EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

HITACHI MAXELL, LTD.,
 	
         Plaintiff,
 	
 v.
 	
 HUAWEI DEVICE USA, INC., and
 HUAWEI DEVICE CO., LTD.,
 	
         Defendants.
	Civil Action No. 5:16-CV-178-RWS

HITACHI MAXELL, LTD.,
 	
         Plaintiff,
 	
 v.
 	
 ZTE CORP. and ZTE USA INC.,
 	
         Defendants.
	Civil Action No. 5:16-CV-179-RWS

EXPERT REPORT OF TÜLIN ERDEM
JANUARY 5, 2018

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I.   <u>QUALIFICATIONS AND STATEMENT OF ASSIGNMENT</u>

A.   *Qualifications*

1.   I am the Leonard N. Stern Professor of Business Administration and Professor of Marketing at the Stern School of Business, New York University. I previously served as the Co-Director of the Center for Digital Economy Research and the Director of NYU's Stern Center for Measurable Marketing.

2.   Before joining the Stern School of Business in 2006, I was the E.T. Grether Professor of Business Administration and Marketing at the Haas School of Business, University of California at Berkeley. I joined the Haas School of Business in 1993, where I served as the Associate Dean for Academic Affairs, Marketing Group Chair, and the Ph.D. Director. I was also the Chair of the campus-wide Committee on Research (COR) and the University of California, Berkeley representative of the University of California system-wide Committee on Research.

3.   I hold a B.A. in Economics from Boğaziçi University in Turkey and an M.A. in Economics and a Ph.D. in Business Administration from the University of Alberta in Canada, with a major in marketing and minors in economics and statistics. My research interests include consumer behavior and choice, consumer decision-making under uncertainty, advertising, brand management and equity, econometric modeling, empirical modeling and quantitative analysis, marketing mix effectiveness, marketing research, and pricing. I have published several papers in top journals in my field and have received best paper awards, as well as major research grants, including two major National Science Foundation (NSF) grants.

4.   I have served as the Editor-in-Chief of the *Journal of Marketing Research*, the preeminent academic journal of the American Marketing Association, which publishes work on

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consumer behavior, marketing science models, marketing strategy, and marketing research methodologies. I also served as an Area Editor at a top-tier journal called *Marketing Science* and as Associate Editor for Quantitative Marketing and Economics at the *Journal of Consumer Research*. Currently, I serve on the Advisory boards of *Marketing Science* and *Journal of Marketing Research*, am a Senior Editor of *International Journal of Research in Marketing*, am an Area Editor at *Journal of Marketing Behavior*, and serve on the editorial boards of the *Journal of the Academy of Marketing Science* and *Marketing Letters*.

5.   I have more than 20 years of teaching experience, during which I have taught empirical market research, branding, brand and product management, marketing management, and international marketing in undergraduate, MBA, and executive education programs. I also have taught doctoral seminars on consumer choice and various aspects of marketing modeling. A complete list of my publications, honors, awards, and professional activities is provided in my CV, attached in Exhibit 1.

6.   From 2008 to 2012, I was an Academic Partner at Prophet, a branding and marketing consultancy firm. In this role, I helped Prophet run several marketing research and consumer decision-making studies for Prophet's clients.

7.   I have served as an expert witness in several cases, on matters relating to marketing, consumer behavior, brand positioning, and brand equity. I have conducted, analyzed, and evaluated consumer surveys in these roles. My testimony has never been excluded from litigation due to any issue involving my qualifications or expertise. The list of cases for which I submitted testimony in the past four years is available in Exhibit 1.

B.   *Assignment*

8.   I have been retained by Mayer Brown LLP, counsel for Plaintiff Maxell, Ltd.

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