

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ROBIN SINGH EDUCATIONAL  
SERVICES, Inc., d/b/a  
TESTMASTERS

*Plaintiffs,*

v.

TEST MASTERS EDUCATIONAL  
SERVICES, INC. AND VIVEK ISRANI,

*Defendant.*

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C. A. No. H-03-3348

JUDGE VANESSA D. GILMORE

**DECLARATION OF MICHAEL JACOBS**

1. My name is Michael Jacobs. I have personal knowledge of the facts stated herein, and, if required could testify competently thereto.
2. I am a practicing attorney in New York.
3. This summer, my daughter, Lauren Jacobs, told me that she had heard from her friends that TestMasters was the best LSAT course and that the students who took TestMasters for the LSAT had the highest LSAT score improvements.
4. Because my daughter was busy relocating to school and I would be paying for her LSAT class, she had asked me to register her.
5. When I called the Houston-based TestMasters, I thought I was signing my daughter up for the well-established TestMasters LSAT Course. I cannot remember the exact contents of my conversation with the Houston-based TestMasters. However, I do remember that the whole time that I spent speaking to their representative, I was led to believe that they were the well-established TestMasters LSAT company about which we had received so much positive feedback.
6. At no time in my conversation with the company representative, was there any mention on their part that they were brand new at teaching the LSAT, yet they were using the exact same name as another company that had been teaching LSAT classes for many years in the exact same location.
7. Even though I am a lawyer, I would have absolutely no reason to believe that something like this situation could exist because it is so outrageous. Thus, I do not know how students are expected to know that they are signing up with an



- imposter course that has no experience in teaching LSAT but rather with an SAT company, absent any kind of disclaimers on their website.
8. I feel that my daughter was cheated out of a good education by the Houston-based TestMasters and I feel that I was defrauded because clearly, when I spoke to them, they knew that I had been referring to the other TestMasters and their omission is like false representation.
  9. Furthermore, I feel as though my \$1300 was wasted on a course that only provided marginal help for my daughter. After the completion of her course, my daughter did not feel well prepared for the course and opted not to take the exam in October as she had scheduled. In order to guarantee that she receives the proper training in the LSAT, I may have to spend another \$1250 for the real TestMasters LSAT preparation course.

I, Michael Jacobs, declare under penalty of perjury that the foregoing is true and correct:

Executed this 15<sup>th</sup> day of November, 2003, at

  
Michael Jacobs