IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CLUB TEXTING, INC. d/b/a EZ TEXTING, INC.	:
	:
	:
Plaintiff,	: ECF
	:
v.	:
	: Civil Action No. 1:10-cv-07205-PKC
T-MOBILE USA, INC.	:
	:
Defendant.	:
	:

<u>SECOND DECLARATION OF SHAHRIYAR NEMAN</u>
<u>IN SUPPORT OF ORDER TO SHOW CAUSE</u>

I, Shahriyar ("Shane") Neman, declare pursuant to 28 U.S.C. § 1746:

1.   I am the Chief Executive Officer of Club Texting, Inc. d/b/a EZ Texting, Inc. ("EZ Texting"). I submit this Declaration pursuant to Fed. R. Civ. P. 65(b) and Local Rule 6.1(d) in support of Plaintiff's application for a preliminary injunction enjoining Defendant T-Mobile USA, Inc. ("T-Mobile") from blocking text messages to and from EZ Texting.

2.   This Declaration is intended to clear up a number of incorrect statements made by T-Mobile in its recent papers.

3.   T-Mobile claims it is blocking EZ Texting's short code (the six digit telephone number by which T-Mobile customers communicate with EZ Texting) because EZ Texting did not seek approval from T-Mobile of all of the business relationships EZ Texting has established to use its short code.

4.   Contrary to that claim, EZ Texting's contract counterparty, 4INFO, relayed messages from T-Mobile and OpenMarket that T-Mobile was going to block EZ Texting's short

code based on the content of the website http://www.legalmarijuanadispensary.com (the "website"), which T-Mobile considered inappropriate.

5. EZ Texting's representative also spoke directly with T-Mobile and learned that T-Mobile was blocking EZ Texting because of the website.

6. It was only after EZ Texting filed this lawsuit that T-Mobile began to claim that EZ Texting should have submitted every business relationship it has for T-Mobile's approval. T-Mobile has refused to communicate with EZ Texting at all despite my efforts to resolve this dispute.

7. T-Mobile never told me prior to blocking EZ Texting's short code that EZ Texting was required to submit to T-Mobile for approval every new business that EZ Texting created a keyword for.

8. T-Mobile appears to be relying on an interpretation of Mobile Marketing Association guidelines that is not accepted or practiced in the industry. Nor it is an interpretation that I am aware of T-Mobile ever enforcing before this lawsuit arose.

9. In fact, it is not industry practice to ever seek further carrier approval once the initial program brief is submitted and accepted by the carrier. Acceptance of the program brief the first time by a wireless carrier, is all that is required.

10. Numerous other mobile marketing companies similar to EZ Texting allow businesses and non-profits to create keywords and begin sending text messages over their shared short code without ever seeking pre-approval from T-Mobile or any other carrier.

11. I am aware of many companies that offer immediate shared short codes that work over T-Mobile's network, thus indicating that T-Mobile does not pre-approve every business association as it claims in its recent papers.

12.   Twitter is perhaps the best example as anyone can sign up for Twitter, including businesses, non-profits, and the very website at issue here, and instantly begin broadcasting text messages over Twitter's shared short code to T-Mobile customers without T-Mobile ever approving the Twitter user. Just like a T-Mobile customer would text a keyword to exchange text messages with an EZ Texting user, a T-Mobile customer would text "follow weedmaps" to Twitter's 40404 short code to receive text messages from Twitter's user. There does not seem to be any discernable difference between Twitter and EZ Texting and what each sends to a T-Mobile customer that requests text messages from a certain user. I have attached a true and correct print out copy of the Twitter website for the weedmaps website at issue here to my Declaration. *See* Exhibit A

13.   Other examples of instant use without prior carrier approval include Call-Em-All, http://www.call-em-all.com/lp/sms/bulk-textmessaging (last visited Sept. 23, 2010) (whose previous customer boasts, "In less than 15 minutes they completed my 10,000 texts and calls! That included the setup time too. Call-Em-All is fast and efficient, that's for sure."); Mobivity, http://www.mobilemarketing.net (last visited Sept. 23, 2010) (claiming that they have an "instant set up" and "you're up and running in minutes!"); TXT Impact, http://www.txtimpact.com (last visited Sept. 23, 2010) (asserting that, "You can be up and running with a Shared short code number with-in [a] few minutes not months."); and mobileStorm, http://www.mobilestorm.com/resources/digital-marketing-blog/dedicated-short-code-vs-shared-short-code/ (last visited Sept. 23, 2010) (contending that with a shared short code, "…within 10 seconds, that keyword is live and can receive texts from any carrier in the United States.").

14.   I have attached true and correct print out copies of these websites to my Declaration. *See* Exhibits B-E.

3

15.   It is my experience that these examples are representative of the entire industry and that carriers never require a mobile marketer like EZ Texting to inform the carriers of every business relationship the mobile marketers enter into for use of their short codes.

16.   I believe T-Mobile is simply using this as an excuse to justify its unlawful blocking based on the content of the website at issue in this proceeding.
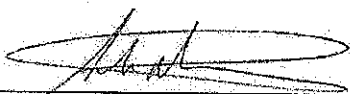
17.   No other wireless carrier has blocked EZ Texting's short code for the alleged failure to seek pre-approval of every business relationship.

18.   A mobile marketer's business is not marketable if it cannot promise access to *at least* the customers of the four major carriers. EZ Texting therefore cannot attract new business or even retain existing business if it is cut off from such a large portion of the market. EZ Texting's thousands of customers can simply stop using EZ Texting's 313131 short code to operate their mobile marketing campaigns. In this industry, contracts between the clients and mobile marketers like EZ Texting are usage-based, pay-as-you-go contracts, such that they can migrate to any other mobile marketer's short code easily, quickly, and at low cost. EZ Texting certainly cannot know if a potential customer avoids EZ Texting's service because of T-Mobile's blocking.

19.   To the extent my contracts with either 4INFO or OpenMarket are at issue in this case, those contracts are confidential. I am prepared to submit them to the Court for in camera review. Without revealing the confidential contents of those contracts, both contain provisions for written notice of a breach and a 30-day opportunity-to-cure period. EZ Texting never received written notice that it was purportedly in breach of any contract because it did not seek prior approval, and was never afforded a 30-day period to cure.

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

Executed on: _9/24/10_

Shahriyar Neman

Exhibit A

weedmaps

Check out the @Nugporn video on
"Cough" at The Clinic in Denver, CO
w/ strain reviewer William Breathes.
http://bit.ly/8YKciB

2 minutes ago via web

It's a beautiful morning and I'm headed to The Springs in a bit. first
things first though. starting with a fine OG wharsin in digdal paper
about 5 hours ago via web

Landed safe and sound in Denver. First things first... Bract a tug
bong...
8:52 AM Sep 21st via HTC Peep

Good morning! Let's start the day off with some "Sape" courtesy of
@Nugporn. http://bit.ly/aFEari | whats in your morning bowl?
8:50 AM Sep 21st via HTC Peep

On the plane and headed to CO!
6:27 AM Sep 21st via HTC Peep

WeedMaps Strain Exchange BETA Preview | http://bit.ly/9M6WM
8:32 PM Sep 20th via web

Check out the @Nugporn interview w/ one of the most most talked

Exhibit B

Watch this video to see how it works!

Simple, Fast Automated Messaging!

Join the thousands that use Call-Em-All everyday as their go-to automated messaging service.

Call-Em-All helps make life a little easier for organizations, businesses, and groups by providing easy and affordable access to powerful bulk text messaging and voice broadcasting technology.

- **Easy to use** - Send text broadcasts online or directly from mobile cell phone.

- **Professional** - Contacts can join via our short code - 292929. For a demo, text **demo** to **292929**.

- **Affordable** - FREE custom keywords, plans as low as $9. Pay-As-You-Go, no fees!

- **Flexible** - Send a phone call and a text message all in the same broadcast!

How amazing! In less than 15 minutes they completed my 10,000 texts and calls! That included the setup time too. Call-Em-All is fast and efficient, that's for sure!

- Tim, Kankakee, IL

Easy, Effective Automated Messaging.

Setting up a Call-Em-All account can be done entirely online, and creating a broadcast using our automated message service can be done in a few simple steps.

Try It For Free

25 Free Credits.
No credit card required!

Customers include...

amazon.com   care.com   ✚ American Red Cross

Inc.   (SPURS)   §

Give it a try! Call us. 877.226.3080

Exhibit C

mobivity

Contact Us   Customer Log In   Blog

Home   Solutions   Tour   FAQ   Short Codes   Bulk SMS Gateway   Resellers   Agencies   Get Started!

Simply the Easiest **SMS Gateway** and **Mobile Marketing** platform available!

Effective Mobile Marketing & SMS at a price you can afford!

- Over 90% of text messages are read by recipient
- Personal, instant link between you and the consumer
- Connect with consumer at the right place, at the right time
- Easy Setup - two-way SMS mobile marketing campaigns in minutes!
- Affordable - **No Contracts or Setup Fees! Only $79 per month!**

How it works

You simply choose a **KEYWORD** that identifies your company or campaign. Your customers, and prospects then send a text message with your keyword to our **short code (95495)**.

When Mobivity receives an incoming text message to your keyword, the sender's mobile # is stored in your database for future mobile marketing campaigns, and they receive the response that you have chosen.

Using our built in applications, you can reply with a simple text message, hold a contest or vote, or send a link to a mobile web page. Using our powerful API, SMS can easily be integrated into your existing systems for customized content.

Whether you want to send coupons, a simple text message response, or connect to an elaborate SMS application or API, with Mobivity you'll be connected instantly! Our Mobile Marketing service is simply the easiest and most inexpensive way to integrate text messaging into your business. Mobile Marketing is no longer just for big brands! With Mobivity, small to medium sized businesses can have the same capabilities at a fraction of the cost.

Setup a FREE Trial Account Now!

Keyword :

Take a tour of some key features, or set up a FREE Trial account right now!

Mobivity Mobile Marketing Highlights

- Free Trial - Includes Incoming Keyword! Explore and use all features an capabilities!
- **Instant Setup** - You're up and running in minutes!
- SMS Autoresponder - Return specific text to the user
- Message Forwarding - Incoming messages to your keyword can be sent to email or a mobile phone
- Mobile Lists - The mobile phone number of the sender is put on one of your specified lists.
- Wap Push - Send them a link to a mobile web site
- Coupons,Voting, Txt2Win
- Custom API - Have messages forwarded to your own application
- SMS Blast - Instantly send text messages to your lists anytime.
- Many more coming soon!
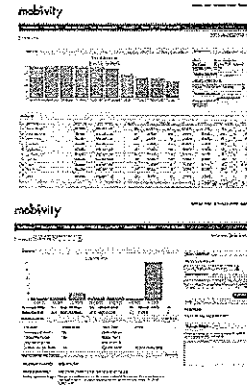
Starting at **$79** per month!
No Setup fees!
No Contracts!

Click to Call

Perfect for:
Restaurants
Bars & Nightclubs
Retail Stores
Bands & Entertainers
Real Estate
Sports Leagues
Hair Salons
Radio Stations
T.V. & Radio Ads
Print Advertisers
Software Developers
...and countless others

Deliver your content via SMS. The Mobivity API makes it simple!

Mobivity Q&A

Which wireless carriers work with Mobivity?

Mobivity currently works on AT&T, Verizon Wireless, Sprint, Nextel, T-Mobile, Boost, Virgin, Dobson, Midwest Wireless, Cincinnati Bell, US Cellular and Alltel.

Once I register a keyword, for how long do I own it?

Your keyword remains in your account for as long as you make the monthly payments. If you cancel your account or fail to make your payment, the keyword becomes available for others to register after 30 days.

If I have message credits left over at the end of the month, do they carry-over to the next month?

Message credits included in our plans do not carry over. Each month on your anniversary date, the credits are reset to your plan amount.

How can I upload, or enter mobile phone #'s to one of my marketing lists?

Subscribers can be added to your list by sending a text message to your keyword, or they can enter their informatiom right on your website using our text message widget. If you have an existing list that you need imported, simply upload it through our control panel.

Can I try before I buy?

Yes, we offer a free trial account that lets you use all of the features of Mobivity. This free account includes 25 messages per month. The only limitation is that all messages are sent to your personal mobile phone. Additional credits can be purchased in the control panel if needed.

Do I need to put software on my computer?

No software is required. You configure your keywords through a simple web site that you can access from any computer that is connected to the Internet. Take a look at some screenshots of our dashboard.

What if I just want to run a one-time 2 month long campaign?

With Mobivity, you sign-up on a month to month basis. There are no contracts. When your campaign is completed, simply download your data and cancel the keyword. It's that simple!

What if I need more credits than the monthly package includes?

In the Mobivity control panel, you can upgrade or downgrade your account at any time. If you find you are running low on credits, simply upgrade to the next package and you will be given additional credits.

Can I start with a small plan and then upgrade if I need more?

Yes, our dashboard makes it very simple to upgrade or downgrade your monthly plan. It only takes a few minutes and can be done at anytime.

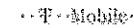**Do you have a referral or affiliate program?**

Yes we do! For each account you refer to us, we will give you a credit for the amount of the monthly package the person you referred signs up for. For information on our paid affiliate program, visit our affiliate page.

Get Started | Take a Tour

Developers | Affiliate Program | Terms of Service | End-User Terms of Service | Short Code
info@mobivity.com - 1-888-808-6274

Copyright 2008, Mobile Visions, Inc
212 Carnegie Center, Suite 206, Princeton, NJ 08540

Supported Carriers

at&t

verizon wireless

Sprint
Together with NEXTEL

alltel
wireless

DOBSON

Virgin

MIDWEST WIRELESS

T-Mobile

US Cellular

CELLULARONE

Cincinnati Bell

Exhibit D

TXTImpact
Impact of 160 characters
Text message marketing

SMS Gateway Mobile Marketing
SMS Gateway Api Premium SMS
Shortcode Info on Demand SMS
Voting/Polling

Text DEMO to 27126 | Resources | Client Login
Call US: 1 (800)-209-2188

Applications | Pricing | FAQs | Contact Us | Clients

2

Promote new Products & Services

Retail Store
Restaurant
Real Estate Agent
Political Campaign
Financial Services
Radio Stations
Entertainment

SMS gateway and mobile marketing using short codes get instant action to your marketing with SMS marketing

SMS Gateway API | Email2SMS | Shared Shortcode | Dedicated Shortcode

TxtImpact offers SMS Gateway services such text message delivery using SMS gateway APIs. We offer both HTTP and SMPP interface for sending and receiving messages to and from US and worldwide carriers. We also offer text broadcast apis, web sms, 2way interactive SMS APIs.

Shared Short code

Reduce time to market and launch your mobile marketing campaign with our shared short code. You can be get up and running with Shared short code number with-in few minutes not months. You can migrate your campaigns to dedicated short code anytime.

Mobile Marketing Campaigns| MMA compliant Mobile Marketing

Txtimpact offer out of box interactive Mobile marketing application allows you to engage your customers and launch quickly mobile marketing campaigns. Start building opt-in list with interactive Mobile marketing applications in just a few minutes.TxtImpact makes it easy to create, implements, and monitors the progress of your marketing Mobile marketing campaign to boost sales and increase awareness about your business.

Price plans starts from $49.00 a month include 500 messages, access to shared short code with one keyword. Click here to see all plans.

Dedicated Short code

SHARED Short code

Get Started
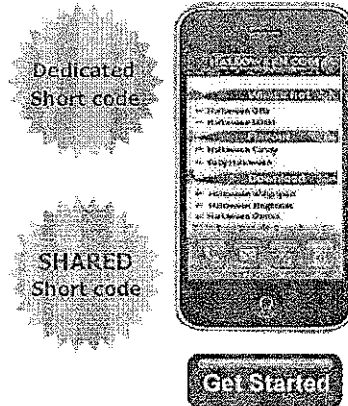
SMS Gateway 2way developer API

Tap into our two-way SMS Developer API to quickly launch your own SMS marketing applications.

Info on Demand

Allow users to receive marketing information on demand.

SMS Voting/Polling

Users can vote for their favorite choice and view live results on their phone or video screen.

Shared shortcode

Provisioning a dedicated Short Code takes substantial time, technical expertise, and an ongoing financial commitment.

CSCA. **Dedicated shortcode**

What is Common Short Code? Short codes are 5 or 6 digit numbers, to which wireless subscribers can address text messages, regardless of their wireless service provider.

Email 2 SMS Gateway Send and Receive SMS via Email

By using your email client to send receive SMS you can easily communicate with one person or groups of people while using a familiar email client interface such as Outlook, Gmail, Yahoo, etc.

Bulk SMS: Send Bulk SMS with a click

Bulk SMS provides solutions to send and receive single and bulk SMS messages from Txtimpact SMS gateway using the Internet.

Subscription Lists

Used to promote events, specials, coupons, etc to a subscription list. Subscribers are required to opt-in. and can choose to opt out (and opt back in) at any time.

Dynamic Content Alerts (RSS or ATOM Feed)

Allow content provider to push dynamic contents to users; such as stock alerts, Astro, Jokes, Weather update, traffic, Sports, News, etc. Integrate with XML services to feed data.

Contests : Txt2Win

Users can text for a chance to win. Winners can be selected randomly (first N entries win, every Nth entry wins, Nth entry wins, selected at end) or manually.

Premium SMS Gateway

Txtimpact alert and subscription managed services allow you to send SMS alert to all opt-in subscribers worldwide.

Trivia

Used to create single or multiple question trivia campaigns. Assign points to each question and winners can be selected randomly (first N correct answers wins and selected at end) or manually.

Txt2Survey

mobile marketing platform; and mobile advertisers can obtain immediate feedback on a certain event or action from your customers.

Txt2TinyUrl Connect to the Mobile Web with SMS

Adding SMS notification with embedded URLs has many advantages: you can reach your users wherever they are, provide links to detailed rich content.

Contact us

SMS Gateway	Email To SMS Gateway	Mobile Marketing
SMS Gateway Api	Send SMS from Excel	Mobile Marketing campaign
Bulk SMS Gateway	Sending SMS Messages Via API	Mobile Marketing Pro
SMS Marketing	SMS Voting/Poling	Mobile Marketing 101
Text Message Gateway	Send SMS PHP	Mobile Marketing Industry
SMS Gateway Features	Send SMS C#	Mobile Marketing Company
Text Message Marketing	SMS Shortcode	Mobile Marketing Solutions
Text Message Marketing Real Estate	Send SMS ASP	SMS Mobile Advertising
Shared Shortcode	Receive SMS Messages Via API	Connect to the Mobile Web

Message and Data Rates May Apply. To unsubscribe from any Txtimpact list simply send 'STOP' to 27126 or contact Support

Exhibit E

Search for... 🔍

- Home
- Products
- Clients
- Resources
- Company

- OVERVIEW
- WHITEPAPERS
- MARKETING BLOG
- WEBINARS
- NEWSLETTER
- BEST PRACTICES
- REPORTS

MOST POPULAR

- SMS and SMS Aggregators - Playing catch up
- The Reason Why Email Marketers Think Mobile Marketing is Stupid--and Why They are Wrong.
- What is Digital Marketing?
- SMS Follows Twitter...All the Way to the Bank!

CATEGORIES

- Advanced Digital Marketing (86)
- Case Studies (5)
- Casino Marketing (1)
- Digital Marketing Best Practices (49)
- Email Deliverability (40)
- Email Marketing News (32)
- Email Marketing Tips (85)
- General (55)
- Messaging Laws & Compliance (37)
- Mobile Marketing (126)
- Mobile Technology (48)
- Multi-Channel Marketing (81)
- Newsletter Marketing (67)
- Product Updates (5)
- RSS Marketing (4)
- SEO, SEM, Online Marketing (98)
- Speakers Corner (4)
- Video Marketing (23)

- Videos (18)
    - Commercials (3)
    - Interviews (6)
    - News and Press (1)
    - Outside The Inbox (8)
- Website Usability (10)

Digital Marketing Blog

Dedicated Short Code vs. Shared Short Code

July 14th, 2008 by Jared Reitzin

Clients ask me all the time: What's better for their mobile strategy, using a shared short code or a dedicated short code? Each has its own set of pros and cons. In this post I will set the record straight.
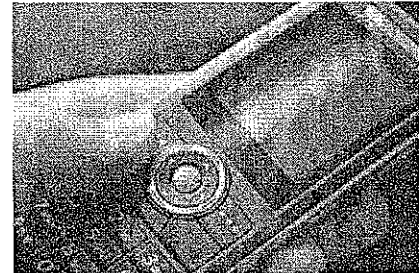
Shared Short Code

PROS

1. Time to market: Sharing a mobile marketing company's short code is the fastest way to get into the mobile space. For instance, clients using the mobileStorm 4.0 platform can create a keyword like "SHOP" and within 10 seconds, that keyword is live and can receive texts from any carrier in the United States. Becoming a mobile marketer takes seconds, not months. Your time to market with a shared short code is extraordinary.

2. Cost: Short codes are expensive; it's not like buying a $7.99-per-month domain from Godaddy. If you are sharing a code, typically there are very little additional costs involved other than paying for your messages going out.

CONS

1. Fair user experience: Because you are sharing your code, the user experience for your subscribers might be more tedious than if you had your own dedicated code. For example, on a shared short code everything is done with keywords. If you are asking someone to vote using A, B, and C and your keyword is FOOTBALL, you would need to get your audience to reply "FOOTBALL A," "FOOTBALL B," or "FOOTBALL C." This is so the system knows which keyword the voter is subscribing to.

2. Brand confusion: There isn't much brand value out of using a shared short code. In some cases there is a very good chance someone else in your industry is using the same code you are, possibly even competitors. When the subscriber receives a text message, it comes from the five- or six-digit short code. If that subscriber is signed up to two different companies using the same code, he or she won't know right off the bat who sent the message, until they have had a chance to read the body of the message. There is always the possibility that they want your texts, but not those from the other company. They could get upset and reply "STOP," and not realize they just removed themselves from your database.

3. Additional costs: Typically mobile marketing service providers will charge for a few extras if you are using a shared code. In some cases you have to lease keywords, and the price depends upon if it is a common keyword like SHOP or an uncommon keyword like SHOP1. The mobile service provider wants to make sure you don't get a bunch of keywords and not use them.

Outcome: Shared short codes are wonderful for the small business with the small budget or for the enterprise that wants to test the waters. These businesses can get into the market quickly, and for not a lot of money. However, if you a well-known brand in your space or you have a little extra coin, you definitely want to consider a dedicated code.

Dedicated short code

PROS

1. Brand-friendly: It is extremely important for any business with a well-known brand to have its own short code. The subscriber needs to be able to recognize right away who is sending them a text message. You can even lease a vanity code that spells something, such as 73775 (Pepsi), or that is easy to remember, like 95959 (Palms Hotel in Las Vegas).

2. Portable: If you lease your own code, you can take it with you no matter where you go. You can switch your aggregator or mobile service provider and not worry about having to reintroduce your subscriber base to a whole new code. The brand confusion that happens after switching aggregators or service providers can be avoided by having your own code.

3. Better user experience: As I pointed out above, because you are not sharing your code with anyone, you don't necessarily need to have a keyword sent before your action word. You can just have someone text in the keyword directly.

CONS

1. Costly: There are a few fees associated with have your own dedicated short code. First you need to choose whether you want a random or vanity code. You would apply for your code at www.usshortcodes.com and it would cost $1,500 or $3,000 per quarter depending on the type of code you choose. On top of that, most mobile service providers charge a monthly fee to host and maintain the code on a monthly basis. Also, setting up a short code is a lot of work and usually takes up to 10 weeks to get approved. There is usually a one-time set-up fee for someone to help you apply for the code and see it through testing all the way to certification.

2. Time to set up: This is one of the biggest bummers in mobile. They say it takes six to eight weeks to approve a short code, but I have seen it take as long as 12. If you are trying to get a code approved for premium SMS and binary content, it can really take a while. You would think there would be more of a turnkey process getting codes up and running, considering these codes are making everyone money. This is something the industry needs to figure out. There have been talks about selling pre-approved short codes to companies who qualify. If this happens, sign me up!

Outcome: There is no doubt that if you are a premium brand, you need your own dedicated short code. However, be prepared to pay and don't expect to jump right in. I always suggest to my clients to use our shared short code while they are getting their dedicated ones approved. This allows them to get into the market right away so they can test some things out before their dedicated code is live.

"Short code" is just one of many phrases that might rattle the SMS marketing beginner. To learn more about numerous other SMS terms, read mobileStorm's new white paper, *SMS* Primer, available for download here.

Jared Reitzin
Founder and CEO, mobileStorm
Small Business Information

Posted in Digital Marketing Blog, Mobile Marketing, Mobile Technology

3 Comments on "Dedicated Short Code vs. Shared Short Code"

1. Aug 21, 2009 - 6:36 pm
   Marc Burgess

   Thanks so much for the article.

2. Sep 2, 2009 - 11:27 am
   Matt

   I understand that the requirement of short codes in the US is due to the spamming of phones. I feel that the carriers took advantage of the situation and forced this solution since it makes good money sense to them, and closes competition out in a very indirect way. Why not just register our long codes for a small fee if we want to use them for commerce, then have them regulated for an example of a much simpler solution.
   I have a small business that has a wonderful app over SMS, but we simply cannot implement it because of the short code costs. We should fight to get rid of the short code requirements in the US, or at least regulate the pricing, but in the meantime I am hoping that the solution Mobilestorm offers can help us.
   -Matt

3. Sep 3, 2009 - 10:48 am
   Jared Reitzin

   The cost of short codes really do create a barrier for the SMB. You should download and read about this in more detail in our new whitepaper: http://www.mobilestorm.com/resources/digital -marketing-white-papers/whitepapers/the-ultimate-guide-to-common-short-codes/

   We can definitely get you in the market with a shared code. We have a new one that is not yet being used that much.

Leave a Reply

Name (required)

Mail (will not be published) (required)

Website

Submit Comment

GET UPDATES AS POSTED

email...

Subscribe

- Technorati FAVORITES
- MY YAHOO!
- Google

RECENT POSTS

MMA: One Quarter of Euro Consumers Will Respond to Advertising If Given a Mobile Response Option
Half of Mobile Data Usage Attributed to Mobile Apps
Consumers Encouraged To Ask FCC To Protect Text Messaging
Success in Mobile Marketing Won't Come to Apple, Says Yahoo Chief

AUTHORS

Alex Gans (2)
Darren Withers (2)
Elyse Rossler (1)
Eydie Cubarrubia (157)
Forrest Knighton (1)
Jared Reitzin (59)
Jaren Angerbauer (17)
Marwan Soghaier (6)
Mobile Guru (102)
Mobile Marketer (81)
mobilestorm (107)
Patrick Knight (3)
Ric Hattabaugh (4)
Shaneli Ramrantan (30)
Shavkat (75)
Steve Chipman (21)

BLOG ROLL

- Founder Blog
- Entrepreneur Blog

META

- Entries RSS
- Comments RSS

mobileStorm: We know it, time for everyone else to understand. SMS Marketing: The Most Effective Mar ...

[Posted September 23, 2010]

			Company
---	---	Resources	Overview
Go		Clients	Overview	Partners
Overview	Pro	Overview	Whitepapers	Management
Email	Why Pro?	Our Clients	Marketing Blog	Board
SMS	Human Factor	Case Studies	Webinars	Investors
Start Now	Solutions	Testimonials	Newsletter	Advisors
Go vs Pro	Schedule Demo	For Agencies	Best Practices	Careers
			Reports	News + Press
				Contact

Copyright © 2009 mobileStorm, Inc. All Rights Reserved.
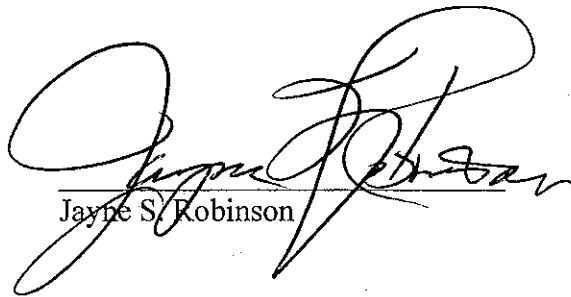Privacy | Terms of Use | Sitemap | Unsubscribe | Contact

Cancel
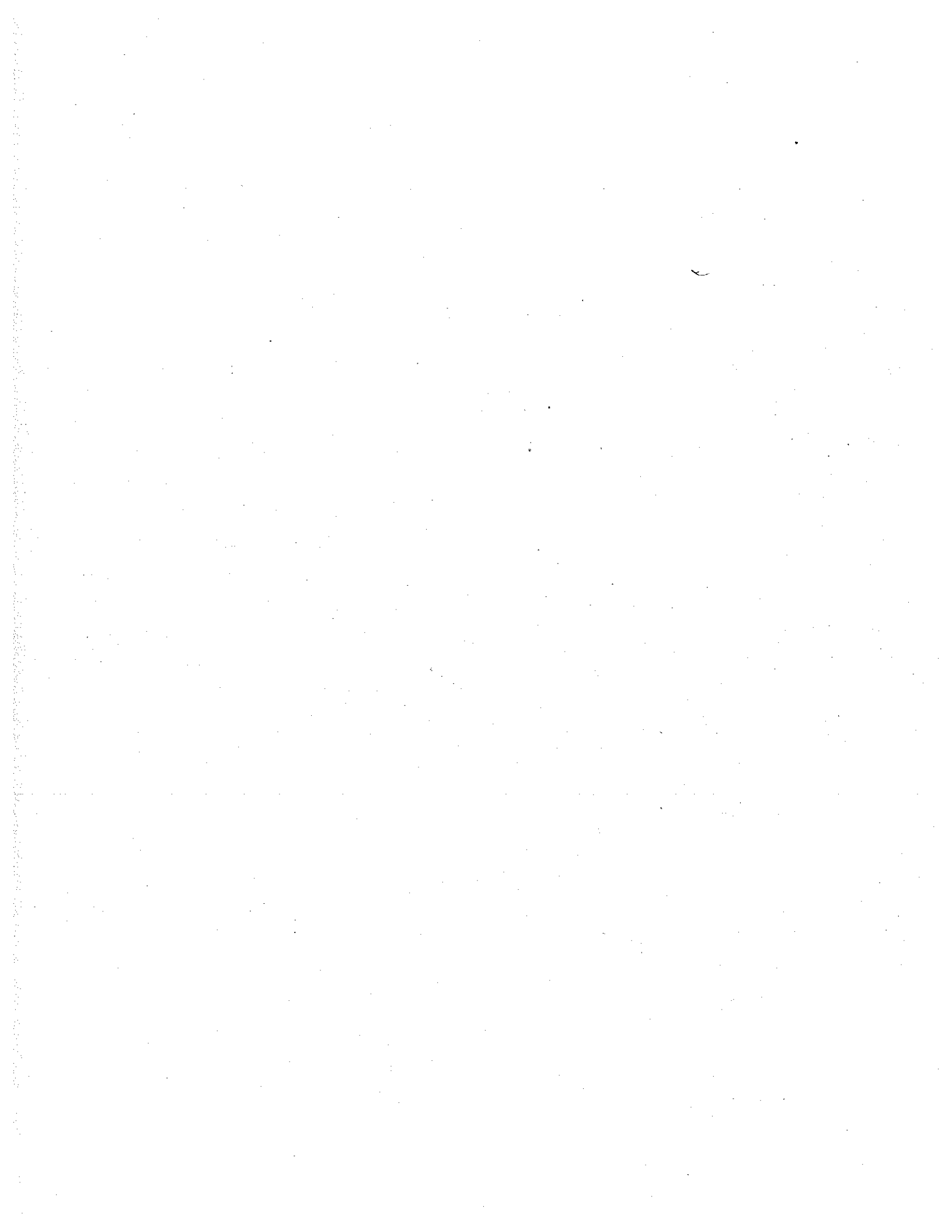
CERTIFICATE OF SERVICE

I, JAYNE S. ROBINSON, hereby certify that on September 24, 2010, a copy of the foregoing Second Declaration of Shahriyar Neman in Support of Order to Show Cause was filed electronically. Notice of this filing will be sent by e-mail by operation of the Court's electronic filing system to all parties, who may access this filing through the Court's system.

Jayne S. Robinson