

EXHIBIT 16

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ANTHONY OLIVER, TERRY GAYLE
QUINTON, SHAWN O'KEEFE, ANDREW
AMEND, SUSAN BURDETTE, GIANNA
VALDES, DAVID KOSKOWITZ,
ZACHARY DRAPER, NATE THAYER,
MICHAEL THOMAS REID, ALLIE
STEWART, ANGELA CLARK, JOSEPH
REALDINE, RICKY AMARO, ABIGAIL
BAKER, JAMES ROBBINS IV, EMILY
COUNTS, DEBBIE TINGLE, NANCI-
TAYLOR MADDUX, SHERIE
MCCAFFREY, MARILYN BAKER, WYATT
COOPER, ELLEN MAHER, SARAH GRANT
and GARY ACCORD on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

AMERICAN EXPRESS COMPANY and
AMERICAN EXPRESS TRAVEL RELATED
SERVICES COMPANY, INC.,

Defendants.

EXPERT REPORT OF ERIC EMCH, PHD

January 16, 2023

PUBLIC REDACTED VERSION

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