

Exhibit 1

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

ESTADOS UNIDOS MEXICANOS,

Plaintiff,

vs.

SMITH & WESSON BRANDS, INC.; BARRETT
FIREARMS MANUFACTURING, INC.; BERETTA
U.S.A. CORP.; CENTURY INTERNATIONAL
ARMS, INC.; COLT'S MANUFACTURING
COMPANY LLC; GLOCK, INC.; STURM, RUGER
& CO., INC.; WITMER PUBLIC SAFETY GROUP,
INC. D/B/A INTERSTATE ARMS,

Defendants.

Case No.: 1:21-cv-11269

EXPERT REPORT

OF

LUCY P. ALLEN

January 31, 2022

I. SCOPE OF ASSIGNMENT

1. I have been asked by counsel for Plaintiff Estados Unidos Mexicanos (the “Mexican Government”) to estimate the number of firearms trafficked into Mexico over the last ten years with a sale linked to Massachusetts that were manufactured by each of the Defendants by extrapolating from limited available data. In particular, since more recent and/or relevant data sources were unavailable at this time, I was asked to extrapolate from the following data sources (the “Specified Data Sources”):

- 1) *Data by manufacturer on firearms recovered in Mexico* from the Fiscalía General de la República from 2010 to 2019 (“FGR Recovery Data”) and from the Secretaria de la Defensa Nacional from 2010 to 2021 (“SEDENA Recovery Data”). It is my understanding that the FGR Recovery Data and SEDENA Recovery Data were obtained by John Lindsay-Poland, the Coordinator of Stop US Arms to Mexico, a project of Global Exchange, through requests under Mexico’s Federal Transparency and Information Access Law (“Ley Federal de Transparencia y Acceso a la Informacion”).
- 2) *Data on traces of firearms recovered in Mexico* from the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) from 1992 to 2001 (“Early ATF Mexico Trace Data”).

2. The Defendants consist of seven firearm manufacturers (the “Manufacturer Defendants”) and one firearm wholesaler Witmer Public Safety Group, Inc., which acquired Massachusetts-based Interstate Arms Corp. in 2019 (“Interstate Arms”).¹ The Manufacturer Defendants are:

- 1) Barrett Firearms Manufacturing, Inc. (“Barrett”),
- 2) Beretta U.S.A. Corp. (“Beretta”),
- 3) Century International Arms, Inc. (“Century Arms”),

¹ Complaint, ¶1. See, “History,” *Witmer Public Safety Group Website*, available at <https://wpsginc.com/history/>, accessed on January 30, 2022, which states that “In January 2019, WPSG acquired Interstate Arms, a wholesale firearms, accessories, and ammo distributor located in Billerica, MA.”

- 4) Colt's Manufacturing Company LLC ("Colt"),
- 5) Glock, Inc. ("Glock"),
- 6) Smith & Wesson Brands, Inc. ("Smith & Wesson"), and
- 7) Sturm, Ruger & Co., Inc. ("Ruger").

3. Defendants Smith & Wesson and Interstate Arms are both based in Massachusetts.²

II. QUALIFICATIONS AND REMUNERATION

4. I am a Managing Director of NERA Economic Consulting ("NERA"), a member of NERA's Securities and Finance Practice and NERA's Product Liability and Mass Torts Practice. NERA provides practical economic advice related to highly complex business and legal issues arising from competition, regulation, public policy, strategy, finance, and litigation. NERA was established in 1961 and now employs approximately 500 people in more than 20 offices worldwide.

5. In my over 20 years at NERA, I have been engaged as an economic consultant or expert witness in numerous projects involving economic and statistical analysis. I have been qualified as an expert and testified in court on various economic and statistical issues relating to firearms, including the flow of firearms into the criminal market and analyses of data on firearm traces from the ATF. I have testified on these topics at trials in Federal District Court, including in *NAACP v. American Arms, Inc., et al.* and *Freddie Hamilton, et al. v. Accu-Tek, et al.*, and before the New York City Council Public Safety Committee.

6. I have an A.B. from Stanford University, an M.B.A. from Yale University, and M.A. and M. Phil. degrees in Economics, also from Yale University. Prior to joining NERA, I was an Economist for both President George H. W. Bush's and President Bill Clinton's Council

² See, Smith & Wesson 2020 Form 10-K, dated June 19, 2020, p. 1, which states that Smith & Wesson "[maintains its] principal executive offices at 2100 Roosevelt Avenue, Springfield, Massachusetts," and "About Us," *Interstate Arms Website*, available at <https://www.interstatearms.com/page.aspx/contentId/528/About-Us/>, accessed on January 25, 2022, which lists Interstate Arms' address as 6 G Dunham Road, Billerica, Massachusetts, 01821.

of Economic Advisers. My resume with recent publications and testifying experience is included as Appendix A.

7. NERA is being compensated for time spent by me and my team at standard billing rates and for out-of-pocket expenses at cost. NERA currently bills for my time at \$1,050 per hour. NERA's fees are not in any way contingent upon the outcome of this matter.

III. MATERIALS CONSIDERED

8. In preparing this report, I considered the following materials:

- a) Complaint, filed August 4, 2021 (“Complaint”);
- b) Bureau of Alcohol, Tobacco, Firearms and Explosives trace and recovery data for firearms recovered in Mexico from 1989 to 2001 (“Early ATF Mexico Trace Data”);
- c) Fiscalía General de la República data for firearms recovered in Mexico from 2010 to 2019 (“FGR Recovery Data”);
- d) Secretaria de la Defensa Nacional data for firearms recovered in Mexico from 2010 to 2021 (“SEDENA Recovery Data”);
- e) FBI data on firearm background checks by state conducted through the National Instant Criminal Background Check System (“NICS Data”);³
- f) Select academic literature and news stories on firearms trafficking from the U.S. to Mexico; and
- g) Select websites and SEC filings of Defendants and Massachusetts-based firearm distributors.

³ NICS Data was downloaded on January 17, 2022, available on https://www.fbi.gov/file-repository/nics_firearm_checks_-_month_year_by_state.pdf/view.

IV. ANALYSIS

9. We extrapolated from the Specified Data Sources to estimate the number of firearms trafficked into Mexico over the last ten years with a sale linked to Massachusetts that were produced by each of the Manufacturer Defendants by using the following inputs:

- 1) Estimate of the number of firearms trafficked annually from the U.S. into Mexico;
- 2) Estimate of the share of firearms recovered in Mexico that were produced by each of the Manufacturer Defendants; and
- 3) Estimate of the share of firearms recovered in Mexico that had a sale linked to Massachusetts.

Number of firearms trafficked from the U.S. into Mexico

10. A February 2021 U.S. General Accounting Office Report refers to 200,000 per year as “the best estimate available” of the number of firearms trafficked from the U.S. to Mexico.⁴ The Brookings Institution, as part of its Partnership for the Americas Commission, estimated a substantially higher number. In particular, the Brookings Institution estimated that 2,000 firearms a day, or 730,000 firearms a year, are trafficked from the U.S. to Mexico.⁵

11. I have not undertaken an independent study to determine which of these estimates (or any other one) is likely more accurate. Although I reserve the right to conduct such an analysis later in this litigation, for the purposes of this report, I show the results using both estimates.

Manufacturer Defendants’ share of firearms recovered in Mexico

12. To calculate the share of firearms recovered in Mexico that were produced by each of the Manufacturer Defendants, we used data by manufacturer on firearms recovered in

⁴ “Firearms Trafficking: U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis,” *United States Government Accountability Office*, February 22, 2021, p. 1.

⁵ “Rethinking U.S.-Latin American Relations,” *The Brookings Institution*, November 2008, p. 24.

Mexico from 2011 to 2020, combining the FGR Recovery Data and the SEDENA Recovery Data.⁶ As an alternative we calculated the share by Manufacturer Defendant using each data set individually and obtained similar results.

13. The table below shows the percent of firearms recovered in Mexico based on this data that were produced by each of the Manufacturer Defendants over the ten-year period from 2011 to 2020.

Percent of Firearms Recovered in Mexico By Manufacturer Defendants													
Manufacturer	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	3-Year Period 2018-2020	5-Year Period 2016-2020	10-Year Period 2011-2020
1. Barrett	0.1%	0.2%	0.2%	0.4%	0.5%	0.5%	0.7%	1.2%	1.8%	3.0%	1.8%	1.2%	0.4%
2. Beretta	3.3%	3.1%	4.8%	4.1%	5.0%	5.2%	6.7%	6.1%	5.2%	4.9%	5.5%	5.8%	4.2%
3. Century Arms	4.4%	4.6%	5.1%	3.2%	3.5%	2.2%	2.0%	3.9%	4.1%	8.5%	5.0%	3.5%	4.1%
4. Colt	12.2%	13.4%	15.1%	24.3%	13.7%	12.7%	15.3%	12.8%	10.6%	10.6%	11.6%	12.9%	14.3%
5. Glock	0.9%	1.1%	1.4%	2.0%	2.3%	2.5%	3.4%	4.2%	6.1%	8.0%	5.7%	4.3%	2.0%
6. Ruger	4.6%	4.4%	3.9%	2.8%	3.5%	3.5%	3.0%	3.8%	4.1%	5.3%	4.2%	3.7%	4.0%
7. Smith & Wesson	6.3%	6.0%	7.2%	6.9%	7.7%	8.5%	9.2%	9.5%	11.0%	10.9%	10.3%	9.6%	7.2%
Defendants	31.6%	32.8%	37.7%	43.7%	36.2%	35.0%	40.2%	41.5%	42.9%	51.2%	44.1%	40.9%	36.2%

Notes and Sources:
Data from SEDENA Recovery Data and FGR Recovery Data. Firearms without a listed manufacturer were excluded.

14. As can be seen in the table, the Manufacturer Defendants' share of the firearms recovered in Mexico generally increased over time. The Manufacturer Defendants accounted for 36.2% of firearms recovered over the last ten years, while for the more recent three-year and five-year periods their share went up to 44.1% and 40.9%, respectively.

Share of firearms recovered in Mexico that were traced back to Massachusetts

15. The Early ATF Mexico Trace Data contains information for firearms recovered in Mexico that were traced from 1992 to 2001. Note that more recent trace data was not available to me, and that the FGR Recovery Data and SEDENA Recovery Data do not include any tracing

⁶ Firearms without a listed manufacturer were excluded from the analysis. Firearms from Century Arms include those with Romarm, Cugir or WASR listed as the manufacturer.

information. The Early ATF Mexico Trace Data provides information for each firearm on its tracing history, including from the records of Federal Firearms Licensees (“FFL”).⁷

16. Using the Early ATF Mexico Trace Data, we identified firearms with a sale linked to Massachusetts. In particular, we identified firearms that were either traced to an FFL in Massachusetts, or to Interstate Arms or Camfour Inc. (“Camfour”), two large distributors based in Massachusetts.⁸ The analysis was limited to firearms traced to at least one FFL with a listed name and state.⁹

17. The analysis separated firearms manufactured by Smith & Wesson, which is headquartered in Massachusetts and manufactures most of its firearms in Massachusetts, from firearms by all other manufacturers.¹⁰ We found that for Smith & Wesson traced firearms, 24.5% of the firearms were linked to a sale in Massachusetts and for other traced firearms, 5.7% of firearms were linked to a sale in Massachusetts.¹¹

18. To analyze if there were changes to the share of firearms traced to Massachusetts since the Early ATF Trace Data, we reviewed data on background checks by state. In particular, we reviewed data from NICS on the number of background checks that were conducted in Massachusetts relative to the rest of the U.S. from 1999, the earliest year of data available from NICS, to 2021. As can be seen in the chart below, over the last 23 years, the number of background checks conducted in Massachusetts increased elevenfold, from 24,314 in 1999 to 259,248 in 2021, while the number of background checks conducted in the rest of the U.S. increased only fourfold, from 9,019,433 in 1999 to 38,313,879 in 2021. This review suggests that Massachusetts’ share of traced firearms has grown since the Early ATF Trace Data and that the

⁷ Note that the Early ATF Mexico Trace Data includes firearm recoveries that were not traced, because, for example, the firearm serial number and/or the name of the manufacturer was missing.

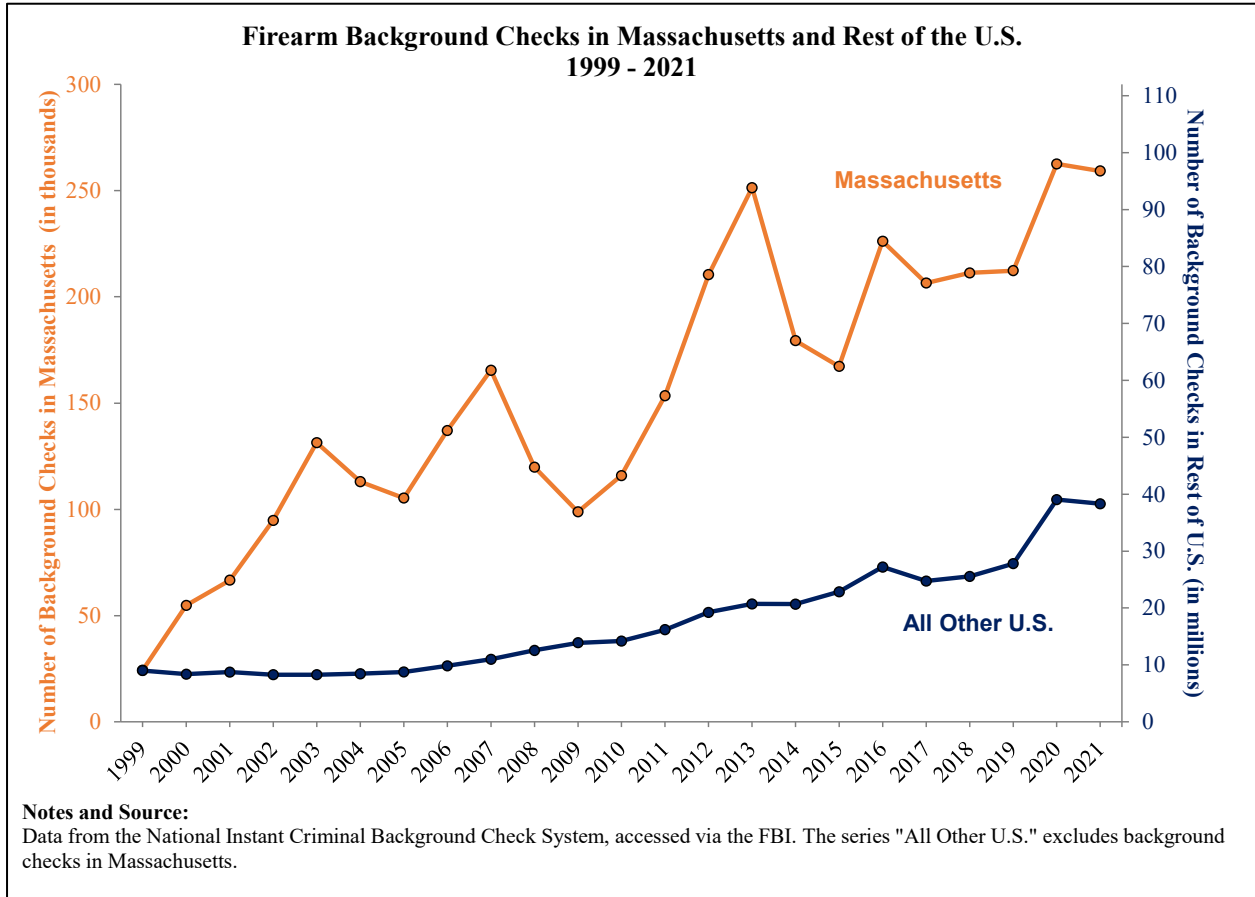
⁸ Includes firearms traced to Camfour’s subsidiary Hill Country Wholesale. According to Camfour’s website, Camfour has “its present location in Westfield, MA” and has “consistently [been] ranked as one of the top 10 distributors in the industry.” See, “About Us,” *Camfour Website*, available at <https://www.ezgun.net/about-us>, accessed on January 24, 2022.

⁹ 73% of firearms traced to an FFL were traced to an FFL where the name and state of the FFL was known.

¹⁰ See, Smith & Wesson 2020 Form 10-K, dated June 19, 2020, p. 27, which states that “[Smith & Wesson’s] Springfield, Massachusetts facility is critical to [their] success, as [they] currently produce most of [their] products at this facility.”

¹¹ Alternatively, if we remove firearms from non-Defendant manufacturers and focus on the six Manufacturer Defendants other than Smith & Wesson, the percent of firearms linked to a sale in Massachusetts is 7.8%, or 36% higher.

results in this report would underestimate the number of firearms trafficked into Mexico over the last ten years that were produced by each of the Manufacturer Defendants and sold in Massachusetts.



Results

19. We extrapolated from the Specified Data Sources to estimate the number of firearms by Manufacturer Defendant with a sale linked to Massachusetts that were trafficked into Mexico over the last ten years. In particular, we applied the two estimates of firearms that are trafficked annually from the U.S. into Mexico to the share of firearms recovered in Mexico by each of the Manufacturer Defendants in the past ten years and to the share of firearms that were recovered in Mexico with a sale linked to Massachusetts from the Early ATF Mexico Trace Data. The table below shows the results by Manufacturer Defendants from 2011 to 2020.

**Estimated Firearms By Defendant
Trafficked to Mexico and Linked to a Massachusetts Sale
Extrapolated from Specified Data Sources
2011 - 2020**

Manufacturer	% of Firearms Recovered 2011-2020 ¹	And Apply % Firearms Linked to MA ²	
		Apply to Annual 200K Trafficked Firearms Over Last 10 Years ³	Or Use Annual 730K Trafficked Firearms Over Last 10 Years ⁴
(1)	(2)	(3)	(4)
Barrett	0.4%	499	1,822
Beretta	4.2%	4,823	17,606
Century Arms	4.1%	4,680	17,083
Colt	14.3%	16,449	60,039
Glock	2.0%	2,263	8,259
Ruger	4.0%	4,559	16,639
Smith & Wesson	7.2%	35,437	129,346
All Defendants	36.2%	68,711	250,794

Notes and Sources:

¹ Data on number of firearms recovered in Mexico from SEDENA Recovery Data and FGR Recovery Data.

² Data on number of firearms traced to Massachusetts from Early ATF Mexico Trace Data. Firearms linked to Massachusetts include firearms traced to an FFL in Massachusetts or traced to Interstate Arms or Camfour.

³ Data on number of firearms trafficked from the United States to Mexico from "Firearms Tracking: U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis," *United States Government Accountability Office*, February 22, 2021, p. 1.

⁴ Data on number of firearms trafficked from the United States to Mexico from "Rethinking U.S.-Latin American Relations," *The Brookings Institution*, November, 2008, p. 24.

20. Note that applying the more recent three-year share of firearms recovered in Mexico by manufacturer, instead of the ten-year share, yields estimates that are approximately 30% higher, with for example, firearms manufactured by Barret increasing by more than 300%, firearms by Glock increasing by more than 180%, and firearms manufactured by Colt decreasing by approximately 20%.

21. My work on this engagement is ongoing. I reserve the right to amend and supplement my opinions based upon discovery, disclosures, and any new or additional information, documents or materials which might come to light or become available during the course of this case. As of the time of the filing of this report, more recent and/or relevant data sources were unavailable to me. It is my understanding that this report is a preliminary analysis for limited jurisdictional purposes. I expect to obtain more recent and/or relevant data, such as recent data on the tracing of firearms recovered in Mexico, and data by Defendant on the manufacturing, distribution and sale of firearms, including breakdowns by the types of firearms that are most associated with the drug cartels in Mexico.

A handwritten signature in black ink, appearing to read "Lucy P. Allen", written over a horizontal line.

Lucy P. Allen



Lucy P. Allen
Managing Director

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Appendix A

LUCY P. ALLEN MANAGING DIRECTOR

Education

YALE UNIVERSITY

M.Phil., Economics, 1990

M.A., Economics, 1989

M.B.A., 1986

STANFORD UNIVERSITY

A.B., Human Biology, 1981

Professional Experience

1994-Present

National Economic Research Associates, Inc.

Managing Director. Responsible for economic analysis in the areas of securities, finance and environmental and tort economics.

Senior Vice President (2003-2016).

Vice President (1999-2003).

Senior Consultant (1994-1999).

1992-1993

Council of Economic Advisers, Executive Office of the President

Staff Economist. Provided economic analysis on regulatory and health care issues to Council Members and interagency groups. Shared responsibility for regulation and health care chapters of the *Economic Report of the President, 1993*. Working Group member of the President's National Health Care Reform Task Force.

1986-1988

1983-1984

Ayers, Whitmore & Company (General Management Consultants)

Senior Associate. Formulated marketing, organization, and overall business strategies including:

Plan to improve profitability of chemical process equipment manufacturer.

Merger analysis and integration plan of two equipment manufacturers.

Evaluation of Korean competition to a U.S. manufacturer.

Diagnostic survey for auto parts manufacturer on growth obstacles.

Marketing plan to increase international market share for major accounting firm.

Summer 1985

WNET/Channel Thirteen, Strategic Planning Department Associate. Assisted in development of company's first long-term strategic plan. Analyzed relationship between programming and viewer support.

1981-1983

Arthur Andersen & Company Consultant. Designed, programmed and installed management information systems. Participated in redesign/conversion of New York State's accounting system. Developed municipal bond fund management system, successfully marketed to brokers. Participated in President's Private Sector Survey on Cost Control (Grace Commission). Designed customized tracking and accounting system for shipping company.

Teaching

1989- 1992

Teaching Fellow, Yale University
Honors Econometrics
Intermediate Microeconomics
Competitive Strategies
Probability and Game Theory
Marketing Strategy
Economic Analysis

Publications

"Snapshot of Recent Trends in Asbestos Litigation: 2021 Update," (co-author), NERA Report, 2021.

"The Short-Term Effect of Goodwill Impairment Announcements on Companies' Stock Prices" (co-author), *International Journal of Business, Accounting and Finance*, Volume 14, Number 2, Fall 2020.

"Snapshot of Recent Trends in Asbestos Litigation: 2020 Update," (co-author), NERA Report, 2020.

"Snapshot of Recent Trends in Asbestos Litigation: 2019 Update," (co-author), NERA Report, 2019.

"Snapshot of Recent Trends in Asbestos Litigation: 2018 Update," (co-author), NERA Report, 2018.

"Trends and the Economic Effect of Asbestos Bans and Decline in Asbestos Consumption and Production Worldwide," (co-author), *International Journal of Environmental Research and Public Health*, 15(3), 531, 2018.

“Snapshot of Recent Trends in Asbestos Litigation: 2017 Update,” (co-author), NERA Report, 2017.

“Asbestos: Economic Assessment of Bans and Declining Production and Consumption,” World Health Organization, 2017.

“Snapshot of Recent Trends in Asbestos Litigation: 2016 Update,” (co-author), NERA Report, 2016.

“Snapshot of Recent Trends in Asbestos Litigation: 2015 Update,” (co-author), NERA Report, 2015.

“Snapshot of Recent Trends in Asbestos Litigation: 2014 Update,” (co-author), NERA Report, 2014.

“Snapshot of Recent Trends in Asbestos Litigation: 2013 Update,” (co-author), NERA Report, 2013.

“Asbestos Payments per Resolved Claim Increased 75% in the Past Year – Is This Increase as Dramatic as it Sounds? Snapshot of Recent Trends in Asbestos Litigation: 2012 Update,” (co-author), NERA Report, 2012.

“Snapshot of Recent Trends in Asbestos Litigation: 2011 Update,” (co-author), NERA White Paper, 2011.

“Snapshot of Recent Trends in Asbestos Litigation: 2010 Update,” (co-author), NERA White Paper, 2010.

“Settlement Trends and Tactics” presented at Securities Litigation During the Financial Crisis: Current Development & Strategies, hosted by the New York City Bar, New York, New York, 2009.

“Snapshot of Recent Trends in Asbestos Litigation,” (co-author), NERA White Paper, 2009.

“China Product Recalls: What’s at Stake and What’s Next,” (co-author), NERA Working Paper, 2008.

“Forecasting Product Liability by Understanding the Driving Forces,” (co-author), The International Comparative Legal Guide to Product Liability, 2006.

“Securities Litigation Reform: Problems and Progress,” Viewpoint, November 1999, Issue No. 2 (co-authored).

“Trends in Securities Litigation and the Impact of the PSLRA,” Class Actions & Derivative Suits, American Bar Association Litigation Section, Vol. 9, No. 3, Summer 1999 (co-authored).

“Random Taxes, Random Claims,” Regulation, Winter 1997, pp. 6-7 (co-authored).

Depositions & Testimony (4 years)

Deposition Testimony before the Superior Court of New Jersey, Middlesex County, in *Dana Transport, Inc. et al., vs. PNC Bank et al.*, 2021.

Deposition Testimony before the United States District Court, Western District of North Carolina, in *Cheyenne Jones and Sara J. Gast v. Coca-Cola Consolidated Inc., et al.*, 2021.

Deposition Testimony before the Superior Court of New Jersey, Hudson County, in *Oklahoma Firefighters Pension and Retirement System vs. Newell Brands Inc., et al.*, 2021.

Testimony and Deposition Testimony before the Court of Chancery of the State of Delaware in *Bardy Diagnostics Inc. v. Hill-Rom, Inc. et al.*, 2021.

Deposition Testimony before the Court of Chancery of the State of Delaware in *Arkansas Teacher Retirement System v. Alon USA Energy, Inc., et al.*, 2021.

Deposition Testimony before the United States Bankruptcy Court, Southern District of Texas, Houston Division, in *Natixis Funding Corporation v. Genon Mid-Atlantic, LLC*, 2021.

Deposition Testimony before the United States District Court, Southern District of California, in *James Miller et al. v. Xavier Becerra et al.*, 2021.

Deposition Testimony before the United States District Court, Western District of Oklahoma, in *Kathleen J. Myers v. Administrative Committee, Seventy Seven Energy, Inc. Retirement & Savings Plan, et al.*, 2020.

Testimony before the United States District Court, Southern District of California, in *James Miller et al. v. Xavier Becerra et al.*, 2020.

Deposition Testimony before the United States District Court, Middle District of Tennessee, in *Nikki Bollinger Grae v. Corrections Corporation of America, et al.*, 2020.

Deposition Testimony before the Supreme Court of the State of New York, County of New York, in *MUFG Union Bank, N.A. (f/k/a Union Bank, N.A.) v. Axos Bank (f/k/a Bank of Internet USA), et al.*, 2020.

Deposition Testimony before the United States District Court, Western District of Washington at Seattle, in *In re Zillow Group, Inc. Securities Litigation*, 2020.

Lucy P. Allen

Deposition Testimony before the United States District Court, Middle District of Tennessee, in *Zwick Partners LP and Aparna Rao v. Quorum Health Corporation*, 2019.

Testimony before the United States District Court, Southern District of Iowa, in *Mahaska Bottling Company, Inc., et al. v. PepsiCo, Inc. and Bottling Group, LLC*, 2019.

Testimony before the United States District Court, Southern District of New York, in *Chicago Bridge & Iron Company N.V. Securities Litigation*, 2019.

Deposition Testimony before the United States District Court, Middle District of Florida, in *Jacob J. Beckel v. Fagron Holdings USA, LLC et al.*, 2019.

Deposition Testimony before the United States District Court, Central District of California, Southern Division, in *Steven Rupp et al. v. Xavier Becerra et al.*, 2018.

Deposition Testimony before the Clark County District Court of Nevada in *Round Square Company Limited v. Las Vegas Sands, Inc.*, 2018.

Deposition Testimony before the United States District Court, Middle District of Tennessee, in *Nikki Bollinger Grae v. Corrections Corporation of America et al.*, 2018.

Deposition Testimony before the District Court for the State of Nevada in *Dan Schmidt v. Liberator Medical Holdings, Inc., et al.*, 2018.

Deposition Testimony before the United States District Court, Northern District of Illinois, Eastern Division, in *In re the Allstate Corporation Securities Litigation*, 2018.

Testimony before the American Arbitration Association in *Arctic Glacier U.S.A., Inc. and Arctic Glacier U.S.A., Inc. Savings and Retirement Plan v. Principal Life Insurance Company*, 2018.

Deposition Testimony before the United States District Court, Southern District of New York, in *Marvin Pearlstein v. Blackberry Limited et al.*, 2018.

Deposition Testimony before the United States District Court, Eastern District of Texas, in *Alan Hall and James DePalma v. Rent-A-Center, Inc., Robert D. Davis, and Guy J. Constant*, 2018.

Deposition Testimony before the United States District Court, Southern District of Iowa, in *Mahaska Bottling Company, Inc., et al. v. PepsiCo, Inc. and Bottling Group, LLC*, 2018.

Testimony and Deposition Testimony before the United States District Court, District of New Jersey, in *Association of New Jersey Rifle & Pistol Clubs, Inc. et al. v. Gurbir Grewal et al.*, 2018.

Deposition Testimony before the Supreme Court of the State of New York in *Bernstein Liebhard, LLP v. Sentinel Insurance Company, Ltd.*, 2018.

Deposition Testimony before the United States District Court, Southern District of New York, in *Andrew Meyer v. Concordia International Corp., et al.*, 2018.

Deposition Testimony before the United States District Court, Southern District of California, in *Virginia Duncan, et al. v. Xavier Becerra, et al.*, 2018.