

Tammy R. Metzger, J.D., M.A.

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EDUCATION

Juris Doctorate with emphasis in Environmental and Natural Resources Law, May 2002.
Northwestern School of Law of Lewis and Clark College, Portland, Oregon.

Certificate of Alternative Dispute Resolution, May 2002. Straus Institute for Dispute Resolution
at Pepperdine University School of Law, Malibu, California.

Master of Arts in Geography, December 1998. University of California, Santa Barbara.
Thesis entitled [Climate Change and Sierra Nevada Snowpack](#).

Certificate of Hazardous Materials Management, March 1995. UC Riverside Extension.

Bachelor of Science in Environmental Science, August 1993. University of California, Riverside.

EXPERIENCE

TRIAL CONSULTANT, PRESIDENT

August 2005 to Present

JuriSense
Seal Beach, California

Offering litigation support and MCLE trial advocacy workshops nationwide. Specialties include:
jury selection, theme development, storytelling skills, pre-trial research, expert testimony, post-
verdict interviews and combining *Rules*, *Reptile* and *Damages* approaches.

"Train to Win" workshops, which are endorsed by David Ball, help attorneys develop their
courtroom instincts. These 1-day mock trials utilize the most sophisticated equipment and scientific
methods to peer into jurors' minds. By analyzing the live graphical display of jurors' moment-to-
moment reactions to "Reptile" and "Rules of the Road" techniques, Tammy helps attorneys
understand what drives juror decision-making.

ADJUNCT FACULTY

July 2004 to December 2005

Irvine Valley College
Irvine, California

Taught Physical, Cultural and World Regional Geography. These courses provide a broad overview
of the physical and social sciences, in the context of space; i.e., examining the patterns of human
activity and geophysical phenomena by understanding the effects of location.

PARK NATURALIST

December 2003 to April 2004

Department of Parks, Recreation & Marine
Long Beach, California

Led children on educational nature tours at the El Dorado Nature Center, stopping to examine
insects, flora and fauna. Maintained the park grounds.

RESEARCH ASSOCIATE
July 2002 to November 2003

Metzger Law Group
Long Beach, California

Conducted legal research and wrote responses to motions, prepared subpoenas, researched epidemiological studies, assisted with trial.

CONSULTANT, PRESIDENT
August 2001 to July 2002

Legal and Scientific Consulting
Santa Barbara, California

Provided attorneys assistance with legal research and writing, expert witnesses, scientific evidence, trial preparation, negotiations and evaluating environmental documents for law firms, government organizations and private industries in environmental, patent and criminal law.

CERTIFIED LAW CLERK
November 2001 to May 2002

Santa Barbara County District Attorney's Office
Santa Barbara, California

Court appearances under the Certification Program for the State Bar of California, assisted with jury selection, prepared briefs.

LAW CLERK
February 2001 to April 2001

Oregon Department of Justice, Natural Resources Section
Salem, Oregon

Conducted legal research on various topics, including secured transactions, civil procedure, delegation of agency power, public officers' duties and construction liens for property on state land.

LAW CLERK
March 2000 to January 2001

National Oceanic and Atmospheric Administration
Seattle, Washington

Developed a statistical method to introduce toxic tort causation evidence following the guidelines established by the Supreme Court's ruling in *Daubert v. Merrell Dow*. See [Principal Components Analysis in Demonstrating Causation by a Preponderance of the Evidence](#).

TEACHING ASSISTANT
January 1999 to March 1999

University of California
Santa Barbara, California

Ran the laboratory for a Regional Planning and Policy class where the students created detailed plans for a hypothetical city.

GRADUATE STUDENT RESEARCHER
September 1995 to December 1998

University of California
Santa Barbara, California

Analyzed monthly and seasonal maximum snow accumulation trends in the Sierra Nevada using statistical models. Spoke at international geophysical conferences and published peer-reviewed articles.

ASSOCIATE FACULTY

Fall 1998

**Allan Hancock Community College
Santa Maria, California**

Taught two Physical Geography classes that focus on understanding the Earth's atmosphere, hydrosphere, lithosphere and biosphere as a single interconnected system.

INSTRUCTOR

Summer 1998

**University of California
Santa Barbara, California**

First instructor to teach two new courses: Geography 3A Oceans and the Atmosphere and Geography 3B Land Surface Processes. Created fun, outdoor laboratory projects that utilized the gorgeous UCSB campus and surrounding community to bring to life geophysical processes. Organized a simulation of the Kyoto Climate Treaty where students enacted roles such as scientists, negotiators, industry representatives and environmental activists.

ENVIRONMENTAL SCIENTIST

January 1994 to May 1995

**Tetra Tech, Inc
San Bernardino, California**

Assigned two PCB spill Sites for the March Air Force Base (AFB) Remedial Investigation Feasibility Study (RI/FS). Wrote site reports summarizing investigation efforts and results, including risk assessments and remediation strategies. Conducted site inspections for Basewide Environmental Baseline Surveys (EBSs) of Griffiss AFB in New York and Arnold AFB in Tennessee.

ENVIRONMENTAL CONSULTANT

October 1993 to January 1994

**Jorgensen Environmental
Cedar City, Utah**

Prepared Toxic Hot Spots Emissions Plans and Reports which required calculating emissions by mass balance equations, analysis and description of industrial processes and chemical reactions. Co-author of Stormwater Pollution Prevention Plans (SWPPs), Emergency Response Plans and waste reduction documents.

ASSISTANT TO THE BOARD

September 1992 to June 1993

**South Coast Air Quality Management District
Diamond Bar, California**

Summarized Rules, reports and meetings for a board member. Analyzed the Regional Clean Air Incentives Market (RECLAIM). Responded to mail and met with business leaders, activists, scientists, engineers, lawyers, politicians, planners and government regulators to build consensus.

RESEARCH EXPERIENCE FOR UNDERGRADUATES

June 1992 to August 1992

**National Science Foundation
University of Nevada, Reno**

Conducted original research for an ongoing iron chemistry project at the Leviathan acid mine drainage Superfund Site. Collected and analyzed water samples, submitted an abstract and presented a project overview and results.

NEWSPAPER FEATURES WRITER

December 1991 to June 1992

**University of California
Riverside, California**

Interviewed experts in water quality, atmospheric chemistry, soil physics, human health and various other fields to report and analyze environmental issues.

INTERN ENGINEER

August 1990 to September 1991

**Loral Aerospace
Newport Beach, California**

Repaired and programmed laser solder inspection equipment. Set up manufacturing machinery and trained inspectors. Translated technical missile electronics manufacturing and process control specifications into simplified instructions for assemblers.

PUBLICATIONS and PRESENTATIONS (Please note, Tammy Johnson is my maiden name.)

[*Tammy Metzger Responds*](#), (Editor asked for consultants' responses to academic article: [*Are Your Jurors Mad or Sad?*](#)), [*The Jury Expert*](#), May 2011.

Metzger, T.R. and C. Tabag, [*RSS: Your Easy Button for the Internet*](#), [*The Jury Expert*](#), July 2008.

LITIGATION CONFERENCE PRESENTATIONS

Metzger, T.R., HB Benzene Litigation Conference, July 24, 2009, Parc 55 Hotel Union Square, San Francisco (Rebroadcast on November 18, 2009, with live Q & A)

Metzger, T.R., HarrisMartin's Trial of a Benzene Case Conference
December 8-9, 2008, New York Marriott Marquis Hotel in Midtown Manhattan, NY

Metzger, T.R., HarrisMartin's California Asbestos Conference
September 15, 2008, The Beverly Wilshire Hotel in Los Angeles, CA

Metzger, T.R., HarrisMartin's Asbestos Conference: Trial of a Mesothelioma Case from Jury Selection to Verdict, June 23-24, 2008, The Peninsula Hotel in Chicago, IL.

Metzger, T.R., HarrisMartin's Benzene Litigation Conference: Trial of a Benzene-Leukemia Case from Jury Selection to Verdict, December 3-4, 2007, The Westin New York Hotel in New York, NY.

Metzger, T.R., Mealey's Benzene Litigation Conference, December 4-5, 2006, The Ritz-Carlton Battery Park in New York City.

PRESENTATIONS WITH PUBLISHED ABSTRACTS

Johnson, T.R., J. Dozier and J. Michaelsen, *Climate Change and Sierra Nevada Snowpack*, International Union of Geodesy and Geophysics 1999 Meeting, Birmingham, England.

Johnson, T.R., J. Dozier and J. Michaelsen, *Climate Change and Sierra Nevada Snowpack*, American Association of Geographers 1998 Spring Meeting, Boston, Massachusetts.

Johnson, T.R., J. Dozier and J. Michaelson, *Climate Change and Sierra Nevada Snowpack*, American Geophysical Union 1997 Fall Meeting, San Francisco, California.

Johnson, T.R., P. Fohl and J. Dozier, *Climate Change and Sierra Nevada Snowpack*, International Snow Science Workshop ISSW 1996, Banff, Alberta, Canada.

PEER REVIEWED PAPERS (Both in Books)

Johnson, T.R., J. Dozier and J. Michaelson, 1998, [*Climate Change and Sierra Nevada Snowpack*](#), Interactions Between the Cryosphere, Climate and Greenhouse Gases, 63-70 (Proceedings of the International Union of Geodesy and Geophysics, Birmingham, England, July 1999), International Association of Hydrological Sciences Publication no. 256.

Johnson, T.R., J. Dozier and J. Michaelson, 1999, *Snowpack Accumulation Trends in California*, 299-304, North Atlantic Treaty Organization Advanced Study Institute, [Ice Physics in the Natural and Endangered Environment](#), Series 1: Global Environmental Change, Vol. 56 (Proceedings of this NATO ASI were held in Maratea, Italy, September 1997).

CONFERENCE PAPERS

Metzger, T.R., [*Dissection of a Defense Verdict in a Benzene Lymphoma Trial*](#), Harris Martin.

Metzger, T.R., [10 Tips for Trial Attorneys](#), and *Jury Selection Questionnaire Summaries, Comments and Rankings*, Harris Martin Trial of a Benzene Case Conference, December 8-9, 2008, New York City.

Metzger, T.R., *Plaintiff's Jury Selection in a Mesothelioma Case*, and *Jury Selection Questionnaire Summaries, Comments and Rankings*, Harris Martin Asbestos Litigation Conference June 23-24, 2008, Chicago.

Metzger, T.R., *Plaintiff's Jury Selection in a Benzene Leukemia Case*, and *Jury Selection Questionnaire Summaries, Comments and Rankings*, Harris Martin Benzene Litigation Conference, December 3-4, 2007, New York City.

Metzger, T.R., *Plaintiff's View of a Benzene Leukemia Case*, Mealey's Benzene Litigation Conference, December 4-5, 2006, New York City, pp 109-135.

Johnson, T.R., J. Dozier, J. Michaelson and P. Fohl, *River Basin Variations in Sierra Nevada Snowpack Accumulation Trends*, Proceedings of the 65th Western Snow Conference, 1997, Banff, Alberta, Canada, pp 310-316.

Johnson, T.R., P. Fohl and J. Dozier, *Climate Change and Sierra Nevada Snowpack*, International Snow Science Workshop ISSW 1996, Banff, Alberta, Canada, pp 29-34.

OTHER PUBLICATIONS

Environmental Crimes Prosecution Manual, Published by the California District Attorneys Association (I authored a section on negotiation strategy and proofread a chapter written by Deputy District Attorney John Fentis.)

Remedial Investigation, Feasibility Study, Installation Restoration Program (RI/FS IRP) March Air Force Base, CA. (I wrote the chapters for Sites 37 and 38, PCB spill sites, summarizing the investigation efforts and results, including risk assessments and remediation strategies.)

Toxic Hot Spots Emissions Plans and Reports, Stormwater Pollution Prevention Plans, Emergency Response Plans and Waste Reduction Plans (I authored these regulatory reports for small to medium-sized California companies.)

The Highlander, UC Riverside. (I wrote features articles on water quality, atmospheric chemistry, soil physics, human health and various other fields to report and analyze environmental issues.

Johnson, T.R., *The Resolution*, in Rapisarda, J., ed., Holding on to Forever: The International Library of Poetry at 181 (Watermark Press, Owings Mills, MD 2001).

SEMINARS

Plaintiff's Jury Selection, Teaching Points for Plaintiffs: Framing Issues, Juror Decision-Making and Painting Word Pictures. (California State Bar approved CLE talks) Los Angeles and Orange County, 2009-Present.

How Jurors Decide, HG Litigation, Los Angeles, November 2009.

What Jurors Find Important in Their Verdicts, Irvine University College of Law, March 2009.

Climate Change, Butterfly Extinctions and Sierra Nevada Snowpack, Environmental Science Department at the University of California, Riverside, April 1999.

Climate Change and Sierra Nevada Snowpack, Hydrology Group of the Center for Advanced Studies, Research and Development in Sardinia, Italy, September 1997.

Snow Science Statistics, Statistics Department at the University of California, Santa Barbara, January 1997.

RESEARCH AND GRANTS

University of Nevada	Reno, NV	National Science Foundation	1992
Original research for iron chemistry project at a Superfund Site, submitted abstract, presentation.			
NATO Advanced Study Institute	Maratea, Italy	North Atlantic Treaty Org.	1998
IUGG Annual Meeting	Birmingham, UK	Am. Geophysical Union	1999
University of California	Santa Barbara, CA	NASA funded M.A.	1995-1998

PUBLIC SERVICE

1st Vice President of Advocacy and Membership, McGaugh PTA
Member of Board of Directors of [Friends of the Los Angeles River](#) (FoLAR)
Long Beach [Community Emergency Response Team](#) (CERT) member

Graduate representative to UC Santa Barbara's Geography Department faculty meetings
Geography representative to UC Santa Barbara's Graduate Student Association
Vice President of Association of Environmental Professionals, UC Riverside Chapter
Volunteer Planetarium Lecturer at the Santa Barbara Museum of Natural History
Geography Awareness Week presentations for local grade school children

COURSEWORK

Core Law Courses

Administrative Law
Advanced Legal Research
Civil Procedure
Constitutional Law
Contracts
Criminal Law
Criminal Procedure
Evidence
Legal Writing
Professional Responsibility
Property
Remedies
Torts
Wills and Trusts

Environmental / ADR / Criminal / Trial Courses

Alternative Dispute Resolution
Arbitration Practice
Criminal Internship – Santa Barbara
District Attorney's Office
Criminal Practice Seminar
Environmental Law
Environmental Litigation
Environmental Regulation
International Trade and the Environment
Interviewing, Counseling, and Planning
Land Use Planning
Law / Science / Environment Seminar
Mediation
Mock Trial
Negotiation and Settlement Advocacy
Trial Procedure
Water Law

ENVIRONMENTAL MANAGEMENT

Environmental Economics
Environmental Impact Analysis
Internship in Environmental Sciences
(Assistant to Board Member of the
South Coast Air Quality Management
District)
Regional Planning and Environmental Policy
Workshop in Environmental Management

HAZARDOUS MATERIALS MANAGEMENT

Environmental Fate of Hazardous Substances
Environmental Toxicology and Risk
Assessment
Hazardous Materials Management
Health and Safety Training for Hazardous
Waste Workers (40-Hour OSHA
training)
Regulatory Framework for Toxic and
Hazardous Substances

GENERAL SCIENCES (one year for each)

Astronomy
Biology
Chemistry
Environmental Science
Geology
Organic Chemistry
Physics

ATMOSPHERIC SCIENCES

Chemistry of the Clean and Polluted
Atmosphere
Global Warming

HYDROLOGIC SCIENCES

Advanced Snow Hydrology
Environmental Hydrology
Limnology (study of surface waters)
Oceanography
Thermohaline Circulation (global oceanic
circulation patterns)
Water Quality Control
Water Resources

SOILS AND EARTH SCIENCES

Bioremediation
Geomorphology
Soil Science

ANALYTICAL METHODS

Analytical Methods for Geographers (linear algebra,
vector analysis, differential equations,
Fourier transforms and least-squares
estimation)
Avenue (Arcview's GIS programming language)
Basic Programming
Calculus
Geographical Information Systems (GIS)
Geographic Research Methods
Group Studies (analyzed notable scientific studies,
identifying useful findings and errors)
Remote Sensing and Environmental Optics
Spatial Statistics
Statistics

ANTHROPOLOGY / SOCIOLOGY

Cultural Anthropology
Cultural Geography
Physical Anthropology
Race and Ethnicity
Sociology of the Family
World Regional Geography

COMMUNICATION

Communication Fundamentals
Computational Concepts in Geography (incl. web
page development)
Creative writing
Instructional Development (effective teaching
methods, considering how students learn)
Persuasive Speaking and Writing (Environmental
Seminar)
Speech
Speed Reading/Comprehension Training

HISTORY / POLITICAL SCIENCE / PHILOSOPHY

American Government
Contemporary Earth Issues
Philosophy
United States History
World History

PSYCHOLOGY

Abnormal Psychology
Child Psychology
Cognitive Psychology
Psychology
Psychology of Adjustment
Social Dynamics and Conflict Resolution in
Environmental Management