of relevant information to enable the parties, in the most cost effective manner possible, to identify crucial witnesses and essential information to determine the extent of the use of the LANrev technology to capture screen shots and web cam pictures.
- Obtaining a Court Order which prevented the future dissemination of any of the images that have been obtained by use of the LANrev technology, to ensure the protection of the privacy of the students and families in the Lower Merion School District.
- Obtaining an Order which included broad ranging protection for class members, further protected the class members privacy and assured that there can be no future use of similar technology in the Lower Merion School District without disclosure and strict guidelines.
- Establishing with defense counsel a methodology for those members of the class who were identified during discovery as having images taken using the LANrev software to view such images.

8. During the course of this litigation my usual and customary hourly rate for all matters, either hourly or contingent, has been \$425.00 per hour.

I make the foregoing statement subject to the penalties of 28 U.S.C. §1746, relating to unsworn falsification to authorities.

Date: 7-23-2010



Mark S. Haltzman, Esquire