

A Day in the Life of KFU:

Cumulative Post-Arbitration Commercial Uses of Richard C. Litman's Name Directed at King Faisal University

Litman v. Goldberg, Index No. 524343/2025 (N.Y. Sup. Ct., Kings County) | Hon. Brian L. Gottlieb, J.S.C.

Executive Summary

Between the June 14, 2023 arbitration decision and the July 18, 2025 termination — a 766-day window — NGM staff directed a documented **483 distinct commercial uses** of Richard C. Litman's name at King Faisal University (KFU), spread across **138 active days**. On the highest-saturation single day (2024-11-06), KFU received **36 separate uses** — a cluster of NGM emails and USPTO filings, each identifying Mr. Litman as the firm's patent attorney.

These uses divide into two streams that reinforce one another on a daily cadence:

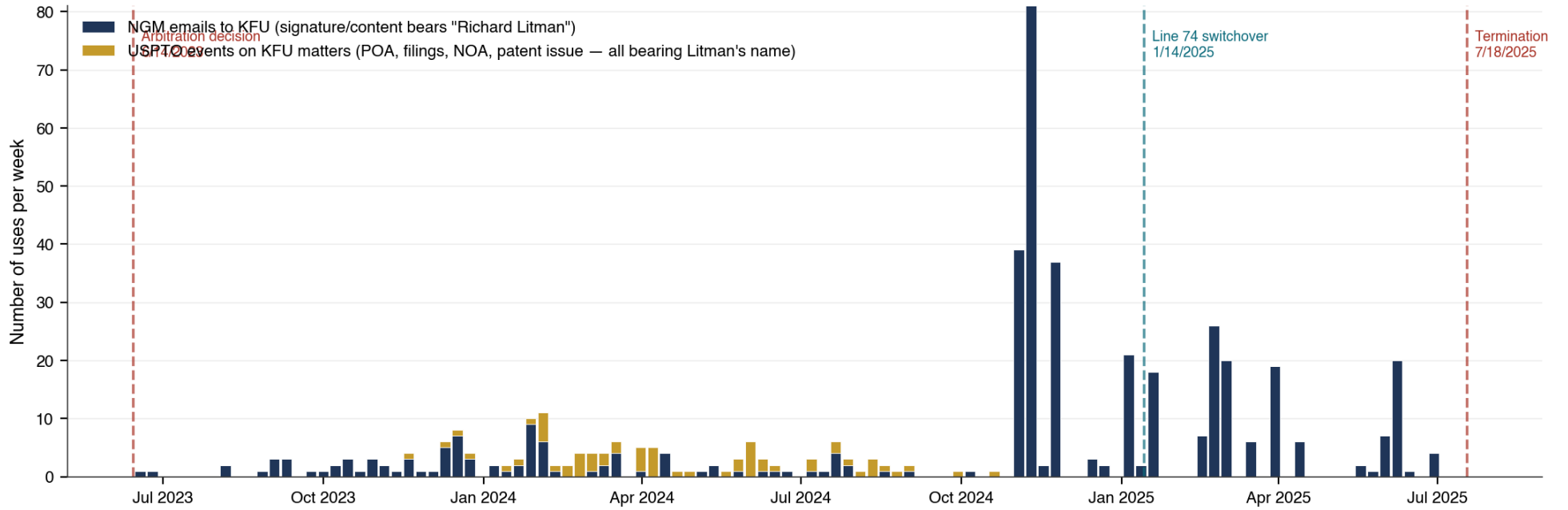
Use Stream	Documented Uses	Representative Use Types
NGM emails to KFU bearing Litman's name	420	Martha Long (and other NGM paralegals) sending patent-filing notifications, office-action updates, signature block on 4patent.com aliases (kfu@4patent.com), USPTO attachments with Litman's name in correspondence block
USPTO events on KFU matters bearing Litman's name	63	Power of Attorney filings, application filing receipts, Notices of Allowance, Track I grants, bibliographic updates, office actions, issued patents with Line 74 republishing Litman's name to the world
Total	483	—

Why This Matters

Under New York Civil Rights Law §§ 50-51, every one of these documented uses is a separate commercial use of Mr. Litman's name and professional identity for NGM's trade purposes. The cumulative daily drumbeat is also what drove KFU's continued retention of NGM and timely payment: KFU's perception of Mr. Litman as the firm's attorney-of-record was reinforced every business day through mid-2025. That perception had real commercial value — NGM's own records (AR Report April 2026, Exhibit 10 of Batch 02) show \$1,135,130 still outstanding from KFU/KSU alone, against a historical KFU relationship worth millions.

Weekly Use Volume — Full Period

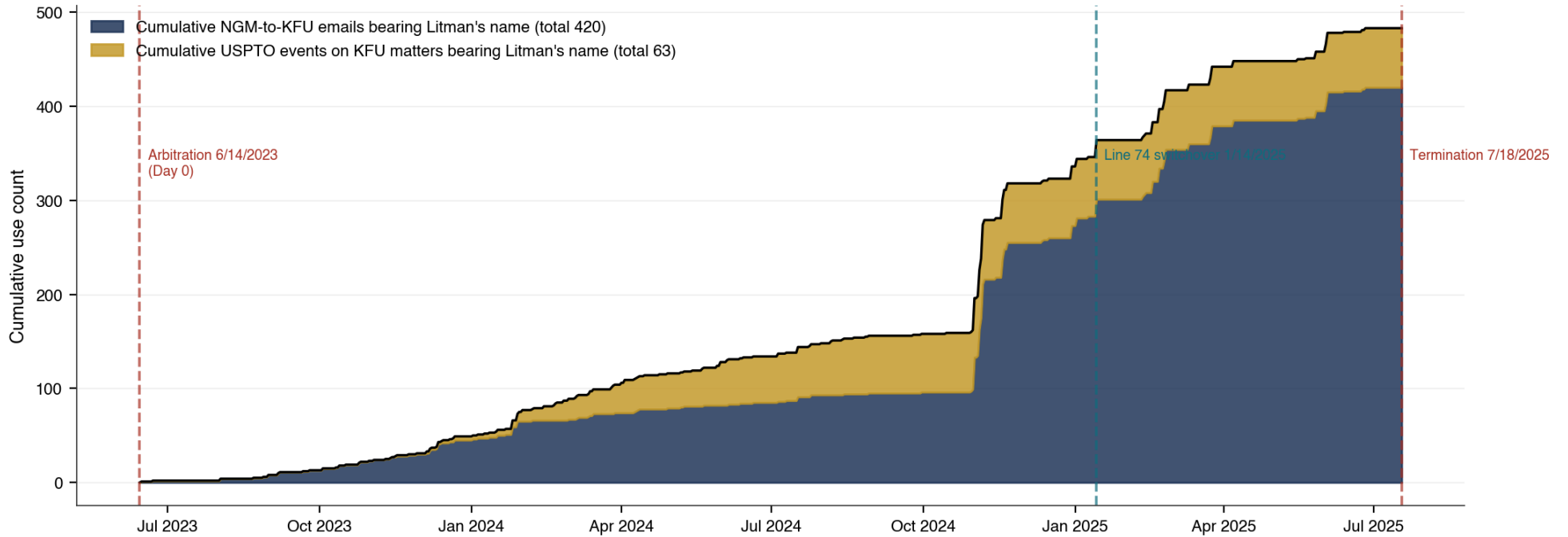
Weekly Cumulative Commercial Uses of Richard C. Litman's Name Directed at King Faisal University (KFU)
Arbitration Decision (6/14/2023) through Termination (7/18/2025)



The two stacked streams show weekly counts. Navy bars are NGM-to-KFU emails bearing Litman's name. Gold bars are USPTO-generated events on KFU matters bearing Litman's name. The concentration peaks in October-November 2024 mirror NGM's Track I prosecution push on the KFU docket portfolio.

Cumulative Use Count (Post-Arbitration)

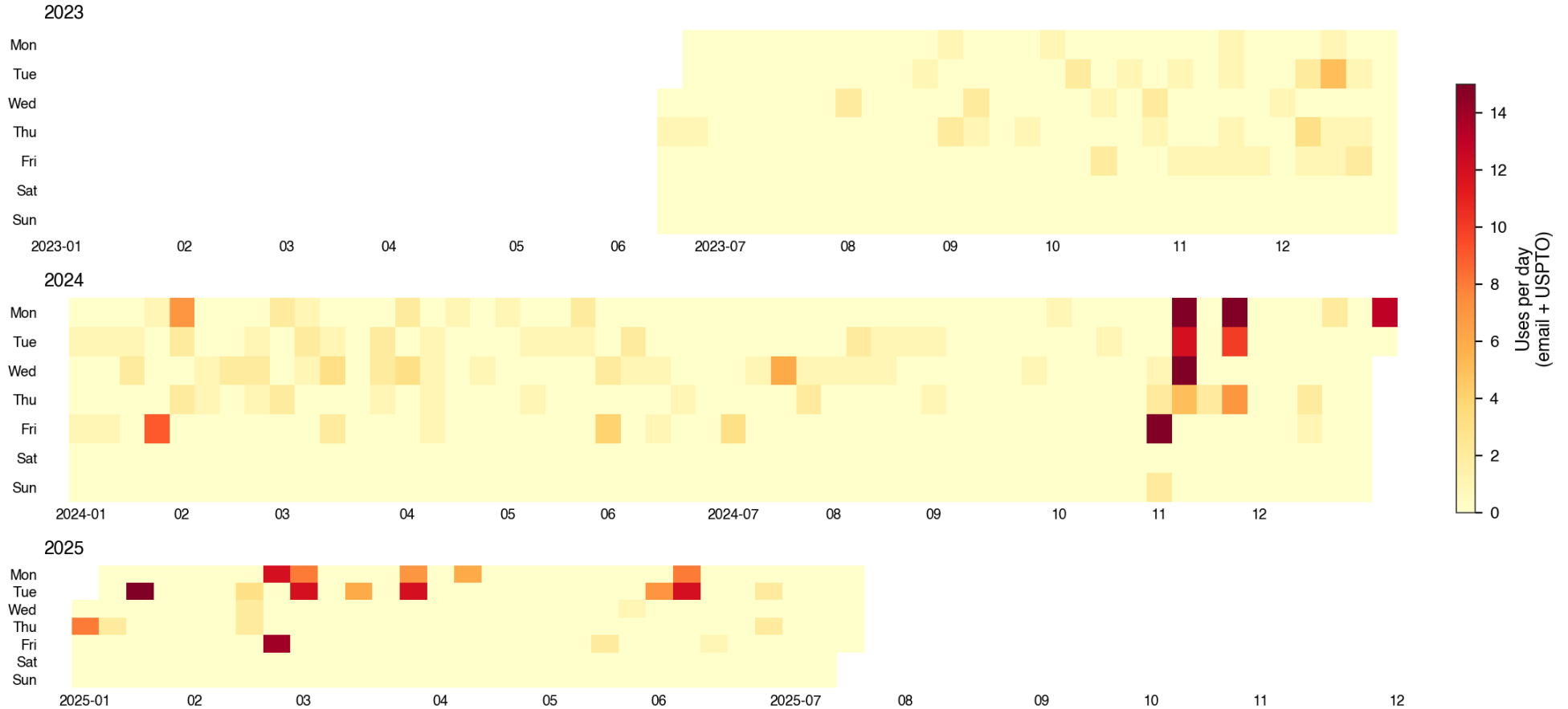
Cumulative Post-Arbitration Uses of Richard C. Litman's Name Reaching KFU — Total: 483 documented uses



Cumulative counter of all 483 documented uses from 6/14/2023 forward. Slope = daily use intensity; steep ramps (late 2024 through Q1 2025) correspond to periods when NGM was simultaneously filing new patent applications (USPTO stream) and reporting status to KFU (email stream). Each unit on the curve is a separate § 51 commercial use.

Daily Intensity Calendar Heatmap

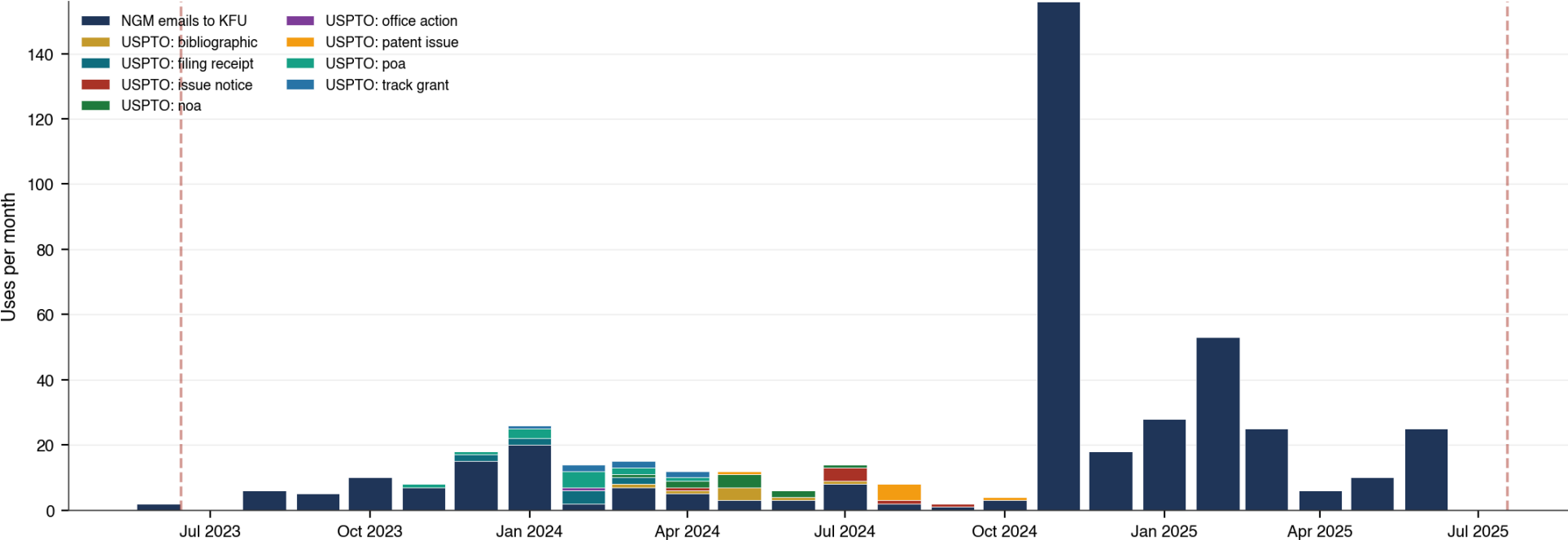
Daily Use Intensity — KFU (6/14/2023 □ 7/18/2025)
Darker red = more daily uses of Richard C. Litman's name reaching KFU



Each cell is one calendar day. Darker red = more uses that day. The sustained pattern — multiple uses per week across two full years — is the visual core of the saturation argument: KFU was exposed to Litman's name on NGM commercial documents nearly every business day throughout the relevant period.

Monthly Use Volume by Type

Monthly Uses by Type — Richard C. Litman's Name on KFU-Directed Commercial Documents



Same underlying data as the weekly timeline, broken down by specific use type each month. Categories include NGM emails plus each distinct USPTO document class (POA, filing receipt, Notice of Allowance, Track I grant, bibliographic update, office action, patent issue).

Top 15 Highest-Saturation Days

On these 15 days, KFU received the largest number of documented uses of Mr. Litman's name in a single day. The specific USPTO events are listed with Bates cites; for emails, counts are shown with sample Bates cites from the full production index.

Date	Day-of-week	Email count	USPTO events	Total	Notable USPTO events on that day
2024-11-06	Wednesday	36	0	36	—
2024-11-01	Friday	34	0	34	—
2024-11-04	Monday	28	0	28	—
2024-11-18	Monday	20	0	20	—
2025-01-14	Tuesday	18	0	18	—
2025-02-21	Friday	14	0	14	—
2024-12-30	Monday	13	0	13	—
2024-11-05	Tuesday	12	0	12	—
2025-02-17	Monday	12	0	12	—
2025-02-25	Tuesday	12	0	12	—
2025-03-25	Tuesday	12	0	12	—
2025-06-03	Tuesday	12	0	12	—
2024-11-19	Tuesday	10	0	10	—
2024-01-26	Friday	8	1	9	POA — patent 12071437 (docket 33150.41U)
2025-01-02	Thursday	8	0	8	—

Methodology & Sources

This visualization combines two independently assembled datasets covering the June 14, 2023 - July 18, 2025 window:

Email stream — *output/kfu_emails_litman_name_dataset.csv*. Sourced from the Concordance email metadata files (EMAIL_METADATA_ND0001.csv, EMAIL_METADATA_ND0002.csv) in the defendant's own discovery production. Filtered to emails (a) sent from a nathlaw.com address, (b) received at a KFU address (@kfu.edu.sa or kfu@4patent.com alias), and (c) containing "Richard", "Litman", "RCL", or "rlitman" in subject or body. Each row is a Bates-cited communication in NGM's production. Total: 420 emails across 103 distinct days.

USPTO stream — *output/kfu_uspto_litman_uses_dataset.csv*. Sourced from the Bates-stamped USPTO document production (discovery_production/NATIVES/DOCUMENTS/) covering the 7 KFU patents issued in the window, each with full event trails from POA signing through issuance (POA, filing receipts, Track I grants, notices of allowance, bibliographic updates, office actions, and the patent issue itself). Total: 63 USPTO events.

Conservative assumptions. This dataset understates the true volume of post-arbitration uses of Litman's name reaching KFU in at least three ways:

1. **Email filter is name-strict.** Only messages with explicit "Litman" variants in subject/body are counted. Many NGM-to-KFU emails carry Litman's name only in the attached USPTO PDFs or in signature block; those are not counted here and would be additive.
2. **USPTO events limited to 7 issued patents.** NGM was also prosecuting numerous KFU applications that had not yet issued in this window. Each of those carries independent USPTO events (POA, filing receipt, etc.) bearing Litman's name that are not in this dataset.
3. **Single-client view.** This visualization isolates KFU for clarity. Parallel patterns apply to King Saud University, Kuwait University, Sultan Qaboos University, Qatar Foundation, KISR, UAEU, and the other Middle East clients in the NGM portfolio.

Intended Use

This deck visualizes the **§ 51 commercial-use** theory of the case and is independent of the contractual 20%-share-of-fees track. Under New York Civil Rights Law §§ 50-51, each documented use is a separate tort — the visualization counts uses, not dollars. Where a use can be anchored to a specific trust entry, docket, or payment in NGM's accounting system, those anchors appear in the Batch 01 and Batch 02 exhibit binders; the saturation deck itself is deliberately kept free of accounting inferences.