

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SCHWAN'S COMPANY and)	Case No. 0:20-cv-2157 (JRT/HB)
SCHWAN'S SHARED SERVICES,)	
LLC,)	
)	
Plaintiffs,)	
)	
v.)	
)	
RONGXUAN CAI, and)	
CONAGRA BRANDS, INC.,)	
)	
Defendants.)	

SECOND DECLARATION OF MARK LANTERMAN

I, Mark Lanterman, declare as follows:

1. My name is Mark Lanterman.¹ I am the Chief Technology Officer of Computer Forensic Services ("CFS") located in Minneapolis, Minnesota. CFS and I have been retained by counsel for Plaintiff Schwan's.

2. On September 13, 2021, I submitted a declaration describing my and CFS's work to preserve, assist in the identification of, and remove potentially relevant files from Mr. Cai's personally owned electronic devices.

3. As described in greater detail in my previous declaration, CFS observed both active (undeleted), and deleted files on Mr. Cai's devices. CFS provided complete

¹ Exhibit 1 to this Declaration contains my curriculum vitae, including a list of cases in which I have testified in the last four years, as well as a list of articles I have written for several publications throughout the past 10 years. CFS is compensated at a rate of \$325 per hour during normal business hours and my time is billed at \$625 per hour for this declaration. CFS's compensation is not dependent upon the outcome of this case.

listings (spreadsheets) detailing all deleted and active files from Mr. Cai's devices, which included information such as file name, file path (location), timestamps, and a hash value for each file.² CFS was instructed to refrain from searching, viewing, or providing Plaintiffs' counsel "...any documents, files, or content from Mr. Cai's devices." (See Lanterman Decl., Sep. 13, 2021, ¶ 13).³

4. From the file listings, counsel for Plaintiffs identified 68,874 files (of which 39,953 of the files are unique), believed to have originated from Schwan's systems. (*Id.* ¶ 14). CFS and I did not participate in the selection of potentially relevant files. Plaintiff's counsel, in turn, provided the list of selected files to CFS, so that CFS could excise them from Mr. Cai's personal devices, which CFS completed. (*Id.* ¶ 15).

5. I offer this declaration to supplement my initial declaration. Working in concert with Plaintiff's counsel, I have identified features of files from Mr. Cai's personal devices, which demonstrate the likelihood that they originated from Plaintiff.

I. The files' metadata references the subject matter of this action and are associated with the period of Mr. Cai's employment with Plaintiff.

6. As noted in my previous declaration, I observed that the names of files identified by counsel reference the subject of this litigation (dough, yeast, lemon meringue, etc.). In addition to the names of the files identified by counsel, nearly all were associated with dates that span the period that I understand Mr. Cai was employed by Plaintiff (approximately 2003 through 2017).

² A hash value is like a file's fingerprint, and it is unique to the file.

³ I note that if CFS and I were permitted to search and review the content of the files, additional information, which could inform an opinion about the files' origins, may be made available.

7. Similarly, the names of *deleted* items also refer to the same subject matter (e.g., dough) and are associated with dates that encompass Mr. Cai's employment with Schwan's. Approximately 92% of unique, deleted files from Mr. Cai's Toshiba external hard drive are associated with the period 2003-2017.

8. For example, the phrase "Schwan" appears in the paths (locations) or file names of at least 3,469 items, which were deleted from Mr. Cai's 500 GB Toshiba hard drive at some point before CFS received it. The files span between 2002 and 2021, with approximately 95% being associated with dates between 2003 and 2017 (e.g., the period that Mr. Cai was employed with Schwan's).

9. Plaintiff's counsel has shared with me a list of key words that may provide a basis to indicate whether a file is related to Plaintiff. I have identified these terms in the names, and paths (locations) of items that had been deleted from Mr. Cai's devices before they were provided to CFS. The terms that Plaintiff's counsel has provided to me are:

- a. Innovation
- b. Salina
- c. Florence
- d. Farinograph
- e. Mixograph
- f. Risograph
- g. Viscograph

10. Table 1 below summarizes information about the appearance of these keywords in file paths associated with items that were deleted from Mr. Cai's 500 GB Toshiba external hard drive.

Keyword	Innovation	Salina	Florence	Farinograph	Mixograph	Risograph	Viscograph
# of Items	11,211	2,814	1,585	427	320	372	70

Table 1

11. I further understand that file locations (paths) that reference “Spec/” “Specs/” or “Specifications/” may likewise be associated with Plaintiff. Plaintiffs’ counsel identified a total of approximately 1,370 active files that are located within folders containing “Spec/” “Specs/” or “Specifications/.”

12. There are approximately 8,489 deleted items that reference “Spec/” “Specs/” or “Specifications/”. As an example, the files listed below, were identified as having been deleted from Mr. Cai’s 500 GB external hard drive, which was provided to CFS⁴:

- a. /Rong/Rong Marshall/Other's/Specs/Eggroll/Eggroll/69993 herb chick ER.pdf
- b. /Rong/Rong Marshall/Rong 2013/Projects/Flour quality and functionality/Specs/Heat Treated Flour 36050 [redacted].pdf
- c. /Rong/Rong Marshall/Rong 2011/Project/Self-Rising Crust/Specs/1002891 Xantan Gum [redacted].pdf
- d. /Rong/Rong Marshall/Other's/Specs/Pizza/Self-rising/FreschwholeGrain29927.rtf
- e. /Rong/Rong Marshall/Other's/Specs/Pizza/Self-rising/Hand Tossed Baron's Best/Spec Hand Tossed 3010103.xls
- f. /Rong/Rong Marshall/Rong 2013/Projects/Flour quality and functionality/Specs/34537 Big E-Tab Enzyme blend CLX [redacted] 6-17-2013.pdf

⁴ Please note that four (4) filenames listed in ¶12(a-p) contain “[redacted].” Any such redacted portion of a filename has been represented to me as the identity of Schwan’s suppliers, which are confidential, and have been removed to allow for the public filing of this declaration.

- g. /Rong/Rong Marshall/Rong 2013/BU Support/Greek Yogurt Atlanta/Specs/4001002 Lemon Condense Pie.xls
- h. /Rong/Rong Marshall/Other's/Specs/Ice Cream/SAP51271.doc
- i. /Rong/Rong Marshall/Other's/Specs/Ice Cream/51270MintChipIC.rtf
- j. /Rong/Rong Marshall/Rong 2011/Project/Self-Rising Crust/Specs/18023 Cream Yeast [redacted].docx
- k. /Rong/Rong Marshall/Rong 2011/Project/Project Premium Cream Base/Formulations & Spec/SAP Specs/1003121 Topping Chocolate Ready-To-Whip.docx
- l. /Rong/Rong Marshall/Other's/Specifications/Ingrdient's Attachments/Spec 6846 Citric Acid 3-11-09.doc
- m. /Rong/Rong Marshall/Other's/Specifications/Ingrdient's Attachments/Spec 29066 Fire Roasted Tomato Base 6-15-05.pdf
- n. /Rong/Rong Marshall/Other's/Specifications/Cooking Instructions/TX/Mini ER/69492 - Mini Pza Rolls.pdf
- o. /Rong/Rong Marshall/Other's/Specifications/Co-pack's Finished Product Spec/Attachments/Co-Pac Pictures/52093 Crab Dip 8-13-08-2.jpg
- p. /Rong/Rong Marshall/Other's/Specifications/Ingrdient's Attachments/Spec 20731 Chic Breast Cubed CN 03-01-05.pdf

13. From the spreadsheets listing deleted documents, Counsel has identified the filenames listed in Table 2 below. I have confirmed that these file names and paths are associated with files deleted from Mr. Cai’s 500 GB Toshiba external hard drive.

File Name	File Path
Batter Up Packaging Options 7-29-11.xls	/Rong/Rong Marshall/Other's/Innovation/Project Batter Platform/Transferred-to-Project-Central-DONT-USE/Packaging/Batter Up Packaging Options 7-29-11.xls
BTR Thin Crust 8.14.14.xlsx	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/FS BTR pizza/formulas/BTR Thin Crust 8.14.14.xlsx
Project York 8.14.14.xlsx	/Rong/Rong Marshall/Other's/Innovation/Projects Active/Project York-Entice/Formula Work/Project York 8.14.14.xlsx
Deep Dish Ragu Sauce.xls	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Deep Dish Idea Submission.2 4_10_12/Formula/Deep Dish Ragu Sauce.xls

Mrs Smith.xls	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Ethnic Research/Formula's.recipes/Empanada/Mrs Smith.xls
Experimental Formulas 12.20.11.xls	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Facet/Formula/Experimental Formulas 12.20.11.xls
Project Facet.decision tree.DCR1.docx	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Facet/meeting notes/Project Facet.decision tree.DCR1.docx
Project Helga11.23.10.docx	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Project Hand Craft Style Crust/meeting outlines/Project Helga11.23.10.docx
Project Helga team meeting 10.21.10 recap 10.25.10.doc	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Project Hand Craft Style Crust/meeting outlines/Project Helga team meeting 10.21.10 recap 10.25.10.doc
11 23 10 cutting Matrix.xlsx	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Project Hand Craft Style Crust/meeting outlines/11 23 10 cutting Matrix.xlsx
Project Summary Completion Report Project Pretza 9.4.14.docx	/Rong/Rong Marshall/Other's/Innovation/Projects Inactive/Pretza - Pretzel Pizza/Project Summary Completion Report Project Pretza 9.4.14.docx

Table 2

II. Email messages were sent to or from Schwan's email accounts, indicating that they originated with Schwan's.

14. Of the 39,953 unique files identified by counsel, 12,582 represent individual email messages (.msg files).⁵ Of these 12,582 unique messages, approximately 500 contain the term "Schwan" in the file name – which represents the underlying email's subject line. It is also important to note that several of the emails contained attached files.

⁵ These emails were identified on Mr. Cai's 500 GB External Hard Drive, which was provided to CFS.

15. I have further determined that vast majority of these emails (11,938 of 12,582) were either sent or received by “@schwans.com” email accounts.⁶ The earliest email is dated March 23, 2009, and the most recent email is dated December 8, 2017.

16. Individual email files (.msg files) also comprise a substantial portion of the observed deleted files. Deleted email files span the relevant periods of Cai’s employment with Schwan’s, and some of which refer to the subjects noted previously. (See *supra*. ¶¶ 8, 9(a-f), 10-12).

17. I respectfully reserve the right to supplement or amend this declaration should additional information be made available to me, or should additional details be requested.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed this 17th day of December 2021.



Mark Lanterman

⁶ Original email messages often contain important contextual information about an individual message. This information is often referred to as “email headers.” Email headers contain information about a specific message such as date, sender, recipient, and subject line. As an analogy, “email headers” are like an envelope of a letter, describing where a message came from, to where it was sent, and when.

Exhibit 1



Mark Lanterman Chief Technology Officer

Office
800 Hennepin Avenue
5th Floor
Minneapolis, MN 55403

Phone
(952) 924-9920

Fax
(952)924-9921

Email
mlanterman@compforensics.com

Web
www.compforensics.com

Professional Biography

Mark has over 25 years of experience in digital forensics, e-discovery, and has provided education and training to a variety of audiences. Prior to founding Computer Forensic Services in 1998, Mark was a sworn law enforcement investigator with the United States Secret Service Electronic Crimes Task Force. Both federal and state court judges have appointed Mark as a neutral computer forensic analyst.

Mark is a member of the Minnesota Lawyers Professional Responsibility Board and serves as Chairperson of its Opinion Committee.

Mark frequently provides training within the legal community, including presentations for the United States Supreme Court, Georgetown Law School, the 11th Circuit Federal Judicial Conference, the 8th Circuit Federal Judicial Conference, the American Bar Association, the Federal Bar Association, and the Department of Homeland Security, among others.

As a member of its faculty, Mark has presented to the entire Federal Judiciary through the Federal Judicial Center. Mark is faculty at the National Judicial College, Mitchell Hamline School of Law, and is an adjunct instructor in the University of Minnesota's MSci Security Technologies program. Mark is also a professor at the Saint Thomas School of Law.

Mark provides frequent commentary about cyber security issues for national print and broadcast media, including ABC, Bloomberg, BusinessWeek, CBS, Fox News, NBC, *The New York Times*, NPR, and the *Wall Street Journal*.

Education and Certifications

Upsala College - B.S. Computer Science; M.S. Computer Science

Harvard University - Cybersecurity

Department of Homeland Security - Federal Law Enforcement Training Center
Seized Computer Evidence Recovery Specialist

National White-Collar Crime Center - Advanced Computer Forensics

Publications

Co-author of the *E-Discovery and Forensic Desk Book*

Regular columnist for *Bench & Bar* magazine



Previous Testimony List – Mark Lanterman

- *Jane Doe, et al. v. Independent School District 31*, 20-CV-00226, (U.S. Dist. Ct. Minn.)
- *Vision Industries Group, Inc. v. ACU Plasmold, Inc., et al.*, 2:18-CV-6296, (U.S. Dist. Ct. New Jersey)
- *Baxter Insurance Group of Agents, et al. v. Woitalla et al.*, 27-CV-20-16685, (Henn. Co. Minn.)
- *Sarah Hoops v. Solution Design Group, Inc.*, 27-CV-20-11207, (Henn. Co. Minn.)
- *Stephanie Ramos v. Lazy J Transport, et al.*, 2018CI21594, (Dist Ct. Bexar Co., Texas)
- *Schwan's Company, et al. v. Rongxuan Cai, et al.*, 0:20-SC-2157, (U.S. Dist. Ct. Minn.)
- *Michael D. Tewksbury, as Guardian ad Litem for Miles Chacha and Lulu Kerubo Simba v. PODS Enterprises, LLC, et al.*, 62-CV-20-4209, (Ramsey Co., Minn.)
- *RG Golf v. The Golf Warehouse*, 19-CV-00585 (U.S. Dist. Ct. Minn.)
- *Dunn v. PSD LLC, et al.*, 02-CV-20-4504, (Anoka Co., Minn.)
- *Chambers, et al. v. B&T Express, et al.*, 19-CI-00790, (Franklin Cir. Ct. Ky. 2d Div.)
- *Natco Pharma Ltd. V. John Doe*, 21-cv-00396-ECT-BRT, (U.S. Dist. Ct. Minn.)
- *Kimberly Clark, et al. v. Extrusion Group, et al.*, 1:18-cv-04754-SDG, (U.S. Dist. Ct. N.D. Ga.)
- *PalatiumCare Inc. v. Notify, LLC, et al.*, 2021-cv-000120, (Sheboygan Co., Wis.)
- *State of Nebraska v. Jeffrey Nelson*, CR21-19, (Saunders Co., Nebraska)
- *Lutzke v. Met Council*, 27-CV-19-14453, (Henn. Co. Minn.)
- *Rivera et al., v. Hydroline, et al.*, DC-19-143, (Dist. Ct. Duval Co, Texas).
- *Coleman & Hartman, et al. v. iAMg, et al.*, 16CV317, (Cir. Ct. Polk Co Wis.)
- *Mixon v. UPS, et al.*, 2019-CI-13752, (Dist Ct. Bexar Co., Texas)
- *Goodman v. Goodman*, 27-DA-FA-21-672, (Henn. Co. Minn.)
- *Shaka v. Solar Partnership*, 27-CV-20-12474, (Henn. Co. Minn.)

- *Patel Engineering Ltd. V. The Republic of Mozambique*, UNCITRAL PCA: 2020-21.
- *Estate of Rima Abbas v. ABDCO*, (19-CI-1315), (Fayerette Cir. Ct. Ky. 4th Div.)
- *State of Nebraska v. Jeffrey Nelson*, CR21-19, (Saunders Co., Nebraska)
- *Riccy Mabel Enriquez-Perdomo v. Richard A. Newman, et al.*, 3:18-CV-549, (U.S. W.D. Kentucky)
- *United States v. Alakom-Zed Crayne Pobre*, PX-19-348, (U.S. Dist. Maryland)
- *Lewis v. Northfield Savings Bank, et al.*, 295-5-19-WNCV, (Vermont, Sup. Ct., Washington Div.)
- *State of Minnesota v. Thomas James Crowson*, 13-CR-20-325, (Chisago Co., Minn.)
- *Vimala et al., v. Wells Fargo, et al.*, 3:19-CV-0513, (U.S. M.D. Tenn.)
- In re: Estate of Anthony Mesiti, 318-2017-ET-00340, N.H. 6th Cir. Probate Division.
- *Ernie's Empire, LLC, et al. v. Burrito & Burger, Inc., et al.*, 82-CV-20-28, (Wash. Co., Minn.)
- *Sol Brandys v. Wildamere Capital Management LLC*, Case No.: 27-CV-18-10822, (Henn. Co., Minn.)
- *State of Minnesota v. Yildirim*, Case No. 27-CR-19-7125, (Henn. Co., Minn.)
- *Jabil v. Essentium, et al.*, Case No. 8:19-cv-1567-T-23SPF, (U.S. M.D. Fla.)
- *Lifetouch National School Studios Inc. v. Walsworth Publishing Company, et al.*, (U.S. Dist. Conn.)
- *Motion Tech Automation, LLC v. Frank Pinex*, Case No.: 82-CV-18-5202, (Wash. Co., Minn.)
- *Lundin v. Castillo, et al.*, Case No.: 2019-CV-000452, (Walworth Co., Wis.)
- *Yun v. Szarejko-Gnoinska, et al.*, Case No.: 27-PA-FA-13-967, (Henn. Co., Minn.)
- *Jonas Hans v. Belen Fleming*, Case No.: 27-PA-FA-13-967, (Henn. Co., Minn.)
- *Daniel Hall, et al. v. Harry Sargeant III*, Case No.: 18-cv-80748, (U.S. Dist. Ct. S.D. Fl.)
- *Miller v. Holbert, et al.*, Case No.: 48-CV-15-2178, (Mille Lacs Co., Minn.)
- *Strohn, et al. v. Northern States Power Company, et al.*, Case No.: 18-cv-1826-DSD-KMM, (U.S. Dist. Ct. Minn.)
- *Stamper, et al. v. Highlands Regional Medical Center*, Case Nos.: 11-CI-1134 & 12-CI-00468, (Commonwealth of Kentucky, Floyd Cir. Co., Div. I).

- Patterson Dental Supply, Inc. v. Daniele Pace, Case No.: 19-cv-01940-JNE-LIB, (U.S. Dist. Ct. Minn.)
- Ryan Rock v. Jonathan Sargent and The Sargent Group, Inc. d/b/a Todd & Sargent, Inc., Case No. LACV050708, Dist. Ct. Story Co., Iowa.
- Oscar Alpizar v. Eazy Trans, LLC, et al., Case No.: 2018CI00878, (Dist Ct. Bexar Co., Texas)
- MatrixCare v. Netsmart, Case No.: 19-cv-1684, (D. Minn.)
- State of Minnesota v. Nathan Roth, Case No.: 80-CR-18-1007, (Wadena Co., Minn.)
- Parisi v. Wright, Case No.: 27-CV-18-5381, (Henn. Co., Minn.).
- Lloyd C. Peeoples, III v. Carolina Container, LLC, U.S. N. Dist. Geor., Case No.: 4:19-cv-00021
- Sandra Wolford, et al. v. Bayer Corp., et al., Action No. 16-CI-907, 17-CI-2299, Commonwealth of Kentucky, Pike Cir. Ct. Div. I. (2019)
- BuildingReports.com, Inc. v. Honeywell International, Inc., Case No.: 1:17-cv-03140-SCJ, (U.S. Dist. Ct. N.D. Ga.)
- Evan D. Robert and Dr. Kerry B. Ace v. Lake Street Cafeteria, LLC, et al., Case No: 27-CV-17-18040, (Henn. Co., Minn.)
- State of Minnesota v. Andrew Seeley, Case No.: 14-CR-17-4658, (Clay Co., Minn)
- McNutt & Company v. Focus Engineering, et al., Case No.: CV-2018-900432.00, Cir. Ct. Lee County, Alabama.
- In re: City of Eden Prairie and Law Enforcement Labor Services Inc., BMS Case #19-PA-0530 (2019).
- State of Minnesota v. Stephen Allwine, Case No.: 82-CR-17-242, (Wash. Co., Minn.)
- PMT v. Wade Fredrickson, Case No.: 27-CV-18-4364, (Henn. Co., Minn.)
- Stratasys, Inc. v. Christopher Krampitz, Case No.: 0:17-cv-05524-DSD-HB, (D. Minn.)
- State of North Dakota v. Connor Brennan, (Court File No.: 17300214), (Grand Forks Co., ND)
- U.S. v. Farber, Case No.: 1:2017-cr-00188-320735, (E.D. Cal.)
- In re: the Marriage of: Amanda Jo Briggs and Kent Stewart Mitchell Briggs, Case No.: 27-FA-17-3414, (Henn. Co., Minn.)
- Edgewell Personal Care Company v. Michael O'Malley, (Superior Court (Judicial District of Ansonia at Milford) No. AAN-CV-176025160-S)
- East Coast Test Prep, L.L.C. d/b/a Achieve Test Prep and Mark Olynyk, v. Allnurses.com, Inc., and David R. Smits, as Administrator of the Estate of

Brian Short, ABC Companies 1-10 and John Does 1-10, Case No.: 0:15-cv-03705-JRT-SER (D. Minn.)

- DTN, LLC, v. Matthew Walsh, Case No. 0:17-cv-5206(SRN)(HB) (D. Minn.)
- In Re the Matter of: Wainaina Kamau and Ruth Marionya Kamau, Court File No: 27-DA-FA-18-5521 (Dist. Ct. Hennepin County, Minn.).
- Nagios Enterprises, LLC, vs. Mary Starr, et al. Court File No: 62-CV-16-3280, (Dist. Ct. Ramsey County, Minn.)
- Larry Novack v. David Rios and United Parcel Service, Inc. (TX Dist. CT., 57th Dist. (Bexar County, Texas) No. 2016-CI-12388)
- Mylan Pharmaceuticals Inc., Petitioner v. Sanofi-Aventis Deutschland GMBH Patent Owner (United States Patent and Trademark Office) U.S. Patent Nos. 7,476,652 and 7,713,930-IPR2017-01526/IPR2017-01528)
- Elisabeth Ostendorf v. Michigan State University and the Board of Trustees of Michigan State University, (State of Michigan (In the court of claims) No. 15-47-MZ)
- Elyse Puklich v. Blayne Puklich, (Burleigh Co., ND) No. 08-2014-CV-00029)
- Jeffrey Ketchum and Anniken Ketchum vs. Home-Owners Insurance; D & L Janitorial Supply, Inc. (MI 47th Circuit Court (Delta Co.) No. 15-22960-CB)
- Parsons Electric L.L.C vs. Integrated Building Solutions L.L.C., Paul Kelly, Kristopher Kelly, Troy Stanislawski, and Jack Tucker (MN Dist. CT., 10th Dist. (Anoka Co.) No. 02-CV-16-2644)
- State of Minnesota vs. Erin Marie Hennessey, (MN Dist. CT., 10th Dist. (Washington Co.) No. 82-CR-16-2208)
- The Hays Corporation vs. Barry Peters, et al. (In The Circuit for Montgomery Co., Maryland)
- International Chemtex Corporation vs. Jennifer Lassiter, John Hofstad, and Sustainable Water Treatment, LLC (United States Dist. Court (Dist. of MN)
- David Rubenzer and La La La, LLC vs. City of Burnsville (MN Dist. CT., 1st Dist. (Dakota Co.) No. 19HA-CV-15-3743)
- State of Minnesota vs. John Frederick Thorene, IV (MN Dist. Ct., 6th Dist. St. Louis Co.) No. 69DU-CR-15-3038)
- Nu-Look Exteriors, Inc. vs. Brett A. Looney, Mark A. Peare, Julie A. Young, f/k/a Julie A. Strot, Stephen B. Martin, and 4 Corner Architectural Sheet Medal, Inc. (MN Dist. CT., 1st Dist. (Dakota Co.) No. 19HA-CV-15-432)
- Brook Mallak v. Aitkin County, et al., (United States District Court of Minnesota, No. 13-CV-02119 DWF/LIB)

- Jonathan Scarborough v. Federated Mutual Insurance Company, (United States District Court (Dist. of MN) No: 0:15-cv-01633 -DWF/FLN)
- Future Motion, Inc. vs. Changzhou First International Trade Co., LTD, (United States District Court (Dist. of NV) No. 2:16-cv-00013-MMD-CWH)
- In re the Marriage of: Catherine Ann Ivey and John Raymond Ivey, (State of Minnesota (Hennepin Co.) No. 27-FA-15-7650)
- Bay Side Recycling Co., et al. v. SKB Environmental, Inc., Case No.: 14-CV-4550 (SRN/LIB), (U.S. Dist. Ct. Minn.).
- United States of America v. Khaalid Adam Abdulkadir, (United States District Court (Dist. of MN) No: 15-mj984 KES)
- Kimberly Kay Seidel and Trevor Carlton Seidel, (MN Dist. Ct., 10th Dist. (Anoka Co.) No. 02-FA-15-2022)
- Dexon Computer, Inc. v. Modern Enterprise Solutions, Inc., Timothy Durant, and Andrew Uzpen, (MN Dist. Ct., 4th Dist. (Hennepin Co.) No. 27-CV-15-17171)
- Golden Supply, Inc., a Minnesota Corporation v. Jeffrey Hunt and Ken Aronckes, (MN Dist. Ct. 4th Dist. (Hennepin Co.) No. 27-CV-15-1625)
- Jerry Wilkinson and Karen Wilkinson v. State Farm Fire and Casualty Company, (U.S. Dist. Ct. E.D. Wis.) Case No. 14 CV 1187)
- Greiner Construction, Inc. vs. Bert Westerman et al., (MN Dist. Ct., 4th Dist. (Hennepin Co.)
- Samantha Orduno, et. al. v. Richard Pietrzak, et al. (United States District Court (Dist. of MN) No. 0:14-cv-01393-ADM-JSM)
- Zimmer, Inc. v. Stryker Corporation; Howmedica Osteonics Corp. d/b/a Stryker Orthopedics; and Cody Stovall. (United States District Court (Northern District of Indiana of Indiana South Bend Division) Case No. 3:14-cv-00152-JD-Can)
- Robert Half International Inc., v. Donna Farrugia, et al. (Superior court of State of California (San Francisco Co.) No. CGC-14-539338)
- Emergent Systems Exchange, LLC, vs. Daniel Ray McGinnis, et al., (MN Dist. Ct., 4th Dist. (Hennepin Co.) No. 27-CV-147338)
- Tristan Connor Damron v. John E. Norris, et. al., (Ala. Circuit Court (Elmore Co.) No. CV11-900259.00)
- Curtis Trude, et al. v. Glenwood State Bank, et al. (MN Dist. Ct., 8th Dist. (Meeker Co.) No. 47-CV-12-176)
- Pioneer Home, Inc. v. American Federal Bank, (MN Dist. Ct., 7th Dist. (Hennepin Co.) No. 56-CV-13-3353)
- Prosthetic Laboratories of Rochester, Inc., v. Brandon Sampson, et al., (MN Dist. Ct. 3rd Dist. (Hennepin Co.) No. 55-CV-133625)

- Jenine Ellison v. Advanced Surgery Center of Palm Beach Count, LLC, (15th Circuit Court (Palm Beach County), Florida. No: 502011CA020861XXXXMB.)
- JIT Companies, Inc. v. Erik Edwin Swanson, (MN Dist. Ct., 3rd Dist. (Hennepin Co.) No. 66-CV-132532)



Publications List – Mark Lanterman

Bench & Bar of Minnesota

Go Fish? Proportionality revisited, November 2021

Mailbag: Cybersecurity Q+A, October 2021

The NSA advisory on brute force attacks, September 2021

Security is a team game, August 2021

Improving national cybersecurity, July 2021

Apple's new iOS strikes a blow for data privacy, May/June 2021

Geofence warrants, The battle is just beginning, April 2021

Ransomware and federal sanctions, March 2021

The SolarWinds breach and third-party vendor security, February 2021

Considerations in cloud security, January 2021

Deciding when to use technology-assisted review, December 2020

How to avoid an old scam with a new twist, November 2020

Your back-to-school tech brush-up, October 2020

The Twitter breach and the dangers of social engineering, September 2020

Cyber risk: Is your data retention policy helping or hurting?, August 2020

Cyber riots and hacktivism, July 2020

Working from home and protecting client data, May/June 2020

Cybersecurity in pandemic times, April 2020

Business continuity and coronavirus planning, March 2020

Doxxing made easy: social media, March 2020

Taking responsibility for your cybersecurity, February 2020

Beyond compliance: Effective security training, January 2020

Doxxing redux: The trouble with opting out, December 2019

Proportionality and digital evidence, November 2019

AI and its impact on law firm cybersecurity, October 2019

Too secure? Encryption and law enforcement, September 2019

Security, convenience and medical devices, August 2019

Physical security should be part of your incident response plan, July 2019

"Papers and effects" in a digital age, pt II, May/June 2019

Security considerations for law firm data governance, April 2019

Third-party vendors and risk management, March 2019

The Marriott breach: four years?, February 2019

"Papers and effects" in a digital age, co-authored with Judge (Ret.) Rosenbaum,
January 2019 (Republished in *The Computer & Internet Lawyer*)

The Chinese spy chip scandal and supply chain security, December 2018
(Republished in *The Computer & Internet Lawyer*)

Don't forget the inside threat, November 2018

Cyberattacks and the costs of reputational harm, October 2018

Fair elections and cybersecurity, September 2018

E-discovery vs. forensics: Analyzing digital evidence, August 2018

Social media and managing reputational risk, July 2018

Managing Cyber Risk: Is cyber liability insurance important for law firms?,
May/June 2018 (Republished in *The Computer & Internet Lawyer*)

Social engineering: How cybercriminals capitalize on urgency, April 2018

Stephen Allwine: When crime tries to cover its digital tracks, March 2018

Is the Internet of Things spying on you?, February 2018

#UberFail, January 2018

Ransomware: To pay or not to pay?, December 2017

How digital evidence supported gerrymandering claims, November 2017

Facial recognition technology brings security & privacy concerns, October 2017

Putting communication and clients first in digital forensic analysis, September
2017

Digital evidence: New authentication standards coming, August 2017

*Your Personal Data – Or is it? Doxxing and online information resellers pose
threats to the legal community*, May/June 2017

What You Don't Know Can Hurt You: Computer Security for Lawyers, March 2014

Minnesota Lawyer

Phishing, vishing and smishing – oh, my!, January 2018

Equifax was unprepared for a data breach, September 2017

Cybersecurity and forensic application in cars, July 2017

Preventing 'spear-phishing' cyber attacks, May 2017

Opting out when private information goes public, March 2017

Are fingerprints keys or combinations?, February 2017

Digital Forensics and its role in data protection, February 2017

Acknowledge the security issues, December 2016

Modern life is driven by the internet of things, November 2016

Are medical devices vulnerable to hackers?, October 2016

Digital evidence as today's DNA, September 2016

Colorado Lawyer

Is Emailing Confidential Information a Safe Practice for Attorneys?, July 2018
(Republished in The Journals & Law Reviews database on WESTLAW)

International Risk Management Institute, Inc. (IRMI)

Ransomware, National Cyber Security, and the Private Sector, October 2021

Standardization Matters in Establishing a Strong Security Posture, June 2021

Third-Party Vendor Risk Management, March 2021

The Importance of (Remote) Security Culture in Mitigating Risks, December 2020

Security from Home: Continuing to Work and Learn Amid COVID-19, September 2020

Operational Risk Revisited in the Wake of COVID-19, June 2020

Cyber Threats and Accounting for Operational Risk, March 2020

Human Aspect of Incident Response Investigations, January 2020

The Impact of Digital Incompetency on Cyber-Security Initiatives, September 2019

Communication in Responding to Cyber Attacks and Data Breaches, June 2019

Cyber Security and Resilience, January 2019

Leadership in Developing Cultures of Security, September 2018

Real-Life Consequences in a Digital World: The Role of Social Media, July 2018

Some Thoughts on the Dark Web—and How it Affects You, March 2018

Personal Information and Social Media: What Not to Post, September 2017

Managing Doxxing-Related Cyber Threats, July 2017

Understand the Layers of Cyber-Security and What Data Needs Protecting, March 2017

Learn about the Internet of Things: Connectivity, Data, and Privacy, January 2017

Assessing Risk and Cyber-Security, September 2016

SCCE The Compliance & Ethics Blog

The Components of Strong Cybersecurity Plans: Parts 1-5, 2017

Prevention Is the Best Medicine, August 2016

Lawyerist

Detection: The Middle Layer of Cybersecurity, April 2017

Don't Be Too Hasty! What to Do When an Email Prompts You to Act Quickly, February 2017

How to Avoid Spoofing, Spear Phishing, and Social Engineering Attacks, October 2016

Law Practice

The Dark Web, Cybersecurity and the Legal Community, July/August 2020

Captive International

COVID-19 and the importance of the cyber captive, April 2020

Attorney at Law Magazine

The Digital Challenges of COVID-19, June 2020

E-Discovery Deskbook

Chapter Thirteen “Forensic Experts—When and How to Leverage the Talent” co-authored with John M. Degan Briggs and Morgan, P.A.