

Per-Client Imprimatur Evidence — § 51 Commercial Value of Litman's Name

Litman v. Goldberg, Index No. 524343/2025 (NY Sup. Ct., Kings County) Compiled:

2026-04-25 **Theory:** New York Civil Rights Law §§ 50–51 measures the commercial value of plaintiff's name. To prove that value for each Middle East client (KFU, KSU, UAEU, Kuwait University, SQU, Qatar Foundation), three documentary categories are assembled: (a) engagement-origin, (b) client-side name references, (c) post-arbitration continuation.

Sources used: - `discovery_production/DATA/LITMAN_EMAIL_PRODUCTION.dat` (276,899 emails, Bates LITMAN#####) - `output/KFU_ENGAGEMENT_LETTER_ANALYSIS.md` (Goldberg's 1/26/2024 KFU engagement letter — Litman not mentioned) - `output/MARTHA_LONG_ENGAGEMENT_LETTERS_RATES_20260416.md` - `output/KFU_EXHIBIT_CANDIDATES_RANKED.csv`, KSU/UAEU/KuwaitUni/SQU equivalents - Known anchor Bates: LITMAN209485, LITMAN250428, LITMAN250429, LITMAN267104, LITMAN272429–272454, LITMAN274979–274981

Summary Table

Client	Engagement- origin found?	Client-side name refs (count)	Post-arb continuation refs (count)	Strength rating
KFU	Yes (Goldberg’s 1/26/2024 letter — Litman omitted, evidentiary “negative”) + 9/2/2021 “new dean” thread (Litman personally introduced to incoming dean)	3 from kfu.edu.sa direct + 21 total inbound; KFU comms primarily flow through NGM-controlled kfu@4patent.com mailbox so most KFU-side emails were sent and stored under the alias rather than client domain	1 direct from kfu.edu.sa post-arb (Hulaybi 11/8/2024); however 16,000+ Litman-name-bearing matters continued to issue under kfu@4patent.com pipeline post-6/14/2023	Strongest (largest revenue, longest history, anchor admission “our attorney” = LITMAN209485)
KSU	Yes (KSU originated under Litman; first inbound 9/14/2019 LITMAN056577; first “Dear Richard” personal salutation 11/27/2019 LITMAN181764)	64 direct “Dear Richard”/”Mr. Richard”/”Richard Litman” inbound from ksu.edu.sa	2,588 post-arb inbound; 1,692 in 2024-2025 alone; “our attorney” admission anchor LITMAN250428/250429 (Goldberg, 8/26/2024)	Strongest (longest run of personal “Dear Richard” salutations to Litman through 2023)
UAEU	Yes — pre-SOL relationship documented (Litman in-person visit Nov 2018, see CSV row from 12/2/2018 “Richard’s Visit to United Arab Emirates University”; first inbound 9/14/2019 LITMAN056574)	21 direct inbound name refs; gold-standard inbound LITMAN183061 (1/30/2020) “support always received from Mr. Litman”; LITMAN255520 (1/18/2023) Saudi staff to Clarivate calls Litman “one of our attorney”	930 post-arb inbound; 475 in 2024-2025; “one of our attorneys” admission anchor LITMAN267104 (Goldberg, 6/11/2024)	Strong (post-arb volume + personal in-person relationship Nov 2018)

Client	Engagement-origin found?	Client-side name refs (count)	Post-arb continuation refs (count)	Strength rating
Kuwait University	Yes (first inbound 9/15/2019 LITMANo56595 from Saad Makhseed; relationship with Office of VP Research established pre-SOL)	6 direct name refs from ku.edu.kw (notably LITMANo56765 / LITMANo42872 9/7/2022 from Dr. Fatma Al-Saeedi addressed “Dear Prof. Richard C. Litman” directly)	295 post-arb inbound; 238 in 2024-2025 (still active July 2025)	Strong (active client through 7/2025; explicit “Dear Prof. Richard C. Litman” salutation in 2022)
SQU (Sultan Qaboos)	Yes — and uniquely strong: very first inbound 10/9/2019 LITMANo02686 is addressed “ Dear Litman & Martha ” with subject “Services from NATH, GOLDBERG & MEYER” — client treats Litman as the firm's name	4 name refs (small sample but include “Dear Mr. Richard Litman” LITMANo19213 5/10/2020 from Director Sheikha Al-Akhzami)	77 post-arb inbound; 63 in 2024-2025 (active through 6/29/2025); single relationship-holder Thuraiya Al-Alawi maintained continuity	Strong (inbound volume modest but quality of client-side imprimatur language is the highest of any client)
Qatar Foundation	Yes (first inbound 9/16/2019 LITMANo56451 from Nancy Goel)	189 total inbound name refs (highest count of any client; QF staff pervasively cc Richard Litman through 2020)	0 direct inbound from qf.org.qa post-arbitration; QF appears to have wound down or moved before 6/14/2023	Moderate (huge pre-arb imprimatur, but no documentary continuation post-arb — explanation needed)

1. KFU — King Faisal University

(a) Engagement-origin

- **Goldberg's 1/26/2024 KFU engagement letter** ([output/KFU_ENGAGEMENT_LETTER_ANALYSIS.md](#) ; PDF at [output/goldberg_financial_attachments/20240126_engagement_KFU_2024.pdf](#)). 2 pages, signed Joshua B. Goldberg as “Co-Managing Partner,” addressed to Prof. Abdulrahman Al Lily. **Richard Litman is not mentioned anywhere.** This is the engagement-origin “negative” — the only formal engagement document in production for KFU is one from which Litman is conspicuously erased while his name continued to appear on every KFU patent filing as attorney of record.

- **9/2/2021 “new dean” introduction thread** (LITMAN272449 / LITMAN274979): Goldberg writes “Dear Abdul” to incoming KFU Dean Abdulrahman Allily and brings Litman onto the introduction call. The fact Goldberg felt compelled to walk Litman onto the call to introduce the firm to the incoming dean = evidence Litman was the imprimatur asset.
- KFU originated as a Litman client well before 6/15/2020; first KFU-domain inbound captured is LITMAN002307 (10/3/2019) from Dr. Hamza Hanieh.

(b) Client-side name references (KFU staff invoking Litman)

- **LITMAN027436 — 2/28/2020 — Mahmoud Kandeel mkandeel@kfu.edu.sa** — Subject: “Re: Recent invoices.” Body: “*Dear mr Litman — Please send the emails related to patents only to dean.dsr@kfu.edu.sa...*” Direct salutation to Litman as the attorney to whom invoices are addressed.
- **LITMAN016582 — 7/6/2020 — Mohamed Salem AL-Saikhan msaikhan@kfu.edu.sa** — Reply to a chain on outstanding invoices in which Richard Litman is in the cc and the inbound treats him as an addressee on KFU billing matters; “I inform the KFU president and Vice President in this regard.”
- **LITMAN018178 — 4/23/2020 — msaikhan@kfu.edu.sa** — Same chain; KFU finance staff replying within “Outstanding Invoices for King Faisal University” thread on which Richard Litman is cc’d as the firm’s principal.
- (NOTE: KFU’s normal correspondence pipeline runs through kfu@4patent.com — an NGM-controlled alias on Litman’s 4patent.com domain — so KFU-staff outbound mail is routinely directed there rather than to a kfu.edu.sa outbox the production captures. The 21 directly-from-kfu.edu.sa emails in the production are an undercount of KFU’s actual reliance on Litman as attorney of record.)

(c) Post-arbitration continuation (post-6/14/2023)

- **LITMAN209485 — 12/20/2023 — Goldberg→Martha Long, cc KFU** — “*We are working on the patent application for Docket 33160.75U... Please ask the inventors to respond to our attorney’s questions below.*” Goldberg himself uses “our attorney” referring to Litman in a KFU matter six months after arbitration. Anchor exhibit.
- **LITMAN247508 — 11/8/2024 — Zaid Alhulaybi zalhulaybi@kfu.edu.sa** — Direct KFU-side reply on a 2024 office action; “Dear Martha, Thank you so much for your kind email...” in the active matter pipeline that listed Litman as attorney of record.
- **17,183 KFU emails with attachments, 6/14/2023–7/18/2025** (per [kfu_emails_litman_name_dataset_v2.csv](#) Tier 2 count) — every Martha-Long-to-kfu@4patent.com outbound during this period attached a USPTO PDF naming Litman as attorney; these are independent dated commercial uses of his name to a client who continued paying.
- **466+ KFU patents** issued over the SOL period naming Litman as attorney of record (per case BOP).
- **KFU 36372 trust ledger** shows KFU continued wiring funds against invoices on Litman-named matters through 2/9/2026 (per [KFU_36372_TRUST_LEDGER_ANALYSIS_20260416.md](#)).

(d) Strength assessment: Strongest

- Largest revenue of all six clients
 - Longest unbroken history under Litman
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- Direct documentary “our attorney” admission by Goldberg himself (LITMAN209485)
- Goldberg formalized a new engagement specifically excluding Litman while continuing to use his name on the work (1/26/2024 letter)

(e) Gaps that would strengthen

- The actual native `kfu@4patent.com` PST/mailbox (not produced) would surface thousands of KFU-side replies that the current `kfu.edu.sa` -only filter misses. Demand it in discovery.
 - The “Dear Prof. Hany” template-error letter suggests other KFU-stub engagement letters were sent — request all 2023-onward NGM engagement letters.
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2. KSU — King Saud University

(a) Engagement-origin

- **LITMAN056577 — 9/14/2019 — Mohamed Bassuni / IPTL iptl@ksu.edu.sa** — earliest KSU inbound in production: “Dear Martha — Greetings; with reference to your message below, please find attached the request form from inventors.” Confirms KSU’s IPTL office was already in routine business with the firm in mid-2019 (i.e., relationship pre-dates production cutoff).
- KSU is a long-standing Litman-originated client (per `KFU_KSU_FORENSIC_FINANCIAL_MAP.md` and `ORIGINATED_CLIENT` records).

(b) Client-side name references — 64 inbound, top picks:

- **LITMAN181764 — 11/27/2019 — Dr. Thamer Albahkali (Director, IPTL) talbahkali@ksu.edu.sa** — Subject: “9 Notice of Allowance Applications.” Body: “Dear Richard, How are you? I hope that you are doing fine. It has been a long time since last time I heard from you. First, I want to apologize for the delays of payments...” The IPTL director treats Litman as the personal attorney of record for KSU.
 - **LITMAN005800 — 10/28/2020 — Khalid AlMalam kalmalam@ksu.edu.sa** — “Dear Mr. Richard, Dear Mrs. Martha” — KSU finance staff salutation shows Litman + Martha treated as the responsible attorney/staff pair.
 - **LITMAN045152 — 12/12/2022 — Dr. M. Iqbal Khan miqbal@ksu.edu.sa** — “Dear Richard — Thank you for your timely result-oriented action. Over the years, you have always been at the forefront to help and support according to the situation. I highly appreciate your continuous understanding and cooperation.” Senior KSU professor explicitly treats Litman as his lawyer.
 - **LITMAN255218 — 12/9/2022 — Dr. Iqbal Khan** — “Dear Richard and Martha — Thank you for your unprecedented support, highly appreciated. You saved my skin as well.” Direct attribution of legal results to Litman.
 - **LITMAN229043 — 6/19/2023 — Dr. Iqbal Khan** — “I am sure you will get it resolved. I can proudly promote and advertise you more strongly.” This is direct evidence the client view of Litman = a marketable reputation the client himself was promoting.
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- **LITMAN174919 — 9/13/2021 — Dr. Albahkali** — *“Dear Richard — The information is as follows: To contact the Office of the Rector...”* — IPTL Director coordinating directly with Litman about KSU rector access (relationship-asset evidence).
- **LITMAN174976 — 9/14/2021 — Dr. Albahkali** — Sends Litman his personal patent-attorney rankings for inclusion in Litman's recognition list (“the numbers for me in the us: 2013: 27 issued patents and ranked 74... 2020: 58 issued patents and ranked 45”). Treats Litman as the attorney-rankings authority.
- **LITMAN027923 — 9/27/2021 — Dr. Albahkali** — *“Dear Richard, Can we talk today on zoom. Maybe 10 p.m. Saudi time.”* Personal-attorney-style direct scheduling.
- **LITMAN251651 — 4/24/2024 — IPTL iptl@ksu.edu.sa** — *“The inventors would like to request a meeting with our attorney at your earliest convenience...”* — KSU staff using “our attorney” language post-arb.

(c) Post-arbitration continuation — 2,588 inbound from ksu.edu.sa post-6/14/2023

- **LITMAN048100 / LITMAN229043 — 6/19/2023** (5 days after arbitration) — Iqbal Khan still treating Richard as his attorney
- **LITMAN191229 — 10/3/2023 — Dr. Albahkali to Goldberg** — KSU still negotiating fees/work with Goldberg using a chain on which Richard Litman is cc'd
- **LITMAN228522 / 228534 — 1-2/2023 wire-transfer thread “\$1,437,568.00”** — KSU paying significant sums on chains naming Richard Litman
- **LITMAN250428 / LITMAN250429 — 8/26/2024 — Goldberg to Martha, cc KSU** — *“For this to have a chance of success, we would need information from KSU... Our attorneys have now reviewed the status of this application in greater detail...”* — Goldberg himself uses “our attorneys” referring to Litman in a KSU matter post-arb. **Anchor admission exhibit.**
- **LITMAN199313 / 249951 — 5/22/2024 — Albahkali to Goldberg** — *“Wire transfer”* thread; KSU acknowledges receipt and asks for new invoices “as usual signed and stamped” — continuity of the same NGM/Litman process post-arb
- **LITMAN183591 → LITMAN225860 — 5/10/2025 to 10/2/2025** — IPTL still sending Litman's office (Martha cc Richard Litman) new invention disclosures and patent-search work, e.g., “TuMesh: A Surgical Tissue Stabilization and Protection Device” (Docket 33115.62U; Ref 1308). Continuity through October 2025.
- **1,692 inbound emails from ksu.edu.sa in 2024-2025 alone**; total post-arb inbound = 2,588.

(d) Strength assessment: Strongest

- Largest single corpus of inbound client emails personally addressing Litman by first name (64 direct hits)
 - Active continuously from 9/2019 through at least 10/2025
 - Both anchor “our attorney” admissions by Goldberg in 2024 (LITMAN250428/250429)
 - Direct quote of client *promoting/advertising* Litman (“I can proudly promote and advertise you more strongly”)
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(e) Gaps that would strengthen

- KSU 2019/2020 engagement letter (likely existed; not in production); demand it
 - The KSU \$1.43M wire-transfer chain (1/2023) underlying ledger entries — pair with bank records
 - Albahkali deposition: he is the relationship-holder; his testimony that he believed Litman was his attorney through 2024 = direct § 51 imprimatur testimony
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3. UAEU — United Arab Emirates University

(a) Engagement-origin

- **Pre-SOL Litman in-person relationship:** Per `GOLDBERG_CLIENT_LITMAN_NAME_USE.csv` row 1, on 12/2/2018 Goldberg writes a follow-up to Dr. Salah Al-Omari about “Richard’s Visit to United Arab Emirates University – November 28-29, 2018,” confirming Litman traveled in person to UAEU pre-SOL to cement the relationship.
- **LITMAN056574 — 9/14/2019 — Intellectual Property Office ip@uaeu.ac.ae** — earliest UAEU inbound in production: routine business on Docket 32715.24, confirming established working relationship.
- 12 of 21 client-side name-ref emails name Dr. Salah Addin Al-Omari, the UAEU inventor/relationship-holder originated by Litman.

(b) Client-side name references — 21 inbound, top picks:

- **LITMAN183061 — 1/30/2020 — Dr. Salah Al-Omari s.omari@uaeu.ac.ae** — Subject: “Notice of Allowance for United Arab Emirates University – Docket 32715.58.” Body: *“Thank you so much Mrs. Long, You made my day. Really appreciate the great support and professional performance of you and your team; particularly Mr. Josh, Mr. Apley, Mr. Nick, and for sure the support always received from Mr. Litman.”* — Direct attribution of UAEU’s professional satisfaction to Litman by name.
- **LITMAN056620 — 9/27/2019 — Salah Al-Omari** — *“Dears Josh and Richard, Please see attachment document...”* Litman addressed by first name as project counterpart.
- **LITMAN056600 — 9/26/2019 — Salah Al-Omari** — *“Thanks a lot Richard. It was really great pleasure to have met with you a few days ago.”* Confirms personal in-person meeting.
- **LITMAN255520 — 1/18/2023 — Intellectual Property Office ip@uaeu.ac.ae** — UAEU IP office writing to Clarivate/IPfolio support: *“Please see the email below from one of our attorney indicating they could not login in the IPfolio system...”* — UAEU staff describes NGM/Litman as “our attorney” to a third-party vendor. Independent third-party-recipient evidence of imprimatur.
- LITMAN008999, LITMAN005627, LITMAN007713 — Mahra Mohamed Hamad mahram@uaeu.ac.ae finance correspondence with Litman cc’d as principal attorney.

(c) Post-arbitration continuation — 930 inbound post-arb

- **LITMAN267104 — 6/11/2024 — Goldberg to Martha, cc UAEU** — *“Dear Dr. Sambasivam: Following my earlier email, one of our attorneys called the Examiner of this application...”* — Goldberg uses “one of our attorneys” referring to Litman in a UAEU matter. **Anchor admission exhibit.**
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- **LITMAN188252 / 188253 — 10/28-29/2023 — Salah Al-Omari** — “RE: concern about not receiving feedback from you!!!” — UAEU still treating NGM (Litman) as the attorney owed responses
- **LITMAN188257 / 188705 / 188866 — 10/30/2023 to 11/5/2023 — w.ahmed@uaeu.ac.ae** — Notice of Allowance / Final Office Action threads continuing through October-November 2023
- **LITMAN184691 / 221537 — 6/25/2025 — shareef@uaeu.ac.ae** — “Power of Attorney Needed from United Arab Emirates University” — UAEU still executing POAs naming attorney of record in 2025
- **475 inbound emails in 2024-2025 alone** from uaeu.ac.ae

(d) Strength assessment: Strong

- Documented pre-SOL personal visits by Litman (Nov 2018) — relationship was face-to-face
- Direct professional-attribution language by senior UAEU staff (“Mr. Litman... support always received”)
- Independent third-party-recipient “our attorney” admission by UAEU itself (LITMAN255520) in 2023 to Clarivate
- Goldberg’s own 2024 “one of our attorneys” admission (LITMAN267104)
- Active client through 7/2025

(e) Gaps that would strengthen

- UAEU’s 2018-2019 retainer/engagement letter (would tie pre-SOL imprimatur to documentary form)
 - Salah Al-Omari deposition (he is the consistent client-side voice through the corpus)
 - UAEU IPfolio access logs — would show whether UAEU’s “outside counsel” entry in their IP-management system named Litman or NGM
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4. Kuwait University

(a) Engagement-origin

- **LITMAN056595 — 9/15/2019 — Dr. Saad Makhseed** saad.makhseed@ku.edu.kw — earliest in-production Kuwait U inbound: “Dear every one — I’d like to thank you all for your valuable support and please find our reply...” — established working relationship by Sept 2019.
- 315 of 339 inbound run through Office of VP Research ovpr.patent@ku.edu.kw = institutional client management of Litman-named portfolio.

(b) Client-side name references — 6 direct, headlined by:

- **LITMAN056765 / LITMAN042872 — 9/7/2022 — Dr. Fatma Al-Saeedi** fatma.alsaeedi@ku.edu.kw (Department of Nuclear Medicine, Faculty of Medicine, Kuwait University) — Subject: “Docket No. 33300.23, and Docket No. 33300.25.” Body: “Dear Prof. Richard C. Litman — I would like to ask about the progress of the patent registered numbers as the following...” Addressed directly to Litman by full title and name. **Strongest single Kuwait U inbound exhibit.** (Sent to both rlitman@nathlaw.com and litman@4patent.com.)
 - **LITMAN012671 / 012502 / 003925 — 9/2020 — Shaikha Al-Sanea** ovpr.patent@ku.edu.kw — Zoom-meeting and report threads in which Richard Litman is cc’d as principal counsel.
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- **LITMAN006301 — 11/10/2020 — Shaikha Al-Sanea** — Continued Zoom-meeting thread (“Zoom Meeting for Thursday, November 12, 2020”) on which Litman is cc’d.

(c) Post-arbitration continuation — 295 inbound post-arb

- **LITMAN196099 / 196100 / 196101 — 8/1/2023 — ovpr.patent@ku.edu.kw** — Docket 23588.96 1st Maintenance Fee + 33044.29U + 33044.21U threads continuing immediately after arbitration
- **LITMAN194515 / 194516 — 8/6/2023** — phone-conference and examiner’s-amendment threads
- **LITMAN184908 / 222053 — 7/3/2025 — ovpr.patent@ku.edu.kw** — Patent Search Docket 33044.98S
- **LITMAN185069 / 222283 / 222285 — 7/8/2025** — “Files to the Attorney office” — KU still routing files to “the Attorney office” (i.e., NGM under Litman’s name) in July 2025
- **238 inbound 2024-2025**, active through 7/2025

(d) Strength assessment: Strong

- Single most explicit personal salutation in any client corpus: “Dear Prof. Richard C. Litman” (LITMAN056765)
- Active client through 7/2025
- Institutional VP-Research-Office client management (not just one inventor)

(e) Gaps that would strengthen

- Engagement letter / outside-counsel designation memo from KU’s Office of VP Research — would prove KU’s institutional view of Litman as designated counsel
 - Goldberg “our attorney” admission for KU (none yet found in this scan; search beyond email production may surface one)
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5. SQU — Sultan Qaboos University

(a) Engagement-origin

- **LITMAN002686 / LITMAN023459 — 10/9/2019 — Thuraiya Al-Alawi** thuraya3@squ.edu.om — Subject: “**Services from NATH, GOLDBERG & MEYER**” addressed “**Dear Litman & Martha**”. SQU staff treats “Litman” as the firm’s name (i.e., the firm’s identity = Litman, not Goldberg). Body: “*I need your assistance. Mr. Ayoub Al-Zadjali (cc) is an inventor and he already filed his application as a PCT... He decide after completion 30 month to select USA to file his application. Thus, he need an attorney or agent to help him and I recommended him to contact you.*” — Documentary proof that SQU’s relationship-holder personally referred a new inventor to Litman as the attorney for SQU work. This is the cleanest single piece of imprimatur-origin evidence in the entire corpus.
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(b) Client-side name references — 4, all gold-standard:

- **LITMAN027511 — 2/26/2020 — Sheikha Al-Akhzami (Director, Innovation & Technology Transfer Centre, SQU) akhzami@squ.edu.om** — “Dear Richard, Thank you for your kind email. Regarding the invoices, they are old invoices and surprisingly it is not paid...” — SQU Director writing to Litman directly about invoices.
- **LITMAN019213 — 5/10/2020 — Sheikha Al-Akhzami** — Subject: “Greeting.” Body: “Dear Mr. Richard Litman, Martha and Mr Apley — I hope you and your beloved family are in good health. Wishing lockdown to be gone soon and see you in the Gulf one day — Best wishes Sheikha.” — Personal-relationship language, “see you in the Gulf one day” = expected continued personal contact.
- **LITMAN002686 / 023459** — same “Dear Litman & Martha” referral above (counted once for origination, also a client-side name reference).

(c) Post-arbitration continuation — 77 inbound post-arb

- **LITMAN196095 — 7/31/2023 — Thuraiya Al-Alawi** — Patent Search Docket 32490.49S (continues immediately after arbitration)
- **LITMAN194514 / 195337 / 193530 / 193676 — 8/2023** — “Possible Patent application” thread
- **LITMAN188737 — 11/6/2023 — Thuraiya Al-Alawi** — “Request for Legal Advice on Patent Claims Revision” — SQU explicitly seeking legal advice from the firm whose imprimatur = Litman
- **LITMAN187099 — 11/15/2023** — Patent Search 32490.51S
- **LITMAN211116 / 220121 / 220122 — 5/17-20/2025** — Completed Patent Application 32490.60U
- **LITMAN221269 — 6/14/2025** — “Request for Patentability Search Report” Docket 32590.65S
- **LITMAN184654 / 221893 — 6/29/2025** — “FURTHER REMINDER – Completed Draft of Provisional Patent Application for Sultan Qaboos University – Docket 32490.57”
- 63 inbound 2024-2025; active through 6/29/2025

(d) Strength assessment: Strong

- Lowest absolute volume of the six clients but highest *quality* of client-side imprimatur language (“Services from NATH, GOLDBERG & MEYER” addressed “Dear Litman” = client equating firm’s name with Litman)
- Documented pre-SOL referral of new inventor to Litman by SQU relationship-holder = pure imprimatur monetization evidence
- Active continuously through 6/29/2025

(e) Gaps that would strengthen

- SQU written engagement / appointment letter (would memorialize the institutional relationship)
 - Inventor referrals: how many SQU inventors were brought to NGM specifically because of Litman’s relationship with Sheikha/Thuraiya — depose Sheikha Al-Akhzami
 - Track the 2025 SQU active dockets to confirm Litman-named filings continued
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6. Qatar Foundation

(a) Engagement-origin

- **LITMAN056451 — 9/16/2019 — Nancy Goel nagoel@qf.org.qa** — earliest in-production QF inbound: established business relationship as of mid-2019 (multiple QF dockets 32705.34, 33005.67, 33005.78, 33046.05 etc. in flight).
- QF's IP Management ipmanagement@qf.org.qa regularly cc'd Richard Litman rlitman@nathlaw.com as principal counsel on virtually every matter.

(b) Client-side name references — 189 inbound (highest total of any client), top picks:

- **LITMAN002178 — 9/22/2019 — John T. McEntire jmcentire@qf.org.qa** — Subject: "Notice of Allowance for Qatar Foundation – Docket 33005.67." Body: "*This is news to be celebrated. Thanks for NGM activity and expertise on this achievement.*" — McEntire (QF's senior IP person) celebrating NGM/Litman work product.
- LITMAN002177, 002008, 002010, 002288, 002452, 002462, 002339, 002340, 002341, 002740 — 9/2019 through 10/2019 — repeated Nancy Goel and Aisulu Anarbekova replies on chains where Richard Litman is cc'd as principal attorney. (Pattern: every reminder/response thread cc'd Litman as the attorney of record.)
- LITMAN013498, 013810, 013950, 013952, 014149, 014224, 014599 (5/2020 – 6/2020) — Nancy Goel correspondence on EPO grants, annuities, and "discuss the case with the attorney" requests where Litman is the cc'd counsel. LITMAN014149 (6/8/2020): "*Dr. Monem and John would like to discuss the case with the attorney. Can you please arrange a call between them?*" — QF staff requesting calls with "the attorney" in chains where Litman is the only attorney listed.

(c) Post-arbitration continuation

- **o direct inbound from qf.org.qa after 6/14/2023.** QF's last addressed-to-Litman email captured is LITMAN007845/007846 from Nancy Goel on 12/16/2020. Either: (i) QF terminated the NGM relationship before arbitration and is therefore Strongest only for the *pre-arbitration* damages window; (ii) post-arb QF correspondence was relayed via the qf@4patent.com mailbox and not captured in the production filter; or (iii) data gap in the production. **This is a follow-up question for production / Goldberg deposition.**

(d) Strength assessment: Moderate

- The largest pre-arb client-side imprimatur footprint of any client (189 inbound name refs, multiple QF staff treating Litman as attorney of record)
- BUT: no documentary proof of post-arb continuation in current production = damages window narrower than KFU/KSU/UAEU/KuwaitU/SQU
- Strong for *establishing* imprimatur value, weaker for *post-arb monetization*

(e) Gaps that would strengthen

- **Critical:** confirm via Goldberg deposition / additional discovery whether QF continued with NGM after 6/14/2023 and through what mailbox

- The `qf@4patent.com` native mailbox would resolve whether the production filter is the cause of the apparent post-arb cliff
 - QF's internal IP-Management ledger of outside counsel — did it list NGM/Litman through 2023 or earlier?
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Cross-Cutting Observations

1. **“Our attorney” admissions are the strongest single anchor exhibits** — Goldberg himself uses the phrase referring to Litman in client-cc'd emails for KFU (LITMAN209485, 12/20/2023), KSU (LITMAN250428/250429, 8/26/2024), and UAEU (LITMAN267104, 6/11/2024). All three are post-arbitration, all three sit in client-cc'd chains. Independent UAEU-side use of “one of our attorney” appears at LITMAN255520 (1/18/2023, UAEU IP Office to Clarivate).
 2. **NGM-controlled `<client>@4patent.com` mailboxes are an undercount mechanism for client-side imprimatur evidence.** KFU, KSU, UAEU, KuwaitU, SQU and QF each have a parallel mailbox (`kfu@4patent.com`, `ksu@4patent.com`, etc.) on Litman's `4patent.com` domain through which most institutional correspondence flows. Native mailbox export should be demanded.
 3. **Engagement-letter pattern:** The only post-SOL engagement letter in production for the six clients is the KFU 1/26/2024 letter (Goldberg signing as “Co-Managing Partner”; Litman omitted; “Dear Prof. Hany” salutation error suggests it was a template applied to multiple ME clients). Demand all 2020-onward NGM engagement letters with all six clients.
 4. **Personal-salutation ranking** (most explicit imprimatur language): SQU “Dear Litman & Martha” / “Services from NATH, GOLDBERG & MEYER” (10/9/2019, LITMAN002686) > KuwaitU “Dear Prof. Richard C. Litman” (9/7/2022, LITMAN056765) > KSU “Dear Richard” sustained over 64 emails 2019-2023 > UAEU “Mr. Litman... support always received” (1/30/2020, LITMAN183061) > KFU “Dear mr Litman” (2/28/2020, LITMAN027436).
 5. **Strongest combined showing:** KSU and KFU jointly — KSU has the volume and personal salutations, KFU has the largest revenue and a Goldberg-signed post-arb engagement letter that documents the substitution itself.
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Files generated for this memo: - `/tmp/imprimatur_v2.json` — raw extracted name-reference dataset (per-client) - `/tmp/per_client_refs.txt` — full text dump of client-side name references for each client

Next-step recommendations: - Demand native `<client>@4patent.com` mailboxes (KFU, KSU, UAEU, KuwaitU, SQU, QF) — would multiply client-side evidence 10–20x - Demand all 2020-onward NGM engagement letters to the six clients (only KFU 1/26/2024 currently produced) - Depose Albahkali (KSU IPTL Director), Sheikha Al-Akhzami (SQU ITTC Director), Salah Al-Omari (UAEU), Shaikha Al-Sanea (KuwaitU OVPR), Hany Hassan (KSU IPTL) — the five client-side relationship holders whose own emails read as direct § 51 imprimatur testimony - Resolve QF post-arb cliff via discovery
