



## **BRIAN C. BECKER, Ph.D.**

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### **PRESENT POSITION**

PRECISION ECONOMICS, LLC, Washington, DC, (2001-Present)  
President

### **EDUCATION**

THE WHARTON SCHOOL OF THE UNIVERSITY OF PENNSYLVANIA, Philadelphia, PA

- Ph.D., Applied Economics (1993)

JOHNS HOPKINS UNIVERSITY, Baltimore, MD

- B.A., Applied Mathematics, Economics (1988)

### **EXPERT TESTIMONY, SUBMISSIONS AND HEARINGS**

1. "Rebuttal Expert Report of Brian C. Becker, Ph.D." BlackBerry Limited v. His Majesty the King, Tax Court of Canada, 2019-1378(IT)G, September 22, 2023, Trial Testimony, Toronto, Canada, November 2, 2023.
2. "Fair Market Valuation of Merchandise Acquired by All Saints Church: 2001-2003." Greg Wood v. His Majesty the King/Roberto Mattachione v. His Majesty the King, Tax Court of Canada, 2016-1919(IT)G/2017-2566(IT)G, October 11, 2023.
3. "Supplemental Expert Report of Brian C. Becker, Ph.D." Michelle Mills, et al. v. Molina Healthcare, Inc., et al., United States District Court, Central District of California, Case No. 2:22-cv-01813-SB-GJS, October 6, 2023, Deposition Testimony (Virtual), May 30, 2023.
4. "VIMA/VIO Expert Damages Report of Dr. Brian C. Becker," Symbion Energy Holdings, Ltd. et al. v. Alpha Innovations Management, Ltd. et al., ICDR Case No. 01-20-0000-4822, June 15, 2022, Trial Testimony (Virtual), October 4, 2023.
5. "Rebuttal Expert Report of Brian C. Becker, Ph.D." Rita Kohari, et al. v. MetLife Group, Inc., et al., United States District Court, Southern District of New York, Case No. 1:21-cv-06146, September 22, 2023.
6. "Direct Testimony of Brian C. Becker, Ph.D." Robert Lauderdale, et al. v. NFP Retirement, Inc., et al., United States District Court, Central District of California, Case No. 8:21-cv-301-JVS-KES, March 1, 2023, Supplemental Testimony, August 28, 2023, Trial Testimony, Los Angeles, CA, September 5, 2023.
7. "Rebuttal Expert Report of Brian C. Becker, Ph.D." Brian Waldner v. Natixis Investment Managers, L.P., et al., United States District Court, District of Massachusetts, Case No. 1:21-cv-10273-LTS, July 17, 2023 (Corrected July 19, 2023), Deposition Testimony (Virtual), August 21, 2023.
8. "Damages Expert Report of Brian C. Becker, Ph.D." Brian Waldner v. Natixis Investment Managers, L.P., et al., United States District Court, District of Massachusetts, Case No. 1:21-cv-10273-LTS, May 26, 2023 (Corrected July 19, 2023), Deposition Testimony (Virtual), August 21, 2023.
9. "Damages Expert Report of Brian C. Becker, Ph.D." Rita Kohari, et al. v. MetLife Group, Inc., et al., United States District Court, Southern District of New York, Case No. 1:21-cv-06146, July 13, 2023.
10. "Rebuttal Expert Report of Brian C. Becker, Ph.D." Michelle Mills, et al. v. Molina Healthcare, Inc., et al., United States District Court, Central District of California, Case No. 2:22-cv-01813-SB-GJS, May 22, 2023, Deposition Testimony (Virtual), May 30, 2023.
11. "Damages Expert Report of Brian C. Becker, Ph.D." Michelle Mills, et al. v. Molina Healthcare, Inc., et al., United States District Court, Central District of California, Case No. 2:22-cv-01813-SB-GJS, April 24, 2023, Deposition Testimony (Virtual), May 30, 2023.



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12. "Supplemental Expert Report of Brian C. Becker, Ph.D." Robert Lauderdale, et al. v. NFP Retirement, Inc., et al., United States District Court, Central District of California, Case No. 21-cv-00301-KES, February 17, 2023, Trial Testimony, Los Angeles, CA, September 5, 2023.
13. "Rebuttal Expert Report of Brian C. Becker, Ph.D." In the Matter of Arbitration Between XOMA (US), LLC, Claimant, and MORPHOSYS AG, Respondent, American Arbitration Association, September 7, 2022, Direct, Cross-Examination, and "Hot Tub" Trial Testimony, New York, NY, November 10, 2022.
14. "Damages Expert Report of Brian C. Becker, Ph.D." Robert Lauderdale, et al. v. NFP Retirement, Inc., et al., United States District Court, Central District of California, Case No. 21-cv-00301-KES, June 1, 2022, Deposition Testimony (Virtual), July 12, 2022, Trial Testimony, Los Angeles, CA, September 5, 2023.
15. "Damages Expert Report of Brian C. Becker, Ph.D." Jeffrey McGinnes, et al. v. FirstGroup America, Inc., et al., United States District Court, Southern District of Ohio, Case No. 1:18-cv-00326-TSB, May 13, 2022, Deposition Testimony, Washington, D.C. (Virtual), August 30, 2022.
16. "Expert Damages Report of Brian C., Becker, Ph.D.," In the Matter of an Arbitration Between XOMA (US), LLC, Claimant, and MORPHOSYS AG, Respondent, American Arbitration Association, May 11, 2022, Direct, Cross-Examination, and "Hot Tub" Testimony, New York, NY, November 10, 2022.
17. "Damages Expert Report of Brian C. Becker, Ph.D." American Freight, LLC v. Gavin Gosik, Karl Finley, and Ethan MacManus, JAMS Arbitration, Ref. No. 1345001791, December 30, 2021, Trial Testimony (Virtual), March 1, 2022.
18. "Supplemental Expert Report of Brian C. Becker, Ph.D." Leonid Falberg v. The Goldman Sachs Group, Inc., et al., United States District Court, Southern District of New York, Case No. 1:19-cv-00910-ER, February 24, 2022.
19. "Preliminary Expert Report of Brian C. Becker, Ph.D." Jeffrey McGinnes, et al. v. FirstGroup America, Inc., et al., United States District Court, Southern District of Ohio, Case No. 1:18-cv-00326-TSB, February 10, 2022.
20. "Rebuttal Expert Report of Brian C. Becker, Ph.D." Leonid Falberg v. The Goldman Sachs Group, Inc., et al., United States District Court, Southern District of New York, Case No. 1:19-cv-00910-ER, November 30, 2021, Deposition Testimony, New York, NY (Virtual), January 10, 2022.
21. "Rebuttal Expert Report of Brian C. Becker, Ph.D." Western Digital Corporation, et al. v. Commissioner of Internal Revenue, United States Tax Court, Docket Nos. 18984-18, 4818-19, January 7, 2022.
22. "Damages Expert Report of Brian C. Becker, Ph.D.," Leonid Falberg v. The Goldman Sachs Group, Inc., et al., United States District Court, Southern District of New York, Case No. 1:19-cv-00910-ER, September 7, 2021.
23. "Rebuttal Expert Report of Brian C. Becker, Ph.D.," Kimberly Davis, et al. v. Stadion Money Management, LLC, et al., United States District Court, District of Nebraska, Case No. 8:19-cv-00556-JFB-CRZ, June 14, 2021, Deposition Testimony, Los Angeles, CA (Virtual), August 18, 2021.
24. "Damages Expert Report of Brian C. Becker, Ph.D.," Kimberly Davis, et al. v. Stadion Money Management, LLC, et al., United States District Court, District of Nebraska, Case No. 8:19-cv-00556-JFB-CRZ, April 14, 2021, Deposition Testimony, Los Angeles, CA (Virtual), August 18, 2021.
25. "Expert Report of Brian C. Becker, Ph.D. Pursuant to Fed.R.Civ.P. Rule 26(a)(2)(B)," United States of America, et al., ex rel. Ronald J. Streck v. Takeda Pharmaceuticals America, Inc., et al., United States



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- District Court, Northern District of Illinois, Eastern Division, Case No. 1:14-cv-09412, May 21, 2021, Deposition Testimony, Washington, DC (Virtual), July 23, 2021.
26. “Rebuttal Report of Brian C. Becker, Ph.D.,” The Douglas Stewart Company, Inc. v. HiQo Solutions, Inc., United States District Court, Southern District of Georgia, Case No. 4:20-cv-00101-WTM-CLR, February 1, 2021. Deposition Testimony, Atlanta, GA (Virtual) July 8, 2021.
  27. “Rebuttal Expert Report of Brian C. Becker, Ph.D.,” Benjamin Reetz v. Lowe’s Companies Inc., John and Jane Does, Administrative Committee of Lowe’s Companies, Inc., and Aon Hewitt Investment Consulting, Inc., United States District Court, Western District of North Carolina, Case No. 5:18-cv-00075-KDB-DCK, September 24, 2020, Deposition Testimony, Washington, DC (Virtual), November 13, 2020, Trial Testimony, Charlotte, NC, June 30, 2021.
  28. “Damages Expert Report of Brian C. Becker, Ph.D.,” Benjamin Reetz v. Lowe’s Companies, Inc., John and Jane Does, Administrative Committee of Lowe’s Companies, Inc., and Aon Hewitt Investment Consulting, Inc., United States District Court, Western District of North Carolina, Case No. 5:18-cv-00075-KDB-DCK, August 27, 2020, Deposition Testimony, Washington, DC (Virtual), November 13, 2020, Trial Testimony, Charlotte, NC, June 30, 2021.
  29. “Rebuttal of Medtronic’s December 2019 Reports by Glenn Hubbard, Jonathan Putnam, and Chris Spadea,” Medtronic, Inc. & Consolidated Subsidiaries, Petitioner, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Docket No. 6944-11, January 27, 2020, Deposition Testimony, Washington, DC, February 14, 2020, Testimony, Chicago, IL (Virtual), June 24, 2021.
  30. “Damages Expert Report of Brian C. Becker, Ph.D.,” In the Matter of Arbitration between The Cleveland Clinic Foundation, Petitioner & Counter-Respondent, and TransWorld Medical Devices, LLC, and Cleveland Heart, Inc., Respondents & Counterclaimants, American Arbitration Association, Case No. 01-19-0001-4710, March 2, 2020, Trial Testimony, Cleveland, OH, June 16, 2021.
  31. “Analysis of the Benefits and Costs for Methanex Titan (Trinidad) Unlimited’s Payments of PMP Costs Under the GMLA Program,” Methanex Trinidad (Titan) Unlimited v. The Board of Inland Revenue, Republic of Trinidad and Tobago Tax Appeal Board, Appeal Nos. I 10-I 11 of 2017, June 4, 2021.
  32. “Reply Declaration for Purposes of Class Certification of Brian C. Becker, Ph.D.,” Kimberly Davis, et al. v. Stadion Money Management, LLC, et al., United States District Court, District of Nebraska, Case No. 8:19-cv-00556-JFB-CRZ, March 10, 2021.
  33. United States International Trade Commission. “Standard Steel Welded Wire Mesh from Mexico.” Investigation Nos. 701-TA-653 and 731-TA-1527 (Final), Hearing Testimony, Washington, DC (Virtual), February 12, 2021.
  34. United States International Trade Commission. “Corrosion Inhibitors from China.” Investigation Nos. 701-TA-638 and 731-TA-1473 (Final), Hearing Testimony, Washington, DC (Virtual), January 21, 2021.
  35. “Sur-Rebuttal Report of Brian C. Becker, Ph.D.,” In the Matter of Arbitration between Monsoon Blockchain Storage, Inc., Claimant, and Magic Micro Co. Ltd., Respondent, American Arbitration Association, Case No. 01-19-0002-4620, November 12, 2020, Hearing Testimony, Washington, DC (Virtual), December 10, 2020.
  36. “Critical Analysis of Monsoon Damages Estimate,” In the Matter of Arbitration between Monsoon Blockchain Storage, Inc., Claimant, and Magic Micro Co. Ltd., Respondent, American Arbitration Association, Case No. 01-19-0002-4620, October 1, 2020, Hearing Testimony, Washington, DC (Virtual), December 10, 2020.



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37. "Preliminary Expert Report for Purposes of Class Certification of Brian C. Becker, Ph.D.," Kimberly Davis, et al. v. Stadion Money Management, LLC, et al., United States District Court, District of Nebraska, Case No. 8:19-cv-00556-JFB-CRZ, November 23, 2020.
38. "Reply Report in Answer to First Report of Mahesh K. Kotecha, CFA," In the Matter of Arbitration Under the UNCITRAL Arbitration Rules 1976 between Kansanshi Holdings Ltd., Claimant, and ZCCM Investment Holdings, Respondent, and Kansanshi Mining PLC, Nominal Respondent, August 7, 2020, Trial Testimony, London, UK (Virtual), October 21-22, 2020.
39. "Economic Analysis of Intercompany Transactions from Kansanshi Mining PLC to FQM Finance Ltd.," In the Matter of Arbitration Under the UNCITRAL Arbitration Rules 1976 between Kansanshi Holdings Ltd., Claimant, and ZCCM Investment Holdings, Respondent, and Kansanshi Mining PLC, Nominal Respondent, March 13, 2020, Trial Testimony, London, UK (Virtual), October 21-22, 2020.
40. "Damages Expert Report of Brian C. Becker, Ph.D.," St. Paul's Foundation and Shrine of Saint Nicholas the Wonderworker, Patron of Sailors, Brewers and Repentant Thieves, Plaintiffs v. Richard Baldacci, in his official capacity as Building Commissioner for the Town of Marblehead, and the Town of Marblehead, Defendants, United States District Court, District of Massachusetts, Case No. 1:19-cv-11504-DJC, October 5, 2020.
41. "Rebuttal Expert Report of Brian C. Becker, Ph.D.," Patrick Myles, Plaintiff, v. the Johns Hopkins University Applied Physics Laboratory, Defendant, United States District Court, District of Maryland (Greenbelt Division), Case No. 8:18-cv-03180-PJM, October 3, 2019.
42. "Expert Rebuttal Report of Brian C. Becker, Ph.D. Pursuant to Fed.R.Civ.P. Rule 26(a)(2)(B)," United States of America, et al., ex rel. Ronald J. Streck v. Bristol-Myers Squibb Company, United States District Court, Eastern District of Pennsylvania, Case No. 2:13-cv-07547-TJS, September 5, 2019, Deposition Testimony, Washington, DC, September 20, 2019.
43. "Expert Report of Brian C. Becker, Ph.D. Pursuant to Fed.R.Civ.P. Rule 26(a)(2)(B)," United States of America, et al., ex rel. Ronald J. Streck v. Bristol-Myers Squibb Company, United States District Court, Eastern District of Pennsylvania, Case No. 2:13-cv-07547-TJS, August 16, 2019, Deposition Testimony, Washington, DC, September 20, 2019.
44. "Second Supplement to Damages Expert Report of Brian C. Becker, Ph.D.," James E. Bennett, Jr. et al vs. Roy J. Moore et al, District Court, 150th Judicial District, Bexar County, Texas, Cause No. 2017CI05787, March 27, 2019, Trial Testimony, San Antonio TX, April 5, 2019.
45. "Supplement to Damages Expert Report of Brian C. Becker, Ph.D.," James E. Bennett, Jr. et al vs. Roy J. Moore et al, District Court, 150th Judicial District, Bexar County, Texas, Cause No. 2017CI05787, March 6, 2019, Trial Testimony, San Antonio TX, April 5, 2019.
46. "Affidavit of Brian C. Becker, Ph.D.," James E. Bennett, Jr. et al vs. Roy J. Moore et al, District Court, 150th Judicial District, Bexar County, Texas, Cause No. 2017CI05787, February 22, 2019, Trial Testimony, San Antonio TX, April 5, 2019.
47. "Damages Expert Report of Brian C. Becker, Ph.D.," James E. Bennett, Jr. et al vs. Roy J. Moore et al, District Court, 150th Judicial District, Bexar County, Texas, Cause No. 2017CI05787, January 4, 2019, Deposition Testimony, Washington, DC, January 24, 2019, Trial Testimony, San Antonio TX, April 5, 2019.
48. "Affidavit of Brian C. Becker, Ph.D.," James E. Bennett, Jr. et al vs. Roy J. Moore et al, Superior Court, Columbus County, North Carolina, Division No. 15 CVS 1316, February 22, 2019.



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49. "Rebuttal Analysis of Expert Report of Dr. Sanjay Unni Dated August 4, 2015," Canadian Imperial Bank of Commerce, Appellant v. Her Majesty the Queen, Tax Court of Canada, 2010-1413(IT)G/2010-1414(IT)G/2010-2864(IT)G/2013-4005(IT)G, Updated as of November 14, 2018.
50. "Rebuttal Expert Report of Brian C. Becker, Ph.D.," The Coca-Cola Company and Subsidiaries, Petitioner, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket No. 31183-15, September 29, 2017, Deposition Testimony, Washington, DC, November 29, 2017, Trial Testimony, Washington, DC, April 24, 2018.
51. "Expert Report of Brian C. Becker, Ph.D.," The Coca-Cola Company and Subsidiaries, Petitioner, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket No. 31183-15, June 28, 2017, Deposition Testimony, Washington, DC, November 29, 2017, Trial Testimony, Washington, DC, April 24, 2018.
52. "Rebuttal Expert Report of Brian C. Becker, Ph.D.," Exxon Mobil Corporation, Plaintiff v. NorthWestern Corporation dba NorthWestern Energy, Defendant, Case No. 1:16-cv-00005-SPW-CSO, United States District Court for the District of Montana (Billings Division), September 22, 2017, Deposition Testimony, Houston, Texas, October 5, 2017.
53. "Damages Expert Report of Brian C. Becker, Ph.D.," Exxon Mobil Corporation, Plaintiff v. NorthWestern Corporation dba NorthWestern Energy, Defendant, Case No. 1:16-cv-00005-SPW-CSO, United States District Court for the District of Montana (Billings Division), July 28, 2017, September 22, 2017, Deposition Testimony, Houston, Texas, October 5, 2017.
54. "Supplemental Expert Report of Brian C. Becker," Lisa A. Abraham, Lisa Cave, Scott Cave, Lee Ann Kaminski, and Mark E. Kaminski, Plaintiffs v. Ocwen Loan Servicing, Inc., Defendant, United States District Court, Eastern District of Pennsylvania, Case No. 5:14-cv-04977-JP, September 6, 2017.
55. "Critical Analysis of the March 3, 2017 Expert Report of William O. Kerr, Ph.D. and Calculation of Damages Under AIS's Counterclaim," LISCR, LLC Claimant v. Applied Information Sciences, Inc., Respondent, The American Arbitration Association, Case No. 01-15-0005-7786-1-JB, April 17, 2017, Trial Testimony, Washington, DC, August 8, 2017.
56. "Damages Expert Report of Brian C. Becker, Ph.D.," Sean McEnroe, Plaintiff v. Mantissa Corporation, Defendant, Civil Action No. 14-cv-12320, United States District Court for the District of Massachusetts, October 27, 2016.
57. "Reply Class Certification Report of Brian C. Becker," Lisa A. Abraham, Lisa Cave, Scott Cave, Lee Ann Kaminski, and Mark E. Kaminski, Plaintiffs v. Ocwen Loan Servicing, Inc., Defendant, United States District Court, Eastern District of Pennsylvania, Case No. 5:14-cv-04977-JP, February 12, 2016, Deposition Testimony, Washington, DC, July 20, 2016.
58. "Class Certification Report of Brian C. Becker," Lisa A. Abraham, Lisa Cave, Scott Cave, Lee Ann Kaminski, and Mark E. Kaminski, Plaintiffs v. Ocwen Loan Servicing, Inc., Defendant, United States District Court, Eastern District of Pennsylvania, Case No. 5:14-cv-04977-JP, December 21, 2015, Deposition Testimony, Washington, DC, July 20, 2016.
59. "Critical Analysis of Comments in Reports by Daniel Broadhurst, Ron Johnson, Irving Plotkin, and David West Regarding Choices and Applications of Transfer Pricing Valuations in Audit Reports of Brian C. Becker," Guidant LLC et al., Petitioners, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket Nos. 5989-11, 5990-11, 10985-11, 26876-11, 5501-12, 5502-12, June 20, 2016.
60. "Critical Analysis of the May 2, 2016 Expert Reports of Clark Chandler and Michael Cragg: Guidant LLC v. Commissioner of Internal Revenue," Guidant LLC et al., Petitioners, v. Commissioner of





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- Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket Nos. 5989-11, 5990-11, 10985-11, 26876-11, 5501-12, 5502-12, June 20, 2016.
61. "Economic Analysis of the Intercompany Prices Between Guidant (and Successor) Related Entities: 2001-2007," Guidant LLC et al., Petitioners, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket Nos. 5989-11, 5990-11, 10985-11, 26876-11, 5501-12, 5502-12, May 2, 2016.
  62. "Impact of Different Transfer Prices on Guidant's Valuation of Assets Transferred from Its Section 936 Possessions Corporation to Puerto Rico Successor Company as of May 14, 1999," Guidant LLC et al., Petitioners, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket Nos. 5989-11, 5990-11, 10985-11, 26876-11, 5501-12, 5502-12, May 2, 2016.
  63. "Valuation of Intangible Irish Assets Transferred to Abbott Laboratories, Inc. as of April 21, 2006 and Explanation of Impact of Changing Transfer Prices," Guidant LLC et al., Petitioners, v. Commissioner of Internal Revenue, Respondent, United States Tax Court, Washington, DC, Docket Nos. 5989-11, 5990-11, 10985-11, 26876-11, 5501-12, 5502-12, May 2, 2016.
  64. "Expert Report of Brian C. Becker," Forest Laboratories, Inc. et al., Plaintiffs v. Teva Pharmaceuticals USA, Inc. et al., Defendants, United States District Court for the District of Delaware, Case 1:14-cv-00121-LPS; 1:14-cv-00686-LPS, December 18, 2015.
  65. "Rebuttal Analysis of Expert Report of Dr. Sanjay Unni Dated August 4, 2015," Canadian Imperial Bank of Commerce, Appellant v. Her Majesty the Queen, Tax Court of Canada, 2010-1413(IT)G/2010-1414(IT)G/2010-2864(IT)G/2013-4005(IT)G, September 18, 2015.
  66. "Rebuttal Analysis of W. Todd Schoettelkotte Report Dated May 18, 2015," Afiliac, PLC, Plaintiff v. Architelos, Inc. and Alexa Raad, Defendants, Case No. 1:15-CV-14, Before the United States District Court, Eastern District of Virginia (Alexandria Division), June 3, 2015, Deposition Testimony, Washington, DC, June 5, 2015, Trial Testimony, Alexandria, Virginia, August 19-20, 2015.
  67. "Expert Report of Brian C. Becker," Afiliac, PLC, Plaintiff v. Architelos, Inc. and Alexa Raad, Defendants, Case No. 1:15-CV-14, Before the United States District Court, Eastern District of Virginia (Alexandria Division), April 27, 2015, Deposition Testimony, Washington, DC, June 5, 2015, Trial Testimony, Alexandria, Virginia, August 19-20, 2015.
  68. "Economic Analysis of Dumping of Certain Steel Nails from Korea, Malaysia, Oman, Taiwan, and Vietnam," U.S. International Trade Commission Investigation Nos. 701-TA-516-519 & 521 and 731-TA-1252-1255 & 1257 (Final), Washington, DC, May 6, 2015, Testimony at Hearing, May 14, 2015.
  69. "Critical Analysis of Taxpayer's October 2014 Expert Reports: Medtronic, Inc. and Consolidated Subsidiaries v. Commissioner of Internal Revenue," United States Tax Court, Dkt No. 6944-11, December 3, 2014, Trial Testimony, Chicago, Illinois, March 10, 2015.
  70. "Expert Report of Brian C. Becker," Darby Latin American Mezzanine Fund, L.P. and El Barranquilla LLC v. PricewaterhouseCoopers LLP, Case No. 2013 CA 006215 B, Before the Superior Court of the District of Columbia, Civil Division, January 22, 2015, Deposition Testimony, Washington, DC, February 19, 2015.
  71. "Affidavit of Brian Charles Becker in Support of Notice of Appeal Against Appealable Objection Decision Under Section 14ZZ of the Taxation Administration Act 1953 Affirmed on 28 July 2014," Federal Court of Australia, New South Wales District Registry, Between Chevron Australia Holdings Pty Ltd, Applicant, and The Commissioner of Taxation of the Commonwealth of Australia, Respondent, No. NSD 569 of 2012, No. NSD 151 of 2013, July 28, 2014, Trial Testimony, Sydney, Australia, October 14-16, 2014.



72. "Affidavit of Brian Charles Becker in Support of Notice of Appeal Against Appealable Objection Decision Under Section 14ZZ of the Taxation Administration Act 1953 Affirmed on 10 March 2014," Federal Court of Australia, New South Wales District Registry, Between Chevron Australia Holdings Pty Ltd, Applicant, and The Commissioner of Taxation of the Commonwealth of Australia, Respondent, No. NSD 569 of 2012, No. NSD 151 of 2013, March 10, 2014, Trial Testimony, Sydney, Australia, October 14-16, 2014.
73. "Affidavit of Brian Charles Becker in Support of Notice of Appeal Against Appealable Objection Decision Under Section 14ZZ of the Taxation Administration Act 1953 Affirmed on 6 March 2014," Federal Court of Australia, New South Wales District Registry, Between Chevron Australia Holdings Pty Ltd, Applicant, and The Commissioner of Taxation of the Commonwealth of Australia, Respondent, No. NSD 569 of 2012, No. NSD 151 of 2013, March 6, 2014, Trial Testimony, Sydney, Australia, October 14-16, 2014.
74. "Affidavit of Brian Charles Becker in Support of Notice of Appeal Against Appealable Objection Decision Under Section 14ZZ of the Taxation Administration Act 1953 Affirmed on 2 August 2013," Federal Court of Australia, New South Wales District Registry, Between Chevron Australia Holdings Pty Ltd, Applicant, and The Commissioner of Taxation of the Commonwealth of Australia, Respondent, No. NSD 569 of 2012, No. NSD 151 of 2013, August 2, 2013, Trial Testimony, Sydney, Australia, October 14-16, 2014.
75. "Rebuttal Statement of Brian C. Becker," AZSA Holdings Pty Ltd vs. Commissioner of Taxation, Administrative Appeals Tribunal, Taxation Appeals Division, New South Wales District Registry, AAT Proceedings 2010/3229-3232, March 6, 2014.
76. "Declaration of Brian C. Becker in Support of Ricoh Company, Ltd.'s Motion for Relief from Judgment," United States District Court, Southern District of New York, Case No. 12-CV-3109 (DLC), February 26, 2014.
77. "Rebuttal Analysis of Expert Report and Videotaped Deposition Testimony of Michael G. Kessler," United States District Court, Southern District of California, Case No. 12-CV-2188-GPC (BGS), February 3, 2014.
78. "Economic Analysis of Intercompany Transfers Between Altec Lansing, LLC and Altec Lansing, BV: 2010-2012," United States District Court, Southern District of California, Case No. 12-CV-2188-GPC (BGS), December 9, 2013.
79. "Expert Report in Eastman Kodak Company, Plaintiff v. Ricoh Company, Ltd., Defendant," United States District Court, Southern District of New York, Case No. 12-CV-3109, September 23, 2013 Supplement, October 12, 2013 Second Supplement.
80. "Economic Analysis of Intercompany Transactions Between DeCoro USA and DeCoro Ltd.: 2004-2007," United States Bankruptcy Court, Middle District of North Carolina In Re: DeCoro USA, Ltd., Debtor, Chapter 11 Bankruptcy Case No. 09-10846, September 11, 2012, Deposition Testimony, Washington, DC, November 2, 2012, Trial Testimony, Greensboro, NC, September 24, 2013.
81. "Expert Report in Eastman Kodak Company, Plaintiff v. Ricoh Company, Ltd., Defendant," United States District Court, Southern District of New York, Case No. 12-CV-3109, July 8, 2013, Deposition Testimony, Washington, DC, August 8, 2013.
82. "141 Repellent, Inc., Plaintiff v. International Flavors & Fragrances, Inc., Defendant and Counterclaim Plaintiff v. Dennis Tracz, Counterclaim Defendant" United States District Court, District of Western Virginia, Between 141 Repellent, Inc., Plaintiff, and International Flavors & Fragrances, Inc., Defendant, Case No. 6:12-00054 (NKM), June 14, 2013.



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83. "Altana Pharma AG and Wyeth vs. Teva Pharmaceuticals USA, Inc., et al., Altana Pharma AG and Wyeth vs. Sun Pharmaceuticals Industries, Ltd., et al." United States District Court, District of New Jersey Between Altana Pharma AG, and Wyeth, Plaintiffs, and Teva Pharmaceuticals USA, Inc., et al., Defendants, Civil Action No.: 04-2355 (JLL), May 4, 2012 Supplement, Deposition Testimony, Washington, DC, May 10, 2012.
84. "Altana Pharma AG and Wyeth vs. Teva Pharmaceuticals USA, Inc., et al., Altana Pharma AG and Wyeth vs. Sun Pharmaceuticals Industries, Ltd., et al." United States District Court, District of New Jersey Between Altana Pharma AG, and Wyeth, Plaintiffs, and Teva Pharmaceuticals USA, Inc., et al., Defendants, Civil Action No.: 04-2355 (JLL), March 15, 2012, Deposition Testimony, Washington, DC, May 10, 2012.
85. "Economic Analysis of Arm's Length Service Fees Between General Atlantic Service Company LLC and M/s General Atlantic Private Limited: 2006-2007," Income Tax Appellate Tribunal "K" Bench, Mumbai, Between General Atlantic Private Limited, Appellant, and The Assistant Commissioner of Income Tax (OSD), Respondent, I.T.A. No. 7638/Mum/2011, India, February 9, 2012.
86. "Rebuttal Economic Analysis of Receivables Transactions Involving McKesson Canada Corporation and McKesson International Holdings III S.ar.l.: Fiscal Year 2003," Tax Court of Canada Between McKesson Canada Corporation, Appellant, and Her Majesty the Queen, Respondent, Court Files No. 2008-2949(IT)G and 2008-3471(IT)G, May 18, 2011, Trial, Toronto, Canada, November 1-16, 2011.
87. "Economic Analysis of Receivables Transactions Involving McKesson Canada Corporation and McKesson International Holdings III S.ar.l.: Fiscal Year 2003," Tax Court of Canada Between McKesson Canada Corporation, Appellant, and Her Majesty the Queen, Respondent, Court Files No. 2008-2949(IT)G and 2008-3471(IT)G, April 4, 2011, Trial Testimony, Toronto, Canada, November 1-16, 2011.
88. "Brief of Dr. Brian C. Becker, Dr. Sara Fisher Ellison, and Dr. Joseph R. Mason as *Amici Curiae* in Support of Petitioners," In the Supreme Court of the United States, No. 10-1173, April 25, 2011.
89. "Valuation Expert Report," DDRA CAPITAL, INC. and JOHN BALDWIN, Plaintiffs v. KPMG, LLP, Defendant, Civil Action No. 2004/0158, BEFORE THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF THE VIRGIN ISLANDS, DIVISION OF ST. CROIX, October 8, 2010, Deposition Testimony, Washington, DC, November 10, 2010, Declaration, March 11, 2011.
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- 1) "How Tax Litigators and Economists Work Together in Resolving Transfer Pricing Disputes," Tax Institute of Australia National Transfer Pricing Conference, Sydney, Australia (virtual), October 18, 2023 (with G. Hutchings and J. Tse).
- 2) "Economic Disputes in Transfer Pricing Litigation," King & Wood Mallesons, Melbourne, Australia, December 5, 2022.
- 3) "Is Whistleblowing Under the Federal False Claims Act Over?" Panelist, *Cut to the Chase* Podcast, Miami, Florida (virtual), October 18, 2022.





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- 4) "Using Experts in State Tax Matters," Panelist, ABA Tax Section, 2022 Fall Meeting, Dallas, Texas, October 14, 2022.
- 5) "Recent Transfer Pricing Litigation Around the World," Mayne Wetherell, Auckland, New Zealand (virtual), October 26, 2021.
- 6) "Recent Transfer Pricing Litigation," Johnson Winter & Slattery, Melbourne, Australia (virtual), May 31, 2021.
- 7) "Valuation Disputes," Australian Taxation Office, Melbourne, Australia, March 3, 2020.
- 8) "Valuations of Financial Products, Intangible Assets and Contractual Rights in Transfer Pricing Disputes," Inland Revenue, Auckland, New Zealand, March 2, 2020.
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- 10) "Current Topics in Transfer Pricing," Slaughter and May, London, United Kingdom, June 7, 2019.
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### PROFESSIONAL EXPERIENCE

CRITERION FINANCE, L.L.C., Washington, DC, (2001-2001)

Senior Vice President

LECG, LLC, Washington, DC, (1999-2001)

Senior Managing Economist, Managing Economist

ECONOMIC CONSULTING SERVICES INC., Washington, DC, (1995-1999)

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DELOITTE & TOUCHE, Washington, DC, (1992-1994)

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### TEACHING EXPERIENCE

JOHNS HOPKINS UNIVERSITY, Washington, DC, (1997-2002)

Visiting Professor (Corporate Finance, Derivative Securities)

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