

Wendy W. Moe

Robert H. Smith School of Business
University of Maryland
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College Park, MD 20742

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EMPLOYMENT

University of Maryland, Robert H. Smith School of Business	
<i>Associate Dean of Master's Programs</i>	December 2018 - present
<i>Dean's Professor in Marketing</i>	July 2018 – present
<i>Co-Director of the Smith Analytics Consortium</i>	August 2016 – present
<i>Director of MS in Marketing Analytics</i>	August 2012 – December 2018
<i>Professor of Marketing</i>	August 2014 – July 2018
<i>ADVANCE Professor</i>	August 2014 – August 2015
<i>Associate Professor of Marketing</i>	August 2007 – August 2014
<i>Assistant Professor of Marketing</i>	July 2004 – July 2007
University of Texas at Austin, McCombs School of Business	July 2000 – June 2004
<i>Assistant Professor of Marketing</i>	
A.C. Nielsen Company	1992-1994
<i>Senior Associate, Analytic Services (Hackensack, NJ)</i>	
<i>Associate Statistician, Advanced Analytical Technologies (Northbrook, IL)</i>	

EDUCATION

PhD, Marketing, University of Pennsylvania, The Wharton School	August 2000
MA, Marketing, University of Pennsylvania, The Wharton School	May 1999
MBA, Georgetown University	May 1996
BS, Economics, University of Pennsylvania, The Wharton School	May 1992

HONORS AND AWARDS

MBA Teaching Award for Most Effective Elective Professor	2017
MSI/H. Paul Root Award, Finalist	2017
O'Dell Award, Finalist	2016
MBA Teaching Award for Most Effective Elective Professor	2016
Paul Green Award, Finalist	2016
Distinguished Teaching Award	2016
ADVANCE SEED grant	2015
MBA Teaching Award for Most Effective Elective Professor	2015
Distinguished Teaching Award	2015
AMA-Sheth Doctoral Consortium, Faculty Fellow	2015
Marketing Science Institute's Buzzell Award	2014

Marketing Science Institute's Top Download Award	2014
AMA-Sheth Doctoral Consortium, Faculty Fellow	2014
MBA Teaching Award for Most Effective Elective Professor	2013
Journal of Interactive Marketing Best Reviewer Award	2012
Research Paper Finalist at the MIT Sloan Sports Analytics Conference	2011
Erin Anderson Award for Emergent Female Scholar and Mentor	2010
AMA-Sheth Doctoral Consortium, Faculty Fellow	2010
Wharton Customer Analytics Initiative/Marketing Science Institute Research Award	2009
University of Maryland GRB Summer Research Award	2005, 2009
Marketing Science Institute Research Award	2008
Journal of Interactive Marketing's Best Paper Award – Runner Up	2007
Journal of Marketing Best Reviewer Award	2007
Nominated for the 2005-2006 Krowe Teaching Excellence Award	2006
Frank M. Bass Award, finalist	2005
Journal of Interactive Marketing Best Paper Award	2005
University of Maryland GRB Summer Research Award	2005
Marketing Science Institute Young Scholar	2005
Nominated for CBA Foundation Research Excellence Award for Asst. Professors	2003, 2004
McCombs School of Business Dean's Fellow	2003
Nominated for Best MBA Elective Instructor	2003
Winter AMA Best Special Session Award	2002
AMA Howard Award, honorable mention	2001
MSI Alden G. Clayton Dissertation Proposal Competition Winner	1999
AMA Doctoral Consortium Fellow, Univ. of Southern California	1999
GE Foundation Fellowship	1997-1998
Georgetown MBA Scholar	1994-1996

JOURNAL PUBLICATIONS

Berger, Jonah, Ashlee Humphreys, Stephan Ludwig, Wendy W. Moe, Oded Netzer and David Schweidel (2019), "Uniting the Tribes: Using Text for Marketing Insights," *Journal of Marketing*.

Moe, W. Wendy and Brian T. Ratchford (2018), "How the Explosion of Customer Data Has Redefined Interactive Marketing," *Journal of Interactive Marketing*.

Schweidel, David A. and Wendy W. Moe (2017), "Opportunities for Innovation in Social Media Analytics," *Journal of Product Innovation and Management*.

Zhang, Yuchi, Wendy W. Moe and David Schweidel (2016), "Modeling the role of message content and influencers in social media rebroadcasting," *International Journal of Research in Marketing*, <http://dx.doi.org/10.1016/j.ijresmar.2016.07.003>

Schweidel, David A. and Wendy W. Moe (2016), "Binge Watching and Advertising," *Journal of Marketing*.

- **Finalist for the MSI/H. Paul Root Award given by the American Marketing Association and the Marketing Science Institute for the *Journal of Marketing* paper that has made a significant contribution to the advancement of the practice of marketing.**

Healey, John and Wendy W. Moe (2016), "The Effects of Platform and Consumer Lifecycles on Content Sales in a Platform-Mediated Market," *International Journal of Research in Marketing*, 33 (2).

Schweidel, David and Wendy W. Moe (2014), "Listening in on Social Media: A Joint Model of Sentiment and Venue Choice," *Journal of Marketing Research*, 51 (4), 387-402.

- **Finalist for the Paul Green Award given to the *Journal of Marketing Research* paper that shows or demonstrates the most potential to contribute significantly to the practice of marketing research and research in marketing.**

Braun, Michael and Wendy W. Moe (2013), "Online Advertising Campaigns: Modeling the Effects of Multiple Ad Creatives," *Marketing Science*, 32 (5), 753-767.

Moe, Wendy W. and David A. Schweidel (2012), "Online Product Opinion: Incidence, Evaluation and Evolution," *Marketing Science*, 31 (3), 372-386.

Kulkarni, Gauri, P.K. Kannan and Wendy Moe (2012), "Using Online Search Data to Forecast New Product Sales," *Decision Support Systems*, 52 (3), 604-611.

Moe, Wendy W., David A. Schweidel and Michael Trusov (2011), "What Influences Customers' Online Comments" *Sloan Management Review*, Fall.

- **Featured in Freakonomics.com**

Moe, Wendy W. and Michael Trusov (2011), "The Value of Social Dynamics in Online Product Ratings Forums," *Journal of Marketing Research*, 48 (3), 444-456.

- **Finalist for the O'Dell Award given to the best or outstanding *Journal of Marketing Research* paper with respect to the degree they have made a significant, long-run contribution to marketing theory, and/or methodology, and/or practice.**

Moe, Wendy W. and Sha Yang (2009), "The Impact of a New Competitive Entry on an Incumbent's Customer Base," *Journal of Marketing*, 73 (1), 109-121.

Moe, Wendy W. and Peter S. Fader (2009), "The Role of Price Tiers in Advance Purchasing of Event Tickets," *Journal of Service Research*.

Moe, Wendy (2006), "An Empirical Two-Stage Choice Model with Decision Rules Applied to Internet Clickstream Data," *Journal of Marketing Research*, 43 (4), 680-692.

Moe, Wendy (2006), "A Field Experiment Assessing the Interruption Effect of Pop-Up Promotions," *Journal of Interactive Marketing*, 20 (1), 34-44

Moe, Wendy and Peter Fader (2004), "Dynamic Conversion Behavior at E-Commerce Sites," *Management Science*, 50 (3), 326-335.

- **Finalist for the Frank M. Bass Award given to the best marketing paper derived from a Ph.D. thesis published in an INFORMS-sponsored journal.**
- **Featured in "Turning Browsers into Buyers" in *MIT Sloan Management Review*, 2001, vol. 42, no.2, p.8.**

Johnson, Eric, Wendy Moe, Peter Fader, Steve Bellman, and Jerry Lohse (2004), "On the Depths and Dynamics of World Wide Web Shopping Behavior," *Management Science*, 50 (3), 299-308.

- **Featured article in issue**

Moe, Wendy and Peter Fader (2004), "Capturing Evolving Visit Behavior in Clickstream Data," *Journal of Interactive Marketing*, 18 (1), 5-19.

- **Winner of the *Journal of Interactive Marketing* Best Paper Award**
- **Lead article in issue**

Moe, Wendy (2003), "Buying, Searching, or Browsing: Differentiating between Online Shoppers using In-Store Navigational Clickstream," *Journal of Consumer Psychology*, 13(1&2), 29-40.

Moe, Wendy and Peter Fader (2002), "Using Advance Purchase Orders to Forecast New Product Sales," *Marketing Science*, 21(3), 347-364.

Moe, Wendy W. and Peter S. Fader (2001), "Modeling Hedonic Portfolio Products: A Joint Segmentation Analysis of Music CD Sales," *Journal of Marketing Research*, 38(3), 376-385.

Moe, Wendy and Peter Fader (2001), "Uncovering Patterns in Cybershopping," *California Management Review*, 43(4), 106-117.

- **reprinted in Understanding Consumer Behavior, Business Fundamentals Series, Harvard Business Press, 2002.**

Burke, Sandra J., Sandra J. Milberg and Wendy W. Moe (1997), "Displaying Common but Previously Neglected Health Claims on Product Labels: Understanding Competitive Advantages, Deception, and Education," *Journal of Public Policy and Marketing*, 16 (November), 242:255.

BOOKS, BOOK CHAPTERS AND OTHER PUBLICATIONS

Oates, Sarah and Wendy W. Moe (2018), “Donald Trump and the ‘Oxygen of Publicity’: Branding, Social Media and Traditional Media,” The Presidency and Social Media: Discourse, Disruption, and Digital Democracy in the 2016 Presidential Election, Routledge.

Moe, Wendy W., Oded Netzer, and David Schweidel (2017), “Social Media Analytics,” Handbook of Marketing Decision Models, ed. Berend Wierenga and Ralf van der Lans, Springer Science and Business Media.

Moe, Wendy W. and David Schweidel (2014), Social Media Intelligence, Cambridge University Press.

Moe, Wendy W. and David Schweidel (2014), “Chapter 12: Digital and Internet Marketing,” History of Marketing Science, ed. Russ Winer and Scott Neslin, World Scientific Publishing, p. 319-340.

Moe, Wendy W. (2013), “Chapter 9: Targeting Display Advertising,” in Advanced Database Marketing: Innovative Methodologies & Applications for Managing Customer Relationships, ed. Kristof Coussement, Koen De Bock and Scott Neslin, Gower Publishing Company, pp. 209-228.

Moe, Wendy W. (2010), “Social Media Provide Valuable Way to Get Customer Feedback,” *Washington Post*, September 20, <http://www.washingtonpost.com/wp-dyn/content/article/2010/09/17/AR2010091706205.html>.

Sorenson, Herb (2009), “Chapter 7: Integrating online and Offline Retailing: An Interview with Professor Peter Fader (The Wharton School) and Wendy Moe (University of Maryland),” Inside the Mind of the Shopper: The Science of Retailing, Wharton Publishing.

Haberkern, Katy, Katrina Hubbard, and Wendy Moe (2000), “The World According to E: E-Commerce and E-Customers,” *MSI Conference Summary*, Report #00-102.

WORK IN PROGRESS

Berger, Jonah, Wendy W. Moe and David Schweidel, “What Leads to Longer Reads? Reading Depth in Online Content,” revising for 3rd round review at *Journal of Marketing Research*.

Zhang, Kumpeng and Wendy W. Moe (2016), “Measuring Brand Favorability Using Large-Scale Social Media Data,” revising for 3rd round review at *ISR*.

Weiger, Welf H., Wendy W Moe, Hauke A. Wetzel, and Maik Hammerschmidt (2016), “Behavioral Engagement in Social Media: Measurement, Antecedents, and Purchase Consequences,” *Working Paper*.

CONFERENCE PRESENTATIONS

“Integrating Social Media Metrics”

- American Marketing Association Summer Conference, Chicago, IL (2015)

“Social Media Intelligence”

- American Marketing Association Winter Conference, Orlando, FL (2014)
- Advanced Research Techniques Forum, Seattle, WA (2012)

“Online Advertising Campaigns: Modeling the Effects of Multiple Ad Creatives”

- Advanced Research Techniques Forum, Chicago, IL (2013)

“Online Product Opinion: Incidence, Evaluation and Evolution”

- Marketing Science Conference, Houston, TX (2011)
- Joint Statistical Meetings, Miami, FL (2011)
- Advanced Research Techniques Forum, San Francisco, CA (2010)
- AMA-Sheth Doctoral Consortium, Ft. Worth, TX (2010)

“How Much Does a Good Product Rating Help a Bad Product? Modeling the Dynamics of Online Product Ratings and Their Effects on Sales”

- Marketing Science Conference, Ann Arbor MI (2009)
- INFORMS Conference, October, Washington, DC (2008)
- DMEF Research Summit, October, Las Vegas, NV (2008)

“Roundtable on Navigating the Networked Rivers of the Social Web: Emerging Themes for Consumer Behavior Research on Web 2.X”

- Association for Consumer Research Conference, Pittsburgh, PA (2009)

“Roundtable on User-Generated Content”

- Joint Statistical Meetings, Washington, DC (2009)

“Roundtable on Applications of Clickstream Data: Past, Present and Future”

- Joint Statistical Meetings, Washington, DC (2008)

“The Impact of a New Competitive Entry on an Incumbent’s Customer Base: Structural Changes versus Dynamic Effects”

- Joint Statistical Meetings, Minneapolis, MN (2005)

“An Empirical Two-Stage Choice Model with Decision Rules Applied to Internet Clickstream Data”

- Marketing Science Conference, Atlanta, Georgia (2005)
- MSI Young Scholar Conference, Park City, Utah (2005)

“Using Advance Purchase Orders to Forecast New Product Sales”

- International Symposium on Forecasting, San Antonio, TX (2005)
- Joint Statistical Meetings, New York, New York (2002)

"Should We Wait to Promote?: The Effect of Timing on Response to Pop-Up Promotions"

- Joint Statistical Meetings, San Francisco, California (2003)
- Marketing Science Conference, University of Maryland (2003)

“A Bayesian Treed Model of Online Purchasing Behavior Using In-Store Navigational Clickstream”

- Marketing Science Conference, University of Alberta (2002)
- ART Forum, Vail, Colorado (2002)

“Internet Clickstream Research,”

- American Marketing Association Winter Educator’s Conference, Austin, TX (2002): *winner of Best Session Award.*

“Which Visits Lead to Purchases? A Closer Look at the Relationship Between Visiting and Purchasing Behavior at On-Line Stores”

- American Marketing Association Summer Educator’s Conference, Washington DC (2001)
- ART Forum, Amelia Island, Florida (2001)
- INFORMS Fall Conference, Philadelphia, Pennsylvania (1999)
- Marketing Science Conference, Syracuse, New York (1999)

“Capturing Evolving Visit Behavior in Clickstream Data,”

- Joint Statistical Meetings, Atlanta, Georgia (2001)
- Marketing Science Conference, Los Angeles, California (2000)

“Buying, Searching, or Browsing: Differentiating between Online Shoppers using In-Store Navigational Clickstream”

- Wharton Online Conversion Conference, Philadelphia, Pennsylvania (2001)

“Decomposing the Repeat-Purchase Process into Visiting and Conversion Behavior”

- INFORMS Conference, San Antonio, Texas (2000)

“What is the Value of Radio Airplay?: Investigating the Relationship Between Music Sales and Radio Airplay”

- Marketing Science Conference, Syracuse, New York (1999)

“A Joint Segmentation Model of Consumers and Products: Applied to the Sales of Music Albums”

- Marketing Science Conference, Fontainebleau France (1998)

“Applications of Behavioral Decision Research to Social Exchange Within Public Policy Domains”

- Association for Consumer Research Conference, Denver, Colorado (1997)

“Choice Effects and Regulatory Implications of Advertising Common but Previously Neglected Attributes: Are Consumers Harmed or Helped?”

- Marketing and Public Policy Conference, Washington DC (1996)

INVITED TALKS

“Teaching Marketing Analytics”

- Invited panelist at American Marketing Association Conference (August 2019)

“Wisdom from Words: Insight from Language and Textual Analysis”

- 11th Triennial Invitational Choice Symposium (May/June 2019)

“Competition in Advertising”

- Invited panelist at Department of Justice Workshop (May 2019)

“The Role of Advertising and Social Media Word-of-Mouth in the Customer Journey”

- Keynote speaker at European Advertising Academy ICORIA Conference (2018)

“The Connected Consumer”

- American Marketing Association Winter Conference, New Orleans, LA (2018)

“Measuring Brand Favorability Using Large Scale Social Media Data”

- Georgetown University, Washington DC (May 2018)
- INFORMS Business Analytics Conference, Baltimore, MD (April 2018)
- Fordham University, New York, NY (March 2018)
- Wharton’s Behavioral Insights from Text Conference, Philadelphia, PA (January 2018)
- Drexel, Philadelphia, PA (October 2017)
- Microsoft Corporation, webinar, (September 2017)
- Wharton Marketing Department Research Camp, Philadelphia, PA (February 2017)
- Virginia Tech, Blacksburg, VA (October 2016)

“Quantitative Analysis of Social Media”

- Crimson Hexagon Webinar (December 2016)
- MSI-Facebook Workshop on “Gaining Real Insights from Social Media,” Facebook Headquarters, Menlo Park, CA (July 2016)
- Walt Disney Studios Research Brown Bag, Web Seminar (September 2016)

“Integrating Social Media Metrics”

- INFORMS Conference, Philadelphia, PA (November 2015)
- Columbia University Marketing Department Research Camp (May 2015)
- Dartmouth University Marketing Department Research Camp (May 2015)
- University of Texas at Dallas (April 2015)

“Social Media Intelligence”

- Advertising Research Foundation (ARF) Webinar (December 4, 2014)
- Marketing Science Institute (MSI) Webinar (December 3, 2014)
- AMA Annual Conference, New Orleans, LA (2014)
- University of Connecticut Research Camp, Storrs, CT (2014)
- Teradata Marketing Summit, Los Angeles, CA (2014)
- Tulane University, New Orleans, LA (2104)
- Social Media.org Brands Only Summit, Orlando, FL (2013)
- Marketing Science Institute Conference, Boston, MA (2013)
- Decision Science Institute Conference, Baltimore, MD (2013)
- NYU Center for Measurable Marketing Conference, New York, NY (2013)
- IBM Analytics Workshop, College Park, MD (2013)
- HEC Paris Research Camp, Paris, France (2012)
- Georgetown University, Washington DC (2012)
- Vienna Tysons Regional Chamber of Commerce (VTCC) Conference and Trade Show. McLean, VA (2012)
- Social Media Outlook Event, Gannett Headquarters, McLean, VA (2012)

“Online Advertising Campaigns: Modeling the Effects of Multiple Ad Creatives”

- Wharton Customer Analytics Initiative, Philadelphia PA (2011)

“Measuring the Effectiveness of Online Information and Marketing Campaigns”

- Cyber Terrain Conference, Washington DC (2011)

“Online Product Opinions: Incidence, Evaluation and Evolution”

- Emory University, Atlanta, GA (2010)
- Cornell University, Ithaca, NY (2010)
- University of North Carolina, Chapel Hill, NC (2010)
- University of Miami, Miami, FL (2010)
- University of Houston, Houston, TX (2010)
- The Emergence and Impact of User-Generated Content Conference co-sponsored by Wharton Interactive Media Initiative (WIMI) and Marketing Science Institute (MSI), Philadelphia, PA (2009)

“Measuring the Value of Social Dynamics in Online Product Forums”

- Georgetown University, Washington DC (2009)
- University of Delaware, Newark, DE (2009)
- Temple University, Philadelphia, PA (2009)

“Advance Purchasing of Event Tickets”

- The Wharton School at the University of Pennsylvania, Philadelphia, PA (2008)

“Applications of Internet Clickstream Data: Past, Present and Future”

- Wharton/ISMS Conference on the Practice and Impact of Marketing Science, Philadelphia, PA (2007)
- Sloan Center Research Workshop, University of California at Riverside (2007)

“How to Survive the First Five Years”

- American Marketing Association Summer Educator’s Conference, Washington DC (2007)

“An Empirical Two-Stage Choice Model with Decision Rules Applied to Internet Clickstream Data”

- Georgetown University, Washington DC (2006)
- MIT, Boston, Massachusetts (2005)
- University of Maryland (2004)

“Pre-launch Forecasting Based on Advanced Purchasing”

- International Symposium on Forecasting, San Antonio, TX (2005) - *featured speaker*

“Should We Wait to Promote?: The Effect of Timing on Response to Pop-Up Promotions”

- University of Southern California’s Research Camp, January, Los Angeles, California (2003)

“Building Marketability During your Doctoral Program”

- American Marketing Association Winter Educator’s Conference, Austin, TX (2002)

“A Bayesian Treed Model of Online Purchasing Behavior Using In-Store Navigational Clickstream”

- University of Maryland, February, College Park, Maryland (2002)
- University of Houston, April, Houston, Texas (2002)

PROFESSIONAL ACTIVITIES

- Journal of Interactive Marketing Co-Editor (2018-present)
- Journal of Marketing Area Editor (2018)
- Marketing Science Institute
 - Academic Fellow (2020-present)
 - Academic Trustee (2015-2020)
- Journal of Marketing Editor-In-Chief Selection Committee (2017)
- Erin Anderson Award Selection Committee
 - Chair (2016, 2017)
 - Committee Member (2014, 2015)
- Editorial Review Board:
 - Marketing Science (2015 – present)
 - Journal of Marketing (2006 – present)
 - Journal of Marketing Research (2013 – 2020)
 - Journal of Interactive Marketing (2005 – 2018)
 - Journal of Marketing Analytics (2013 – 2018)
 - International Journal of Research in Marketing (2014-2018)
- Advisory Board for the Wharton Customer Analytics Initiative (2011-2013)
- Conference Co-Chair for the 2012 DMEF Marketing Research Summit (2012)
- Advanced Research Techniques Forum
 - Program Chair (2011)
 - Program Committee (2010)
- U.S. Census Bureau’s Academic Assessment Panel for the 2010 Census Communications Campaign (2009)
- Section on Statistics in Marketing, American Statistical Association
 - Executive Board (2009)
 - Chair (2008)
 - Chair-Elect (2007)
 - Program Chair (2005)
 - Program Chair-Elect (2004)

CONSULTING AND OTHER PROFESSIONAL ACTIVITIES

Journal of Interactive Marketing Co-Editor	2018-present
Marketing Science Institute (MSI) Academic Fellow, Academic Trustee	2015-present
The Langley School Board of Trustees, Vice-Chair/Treasurer (2017-18)	2014-2020
Journal of Marketing Area Editor	2018

General Motors 2017-2018
 Provided social media analytics training and consultation.

Kering 2016
 Provided expert services pertaining to Gucci America, Inc. et al v. Alibaba Group Holding Ltd et al. related to online search and advertising algorithms in the context of promoting and detecting counterfeits.

Competition Bureau of Canada 2015-2016
 Advised the Commissioner of Competition on matters related to online consumer behavior, web analytics, and online advertisements and promotions.

Amazon.com / Bingham McCutchen (now Morgan Lewis) 2014
 Provided analysis and advised on litigation related to the valuation of Amazon’s customer base for transfer pricing dispute with IRS.

United States Census Bureau 2011-2013
 Served as a consultant on issues related to the overall Census communications campaign.

Embarq/CenturyTel 2010-2011
 Provided expert witness services in litigation pertaining to issues related to online behavioral targeting practices.

Neiman Marcus 2011
 Provided training sessions to their Web Analytics team.

United States Census Bureau 2009
 Served on the Academic Assessment Panel for the 2010 Census Integrated Communications Plan to review the communications plan developed to improve the public response to the 2010 Census.

Congressional Hotel Corporation 2009
 Provided expert witness services for litigation pertaining to the impact of retail store location.

Southwest Airlines 2007
 Provided expert witness services for Southwest Airlines in litigation pertaining to the impact of third-party websites on the airline’s website.

Marketing Analytics / Sony Music 2007
 Developed forecasting models for new album releases. Analyzed the effectiveness of various elements of the marketing and promotional mix.

Universal Music 2006
 Provided consulting services pertaining to an expert witness report addressing copyright infringement damages.

NetConversions, Inc. (acquired by aQuantive/Microsoft) 2000-2004
Research Advisor for online marketing research firm. Assisted with the construction of their consumer behavior database and the development of key online consumer metrics. Helped design and implement systematic experiments on client websites to understand and improve conversion behavior at those sites.

Bad Boy Entertainment / Sean John Clothing 2001
Provided expert report regarding branding issues resulting from a trademark infringement case.

Intel Corporation 2001
Developed a forecasting model for a proposed new product introduction.

EXPERT TESTIMONIES PROVIDED

Kirch v. Embarq Management Co. 2011
United States District Court for the District of Kansas
Case No. 10-2047-JAR-GLR
Testified in deposition

Mervis Diamond Corporation v. Congressional Hotel Corporation 2009
Circuit Court for Montgomery County, Maryland
Case No. 259919
Testified in deposition and at trial

Southwest Airlines Co. v. Board First L.L.C. 2007
United States District Court for the Northern District of Texas, Dallas Division
Civil Action No. 3-06CV0891
Testified in deposition