

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

----- X
PAUL D. CEGLIA,

Plaintiff,

v.

MARK ELLIOT ZUCKERBERG and
FACEBOOK, INC.,

Defendants.
----- X

Civil Action No. 1:10-cv-00569-
RJA

**DECLARATION OF GERALD
R. McMENAMIN IN SUPPORT
OF DEFENDANTS' MOTION
FOR EXPEDITED DISCOVERY**

I, Gerald R. McMEnamin, declare as follows:

1. I respectfully submit this declaration in support of Defendants' Motion for Expedited Discovery:

2. I am Professor Emeritus of Linguistics and former Chair of the Department of Linguistics at California State University, Fresno. My academic and professional areas of specialization are the analysis of variation and style in spoken and written language. Attached to this Declaration as **Exhibit A** is my *Curriculum Vitae*. On past occasions, the last five years of which are set forth in my *Curriculum Vitae*, I have qualified as an expert witness in forensic linguistics and have testified in courts in the State of California and in other States and countries, as well as in Federal Courts, to render conclusions and opinions on stylistics and questioned authorship.

3. I was retained in this matter by GIBSON DUNN and was asked to determine, to the extent possible, the authorship of a series of QUESTIONED writings excerpted into an Amended Complaint in this matter, by performing a stylistic analysis of those QUESTIONED writings vis-à-vis KNOWN reference writings of Mr. Mark Zuckerberg.

KNOWN writings used for comparison were various email writings of Mr. Zuckerberg exchanged with the Plaintiff and related parties during the time period as specified in the Amended Complaint, which totaled 35 emails. My task was to analyze the internal structure of all writings, with the objective of either excluding or identifying Mr. Zuckerberg as the writer of the QUESTIONED excerpts.

4. **Opinion:** It is probable that Mr. Zuckerberg is not the author of the QUESTIONED writings.

5. **Forensic Stylistic Analysis:** This is a case in which I have used stylistic analysis, or "stylistics", to reach a conclusion related to the authorship of questioned writings. Stylistics is the scientific study of patterns of variation in written language. The object of study is the language of a single individual, resulting in a description of his/her respective identifying linguistic characteristics. Literary stylistics studies works of literature whose authorship is in doubt. Stylistics is *forensic* when its purpose is to resolve a disputed question related to written language, such as that of the authorship question of this case. In cases of disputed authorship, the linguist analyzes and describes the style of documents known to be written by one or more given suspect authors and compares and contrasts their internal linguistic patterns to those of the questioned writing. The result of this analysis may be exclusion or inclusion of writings within a common canon of writings; or exclusion or identification of a suspect author; or inconclusive with respect to data that support neither of the latter outcomes.

6. This approach to author identification is based on two principles generally accepted, and well-documented in peer-reviewed contexts: author-specific linguistic patterns are present in unique combination in the style of every writer, and these

underlying patterns can be empirically described and often measured by careful linguistic analysis, making author identification possible.

7. A language is at one and the same time *owned* by its whole group of speakers but uniquely *used* by individuals from that group. Why one writer chooses linguistic form A and another chooses form B has two possible causes: differences in what they individually know of the language, and differences in how each one uses the core of linguistic knowledge they have in common as speakers and writers of English. Individual differences in writing style are also very often due to an individual's choice of available alternatives within a large, shared common-pool of linguistic forms. At any given moment, a writer picks and chooses just those elements of language that will best communicate what he/she wants to say. The writer's "choice" of available alternate forms is often determined by external conditions and then becomes the unconscious result of habitually using one form instead of another. Individuality in writing style results from a given writer's own unique set of habitual linguistic choices. Identification and analysis of a writer's choices, i.e., of his or her style markers, constitute stylistic analysis, which is well established as a generally accepted and peer-reviewed method of author identification in both literary and forensic contexts.

8. **Method:** QUESTIONED and KNOWN writings analyzed are the following:

Questioned Excerpts
11 Excerpts from Amended Complaint, attributed to Mr. Zuckerberg
Known-Zuckerberg Writings
35 Emails of Mr. Zuckerberg, as described above

9. I analyzed the language of the QUESTIONED writings and that of the KNOWN-Zuckerberg writings to determine if the QUESTIONED writings are or are not

consistent with Mr. Zuckerberg's KNOWN writings.

10. In order to accomplish this assignment, I performed the following tasks:

a. I examined the QUESTIONED writings and the KNOWN-Zuckerberg writings.

b. I identified specific stylistic features of linguistic variation found in the respective QUESTIONED and KNOWN-Zuckerberg writings.

11. **Findings:** Stylistic features present in the QUESTIONED excerpts but absent in the KNOWN-Zuckerberg writings, as well as those present in both sets of writing include the following:

STYLE-MARKERS IN QUESTIONED AND KNOWN-ZUCKERBERG WRITINGS

1.	Punctuation:	APOSTROPHES
2.	Punctuation:	SUSPENSION POINTS
3.	Spelling:	<i>BACKEND</i>
4.	Spelling:	<i>INTERNET</i>
5.	Spelling:	<i>CANNOT</i>
6.	Syntax:	RUN-ON SENTENCES
7.	Syntax:	SINGLE-WORD SENTENCE OPENERS
8.	Syntax:	SENTENCE-INITIAL "SORRY" [similarity]
9.	Syntax:	DISTANT OR AMBIGUOUS PRONOUN-REFERENT
10.	Syntax:	NO COMMA AFTER IF-CLAUSE
11.	Discourse:	MESSAGE-FINAL "THANKS!" [similarity]

12. **Discussion:** Details of all 11 style markers and their occurrences are presented in **Exhibit B**. There are two similarities (Nos. 8 and 11) and nine differences between the QUESTIONED writings and KNOWN-Zuckerberg writings, the differences demonstrating a compelling aggregate-array of distinct markers in the respective sets of writings.

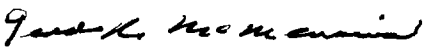
13. It is important to note that no single marker of these nine differing features is

idiosyncratic to these writers. However, these nine contrasting markers constitute a unique set of markers. It would be improbable to find a single writer who simultaneously demonstrates both the QUESTIONED set and the KNOWN set.

14. **Conclusion:** Based on the contrastingly-distinct style markers which the QUESTIONED excerpts and the KNOWN-Zuckerberg writings demonstrate, as well as the presence of no more than two minimally-significant similarities between the QUESTIONED and KNOWN-Zuckerberg writings, I conclude that the KNOWN writings of Mr. Zuckerberg demonstrate a sufficiently significant set of differences vis-à-vis the QUESTIONED writings to constitute evidence that Mr. Zuckerberg is not the author of the excerpted QUESTIONED references.

15. I reserve the right to consider any additional information or writings which may be provided me, and to amend this declaration, as necessary, based on my consideration of such information or writings.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 31 day of May, 2011 at Irvine, California.



Gerald R. McMenamin

EXHIBIT A

Curriculum Vitae of GERALD R. MCMENAMIN**Contacts:**

297 W Trenton Ave, Clovis CA 93619; Tel: 559-322-1407; Cell: 559-765-8986; Email: geraldm@csufresno.edu

Education:

1997	1 wk	Text Encoding Workshop	Oxford University , Somerville College, Oxford, UK
1992	6 wks	Linguistic Soc. of America Inst.	University of California , Santa Cruz, CA
1980	Post Doc Cert.	Clinical Linguistics	University of California , Medical Center-NPI, Los Angeles
1978	PhD	Linguistics	El Colegio de México , México, DF
1974	2 yrs	Linguistic Variation	University of Pennsylvania , Philadelphia, PA
1972	MA	Linguistics	California State University , Fresno, CA
1968	BA	Philosophy, English	University of California , Irvine, CA
1966	BA	English, Latin, Greek	Salesian College , Newton, NJ

Academic Awards:

2010-2011	Named <i>Distinguished Alumnus</i> of California State University, Fresno
2001-2002	The <i>Claude C. Laval Award</i> for Innovative Technology and Research
1998-1999	Named <i>Outstanding Faculty Member in Linguistics</i> at 1998 CSUF University Convocation
1979-1980	Postdoctoral Fellow, Clinical Linguistics, UCLA Medical Center
1974-1976	Doctoral Fellow, Sociolinguistics, University of Pennsylvania
1972-1974	Graduate Fellow, Organization of American States
1970-1972	Graduate Fellow, State of California

Teaching Experience:

2008-Present	Professor Emeritus, Linguistics	California State University , Fresno
1980-2008	Professor, Linguistics	California State University , Fresno
1993-1996	Department Chair, Linguistics	California State University , Fresno
1976-1980	Lecturer, Spanish Linguistics	University of California , Los Angeles
1974-1976	Lecturer, Spanish Linguistics	University of Delaware , Newark
1972-1973	Professor, Spanish Linguistics	Universidad Autónoma de Guadalajara , Jalisco, México

Forensic Experience:

Expert testimony in the **Superior Courts** of the counties of Alameda (CA), Fresno (CA), Kings (CA), Los Angeles (CA), Marin (CA), Oakland (MI), Orange (CA), Placer (CA), Riverside (CA), San Diego (CA), Santa Clara (CA), Ventura (CA), Deschutes (OR), Pima (AZ), El Paso (CO), and the State of Alaska (Anchorage); in **U.S. District Courts** (CA, FL, MT); in the **California Administrative Law Courts** (Sacramento); in the **Supreme Court of the Philippines** (Manila), in the **Canton of Vaud** (Lausanne), in the **Court of Queen's Bench** (Saskatoon), and in the **World Court** (Paris). Opinions in over 600 cases since 1982. Extensive linguistic evidence on DVD accompanying the David Fincher 2007 film: *Zodiac*.

Papers Presented at Professional Meetings: (1988-2011)

2011	Southwestern Association of Forensic Document Examiners, Phoenix
2010	American Academy of Forensic Sciences, Seattle (2 papers)
2009	Southwestern Association of Forensic Document Examiners, Los Angeles
2007	Southwestern Association of Forensic Document Examiners, Monterey
2006	American Academy of Forensic Sciences, Seattle
2005	Southwestern Association of Forensic Document Examiners, Palm Springs
2004	American Society of Questioned documents Examiners, Memphis
2004	American Academy of Forensic Sciences, Dallas
2003	Southwestern Association of Forensic Document Examiners, Anaheim
2002	American Society of Questioned Document Examiners, San Diego
2002	International Association of Identification, Las Vegas

Presentations at Professional Meetings: (1988-2011) cont.

2002 California Association of Criminalists, San Francisco
 2002 Southwestern Association of Forensic Document Examiners, San Diego
 2001 Southwestern Association of Forensic Document Examiners, Monterey
 2000 Georgetown University Roundtable on Language and Linguistics: Law, Washington, DC
 2000 American Academy of Forensic Sciences, Reno
 1999 Colloquium on Psychology, Linguistics, and Law, University of Nevada, Reno
 1999 Southwestern Association of Forensic Document Examiners, Santa Fe
 1999 International Association of Forensic Sciences, Los Angeles (UCLA)
 1999 American Academy of Forensic Sciences, Orlando
 1998 Southwestern Association of Forensic Document Examiners, Breckenridge
 1998 Biennial Descubriendo la Lectura Institute and Collaborative Meeting, Tucson
 1998 Annual West Coast Reading Recovery Institute, Sacramento
 1998 American Academy of Forensic Sciences, San Francisco
 1997 American Society of Questioned Document Examiners, Phoenix
 1997 Southwestern Association of Forensic Document Examiners, Los Angeles
 1996 Southwestern Association of Forensic Document Examiners, Tucson
 1995 International Association of Identification, Costa Mesa
 1995 California Association of Criminalists, Walnut Creek
 1995 Southwestern Association of Forensic Document Examiners, San Diego
 1994 Australasian Society of Forensic Document Examiners, Wellington (NZ)
 1994 Southwestern Association of Forensic Document Examiners, Avalon
 1993 Southwestern Association of Forensic Document Examiners, Albuquerque
 1993 American Society of Questioned Document Examiners, Ottawa
 1993 Southwestern Association of Forensic Document Examiners, San Francisco
 1992 Southwestern Association of Forensic Document Examiners, Denver
 1992 Southwestern Association of Forensic Document Examiners, San Diego
 1991 Southwestern Association of Forensic Document Examiners, Las Vegas
 1990 American Society of Questioned Document Examiners, San Jose
 1990 Southwestern Association of Forensic Document Examiners, Salt Lake
 1989 Southwestern Association of Forensic Document Examiners, Tucson
 1988 Western Conference on Linguistics, Fresno
 1988 American Society of Questioned Document Examiners, Denver
 1988 Southwestern Association of Forensic Document Examiners, Reno
 1988 California Association of Criminalists, Berkeley

Publications:**BOOKS AUTHORED:**

2002 *Forensic Linguistics: Advances in Forensic Stylistics*, CRC Press, Boca Raton, <http://www.crcpress.com/>
 1999 *The Structure Function and Acquisition of English*, book with video tapes, LEP Uplink, Cal Poly Pomona
 1993 *Forensic Stylistics*, Elsevier Science Publishers, Amsterdam.
 1986 *Acquiring English: An ESL Teacher's Guide for the Hmong Student*, EDAC, CSULA, Los Angeles.
 1979 *A First Course in Spanish: Workbook and Recordings*, Harper & Row.

BOOKS EDITED:

2002 *Perspectives in Linguistics: Papers in Honor of P.J. Mistry*, ed. with Laury, Okamoto, Samiian, CB Press, New Delhi.
 1994 *Proceedings of the Western Conference on Linguistics*, editor with S. Hargus and V. Samiian, CSU Fresno
 1993 *Papers in Honor of F.H. Brengelman*, editor with J. Nevis and G. Thurgood, CSU Fresno.

PEER-REVIEWED JOURNAL ARTICLES:

2011 "Forensic Linguistics," in press, *Forensic Communication*, M. Motely, Ed., Hampton Press, NJ

PEER-REVIEWED JOURNAL ARTICLES: (cont.)

- 2010 "Forensic Stylistics," *Handbook of Forensic Linguistics*, M. Coulthard and A. Johnson, Eds. Routledge, Oxford
- 2005 "Forensic Linguistics," *Encyclopedia of Linguistics*, Vol. 1, P. Strazny, Ed.. New York, Routledge, Oxford
- 2004 "Disputed Authorship in U.S. Law," *Forensic Linguistics*, 11:1:73-82.
- 2002 "Forensic Stylistics," C. Wecht (Ed.) *Forensic Sciences*, 2002 Supplement, New York, Bender
- 2002 "A Forensic Analysis of Indian English Writing Style," *Perspectives in Linguistics: Papers in Honor of P.J. Mistry*.
- 2001 "Style Markers in Authorship Studies," *Forensic Linguistics*, 8:2:93-97.
- 1994 "Forensic Stylistics," C. Wecht (ed.), *Forensic Sciences*, 1994 Supplement, New York, Bender.
- 1993 "Perceived vs. Intended Meaning in Written Language," with L. Lepkin, in *WECOL Proceedings*, Nevis *et al.*, 87-92.
- 1992 "El estudio contemporáneo del bilingüismo," *Orbis: Bulletin de Documentation Linguistique*, Fall 1992
- 1984 "Language deficits in a bilingual child with cerebral cysticercosis," *The Bilingual Review*.
- 1979 "La geografía dialectal sociolingüística: un ejemplo andaluz," *La Nueva Revista de Filología Hispánica*.
- 1978 "Chicano bilingualism in the Imperial Valley," *Proceedings of the SWALLOW VI Conference*.
- 1975 "Languages in contact with the computer," *Association for Literary and Linguistic Computing Bulletin*.
- 1973 "Rapid code-switching among Chicano bilinguals," *Orbis: Bulletin de Documentation Linguistique*.
- 1973 "La psicolingüística," *Boletín de la Universidad Autónoma de Guadalajara*, junio.

Membership in Professional Organizations:

American Academy of Forensic Sciences
 International Association of Forensic Linguistics
 Southwestern Association of Forensic Document Examiners

Courses Taught:

English and Spanish language, Introductory Linguistics, Spanish and English Dialects, Spanish Phonetics and Phonology, Spanish Composition, Psycholinguistics, Spanish for Teachers, Applied Spanish Linguistics, History of Spanish, Bilingualism, Sociolinguistics, Field Methods, English for Teachers, Structure of English, Stylistics

Cases in which I have provided trial testimony 1996-2010:

<i>Fahlman v. Lagosmarino</i>	Ventura County Superior Court	Ventura, CA	November 2010
<i>Marriage of Isaacs</i>	Los Angeles County Superior Court	Los Angeles, CA	September 2010
<i>Ghannam v. Ghannam</i>	Oakland County Circuit Court	Pontiac, MI	May 2009
<i>Posnack Estate</i>	Los Angeles County Superior Court	Los Angeles, CA	Dec. 2006, Jan. 2007
<i>Hargitt v. Morell</i>	Placer County Superior Court	Auburn, CA	January 2005
<i>Sarkozi v. Tustin USD</i>	U.S. District Court, Central District of CA	Los Angeles, CA	June 2004
<i>Prajogi v. Udem</i>	Los Angeles County Superior Court	Los Angeles, CA	November 2002
<i>Neilsen v. Neilsen</i>	Riverside County Superior Court	Riverside, CA	September 2002
<i>California v. Flinner</i>	San Diego County Grand Jury	San Diego, CA	Fall 2001
<i>Kepic v. O'Bara</i>	San Bernardino County Superior Court	Rancho Cucamonga, CA	September 1999
<i>Violet Houssien Estate</i>	Superior Court for the State of Alaska	Anchorage, AK	July 1999
<i>Beard v. Wittern</i>	Alameda County Superior Court	Pleasanton, CA	July 1999
<i>Villafranca v. Soukup</i>	Santa Clara County Superior Court	San Jose, CA	November 1998
<i>Zakessian Estate</i>	Marin County Superior Court	San Rafael, CA	January 1997
<i>California v. Armas</i>	Los Angeles County Superior Court	Long Beach, CA	December 1996
<i>Regina v. Gurtler</i>	Court of Queens Bench	Saskatoon, SK, Canada	November 1996

Public Office:

Twice-elected member of the Board of Trustees of the Fresno Unified School District: 63,000 students, 1985-1991

Community Service:

Board member, Valley Performing Arts Council, 2005-2007
 Board member, Kings River Conservancy, 2010-2012
 Deputy Commissioner of Marriages, Office of the Fresno County Clerk, 2010-2014

Complete Court Testimony of Gerald R. McMenamini:**Reported Appellate Decisions:**

In the Matter of the Estate of Violet Houssien, 3AN-98-59 P/R, *Superior Court for the State of Alaska*, Anchorage, 1999. Decision: <http://www.touchngo.com/sp/html/sp-5496.htm>. (2)¹
In the Matter of the Appeal by Amarjit (Jack) Saluja, 30082 and 94-16, 1994, *California State Personnel Board*, 1994. Decision: www.spb.ca.gov/spblaw/pdsindx.htm. (2)
Oregon v. Crescenzi, CA A90559, *Court of Appeals of Oregon*, 152 Ore. App. 567; 953 P.2d 433; 1998 Ore. App., 1998, Deschutes County Circuit Court. No. 94-CR-0258-ST, affirmed without opinion. (2)
Regina v. Gurtler, 7134, *Sask. C.A., Sask. D. Crim.* 260; 10.35.00-08, 1998. (2)

Federal Courts:

Dewey v. Western Minerals and Wytana, CV 86-97-BLG-JFB, *U. S. District Court, District of Montana*, 1990. (1)
Ilic v. Liquid Air, 92-199-CIV-ORL-22, *U.S. District Court, Middle District of Florida*, 1993. (1)
Sarkozi v. Tustin USD, *U.S. District Court, Central District of CA, Los Angeles*, June 2004 (1)

Superior Courts-Civil:

Beard v. Wittern, V-014504-4, *Superior Court of Alameda County, California*, 1999. (2)
Boyar v. Boyar, *Superior Court of Los Angeles County, California*, 1986. (1)
Brisco v. VFE Corp. and Related Cross-Action, 272028-2, *Superior Court of Fresno County, California*, 1984. (3)
DeAndrade v. Rodrigues, Tavares de Almeida, Lausanne, Vaud, l'enquête Lo. 4843/93, 1993 (1)
Hargitt v. Morell, *Placer County Superior Court, Auburn, CA*, 2005 (2)
Marriage of Isaacs, *Superior Court of Los Angeles County, California*, 2010. (1)
In Re The Marriage of Kepic and O'Bara, RFL 35956, *Superior Court of San Bernardino County, California*, 1999. (1)
Lagosmarino Fahlman v. Lagosmarino III, *Ventura County Superior Court, California*, 2010 (1)
Estate of Merrill Miller v. Gunderson, *Superior Court of Orange County, California*, 1994. (1)
Neilsen v. Neilsen, *Riverside County Superior Court, Riverside, CA*, 2002 (1)
In Re Estate of Posnack, *Los Angeles County Superior Court, Los Angeles*, 2007 (1)
Prajogi v. Udem, *Los Angeles County Superior Court, Los Angeles, CA*, 2002 (2)
Villafranca v. Soukup, CV 751860, *Superior Court of Santa Clara County, California*, 1998. (1)
In Re Estate of Sam Zakessian, 39269, *Superior Court of Marin County, 1997*. (2)

Superior Courts-Criminal:

Arizona v. Calo, CR 89-02973, *Superior Court of Maricopa County, Arizona*, 1991. (1)
Arizona v. Muzakkir & Rasul, CR-29681, CR-29722, *Superior Court of Pima County*, 1990. (1)
California v. Armas, NA 023430, *Superior Court of Los Angeles County, California*, 1996. (1)
California v. Flinner, *San Diego County Grand Jury, San Diego, CA*, Fall 2001 (1)
California v. Whitham, C 10514, *Superior Court of Kings County, California*, 1993. (1)
Colorado v. Johnson, *Superior Court of El Paso County, Colorado*, 1989. (1)

Administrative Law Courts:

Butte College v. Grant, *California Office of Administrative Hearings, District 3, #228, Sacramento, California*, 1994. (1)

¹Number of linguists testifying in each case appears in parenthesis at end of each citation.

EXHIBIT B

EXHIBIT B**Style Markers in QUESTIONED vis-à-vis KNOWN-Zuckerberg**

1.	Punctuation:	APOSTROPHES
2.	Punctuation:	SUSPENSION POINTS
3.	Spelling:	BACKEND
4.	Spelling:	INTERNET
5.	Spelling:	CANNOT
6.	Syntax:	RUN-ON SENTENCES
7.	Syntax:	SINGLE-WORD SENTENCE OPENERS
8.	Syntax:	SENTENCE-INITIAL "SORRY" [similarity]
9.	Syntax:	DISTANT OR AMBIGUOUS PRONOUN-REFERENT
10.	Syntax:	NO COMMA AFTER IF-CLAUSE
11.	Discourse:	MESSAGE-FINAL "THANKS!" [similarity]

1. Punctuation: APOSTROPHES

Apostrophes indicating contraction and possession are sometimes absent in QUESTIONED, but always present in KNOWN-Zuckerberg.

Questioned

010604Z doesnt
 010604Z parents [parents']
 020604Z sites [site's = site is]
 020604Z sites [site's = possessive]

Known-Zuckerberg

All apostrophes in contractions and possessives are present.

2. Punctuation: SUSPENSION POINTS

Suspension points appear in threes and are spaced in QUESTIONED. Three suspension points appear in KNOWN-Zuckerberg but are never spaced between each other or away from words.

Questioned

073003Z . . . I've been tweaking the search engine today
 010104Zb I'll just get this site online as quickly as I can ..."

Known-Zuckerberg

So let me know... (3x)
 boxes...there (3x)

3. Spelling: BACKEND

The technical term "backend" is written as two words in QUESTIONED. "Backend" and its parallel "frontend" are always written as one word in KNOWN-Zuckerberg and appear as one word multiple times.

Questioned

010104Z the back end of the site

Known-Zuckerberg

backend (6x)

frontend (5x)

4. Spelling: INTERNET

The word "internet" starts with a small-i in the QUESTIONED writing but with a capital-I in KNOWN-Zuckerberg.

Questioned

090203Z internet

Known-Zuckerberg

Internet (2x with cap I)

5. Spelling: CANNOT

The word "cannot" appears as two words in the QUESTIONED writing but appears multiple times as a single word in KNOWN-Zuckerberg.

Questioned

020604Z can not [2 words]

Known-Zuckerberg

cannot [1 word] (6x)

6. Syntax: RUN-ON SENTENCES (2 sentences with no separating-punctuation)

Run-on sentences constitute a strong and relatively frequent pattern in the QUESTIONED writings. The even more extensive sample of KNOWN-Zuckerberg writings does not demonstrate run-on sentences.

Questioned

073003Z I'd like to --- Face Book], I think it will really help
 090203Z I have been away --- internet, during that time I revised
 010604Z you would be seriously violating --- by doing so, I have done
 010604Z Please do not contact them --- issue, they would probably just
 020204Z Paul, I have --- to discuss with you, *according to* --- I owe you
 020404Z 'thefacebook.com' opened --- today, when you get a chance take a
 020604Z Sorry it's --- to respond, (sic) Now that --- live I feel I must
 020604Z I don't care about --- right now, I just want to see if people

072204Z I still don't have --- build our site, I understand that I

Known-Zuckerberg

No run-on sentences

7. Syntax: SINGLE-WORD SENTENCE OPENERS

It has been shown that words introducing sentences (sentence openers) group as a habitually-used set for individual writers. The set of sentence openers present in the QUESTIONED writings is wholly distinct from that of the KNOWN-Zuckerberg writings.

Questioned

090203Z Further,
 090203Z Additionally,
 010104Z Thus,
 010604Z Again[,]
 020204Z First[,]
 020204Z Mostly though
 040604Z Paul,

Known-Zuckerberg

Okay
 And
 Anyhow, (2x)
 Also,
 But
 But regardless,
 Then
 However,

8. Syntax: SENTENCE-INITIAL "SORRY" [similarity]

Both the QUESTIONED and the KNOWN-Zuckerberg writings demonstrate sentence-initial apologies starting with "Sorry".

Questioned

020604Z Sorry

Known-Zuckerberg

Sentence-initial "Sorry" in Known-Zuckerberg (4x)

9. Syntax: DISTANT OR AMBIGUOUS PRONOUN-REFERENT

A pronoun² will refer back to a noun¹ previously used, as in, *I painted the **door**¹ because **it**² needed attention*. If there is more than one preceding noun, the pronoun will refer back to one of those, one which cannot be too far back, as in, *I painted the door and my nails, and **they** needed attention*. However, sentences like the latter or sentences with a too-distant noun-referent can result in awkward ambiguity: *I painted the door and the table, **which** really needed attention*. This type of problematic ambiguous or too-distant reference occurs in the QUESTIONED writings but not in the KNOWN-Zuckerberg writings.

Questioned

090203Z ... during that time I revised the business plan for the Harvard site. I would like to talk to you on the phone about **it** in detail.

090203Z As you mentioned last week, **the issue** we must resolve is how to produce a revenue stream from the users. My conclusion this past week is With this in mind, ... we could ... expand to other colleges. Further, since the plan involves more than one college, the name can't have Harvard in it **and [no pronoun] remains unresolved.**

010104Z Thus, I am requesting a written waiver on your part exempting me from the obligation to give you additional ownership in the project **that** is outlined in our original contract.

020204Z First I want to say that I think that is completely unfair because I did so much extra work for you on your site **that** caused those delays

Known-Zuckerberg

[No too-distant pronoun referents in KNOWN-Zuckerberg]

10. Syntax: NO COMMA AFTER IF-CLAUSE

A long if-clause is separated from its preceding or following main clause by a comma. Such a comma is absent in the QUESTIONED writings, but most often present in the KNOWN-Zuckerberg writings.

Questioned

112203Z if you could send another \$1000 for --- project _ it would allow
 010104Z if there is any way you can --- funding _ I believe we will be
 020604Z If I had the rest --- that extra work I did _ I wouldn't even

Known-Zuckerberg

Comma present 13x before or after if-clause in KNOWN-Zuckerberg
 Comma absent 2x before or after if-clause in KNOWN-Zuckerberg

11. Discourse: MESSAGE-FINAL "THANKS!" [similarity]

Both sets of writings contain an example of "Thanks!" used to conclude the writing.

Questioned

073003Z Thanks!

Known-Zuckerberg

Thanks! (1x)