

# DISCOVERY DEMANDS

Proposed Document Requests, Interrogatories & Subpoenas

**Case:** Litman v. Goldberg

**Index No.:** 524343/2025

**Court:** Supreme Court of the State of New York, Kings County

**Judge:** Hon. Brian L. Gottlieb, J.S.C.

**Cause of Action:** NY Civil Rights Law Sections 50-51 (Count V)

**SOL Cutoff:** June 15, 2020

**Prepared:** April 14, 2026

## **SOL FRAMEWORK**

All requests are scoped from June 15, 2020 through present. Pre-SOL documents are requested only where they establish the contractual baseline (2017 Agreement/Amendment) or show a continuing wrong extending into the SOL period.

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## TIER 1 -- DOCUMENT REQUESTS

*Highest Priority -- These Win the Case*

### 1. Freedom Bank of Virginia

**REQUEST:** Complete records for accounts 220001028 and 220001002 -- statements, deposit slips, wire confirmations, signature cards, closure documents -- from 6/15/2020 through account closure (7/28/2025).

**SOL:** *Accounts operational entire SOL period. Earliest post-SOL email: 12/14/2020 (Sharjah wire). Closed 7/28/2025.*

**BASIS:** NGM's own Trust Register (7/2/2025) shows \$24,495.15 balance. The 7/22/2025 "Close Account" wire memo matches to the penny. The 5/6/2017 Amendment transferred "exclusive ownership" of these accounts to NGM. Litman demanded closure 2/9/2024. Litman was directing wires as late as Dec 2023. CPA Schaefer knew about these accounts and excluded them from Exhibit A.

**PROVES:** Every client deposit routed through the undisclosed trust account during the SOL period, proving systematic concealment.

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### 2. Payment Allocation Reports -- Complete Set

**REQUEST:** ALL monthly Payment Allocation Reports from June 2020 through present. Currently have Oct 2023-Jun 2025 (21 months). Missing: June 2020-Sept 2023 (~40 months), Jul/Aug/Sep 2025 (suppressed), Oct 2025-present.

**SOL:** *Every missing month is within the SOL period. June 2020 start aligns precisely with SOL cutoff.*

**BASIS:** The July 2025 report was generated 8/11/2025 and withheld until April 2026 -- active concealment, not oversight. These are generated monthly by Soluno and must exist.

**PROVES:** Complete 20% formula validation across the entire 5+ year SOL window; quantifies total underpayment.

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### 3. Bank of America Account 003926278751 (Wire Receipt)

**REQUEST:** Complete statements, wire confirmations, and transfer records from 6/15/2020 through present for BOA account ending 8751 -- the international wire receipt account NOT included in Exhibit A.

**SOL:** *Entirely within SOL period. Middle East client wires are the core revenue stream.*

**BASIS:** This account received KFU, KSU, UAEU wires but was excluded from the Schaefer/Kren accounting. Every wire is a Litman-originated revenue event.

**PROVES:** Full scope of international client receipts never reported to Litman.

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### 4. BOA Operating Account \*\*\*\*2417

**REQUEST:** Complete statements from 6/15/2020 through present for the BOA operating account.

**SOL:** *Entirely within SOL period. All 69 "Uncredited" transfers are post-SOL.*

**BASIS:** All 69 reconciled trust-to-operating transfers are flagged "Uncredited" to Litman. The operating account shows where the money went after leaving trust.

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### 5. Eagle Bank Account \*\*\*\*3780

**REQUEST:** Complete statements from 6/15/2020 through present for the second Eagle Bank account (separate from Eagle Bank Trust \*\*\*\*0495 in Exhibit A).

**SOL:** *July 7, 2025 wire documented -- deep in post-SOL-safe period.*

**BASIS:** Documented receiving a Saudi wire (Alinma Bank) on 7/7/2025. A third undisclosed account receiving Middle East client wires.

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## TIER 2 -- DOCUMENT REQUESTS

*Destroy Their Defenses*

## 6. Soluno Practice Management Export

- REQUEST:** Full Soluno export from 6/15/2020 through present: client ledger cards for all clients, matter-level billing detail for CN-37833 clients, individual trust receipts by client/matter, three-way reconciliation reports, and the "t20 - Freedom Trust\_1028" sub-ledger.
- SOL:** *Scoped to SOL period. We have the "All 7digit Matters" export (6,643 matters, 98% Litman-originated).*
- BASIS:** We need the underlying per-client financial detail within the SOL window.
- PROVES:** Per-client diversion -- which Litman clients had revenue never allocated to his 20%.
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## 7. CN-37833 and CN-24396 Modification History

- REQUEST:** Complete USPTO Patent Center change history (login records, IP addresses, timestamps) for Customer Numbers 37833 (patent) and 24396 (trademark) from 6/15/2020 through present.
- SOL:** *CN-37833 name removal on May 1, 2025 is in the post-SOL-safe period.*
- BASIS:** Bates-cited proof: CN-37833 changed May 1, 2025 at 12:43 PM. Full history shows every unauthorized modification.
- PROVES:** The systematic erasure timeline -- who changed what and when.
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## 8. POA Authorization -- Show Us the Consent

- REQUEST:** Any and all documents evidencing Litman's consent, authorization, or instruction to Goldberg to sign Powers of Attorney on his behalf after June 15, 2020.
- SOL:** *All 16 Goldberg-signed POAs are post-SOL. Latest signature: 1/17/2025. Latest filing: 6/25/2025.*
- BASIS:** Goldberg's Answer admits the name appeared but denies he "caused" it. If he had post-SOL authorization, produce it.
- PROVES:** The absence of any post-SOL authorization document is itself dispositive on causation.
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## 9. litman@4patent.com Complete Inbox

- REQUEST:** Full native export (.pst or .mbox) of the litman@4patent.com mailbox from July 18, 2025 through present.
- SOL:** *Entirely in the post-SOL-safe period. Every email is post-litigation-trigger.*
- BASIS:** NGM's own production proves 7,519 emails arrived between 7/21/2025 and 12/31/2025. The account was NOT eliminated -- Litman's access was cut while NGM continued receiving his mail.
- PROVES:** The "elimination" was a lie; NGM was intercepting mail; every client communication is a separate use.
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## 10. nathlaw.com Website Change Logs

- REQUEST:** All website CMS logs, change history, and modification records for nathlaw.com from 6/15/2020 through September 5, 2025.
- SOL:** *Website displayed Litman throughout entire SOL period through at least 8/23/2025 (Wayback).*
- BASIS:** Litman demanded removal June 10, 2025. "Retired" added ~June 25 but actual page unchanged through August 23.
- PROVES:** Deliberate delay in removing Litman's name despite written demand.
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# TIER 3 -- DOCUMENT REQUESTS

*Expand the Damages*

## 11. Microsoft 365 Admin Logs

- REQUEST:** All mailbox modifications, forwarding rules, auto-reply configurations, and account actions for litman@4patent.com, rlitman@nathlaw.com, rlitman@litmanlaw.com, and all @4patent.com and @litmanlaw.com aliases, from 6/15/2020 through present.
- SOL:** *91 email aliases operated continuously through SOL period. July 18, 2025 "elimination" is in strongest sub-period.*
- BASIS:** An auto-reply from rlitman@nathlaw.com was triggered 8/21/2025 by an email to litman@4patent.com, proving both accounts linked and active 34 days post-"elimination."
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## 12. DNS/DKIM Records

- REQUEST:** All DNS zone files, DKIM records, MX records, SPF records, and domain registration correspondence for 4patent.com and litmanlaw.com from 6/15/2020 through present.
- SOL:** *Both domains operational entire SOL period. 4patent.com expires May 27, 2026.*
- BASIS:** DKIM records point to nathlaw.onmicrosoft.com. NGM operates 91 email aliases across two domains bearing Litman's name.
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## 13. Trademark Docket Files (Post-SOL Activity)

- REQUEST:** Complete files for all trademark dockets listing Litman as attorney/correspondent with any activity from 6/15/2020 through present, including Section 8/9/15 declarations, TTAB filings, and the TUFFKOTE file (SN 90830083).
- SOL:** *245 dockets identified; request scoped to post-SOL activity. Latest confirmed use: July 24, 2025.*
- BASIS:** Each post-SOL sworn declaration under Litman's name is a separate use. TUFFKOTE abandonment shows client harm.
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## 14. Insurance Applications and Policies

- REQUEST:** All professional liability insurance applications, renewals, and policies from 6/15/2020 through present where Litman is listed.
- SOL:** *The 7/6/2021 application listing Litman as "Of Counsel" is already documented. Every renewal is within SOL.*
- BASIS:** Each renewal listing Litman is a separate commercial use of his name.
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## 15. "The Pad" -- Internal Client Tracking

- REQUEST:** All records from Goldberg's internal tracking system known as "The Pad" reflecting activity from 6/15/2020 through present.
- SOL:** *Scoped to SOL period.*
- BASIS:** Goldberg's own consciousness-of-attribution system tracking which clients he is working through Litman's name.
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## 16. KFU Invoices

- REQUEST:** ALL invoices sent to King Faisal University from 6/15/2020 through present.
- SOL:** *All post-SOL. KFU is the #1 patent-granting university globally with 574 U.S. patents.*
- BASIS:** 2,457 KFU dockets billed without matching invoices (\$1.02M). KFU universe totals \$27.68M billed / \$24.68M received.
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## 17. COBRA Administration Records

- REQUEST:** All COBRA correspondence, election forms, notification letters, and premium records for Richard and Cheryl Litman from June 2025 through present.
- SOL:** *Entirely post-SOL-safe.*
- BASIS:** COBRA not offered until Oct 2, 2025 -- 3+ months after June 30 benefits cutoff. 44-day statutory deadline violated.
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## 18. Q4 2025 Through Present Financials

- REQUEST:** Payment Allocation Reports, trust account statements, and disbursement records from October 2025 through present.
- SOL:** *Deep in post-SOL-safe period.*
- BASIS:** The Oct 8, 2025 payment of \$135,947.69 proves NGM continued collecting his 20%. Where are subsequent payments?
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# TIER 4 -- DOCUMENT REQUESTS

*Deposition Ammunition*

## 19. Goldberg Personal Bank Statements

- REQUEST:** Distributions from NGM operating account to Goldberg's personal accounts from 6/15/2020 through present.
- SOL:** SOL period IS the violation period.
- BASIS:** Faithless servant doctrine potentially supports 100% disgorgement of fees collected during the violation period.
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## 20. Martha Long Email Account

- REQUEST:** Complete inbox for mlong@nathlaw.com from 6/15/2020 through present.
- SOL:** Every post-SOL client email through @4patent.com or @litmanlaw.com aliases is a dated use.
- BASIS:** #1 sender (57,352 emails) and operational center of the name-use pattern. Her emails ARE the uses.
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## 21. Howard Kline Email Account

- REQUEST:** Complete inbox for hkline@nathlaw.com from 6/15/2020 through present.
- SOL:** Post-SOL trademark declarations = post-SOL uses.
- BASIS:** Administered 245 trademark docketed under Litman's name. His email shows every sworn declaration filed in the SOL period.
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## INTERROGATORIES

*All Scoped to SOL Period (June 15, 2020 -- Present)*

1. Identify every bank account (bank name, account number, type, date opened, date closed if applicable, current balance) held by NGM, Nath & Associates PLLC, or any related entity that was open at any time from June 15, 2020 through present.
  2. State the total revenue collected on matters originated by Richard C. Litman, by quarter, from Q3 2020 (starting June 15, 2020) through Q2 2026.
  3. Identify by name, registration number, and date every person who signed a Power of Attorney listing Richard C. Litman as attorney of record after June 15, 2020, and state whether written authorization from Litman was obtained for each.
  4. State the date, method, and person responsible for each modification to the nathlaw.com website adding, modifying, or removing Richard C. Litman's listing from June 15, 2020 through September 5, 2025.
  5. Identify every email alias on the domains 4patent.com, litmanlaw.com, and nathlaw.com that was active at any time from June 15, 2020 to present, including the person or function associated with each alias and the date each was created, modified, or deactivated.
  6. State whether the litman@4patent.com mailbox was deleted, disabled, forwarded, or modified on or about July 18, 2025, and identify the person who took each action.
  7. Identify every client who contacted NGM through the nathlaw.com contact form from June 15, 2020 to present, and state whether Richard Litman's name or photo appeared on the website at the time of each contact.
  8. Identify every patent application filed with the USPTO listing Richard C. Litman as attorney of record, or on which a Power of Attorney naming Litman was filed, from June 15, 2020 to present, including the application number, filing date, patent number if issued, and the identity of the person who signed each POA.
  9. State the total amount paid to Richard C. Litman by any method (W-2, wire, check, distribution) from June 15, 2020 through present, itemized by date and amount.
  10. Identify every trademark application, registration, or proceeding with the USPTO on which Richard C. Litman's name appears as attorney, correspondent, or representative that had any activity from June 15, 2020 to present.
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## THIRD-PARTY SUBPOENAS

*All Scoped to SOL Period*

Target	Records Sought	Date Range
Freedom Bank of VA	Accts 220001028 + 220001002	6/15/20 - 7/28/25
Bank of America	Acct 003926278751 + ****2417	6/15/20 - present
Eagle Bank Corp	Accts ****3780 + ****0495	6/15/20 - present
GoDaddy / Registrar	4patent.com + litmanlaw.com	6/15/20 - present
Microsoft	M365 logs, nathlaw.onmicrosoft.com	6/15/20 - present
Kelly Benefits	COBRA admin, R. and C. Litman	6/2025 - present
Resourcing Edge	Benefits records, R. Litman	6/15/20 - 6/2025
USPTO OED	CN-37833 + CN-24396 audit logs	6/15/20 - present
Fidelity Investments	Acct 645375268 transactions	6/15/20 - present
Grace/Schaefer/Kren	Workpapers for 6/26/25 report	Workpapers only

## STRATEGIC NOTES

### What They Cannot Produce Is As Powerful As What They Can

- \* No POA authorization post-6/15/2020 --> Causation proven for entire SOL period
- \* No Freedom Bank records --> Spoliation inference -- accounts closed post-litigation
- \* No Payment Allocation Reports --> Concealment inference -- reports generated and withheld
- \* No website change logs --> Deliberate delay inference -- removal demanded, not executed
- \* No litman@4patent.com inbox --> Interception inference -- access cut, mail kept flowing

### Production Leverage

We have produced 3,130 documents and 276,899 emails in industry-standard Concordance DAT format (Bates LITMAN000001 through LITMAN278898), with 627,043 pages of Bates-stamped email PDFs, an interactive HTML viewer, and complete load files for Relativity/Concordance/DISCO. Our production demonstrates the depth and precision of our evidence. Defendant's production should match this standard.