

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA**

KHALID JADARI,

Plaintiff,

Court File No. CIV. 06-5012-RHB

v.

SHIBA INVESTMENTS, INC. and
KARIM MERALI,

Defendants.

**AFFIDAVIT OF
MARK LANTERMAN**

SARAH TOOKER HTOUTOU and,
MOHAMED HTOUTOU

Plaintiffs,

Court File No. CIV 06-5019-RHB

v.

SHIBA INVESTMENTS, INC., d/b/a
RADISSON HOTEL, KARIM MERALI,
ABDELILAH SAFIR, ABDENNEBI EL
JANATI, and GUNTER SCHNEPP,

Defendants.

WENDY LEONARD,

Plaintiff,

Court File No. CIV 06-5020-RHB

v.

SHIBA INVESTMENTS, INC.,
And KARIM MERALI,

Defendants.

MOHAMED HTOUTOU,

Plaintiff,

Court File No. CIV 06-5037-RHB

v.

SHIBA INVESTMENTS, INC.,
KARIM MERALI, ABDELILAH
SAFIR, and ABDENNEBI EL JANATI,

Defendants.

CELSA ODDO,

Court File No. CIV 06-5050-RHB

Plaintiff,

v.

SHIBA INVESTMENTS, INC.,
KARIM MERALI, ABDELILAH
SAFIR, ABDENNEBI EL JANATI,
and GUNTER SCHNEPP,

Defendants

Mark Lanterman, being duly sworn, states as follows:

1. My name is Mark Lanterman. I am the Chief Technology Officer for Computer Forensic Services, Inc. located in Minnetonka, Minnesota. Information regarding my qualifications and methodologies has already been supplied to the court, and in the interest of brevity will not be repeated here.

2. This affidavit is being supplied at the request of Sara Frankenstein. Its purpose is to address the procedures we have followed, and the costs associated with different scenarios for work which may be requested in the future.

3. I am in receipt of the court order filed on 4/3/07 entitled "Order Regarding Motion to Compel Computer Hard Drives".

4. Sara Frankenstein advised me that although the order called for the production of all documents and files, she would only like me to produce any documents that contained a keyword from a list which she supplied.

5. I received two packets of printed documents from Plaintiff's counsel with the instructions to locate the corresponding electronic files.

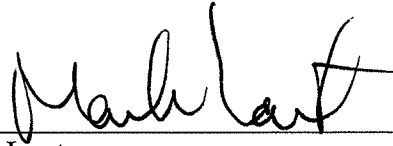
6. A search for these documents was conducted, and the results of that search were submitted to Defendant's counsel. After receiving the approval of Defendant's counsel, these same materials were submitted to Plaintiff's counsel.

7. To conduct a search and production of all documents present anywhere on the devices imaged would require an average of 4-7 hours per device.

8. Given 35 devices were imaged, this would take approximately 175 hours to complete. The cost incurred at our hourly rate would be approximately \$48,125.00.

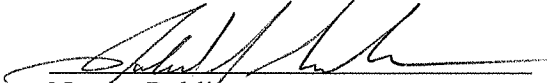
9. I have been told that the Defendant's counsel has requested copies of the hard drive images we prepared. All drive images in our possession are encrypted and associated with our forensic servers. In order to provide opposing expert usable data it will be necessary for us to decrypt this data, transfer the data to portable storage media and validate the integrity of the copied data. Our standard fee for this work is \$1100.00 per image plus the cost of the portable storage media.

Further Affiant sayeth not.



Mark Lanterman

Subscribed and sworn to before me this
17th day of December, 2007.



Notary Public