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# Ex. 10

1 PERRY R. CLARK, State Bar No. 197101  
LAW OFFICES OF PERRY R. CLARK  
2 825 San Antonio Road  
Palo Alto, CA 94303  
3 Telephone: (650) 248-5817  
Facsimile: (650) 248-5816  
4 perry@perryclarklaw.com

5 Attorney for Plaintiff  
PETROLIAM NASIONAL BERHAD (PETRONAS)

6  
7  
8 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
9 OAKLAND DIVISION

10 PETROLIAM NASIONAL BERHAD  
11 (PETRONAS),

12 Plaintiff,

13 vs.

14 GODADDY.COM, INC.,

15 Defendant.

) CASE NO: 09-CV-5939 PJH

) Notice Hearing Date: December 7, 2011

) Noticed Hearing Time: 9:00 a.m.

16  
17 **DECLARATION OF EXPERT WITNESS**  
18 **KEVIN FITZSIMMONS**  
19 **IN SUPPORT OF PLAINTIFF'S**  
20 **MOTION FOR**  
21 **PARTIAL SUMMARY JUDGMENT ON GODADDY'S LIABILITY FOR**  
22 **CONTRIBUTORY CYBERSQUATTING**  
23 **(COUNT II OF FIRST AMENDED COMPLAINT)**  
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DECL. OF KEVIN FITZSIMMONS ISO P'S MTN. FOR  
PARTIAL SUMMARY JUDGMENT  
Case No: 09-CV-5939 PJH

OPPAPP000179

1 I, Kevin Fitzsimmons, declare as follows:

2 1. I have been retained as an expert by the Plaintiff in this case, Petrolaim Nasional  
3 Berhad (PETRONAS).

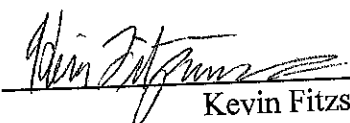
4 2. I make this declaration on personal knowledge and, if called as a witness, I could  
5 and would testify competently as to its contents.

6 3. Attached hereto as Exhibit A is a true and correct copy of my expert report in this  
7 case which I prepared and which I signed on October 3, 2011. My expert report contains a true  
8 and correct statement of my opinions rendered in this matter and the bases for those opinions as  
9 well as an identification of information I considered in forming them (including by citation to  
10 such material throughout the report).

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed on November 1, 2011

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\_\_\_\_\_  
Kevin Fitzsimmons

Ex. A

1 PERRY R. CLARK, State Bar No. 197101  
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5 Attorney for Plaintiff  
PETROLIAM NASIONAL BERHAD (PETRONAS)

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10

11 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 PETROLIAM NASIONAL BERHAD ) CASE NO: 09-CV-5939 PJH  
(PETRONAS), )  
14 )  
Plaintiff, ) **DISCLOSURE OF EXPERT**  
15 ) **WITNESS KEVIN FITZSIMMONS**  
vs. )  
16 )  
GODADDY.COM, INC., )  
17 )  
Defendant. )

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**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that pursuant to Fed. R. Civ. P. 26(a)(2)(A), Plaintiff  
Petroliam Nasional Berhad (Petronas) discloses Kevin Fitzsimmons. This disclosure is  
accompanied by the report attached hereto as Exhibit 1, which contains material designated as  
“confidential” under the protective order in this case.

1 Dated: October 3, 2011

LAW OFFICES OF PERRY R. CLARK

2

3

By:  /s/ Perry R. Clark  
Perry R. Clark

4

5

Attorney for Plaintiff  
PETROLIAM NASIONAL BERHAD  
(PETRONAS)

6

7

**CERTIFICATE OF SERVICE**

8

On October 3, 2011, I served this **DISCLOSURE OF EXPERT WITNESS KEVIN**

9

**FITZSIMMONS** by First Class Mail and electronic mail on:

10

John L. Slafsky, Esq.

11

David Lansky, Esq.

12

WILSON, SONSINI, GOODRICH & ROSATI, P.C.

13

650 Page Mill Road

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Palo Alto, CA 94304-1050

15

650 493 9300

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[jslafsky@wsgr.com](mailto:jslafsky@wsgr.com)

17

dlansky@wsgr.com

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Dated: October 3, 2011

By:  /s/ Perry Clark  
Perry Clark

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# Ex. 1

Expert Report  
of  
Kevin Fitzsimmons

OPPAPP000185



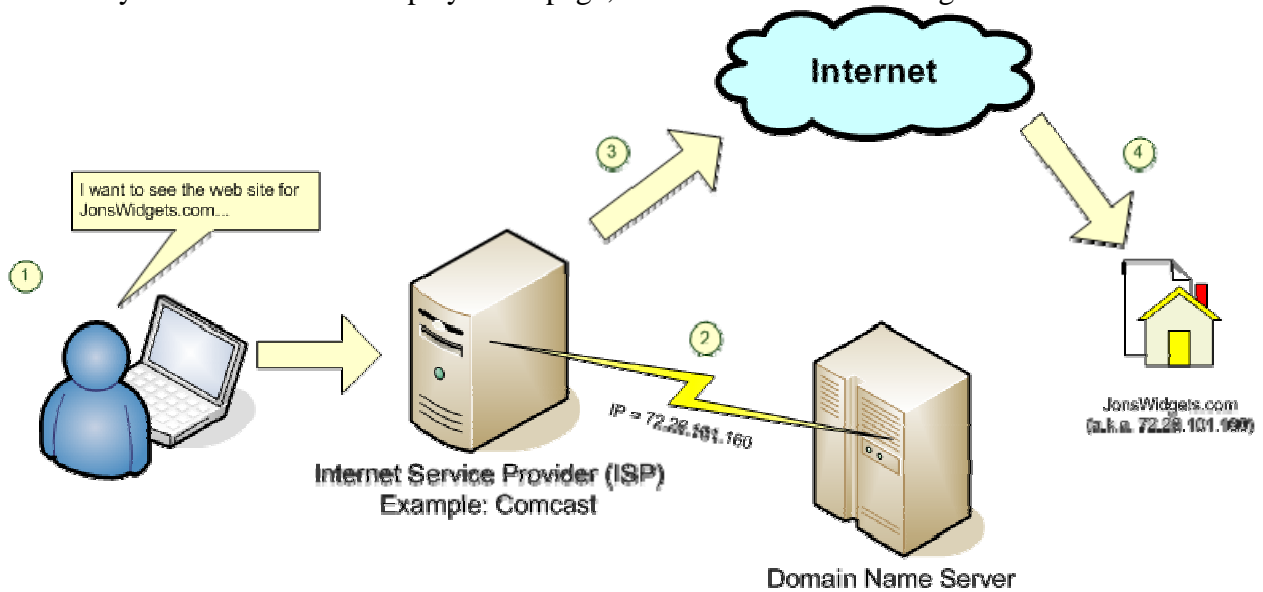
## I. Introduction

I have been retained as an expert in the field of the DNS (Domain Name System). I am being compensated at my normal consulting rate of \$200 per hour. A copy of my resume listing my education and work experience is attached as Exhibit A.

Based on my experience, background, and education as well as the information I have considered in connection with my work on this case, I have formed opinions regarding GoDaddy and the domain names “petronastower.net” and “petronastowers.net,” including with respect to (1) the registration of domain names, (2) the resolving of domain names to access websites, and (3) the forwarding of domain names. The basis and reason for my opinions and the materials I have considered in forming them include the documents cited to and attached as exhibits hereto.

## II. Domain Name Registration

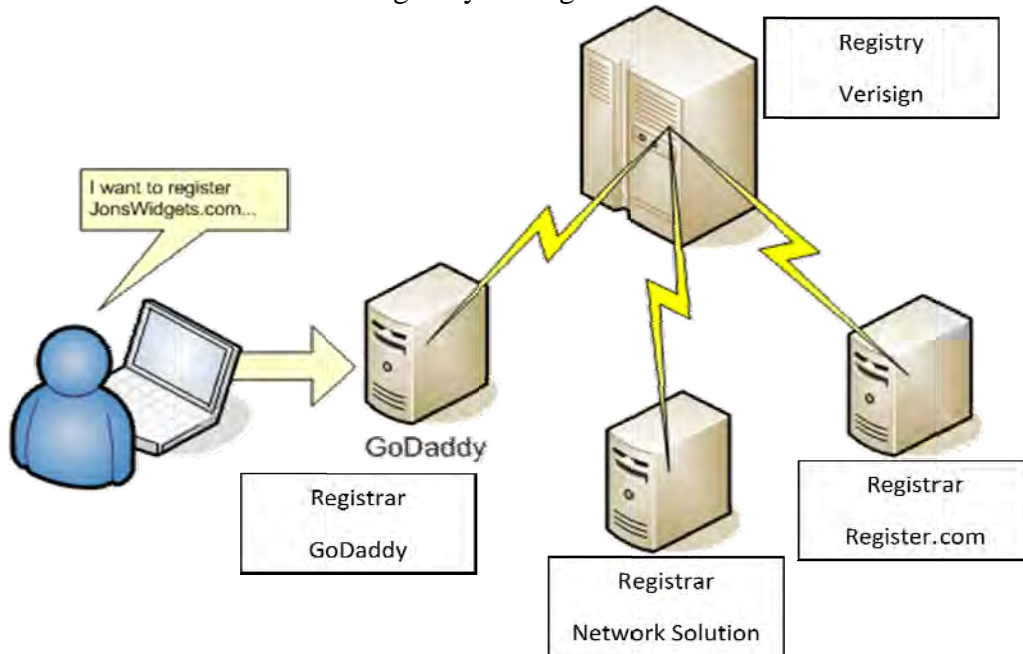
A domain name is a string of letters or numbers separated by one or more “.” or “dots,” such as “www.cand.uscourts.gov,” that can be used to access computer files stored on a network, such as the internet. Commonly, domain names are used by computer users to locate files that display websites. When a computer user types a domain name into a web browser program (such as Internet Explorer), the web browser uses the domain name to obtain the numerical IP (Internet Protocol) address of a computer connected to the internet that can provide (or serve) the computer files associated with that domain name. One of the most familiar uses of a domain name is to obtain the IP address of the computer (often called a web server) storing the files needed by a web browser to display a webpage, as illustrated below in Figure 1.



e

In the example above, the “Domain Name Server” that is responsible for the file containing the IP address (72.28.101.160 in Figure 1) where the files associated with a domain name can be located is called the Authoritative Name Server.

By registering a domain name, a person (called the registrant) is able to designate the Authoritative Domain Name Server that is associated with that domain name. To register a domain name, the potential registrant submits a request to a domain name registrar, such as GoDaddy. Generally, the registrant does so by completing an online form by identifying the domain name to be registered, the prospective registrant's name and contact information, and payment information for the fees charged by the registrar.



After the registrant makes the request to register the domain name and provides the necessary information, the registrar checks its database of registered domain names to determine if the domain name the registrant wants to register is available. If the requested domain name has not already been registered (and is not prohibited from registration for some other reason), the registrar then submits a record to the appropriate domain name registry. The content of this record may vary but it must include the registered domain name and the identity of two Authoritative Domain Name Servers designated for the domain name.<sup>1</sup> There are a number of different domain name registries for the various "top-level domains," such as ".com," ".net," etc. The registry for ".net" domain names is Verisign, Inc.. In addition to submitting the record for the requested domain name, the domain name registrar collects the registration fee from the registrant.

The registry and registrar maintain a publicly accessible database, called the "whois" database, that contains information from the domain name registration records of all registered domain names. The Verisign whois entry for "petronastower.net" is below (Ex. G at GD-000674):

<sup>1</sup> Two Authoritative Domain Name Servers are required for, among other things, redundancy.

## WHOIS Underlying Registry Data:

Whois Server Version 2.0

Domain names in the .com and .net domains can now be registered with many different competing registrars. Go to <http://www.internic.net> for detailed information.

Domain Name: PETRONASTOWER.NET  
Registrar: GODADDY.COM, INC.  
Whois Server: whois.godaddy.com  
Referral URL: <http://registrar.godaddy.com>  
Name Server: NS39.DOMAINCONTROL.COM  
Name Server: NS40.DOMAINCONTROL.COM  
Status: clientDeleteProhibited  
Status: clientRenewProhibited  
Status: clientTransferProhibited  
Status: clientUpdateProhibited  
Updated Date: 02-may-2009  
Creation Date: 08-may-2003  
Expiration Date: 08-may-2010

>>> Last update of whois database: Fri, 18 Dec 2009 18:13:04 UTC <<<

Often, the Authoritative Domain Name Servers designated for a domain name when it is first registered are owned and operated by the domain name registrar but this is not required. This is the case for “petrontower.net” and, as shown in the above example, the designated Authoritative Domain Name Servers “NS39.DOMAINCONTROL.COM” and “NS40.DOMAINCONTROL.COM” are owned and operated by GoDaddy. The registrant can, however, direct the registrar to designate whatever Authoritative Domain Name Servers the registrant chooses. While many domain name registrars provide Authoritative Domain Name Servers for their registrant customers, registrants can operate their own Authoritative Domain Name Servers or use Authoritative Domain Name Servers operated by other domain name registrars or other web services companies.

With respect to the domain names “petronastower.net” and “petronastowers.net,” my opinion is that the conduct of the registrar in initially registering that domain name involved only (1) collecting information from the registrant for submission to the registry, (2) determining whether or not those domain names were available for registration, (3) collecting payment from the registrant, and (4) communicating with the registrant regarding the status of the registration process.

In addition to the initial registration of domain names, domain name registrars perform functions associated with the maintenance of domain name registrations, such as updating the registrant’s contact information, transferring domain names between registrars and registrants, and collecting renewal fees. I understand that GoDaddy was not the registrar which performed the original registration of the domain names “petronastower.net” and “petronastowers.net.” (Ex.C (Lewis Decl. at 2:23-24)); (Ex.D, GD-000393). In my opinion, the conduct of GoDaddy

that could be characterized as either the registration or maintenance of the domain names “petronastower.net” and “petronastowers.net” consists entirely of the following<sup>2</sup>:

- On or before March 30, 2007, GoDaddy received a request from the registrant of the domain names “petronastower.net” and “petronastowers.net” for GoDaddy to become the registrar of record for those domain names. (Ex. D at GD-000377).
- On March 30, 2007, GoDaddy charged the registrant’s credit card for “.NET Bulk Domain Name Transfer (6-20)” for the domain names “petronastower.net” and “petronastowers.net.” (Ex. D at GD-000475).
- By April 1, 2007, GoDaddy completed the transfer of the domain names “petronastower.net” and “petronastowers.net” from the previous registrar to GoDaddy and on April 1, 2007 GoDaddy sent an email to the registrant notifying it of the completion of the transfer. (Ex. D at GD-000367, 369, 110, 152).
- On April 26, 2008 and May 3, 2008, GoDaddy set the domain names “petronastower.net” and “petronastowers.net” to “auto renew.” (Ex. D at GD-000353, 350, 348, 346, 345, 344).
- On May 3, 2008, GoDaddy charged the registrant’s credit card for “.NET Bulk Domain Name Renewal (6-20)” for the domain names “petronastower.net” and “petronastowers.net.” (Ex. D at GD-000467).
- On May 2, 2009, GoDaddy again set the domain names “petronastower.net” and “petronastowers.net” to “auto renew.” (Ex. D at GD-000313).
- On May 2, 2009, GoDaddy charged the registrant’s credit card for “.NET Bulk Domain Name Renewal (6-20)” for the domain names “petronastower.net” and “petronastowers.net.” (Ex. D at GD-000447).
- On July 2, 2009, GoDaddy sent a contact information update request to the registrant of GoDaddy set the domain names “petronastower.net” and “petronastowers.net” and updated the contact information. (Ex. D at GD-000310, 110, 152).
- On December 18, 2009, GoDaddy received and logged a complaint regarding the domain name “petronastower.net.” (Ex. D at GD-000302).
- On December 21, 2009, GoDaddy sent a contact information update request to the registrant of GoDaddy set the domain name “petronastower.net” and updated the contact information. (Ex. D at GD-000302).
- On January 24, 2010, GoDaddy sent a contact information update request to the registrant of GoDaddy set the domain name “petronastowers.net” and updated the contact information. (Ex. D at GD-000301, 110).
- On March 23, 2010, the domain name “petronastowers.net” was renewed. (Ex. D at GD-000299).
- On May 9, 2010, the domain name “petronastower.net” was renewed. (Ex. D at GD-000298).

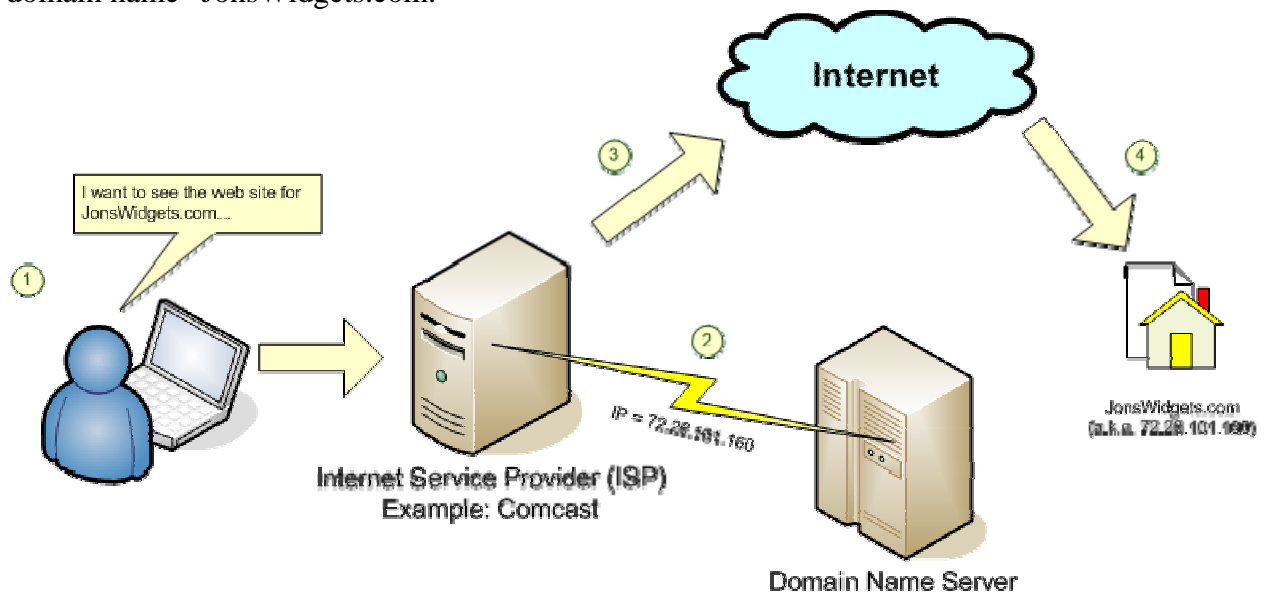
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<sup>2</sup> The process and implementation of domain name registration in general and by GoDaddy in particular are described and referenced in agreements and documents overseen by ICANN, including those by and between Godaddy, the registries, and ICANN. (Ex. F). Documents published by the Internet Engineering Task Force also set forth the substantive characteristics of the implementation and function of domain name registration, including RFCs 5730, 3375, 3632, 2832, 1034, 1035, and 2616. (Ex. H).

- On May 18, 2010, GoDaddy transferred the domain name “petronastower.net” pursuant to a court order from the previous registrant to Petronas. (Ex. D at GD-000298).
- On June 14, 2010, GoDaddy received and logged a complaint regarding the domain name “petronastowers.net.” (Ex. D at GD-000296).
- On August 30, 2010, GoDaddy transferred the domain name “petronastowers.net” pursuant to a court order from the previous registrant to Petronas. (Ex. D at GD-000293).

### III. Resolving Domain Names

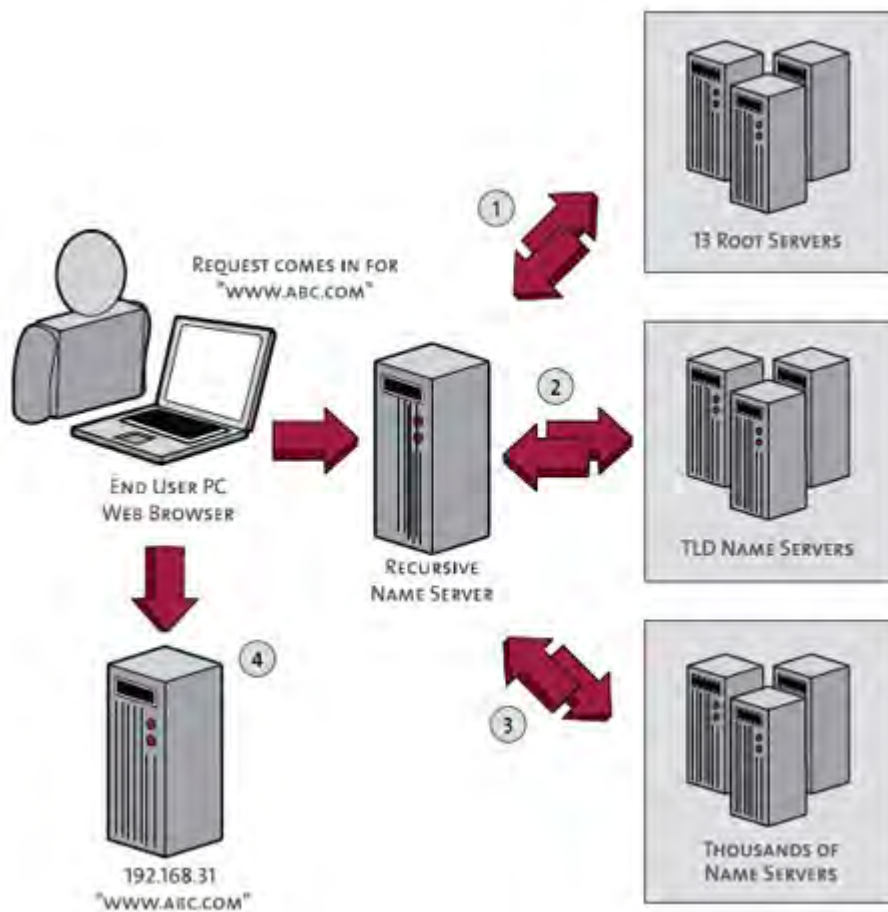
The Authoritative Domain Name Server is the critical component in the internet system that is responsible for routing an internet user to the IP address of the computer storing the files associated with that domain name. This function of an Authoritative Domain Name Server is illustrated below, which shows an internet user searching for the website associated with the domain name “JonsWidgets.com.”



The process by which a web browser locates the Authoritative Domain Name Server for a particular domain name and obtains the correct IP address is called “domain name resolution.” In the situation illustrated above, the domain name resolution process occurs “behind the scenes” (and often in less than one second) and begins at the moment the computer user types “JonsWidgets.com” into his or her web browser. Initially, the web browser submits a request to the Internet Service Provider’s (ISP’s) DNS server (Comcast in the figure above). The ISP’s DNS server then searches its files, or “cache,” for the domain name record for the domain name “JonsWidgets.com.” If the ISP’s DNS server has the domain name record for “JonsWidgets.com” in its own files, it will return the appropriate IP address for the “JonsWidgets.com” domain name. If, as in the example above, the ISP’s DNS server does not have the record for “JonsWidgets.com,” it can pull the domain name record with IP address from the Authoritative Domain Name Server. Using this IP address the web browser can then send a request over the internet to the computer at that IP address to route the appropriate files back to

the web browser for display as a webpage on the internet user’s computer. The computer at the IP address associated with a domain name is sometimes called a web server and the files it stores can be used to display web pages or perform other functions.

Domain name records are distributed across the internet through a hierarchal arrangement of special “name servers” (illustrated below). At the top of this hierarchy are thirteen “root servers” which are specially maintained at select locations around the world. These root servers contain records identifying the “top-level” domain name servers, or “TLD name servers,” for each top-level domain, such as “.com” or “.net.” These TLD name servers are maintained by the domain name registry for each top-level domain and contain records pointing to the Authoritative Domain Servers which make up the lowest level of the hierarchy. The Authoritative Domain Name Servers store the domain name records linking domain names to IP addresses.



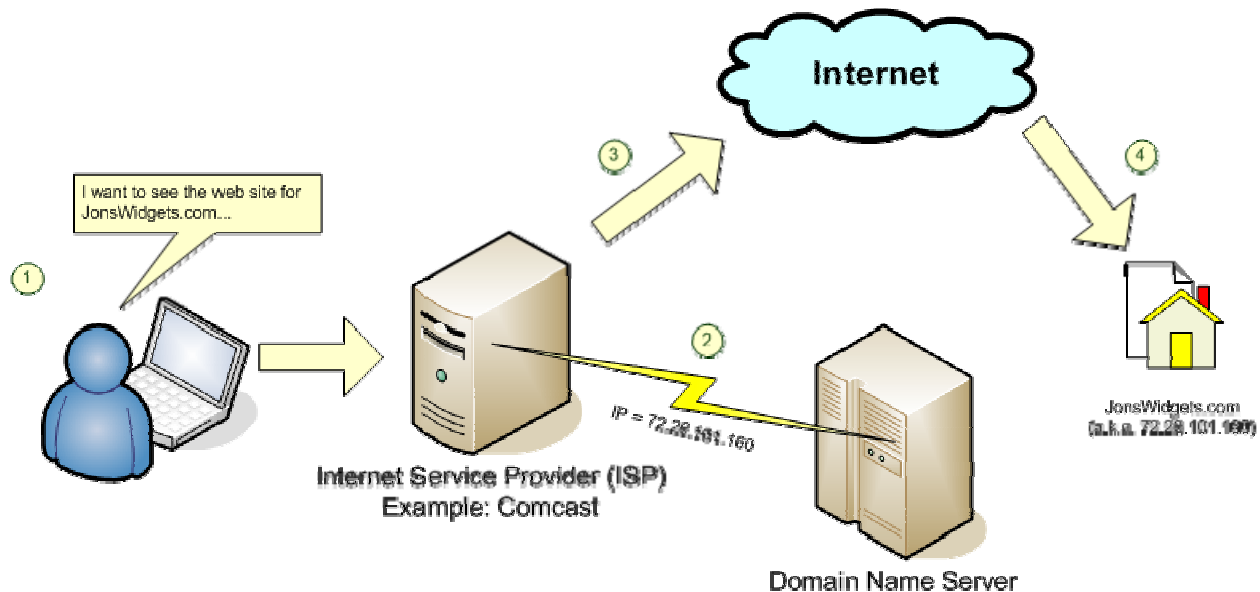
A DNS server that is unable to locate a domain name record—such as for a newly registered domain name—in its own files (or those of nearby servers) will ultimately make its way across the internet to a device that can act as a “recursive name server.” A recursive name server is virtually certain to be able to locate a domain name record by first querying the “root servers,” then the TLD name servers, and ultimately the network of Authoritative Domain Name Servers. It is by virtue of this “hierarchy” and the use of recursive name servers that a domain name registry is able to propagate a new domain name record across the internet.

In my opinion, the domain name registrars do not play a direct or active role in the process of domain name resolution. Their only function is to submit requests to the domain name registries that specific domain names be linked to specific Authoritative Domain Name Servers. It is the responsibility of the domain name registry to update the TLD name servers with the identity of Authoritative Domain Name Server which in turn enable the process of domain name resolution.<sup>3</sup>

#### IV. Domain Name Forwarding

Domain name forwarding, which is also known as URL redirection, is a function that “forwards” a request for one domain name to the IP address associated a second domain name.

Returning to the example from Figure 1 (reproduced below), when an internet user inputs the domain name “JonsWidgets.com” into a web browser, a request for the files associated with “JonsWidgets.com” is sent to the IP address listed in the record from the Authoritative Domain Name Server for “JonsWidgets.com.” If the server at that IP address is programmed to respond to such requests with files that are used to display a web page, the internet user’s web browser will display a web page. Commonly, such a server is called a web server or application server. A web hosting provider is a company that rents space on its servers that its customers can use to store files, such as files for displaying web pages.



Domain name forwarding occurs when the files stored at the server located at the IP address for a particular domain name direct requests for the content associated with that domain name to another domain name. Thus, in the example above, a web browser searching for “JonsWidgets.com” would be “forwarded” or “redirected” to the IP address for the domain name “OtherJonsWidgets.com.” The domain name resolution process would then be implemented for

<sup>3</sup> These aspects of the process and implementation of domain name resolution are described and referenced in agreements and documents overseen by ICANN (Ex. F) and RFCs 5730, 3375, 3632, 2832, 1034, 1035, and 2616 by the IETF (Ex. H).

“OtherJonsWidgets.com” and, using the IP address for “OtherJonsWidgets.com,” a request would be sent for the files associated with “OtherJonsWidgets.com.” In response, the files for “OtherJonsWidgets.com” would be returned to the internet user and displayed by his or her web browser. In this way, an internet user searching for “JonWidgets.com” would be “forwarded” to the webpage for the “OtherJonsWidgets.com.”

The process for domain name forwarding is completely separate from the process of domain name registration and does not involve any action by a domain name registrar. Instead, the process of domain name registration must be totally complete before the domain name forwarding process can occur.

## **V. Additional Specific Opinions**

Based on the foregoing and all of the materials I have considered as well as my background, knowledge, and experience, I have formed the following additional opinions.

I have reviewed the document entitled “Order Denying Motion to Dismiss” (Doc. No. 87) (Ex. B) which states:

Among other things, the court requires a record clarifying the mechanics of what GoDaddy did or does with regard to the disputed domain names, and what “forwarding” and “routing” are and whether either or both can be considered part of domain name registration services generally or the services offered by GoDaddy.

In my opinion, domain name forwarding and routing cannot be considered part of domain name registration services generally or the domain name registration services offered by GoDaddy. The process of domain name registration, in all relevant respects, involves nothing more than the creation of a record linking a domain name to an Authoritative Domain Name Server. A domain name registrar can perform all of the functions of domain name registration and maintenance without owning or operating an Authoritative Domain Name Server for the domain name for which it is the registrar.

The domain name forwarding service provided by GoDaddy for “petronastower.net” and “petronastowers.net” was done using an Authoritative Domain Name Server owned and operated by GoDaddy and that GoDaddy caused to be programmed to link those domain names to the IP address of another server controlled and operated by GoDaddy. The domain name forwarding service further involved programming that other server to respond to requests seeking “petronastower.net” and “petronastowers.net” by redirecting those requests to a domain name associated with a pornographic website.



Although GoDaddy was the registrar of the domain names “petronastower.net” and “petronastowers.net” while it provided its domain name forwarding services, its domain name forwarding service cannot be considered part of its function as a registrar providing domain name registration (or maintenance). The bases for my opinion in this regard include the documents in Exhibit I produced by GoDaddy bearing production numbers GD-000560-563, 000614-629, 000668-677, GD-001804-1821, GD-002079-82, and GD-002446-2550, as well as all of the materials cited in the other sections of this report, and my background, knowledge, and experience.



October 3, 2011

/s/ Kevin Fitzsimmons

Kevin Fitzsimmons

**Ex. A**

# Kevin Fitzsimmons

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Pleasanton, CA 94566  
Home: 925-523-3198  
kfitzsim1@gmail.com

## Summary

---

Senior technology manager with extensive experience in infrastructure architecture and operations management. Knowledgeable of best practices for daily operations, planning and change management associated with complex technology solutions in enterprise environments. Experienced in managing complex projects that fulfill requirements on-time and on-budget. Demonstrated ability to build motivated highly performing teams. Positive team player with extraordinary drive to succeed.

## Recent Career & Achievements

---

### **Director, IT Operations. Shoretel, Inc. – Sunnyvale, CA (2007 to present)**

*Shoretel is a leading provider of Pure IP unified communications systems. ShoreTel enables companies of any size to seamlessly integrate all communications-voice, data, messaging-with their business processes.*

Responsible for managing Shoretel's IT operations team. This includes IT architecture, implementation and on-going support of: LAN, WAN, SAN, phone system, os, active directory, backup, file shares, printer and vpn's. Additionally we provide desktop and mobile device support for 675 employees and 75 contractors.

#### Key Contributions

- Supported corporate growth building out new office locations in Maidenhead, UK, Austin, TX, Sydney, Australia and Signapore. Company has grown headcount from 300 to 750. Supported growth while maintaining total team headcount of 6.
- Lead extensive e-discovery projects for multiple lawsuits. Awarded Above and Beyond Award by General Counsel.
- Improved network and system reliability by implementing system and network redundancy
- Participated in annual SOX compliance audits
- Implementation of IT policy and procedures. Documented SLA's, information security policy, network architecture and standard operating procedures for IT operations.
- Maintained IT operations budget significantly below industry peers.

### **Senior Director, Infrastructure and Application Support. Agentrics, Llc. (formerly GNX/WWRE.) - Alexandria, Virginia (2000 to 2007)**

*Agentrics is an e-business solution and service provider for the global retail industry. Agentrics solutions help retailers, manufacturers and their trading partners reduce costs and improve efficiency by streamlining and automating sourcing and supply chain processes. Agentrics customers include many of the world's largest retailers and manufacturers. Equity owners of Agentrics include: Ahold, Albertsons, Aeon, Carrefour, CVS, Coles Meyer, Delhaize, El Corte, Karstadt Quelle, King Fisher, Kroger, Lotte, Metro, PPR, Safeway, Sainsbury, SCA, Sears, Tesco, and Walgreens.*

Comprehensively responsible for Agentrics IT infrastructure, application support and internal IT operations. Including: establishing IT policy, standards compliance, operating procedures, infrastructure architecture, telecommunications, disaster recovery, capacity planning, technical vendor relations, IT purchasing and budget administration and overall responsibility for daily operations. Lead a team of 35, including 5 managers.

#### Key Contributions

- Responsible for building and maintaining a highly reliable hosting infrastructure and corporate IT environment
- Reduced operating costs by more than 20% annually, as site traffic has increased by 100% annually
- Successfully manage day to day operations for 140+ servers across four co-location facilities and four offices
- Consistently achieve >99.9% availability for all systems, networks and applications
- Exceed all internally and externally published performance service level agreements
- Establish and maintain Agentrics corporate IT policy to comply with ISO17799

OPPAPP000196

- Agentrics hosting operations successfully attained AICPA Systrust certification in 2003 after successfully passing Ernst and Young audit
- Successfully managed several co-location moves with no service disruptions

**Senior Consultant. Oracle Corporation. Advanced Technology Services Group. - Herndon, Virginia (1999 to 2000)**

*Oracle Corporation is an enterprise software company that develops, manufactures, markets, distributes and services database software and infrastructure software, including application server, collaborative software and development tools that help its customers manage and grow their businesses and operations.*

Provided a broad range of consulting services to large worldwide corporations. Architected and implemented Oracle solutions, while managing customer expectations. Performed in-depth troubleshooting and analysis to resolve complex problems.

Key Contributions

- Consistently exceeded targets for billable hours
- Architected solutions to improve performance and leverage existing software licensing.
- Resolved complex technical issues through extensive troubleshooting
- Problem resolutions included: core dump analysis, server configuration, performance diagnostics and tuning.

**Senior Consultant, Booz Allen and Hamilton, Rockville, Maryland (1998 to 1999)**

*Booz Allen and Hamilton is a global strategy and technology consulting firm, providing services to major international corporations and government clients around the world.*

Worked on site at the US Food and Drug Administration's Center for Biologics Evaluation and Research (CBER). Installed and configured help desk ticketing system for end user support issues. Installed and used Microsoft SMS to track inventory and automate package deployment to more than 1000 end users. Defined desktop support practices. Responsible for operations and upgrades of existing Exchange Server infrastructure.

Key Contributions

- Successfully met FDA objectives for their internal IT infrastructure.
- Deployed and administered Microsoft Systems Management Server for 1,000 + user network.
- Served as DBA for MS SQL Server database.
- Installed and supported help desk ticketing system with escalation and alerting capabilities.
- Developed pilot demonstration of secure messaging for presentation to US Food and Drug Administration

**Systems Engineer. Stanley Inc. Alexandria, Virginia (1997 to 1998)**

*Stanley, Inc. provides information technology (IT) services and solutions to United States defense and federal civilian government agencies. The Company offers its customers solutions to support their mission-essential needs at any stage of program, product development or business lifecycle through five service areas: systems engineering, enterprise integration, operational logistics, business process outsourcing and advanced engineering and technology.*

Responsible for onsite implementation, administration, training and documentation of Army War Reserve Deployment System (AWRDS).

Key Contributions

- Implementing, supporting, training and troubleshooting Army War Reserve Deployment System
- Responsible for application availability and performance for three sites in Europe (Luxembourg, Belgium and Netherlands)
- Deployed multiple Windows NT networks in support of database applications
- Performed Sybase database administration tasks including: installation, multi-tiered replication implementation, troubleshooting, performance tuning and custom report generation
- Established automated testing program, created more than 100 automated testing scripts

## **EDUCATION**

---

UNIVERSITY OF VIRGINIA, McIntire School of Commerce  
Graduate coursework in Management of Information Technology

UNIVERSITY OF MARYLAND, Robert H. Smith School of Business  
Bachelor of Science, Logistics and Transportation Management  
Charles A. Taff Academic Scholarship Recipient

**Ex. B**

OPPAPP000199 to  
OPPAPP001588

NOT INCLUDED