

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

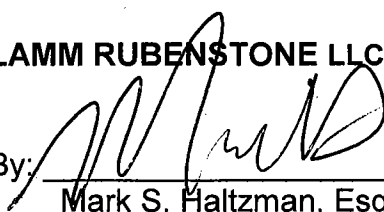
LOWER MERION SCHOOL DISTRICT, :
and :
THE BOARD OF DIRECTORS OF THE :
LOWER MERION SCHOOL DISTRICT, :
and :
CHRISTOPHER W. McGINLEY, :
Superintendent of Lower Merion School :
District, :
Defendants. :

**SUPPLEMENTAL EXHIBIT E TO PLAINTIFFS' MOTION FOR
INTERIM ATTORNEYS' FEES PURSUANT TO 42 U.S.C. §1988**

As a supplement to Plaintiffs' Motion for Interim Attorneys' Fees Pursuant to 42 U.S.C. §1988 (Doc. #84), Plaintiffs hereby file the attached Exhibit E to said Motion, which Exhibit constitutes the detailed billing records of Plaintiffs' computer consultant, John Steinbach. This Supplemental Exhibit was previously produced to opposing counsel on August 9, 2010.

Respectfully submitted,

LAMM RUBENSTONE LLC

By: 
Mark S. Haltzman, Esquire (#38957)
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DATED: August 12, 2010

EXHIBIT E

July 23, 2010

Lamm Rubenstone, LLC

3600 Horizon Boulevard, Suite 200

Trevoze, PA 19053

Interim Billing- Robbins v. Lower Merion School District Matter

Date	Hour	Description
2/22/10	0.6	JS Expedited background research on Lan Rev Software
2/22/10	3.2	JS Preparation/Research on LanRev Software in anticipation of Emergency Temporary Restraining Order Hearing
2/22/10	0.5	JS Meeting with Lamm Rubenstone Team prior to the Hearing on Plaintiff's Motion for Emergency Temporary Restraining Order, before Honorable Jan E. Dubois
2/22/10	3.1	JS Participation in Emergency Temporary Restraining Order Hearing
2/22/10	2	JS Travel time to and from Federal CourtHouse, Philadelphia PA (incl parking fees)
2/23/10	3.7	JS Meeting with Mark Haltzman regarding first conference call to L-3 and post-call discussion
2/23/10	2.1	JS Preparation/Research of Memo to File regarding the first conference call with L-3
2/23/10	1.9	JS attendance at LMSD Parent Meeting that evening in Narberth Borough Hall
2/23/10	4.3	JS Further research on LanRev software platform capabilities
2/24/10	14	JS Build out and testing of LanRev lab environment
2/25/10	12	JS Build out and testing of LanRev lab environment
2/26/10	7	JS Build out and testing of LanRev lab environment
2/27/10	1.6	JS Meeting with Mark Haltzman to discuss possible forensic acquisition, further review of initial L-3 commentary
2/27/10	12	JS Research of MAC OSX Forensic Artifacts
2/28/10	3.2	JS Meeting with Mark Haltzman to discuss MAC OSX issues, preparation time for said meeting
3/1/10	3.5	JS Multiple telephone conversations with Mark Haltzman regarding streaming capabilities / research thereon
3/1/10	0.2	JS Brief telephone conversation with Steve Levin regarding streaming capabilities
3/1/10	2.3	JS further research on streaming capabilities
3/2/10	3	JS research on Lan Rev software security architecture
3/2/10	3.2	JS review of custodian Michael Perbix's publicly available online presence at Apple Corporation webinar
3/3/10	3.3	JS review of custodian Michael Perbix's publicly available online presence
3/3/10	2.5	JS Research relating to forensic implications of Perbix's activation of Lan Rev theft tracking functionality (security rights administration)
3/5/10	5.4	JS Research relating to forensic implications of Perbix's activation of Lan Rev theft tracking functionality (intermittent LED activation)
3/6/10	3.3	JS Research relating to forensic implications of Perbix's activation of Lan Rev theft tracking functionality (remote administrative consoles)
3/7/10	3.6	JS Research relating to forensic implications of Perbix's activation of Lan Rev theft tracking functionality (feasibility of mass retrieval of artifacts from endpoints)

Date	Hour	Description
3/9/10	5.2	JS Strategy for L-3 electronic discovery issues, retention, etc
3/11/10	0.4	JS Brief telephone conversation with Mark Haltzman in preparation for second L-3 conference call to occur the following day
3/12/10	2.5	JS Meeting with Mark Haltzman - Second L-3 Conference call
3/12/10	1.7	JS Post conference call telephone conference with Mark Haltzman regarding the content of the second L-3 Conference call
3/12/10	4.2	JS Preparation of L3 Memo to file - content of second L-3 Conference call
3/13/10	13.4	JS Research relating to LanRev / Absolute software transition, preparation and initial draft of Questions to L-3
3/14/10	3.2	JS Meeting with Mark Haltzman to discuss scope and content of L-3 questions and further research / preparation
3/14/10	4.5	JS further research based upon above exchange
3/15/10	3.5	JS Final revision and redraft of Questions for presentation to L-3
3/17/10	5.3	JS research on "Theft Tracking" feature provided by LanRev software platform
3/18/10	5.5	JS research of publicly available online blog content authored by custodian Michael Perbix
3/20/10	5.1	JS Research and analysis of implications related to "Installation of Updates" by LMSD for special student needs
3/21/10	5.5	JS Research and analysis of "Installation of Updates by LMSD" issues
3/22/10	4.4	JS Research and analysis of "Installation of Updates" by LMSD for special student needs - forensic effects
3/23/10	3.3	JS Research and analysis of "Installation of Updates" by LMSD for special student needs - forensic effects
3/24/10	4.3	JS Research on functional changes secondary to Absolute Software's acquisition of Pole Position Software LanRev product
3/27/10	2.3	JS Research and analysis of "screen capture" forensic header signatures
3/28/10	2	JS Further research/analysis of screen capture forensic header signatures
3/29/10	2	JS Arlen Specter Hearing on Inadequacy of existing electronic privacy legislation
3/30/10	9.7	JS Telephone conference with Mark Haltzman and research in preparation of "Meeting with L-3" to be held on 3/31/2010
3/31/10	2.1	JS attendance at meeting with L-3 offices in Horsham (review of presentation previously made to LMSD board) with Q&A
3/31/10	1.5	JS Travel to and from L-3 meeting
3/31/10	5.4	JS Post L-3 meeting research and analysis
3/31/10	4.3	JS Analysis of LMSD Electronic Records Retention Policies in relation to potential requests for production
4/1/10	1.2	JS Research and analysis of issues relating to systems possessed by custodian Carol Cafiero
4/1/10	2.3	JS Research regarding custodian Carol Cafiero
4/4/10	4.5	JS Initial research and analysis of potential "Rule 30(b) questions/forensic implications" for upcoming depositions
4/5/10	7.2	JS Research relating to Rule 30(b) issues, preparation of Rule 30(b) questions, forensic implications, review of L-3 initial answers to questions
4/6/10	2.9	JS Final proposed draft of forensically relevant questions for inclusion in Rule 30(b) proceeding
4/7/10	1.1	JS Review of potential forensic issues relating to Rule 30(b) questions, telephone conference with Mark Haltzman

Date	Hour	Description
4/7/10	5.4	JS Preparation for custodian Michael Perbix deposition subsequent to telephone conference with Mark Haltzman
4/8/10	5.5	JS Final preparation for, and Attendance at custodian Michael Perbix deposition
4/8/10	1.6	JS travel to and from custodian Michael Perbix deposition in Trevoise
4/8/10	4.1	JS post- custodian Michael Perbix depositions research
4/10/10	7.3	JS Analysis of SQL Lite database architecture and forensic profile
4/12/10	0.5	JS Telephone conversation with Mark Haltzman including discussion of custodian Carol Cafiero's deposition
4/14/10	0.5	JS Follow up conversation post custodian Carol Cafiero deposition
4/23/10	0.5	JS Telephone conversation with Mark Haltzman regarding possible acquisition of custodian Carol Cafiero's computers
4/26/10	1.7	JS Meeting in Trevoise with Mark Haltzman to review stipulation
4/26/10	1.6	JS Travel to and from Trevoise
4/27/10	0.8	JS Multiple conversations to schedule forensic imaging of systems possessed by custodian Carol Cafiero
4/28/10	6.1	JS Forensic imaging of custodian Carol Cafiero's two computer systems (including exotic Solid State Drive in Dell Adamo Notebook)
4/28/10	0.8	JS Telephone conference with Mark Haltzman regarding post-forensic imaging of custodian Carol Cafiero's systems
5/4/10	4.8	JS Review of L-3 LMSD report
5/10/10	1.5	JS conversations with Mark Haltzman regarding feasibility of utilizing alternative image recovery methodologies
5/10/10	6.2	JS research regarding validation of L-3 recovery activities
5/11/10	0.5	JS conversation with L-3 regarding image recovery methodology
5/13/10	1.1	JS Telephone conversation with multiple L-3 personnel regarding image recovery methodologies
5/13/10	0.2	JS Telephone conference with Mark Haltzman to discuss same day L-3 conversation regarding image recovery methodologies
5/18/10	6	JS research of emerging image recovery technologies as published in various digital forensic journals
5/30/10	3.3	JS Technical assistance in development of proposed court order to facilitate validation of L-3 image recovery findings
6/1/10	0.9	JS Meeting with Mark Haltzman and Lamm Rubenstone personnel relating to proposed court order for validation of L-3 image recovery findings
6/1/10	1.6	JS Travel to and from Trevoise
6/1/10	0.8	JS Telephone conference with Lamm Rubenstone personnel regarding draft of proposed court order
6/4/10	1.1	JS Meeting at L-3 offices in Horsham to discuss proposed court order for validation of L-3 image recovery findings
6/4/10	1.6	JS Travel time to L-3 offices in Horsham
6/9/10	9.2	JS Build and validation of forensic examination platform for use at L-3 facilities in Horsham
6/10/10	7.6	JS Build and validation of forensic image recovery toolchains for use at L-3 facilities in Horsham
6/11/10	1.1	JS Visit to L-3 and Kevin Brennan to discuss validation exercise and exchange of hashes, and representative benign images and screenshots for signature analysis
6/11/10	1.6	JS Travel time to L-3 Offices

Date	Hour	Description
6/14/10	1.5	JS AM Setup of Forensic Workstation in L-3 Facilities start of custodian Michael Perbix MacPro image analysis
6/14/10	2.9	JS PM continuation of Michael Perbix MacPro image analysis (no travel charge between AM and PM efforts on same date)
6/14/10	1.6	JS Travel to and from L-3 Offices
6/15/10	1.4	JS custodian Michael Perbix MacPro image recovery analysis
6/15/10	1.6	JS Travel to and from L-3 Offices
6/16/10	1.5	JS custodian Michael Perbix MacPro image recovery analysis
6/16/10	1.6	JS Travel to and from L-3 Offices
6/18/10	5.3	JS custodian Michael Perbix MacPro image recovery analysis
6/18/10	1.6	JS Travel to and from L-3 Offices
6/21/10	4.8	JS custodian Michael Perbix MacPro image recovery analysis
6/21/10	1.6	JS Travel to and from L-3 Offices
6/22/10	5.5	JS custodian Michael Perbix MacPro image recovery analysis
6/22/10	1.6	JS Travel to and from L-3 Offices
6/23/10	0.7	JS custodian Michael Perbix MacPro image recovery analysis
6/23/10	1.6	JS Travel to and from L-3 Offices
6/24/10	0.5	JS custodian Michael Perbix MacPro image recovery analysis
6/24/10	1.6	JS Travel to and from L-3 Offices
6/25/10	3.7	JS custodian Michael Perbix MacPro image recovery analysis
6/25/10	1.6	JS Travel to and from L-3 Offices
6/28/10	2	JS custodian Michael Perbix MacPro Image recovery analysis
Total :	351.7	\$87,925

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Superintendent of Lower Merion School :
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CERTIFICATE OF SERVICE

I hereby certify that on the date written below the foregoing Supplemental Exhibit E to Plaintiffs' Motion for Interim Attorneys' Fees Pursuant to 42 U.S.C. §1988 was filed electronically and is available for viewing and downloading from the ECF system, which also electronically served same on the following:

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DATED: August 12, 2010