

TRACK 1 / TRACK 2 MASTER INDEX

Purpose. Master organizing index splitting the case corpus into two parallel tracks sharing one Bates-numbered evidence pool. Use this file as the navigation root for any binder assembly, settlement deck, MSJ exhibit list, or platform-side filtering.

- **Track 1 — Practice Payout Enforcement.** AAA award + post-2023 NGM accounting. Currency: dollars, accounts, dates, signers. Audience: Scott Woller (Connell Foley), AAA enforcement counsel, settlement table.
- **Track 2 — §§ 50-51 Name-Use Damages.** The surviving Count V. Currency: uses, dates, repetition, imprimatur, name-on-document. Audience: Connell Foley litigation team, MSJ filing, jury.

Convention. Both tracks pull from one shared evidence pool, indexed by Bates / source-id / native filename. Cross-listed items appear in both tracks; the primary track is the one whose argument the document principally supports, with a “see also” reference to the secondary track.

Last updated: 2026-04-25.

0. Shared Evidence Pool — Used by Both Tracks

These are the primary evidentiary substrates from which both tracks pull. Hash-manifested in `output/BATCH_PACKAGES_HASH_MANIFEST.csv`.

| Resource | Path | Role |
|--|--|--|
| NGM-produced documents (Bates LITMAN#####) | discovery_production/ + output/PRODUCTION_INDEX.csv | Both tracks |
| Email metadata corpus | output/EMAIL_METADATA_ND0001.csv (892M), _ND0002.csv (463M) | Both tracks |
| Attachment extraction manifest | output/attachment_extraction_manifest.csv (2.4M) | Both tracks |
| Master research log | RESEARCH_LOG.md (133K, root) | Both tracks |
| Master patent dataset | uspto_richard_litman_package_full/uspto_richard_litman/richard_litman_attorney_issued_patents_since_2020-06-15.csv | Track 2 primary; Track 1 for revenue mapping |
| Master Bates / cross-ref index | output/AUDIT_BATES_MAP.csv , output/AUDIT_CROSS_REF_INDEX.csv | Both tracks |
| Element-by-element admissions matrix | output/ELEMENT_BY_ELEMENT_ADMISSIONS_MATRIX.md (126K) | Both tracks |
| iCloud photos exhibit index | output/ICLOUD_PHOTOS_EXHIBIT_INDEX.csv | Both tracks |

1. Track 1 – Practice Payout Enforcement

1.1 AAA Award + Demand-Letter Sequence

- output/AAA_PACKAGE_INVENTORY.md
- output/AAA_PACKAGE_DEMAND_LETTERS_ANALYSIS.md
- output/AAA_PACKAGE_PAYMENT_RECORDS_ANALYSIS.md
- output/AAA_PACKAGE_TRUST_LEDGERS_ANALYSIS.md
- output/ARBITRATION_ENFORCEMENT_AND DAMAGES_MEMO.md
- output/ARBITRATION_ENFORCEMENT_AR_REPORT.md
- output/ARBITRATION_BRIEFS_ANALYSIS.md

1.2 Trust Ledgers (Per Account)

- Eagle Bank: output/Eagle_east_Trust_Ledger*.csv / .pdf
- BoA: output/BoA_STAGNATION_AND_291K_SHUFFLING_ANALYSIS.md

-
- MSRDC: `output/MSRDC_trust_Ledger*.csv`
 - Martino-Fanelli: `output/Martino-Fanelli_Trust-ledger*.csv`
 - Costello/Dave: `output/Costello_Dave_Trust_ledger*.csv`
 - 2ts (two-trust system): `output/2ts_trust_ledger*.csv`
 - Al-Ani Ma'an R.: `output/Al-Ani_Ma'an_R_Trust_ledger*` (2 files)
 - Qatar Solar: `output/Qatar_Solar_Trust_ledger.csv`
 - Screaming Eagles: `output/Screaming_Eagles_Trust_Ledger.csv`

1.3 Wire Transfers

- `output/694K_WIRE_TRACE_AND_NAME_USE_ANALYSIS.md` (*cross-listed — see Track 2 §2.10*)
- `output/EagleBank_Wire_ACH_Instructions_2024*` (2 instances)
- `output/Schedule_wire_-_NATH_.pdf`
- `output/SUBPOENA_BOA_TRUST_ACCOUNT.md` + `_.DRAFT.md`

1.4 Freedom Bank — Spoliation Bombshell

- `output/FREEDOM_BANK_FINANCIAL_SEARCH.md`
- `output/FREEDOM_BANK_EMAIL_SEARCH.md`, `_.PHOTO_SEARCH.md`, `_.OTHER_SEARCH.md`, `_.NATHLAW_PHOTOS_SCAN.md`, `_.XLSX_SEARCH.md`
- `output/FREEDOM_BANK_WIRES_EXTRACTED.md`, `_.WIRE_TIMELINE.md`
- `output/FREEDOM_BANK_SPOLIATION_EXHIBIT_PACKET.md`
- `output/FREEDOM_BANK_EMAIL_COMPLETE.csv` (423K)

1.5 Q1 2026 Reconciliation Suite

- `output/Q1_2026_RECONCILIATION_MEMO.md`
- `output/Q1_2026_EAGLE_BoA_BASELINE_EXHIBIT.md` + `_.pdf`
- `output/Q1_2026_BILLED_VS_PAID_DETAIL.md`
- `output/Q1_2026_TRUST_BANK_FLOW.md`
- `output/Q1_2026_TRUST_POSITIONS_AND_TRANSFERS.md`
- `output/Q1_2026_payments_received_detail.csv`
- `output/Q1_2026_trust_bank_transactions.csv`
- `output/Q1_2026_trust_transfers.csv`
- `output/Q1_2026_rcl_trust_positions.csv`
- `output/Q1_2026_PAYMENT_BACKUP_ANALYSIS.md`

1.6 Receivables, Allocations, Quarterly Reports

- `output/AUG_2025_RECEIVABLES_REPORT_ANALYSIS_20260416.md`
 - `output/JUL_SEP_2025_PAYMENT_GAP_MEMO.md`
 - `output/JUNE_2025_ALLOCATION_ANALYSIS.md`
 - `output/MONTHLY_ALLOCATION_REPORTS_AUDIT_JUL2023_JUN2025.md`
 - `output/MONTHLY_ALLOCATION_REPORTS_INVENTORY_2023-07_TO_2025-06.md`
-

- `output/QUARTERLY_REPORTS_2020_2023_INDEX.md`
- `output/QUARTERLY_TRUST_LEDGER_ANALYSIS.md`
- `output/MONTHLY_FEE_CREDIT_ANALYSIS_MEMO.md` + `_CHART.png` + `_TIMESERIES_2023-10_TO_2025-06.csv`

1.7 Bank Statement Series & Anomalies

- `output/BANK_STATEMENTS_ANALYSIS_PART1.md` ... `PART7.md`
- `output/CONSOLIDATED_FINANCIAL_EXHIBIT.md`
- `output/TRUST_ACCOUNTING_HANDBOOK_ANALYSIS.md`
- `output/TRUST_RED_FLAGS_AUDIT_CHECKLIST.pdf`
- `output/TRUST_LEDGER_2022_VS_CURRENT_ANALYSIS.md`
- `output/ANOMALOUS_TRANSACTIONS_CATALOG.md`
- `output/COMMINGLING_EVIDENCE_MEMO.md`
- `output/COERCION_AND_CONTROL_MEMO.md` (*cross-listed — see §3.2*)

1.8 KFU Trust-Specific (Turn-and-Burn)

- `output/KFU_36372_TRUST_LEDGER_ANALYSIS_20260416.md`
- `output/KFU_36372_TRUST_MANIPULATION_MEMO.md`
- `output/KFU_TRUST_DOCKET_SUMMARY.csv`, `_LEDGER_36372.csv`, `_MONTHLY.csv`
- `output/TURN_AND_BURN_docket_36372_history.csv`
- `output/TURN_AND_BURN_kfu_nath_transfers.csv`
- `output/TURN_AND_BURN_TEMPLATE_CATALOG.md`
- `output/TEMPLATE_EXHIBIT_36372_TURN_AND_BURN.pdf`

1.9 Damages Models (Track 1 measure)

- `output/DAMAGES_SUMMARY.md`
- `output/VARIANCE_DAMAGES_MODEL_VERIFIED.md` (*cross-listed — Track 2 §2.16*)
- `output/SECTION_51_DAMAGES_BEYOND_20PCT_MEMO.md` (*primary Track 2 — see §2.16*)

1.10 Schaefer / Valencia Gray (CPA & Accounting Signers)

- `output/SCHAEFFER_AND_GRAY_DEPOSITION_PREP.md`

1.11 COBRA Consequentials

- `output/COBRA_BENEFITS_EMAILS.csv` (145K)
- `output/COBRA_KTBSonline_Flyer__pdf`
- `output/Litman_R_-_COBRA_SPECIFIC_RIGHTS_07.2025__pdf`

1.12 Settlement Demand

- `output/SETTLEMENT_DEMAND_LETTER_FREEDOM_BANK_DRAFT.md`
-

1.13 Patent-to-Revenue Linkage (used to anchor Track 1 disgorgement)

- `output/PATENT_REVENUE_LINKAGE.csv` + `_V2.csv`
- `output/PATENT_DOCKET_CROSSREF.csv` (223K)
- `output/PATENT_TRUST_LINKAGE.csv`
- `output/PATENT_TRUST_RECONCILIATION.csv`
- `output/PATENT_UNBILLED_UNCREDITED.csv`
- `output/PER_PATENT_REVENUE.csv`
- `output/PER_PATENT_DAMAGES.csv`
- `output/CLIENT_REVENUE_SUMMARY.json` + `_V2.json`

1.14 Track 1 Lead Exhibits (open with these)

1. Q1 2026 Reconciliation Memo + Eagle/BoA Baseline Exhibit (the served-ready piece for Scott Woller)
 2. KFU \$291K Turn-and-Burn template (15-month recurrence — pattern, not coincidence)
 3. Freedom Bank Spoliation Exhibit Packet (third trust account closed 7/28/25)
 4. \$694K Wire Trace and Name-Use Analysis (Track 1 + Track 2 bridge)
 5. COBRA Consequential Damages exhibit (concrete recurring out-of-pocket harm)
-

2. Track 2 — §§ 50-51 Name-Use Damages

2.1 USPTO IFW & Filing Records

- `output/USPTO_TRADEMARK_NAME_USE_EXHIBIT.md` (74K)
- `output/USPTO_TRADEMARK_DOCKET_MAP.csv` (25K)
- `output/USPTO_EMAILS_TO_LITMAN.csv` (164K)
- `output/USPTO_PRACTITIONER_SEARCH_RESULT.md`
- `output/IFW_EGRANT_EXEMPLAR_MEMO.md` + `_V2.md`
- `output/IFW_EGRANT_EXEMPLAR_EXHIBITS.csv`
- `output/IFW_HIDDEN_ATTRIBUTION_MEMO.md`
- `output/IFEE_SUBMITTER_EXTRACTION_GUIDE.md`, `_RESULTS.md`
- `output/ANALYSIS_filing_issue_sample.csv`
- `output/ANALYSIS_ifw_submitter_direction.csv`

2.2 4patent.com Domain & Alias Infrastructure

- `output/4PATENT_ALIAS_DEFINITIVE_COUNTS.csv` + `.md`
 - `output/4PATENT_CLIENT_ALIAS_INFRASTRUCTURE.md`
 - `output/4PATENT_DOMAIN_EXPIRATION_ACTION_PLAN.md`
 - `output/DOMAIN_CONTROL_4PATENT_MEMO.md`
-

2.3 Power of Attorney (POA) Forensics

- output/POA_GOLDBERG_SIGNATURE_TABLE.md
- output/POA_EMAIL_CROSS_REFERENCE.csv + .json (109K)
- output/POA_EXTRACTION_GUIDE.md
- Per-docket POA files: POA_33032.28.pdf, etc.

2.4 KFU — King Faisal University (largest client)

- output/KFU_EXHIBIT_INVENTORY_MEMO.md
- output/KFU_EXHIBIT_BINDER_100.pdf, _1000.pdf, _14033.pdf (37M largest)
- output/KFU_EXHIBIT_PILOT_BINDER.pdf
- output/KFU_EXHIBIT_CANDIDATES_BY_DOCKET.csv (382K)
- output/KFU_EXHIBIT_CANDIDATES_RANKED.csv (4.8M)
- output/KFU_USE_DATE_CLUSTERED_BINDER.pdf
- output/kfu_email_docket_detail.csv (2.8M)
- output/kfu_emails_litman_name_dataset.csv + _v2.csv
- output/KFU_DAILY_PUBLICATION_PATTERN.md
- output/KFU_DAILY_PUBLICATION_COUNTS.csv (135K)
- output/KFU_CONTACT_DESIGNATION_TIMELINE_2020_2021.md
- output/KFU_USE_VOLUME_ONEPAGER.pdf
- output/PER_CLIENT_REPETITION/KFU_daily.csv, KFU_monthly.csv

2.5 KSU — King Saud University

- output/KSU_EXHIBIT_INVENTORY_MEMO.md
- output/KSU_EXHIBIT_BINDER_100.pdf, _500.pdf
- output/KSU_EXHIBIT_CANDIDATES_BY_DOCKET.csv, _RANKED.csv
- output/KSU_USE_DATE_CLUSTERED_BINDER.pdf
- output/ksu_email_docket_detail.csv
- output/ksu_emails_litman_name_dataset.csv + _v2.csv
- output/PER_CLIENT_REPETITION/KSU_daily.csv, KSU_monthly.csv

2.6 UAEU — United Arab Emirates University

- output/UAEU_EXHIBIT_INVENTORY_MEMO.md
- output/UAEU_EXHIBIT_BINDER_100.pdf, _500.pdf
- output/UAEU_EXHIBIT_CANDIDATES_BY_DOCKET.csv, _RANKED.csv
- output/UAEU_USE_DATE_CLUSTERED_BINDER.pdf
- output/uae_email_docket_detail.csv, _emails_litman_name_dataset.csv + _v2.csv
- output/PER_CLIENT_REPETITION/UAEU_daily.csv, UAEU_monthly.csv

2.7 Kuwait U – Kuwait University

- output/KUWAIT_U_EXHIBIT_INVENTORY_MEMO.md
- output/KUWAIT_U_EXHIBIT_BINDER_100.pdf, _500.pdf
- output/PER_CLIENT_REPETITION/KUWAIT_U_daily.csv, KUWAIT_U_monthly.csv

2.8 SQU – Sultan Qaboos University

- output/SQU_EXHIBIT_INVENTORY_MEMO.md
- output/SQU_EXHIBIT_BINDER_100.pdf, _268.pdf
- output/SQU_EXHIBIT_CANDIDATES_BY_DOCKET.csv, _RANKED.csv
- output/SQU_USE_DATE_CLUSTERED_BINDER.pdf
- output/squ_email_docket_detail.csv, _emails_litman_name_dataset.csv + _v2.csv
- output/squ_daily_docket_counts.csv
- output/PER_CLIENT_REPETITION/SQU_daily.csv, SQU_monthly.csv

2.9 QF – Qatar Foundation

- output/QF_EXHIBIT_INVENTORY_MEMO.md
- output/QF_EXHIBIT_BINDER_42.pdf
- output/QF_EXHIBIT_CANDIDATES_BY_DOCKET.csv, _RANKED.csv
- output/QF_USE_DATE_CLUSTERED_BINDER.pdf
- output/qf_email_docket_detail.csv, _emails_litman_name_dataset.csv + _v2.csv
- output/PER_CLIENT_REPETITION/QF_daily.csv, QF_monthly.csv

2.10 Cross-Client Repetition Pattern

- output/PER_CLIENT_REPETITION/all_clients_monthly.csv (new – 2026-04-25)
- output/PER_CLIENT_REPETITION/REPETITION_SUMMARY_MEMO.md (new – 2026-04-25)
- output/MULTI_CLIENT_SATURATION_DECK.pdf
- output/KFU_SATURATION_VISUAL_POST_ARBITRATION.pdf
- output/CUMULATIVE_USES_CHART.html

2.11 Trademark Name-Use & TTAB

- output/TRADEMARK_NAME_USE_MEMO.md (23K)
- output/TRADEMARK_NAME_USE_EXHIBIT.md (15K)
- output/TRADEMARK_USPTO_EMAIL_CROSSREF_FINDINGS.md
- output/TTAB_PROCEEDINGS_EXHIBIT.md (18K)
- output/TTAB_12_PROCEEDINGS_EXHIBIT.md (12K)
- output/NICOLA_PIZZA_TRADEMARK_EXHIBIT.md

2.12 CN-37833 / CN-20529 Removal Sequence

- output/CN_20529_DOCKET_TRACE.md
 - output/CN_20529_INVESTIGATION.md
-

-
- `output/CN_20529_LINE74_CHECK.md`
 - `output/CN_20529_PATENTS.csv`
 - `output/CN_24396_SEARCH_RESULTS.md`
 - `output/MOTION_COMPEL_CN37833.md`

2.13 Martha Long Email Corpus (predominant client-correspondence channel)

- `output/MARTHA_LONG_COMPLETE_EMAIL_INDEX.csv` (59M)
- `output/MARTHA_LONG_LITMAN_NAME_EMAILS.csv` (13M)
- `output/MARTHA_LONG_LITMAN_NAME_ANALYSIS.md`
- `output/MARTHA_LONG_POST_ENTITLEMENT_EMAILS.md`
- `output/MARTHA_LONG_POST_ENTITLEMENT_ALL_EMAILS.csv`
- `output/MARTHA_LONG_RCL_ORIGINATION_EMAILS.csv`
- `output/MARTHA_LONG_ENGAGEMENT_LETTERS_RATES_20260416.md`
- `output/MARTHA_KFU_DAILY_ACTIONS.csv` (22M)
- `output/martha_kfu_email_docket_detail.csv`
- `output/MARTHA_KFU_DAILY_REPORTS.md`
- `output/MARTHA_GOLDBERG_ATTACHMENT_EMAILS.md` (222K)

2.14 Five-Tier Use Classification (legacy — see also new artifact-class table)

- `output/TIER_1_USES.csv` (3.8M), `TIER_2_USES.csv`, `TIER_3_USES.csv`, `TIER_4_USES.csv`, `TIER_5_USES.csv` (23M)
- `output/FIVE_TIER_DOCKET_REVENUE_LINKAGE.csv`
- `output/FIVE_TIER_NAME_USE_ANALYSIS.md`
- `output/FIVE_TIER_SUMMARY.json`
- `output/FOUR_CATEGORIES_OF_NAME_USE.md`

2.15 Use-Tier Weighting Table (new artifact-class framework)

- `output/USE_TIER_WEIGHTING_TABLE.md` (*new — 2026-04-25*)
- `output/USE_TIER_WEIGHTING_TABLE.csv` (*new — 2026-04-25*)

2.16 § 51 Damages Framework

- `output/NY_SECTION_51_CASE_LAW_COMPENDIUM.md`
- `output/PATENT_SECTION_51 DAMAGES_TABLE.csv` (145K)
- `output/SECTION_51 DAMAGES_BEYOND_20PCT_MEMO.md`
- `output/VARIANCE DAMAGES_MODEL_VERIFIED.md` (*cross-listed — Track 1 §1.9*)
- `output/PRE_LIMITATIONS_FOUNDATION_MEMO.md` (*new — 2026-04-25*)
- `output/IMPRIMATUR_EVIDENCE_BY_CLIENT.md` (*in progress, expected today*)

2.17 Goldberg Personal Action Chronology & Deposition

- `output/GOLDBERG_DEPOSITION_PREP.md` (112K)
-

-
- [output/DEPOSITION QUESTIONS GOLDBERG.md](#)
 - [output/GOLDBERG_DEPOSITION_STINKING_THINKING_QUESTIONS.md](#)
 - [output/GOLDBERG_DEPOSITION_TOPIC_15_CONCEALMENT.md](#)
 - [output/GOLDBERG_DEPO_QUESTIONS_FROM_TEXTS.md](#)
 - [output/WITNESS_LIST_AND_DEPOSITION_PRIORITIES.md](#)
 - [output/DEPOSITION_OUTLINES_FOUR_CATEGORIES.md](#)
 - [output/GOLDBERG_LITMAN_TEXT_THREAD_COMPILED.pdf](#) (50M)
 - [output/LITMAN_GOLDBERG_DIRECT_EMAILS.csv](#) (3.5M)
 - [output/LITMAN_GOLDBERG_EMAIL_TIMELINE.md](#) (1.5M)
 - [output/LITMAN_GOLDBERG_OVERLAP_POST_721_2024.csv](#)
 - [output/GOLDBERG_CLIENT_LITMAN_NAME_USE.csv](#) (11M)
 - [output/GOLDBERG_PERSONAL_ACTIONS_CHRONOLOGY.md](#)
 - [output/GOLDBERG_CONTRADICTIONS_QUICK_REFERENCE.md](#)
 - [output/GOLDBERG_CONNECTED_ENTITIES_INVESTIGATION.md](#)
 - [output/GOLDBERG_TRUST_CONTROL_MEMO.md](#) (*cross-listed — Track 1*)
 - [output/GOLDBERG_JUNE_11_2025_ADMISSION_EXHIBIT.md](#)
 - [output/GOLDBERG_POST_615_2025.csv](#)
 - [output/EMAIL_SEARCH_GOLDBERG_FULL_RESULTS.txt](#)
 - [output/KFU_GOLDBERG_PATENTS_212_RESULTS.csv](#)

2.18 Anchor Willfulness Exhibits (open every Track 2 binder with these)

1. **LITMAN209485** — Goldberg → KFU (12/20/2023) “respond to **our attorney’s** questions” — KFU Docket 33160.75U
2. **LITMAN250428** — Goldberg → KSU (8/26/2024) “our attorney” — Docket 33007.94 NOA (*post-SOL-safe*)
3. **LITMAN250429** — Companion to above on Docket 33056.63
4. **LITMAN267104** — Goldberg → UAEU (6/11/2024) “one of our attorneys” — Docket 33090.41U
5. Sept 2021 KFU “new dean” thread: LITMAN272429, LITMAN272449, LITMAN274979, LITMAN272454, LITMAN274981

2.19 Track 2 Lead Exhibits (settlement / mediation deck open order)

1. Anchor willfulness exhibit for the relevant client
 2. Per-client repetition chart ([PER_CLIENT_REPETITION/REPETITION_SUMMARY_MEMO.md](#))
 3. Use-tier weighting table aggregate ([USE_TIER_WEIGHTING_TABLE.md](#))
 4. Imprimatur evidence per client ([IMPRIMATUR_EVIDENCE_BY_CLIENT.md](#))
 5. Pre-limitations foundation paragraph ([PRE_LIMITATIONS_FOUNDATION_MEMO.md](#)) where relevant
-

3. Dual-Purpose / Cross-Listed

These items are *primary* in one track and *secondary* in the other. The primary track owns the canonical exhibit caption; the secondary track cites by reference.

| Item | Primary track | Secondary track | Reason |
|--|----------------------------------|--|--|
| output/ 694K_WIRE_TRACE_AND_NAME_USE_ANALYSIS.md | Track 1 (wire) | Track 2 (name-use) | Bridge document — wire moves while name appears on the originating documents |
| output/COERCION_AND_CONTROL_MEMO.md | Track 1 (control of accounts) | Track 2 (mechanism by which name-use was sustained) | Same fact pattern serves both |
| output/VARIANCE_DAMAGES_MODEL_VERIFIED.md | Track 1 (payout variance) | Track 2 (§ 51 alternate measure) | Same model, two outputs |
| output/ SECTION_51_DAMAGES_BEYOND_20PCT_MEMO.md | Track 2 (§ 51 measure) | Track 1 (cap argument) | Track 1 sets a floor; § 51 establishes the ceiling-above-floor |
| output/MOTION_SPOILIATION_SANCTIONS_DRAFT.md (112K) + _DRAFT.md (27K) | Both | — | Spoilation goes to both (Freedom Bank for Track 1; PTOL-85B / discovery for Track 2) |
| output/MSJ_EVIDENCE_CHECKLIST.md + .html | Both | — | The MSJ covers Count V (Track 2) but uses Track 1 financial admissions |
| output/ PLAINTIFFS_VERIFIED_BILL_OF_PARTICULARS.md | Both | — | BOP plead both tracks |
| output/RESEARCH_LOG.md (root) | Both | — | Master research log |
| output/CONCEALMENT_TIMELINE_EXHIBIT.md | Both | — | Concealment behavior crosses both |
| output/MASTER_CHRONOLOGICAL_TIMELINE.md + .html | Both | — | Time anchor for both |

| Item | Primary track | Secondary track | Reason |
|--|----------------------------------|---|-------------------------------|
| output/CONSOLIDATED_FINANCIAL_EXHIBIT.md | Track 1 | Track 2 (revenue context for damages) | |
| output/GOLDBERG_TRUST_CONTROL_MEMO.md | Track 1 (control over the trust) | Track 2 (control evidence supporting “knowingly” element) | |
| output/CASE_EVIDENCE_SUMMARY_20260416.md | Both | — | Master evidence summary |
| output/CASE_STRENGTH_ANALYSIS_20260401.pdf | Both | — | Case-wide strength assessment |
| output/PATENT_REVENUE_LINKAGE.csv | Track 1 (revenue per patent) | Track 2 (per-tier dollar floor) | |
| output/CASE_SUMMARY_FOR_JUDGE.html | Both | — | Judge-facing summary |

4. Track 1 / Track 2 Briefing Architecture

Plead the surviving § 51 claim on the merits (Track 2). Plead the AAA payout enforcement and accounting wrongs as a parallel, separate track that supplies (a) revenue context for § 51 damages and (b) standalone equitable / contract relief.

| Brief / filing | Primary track | Notes |
|--|---------------|--|
| output/POINT_I_LIABILITY_DRAFT.md | Track 2 | Liability + judicial estoppel |
| output/POINT_II_REVISED_DRAFT.md | Track 2 | Dissemination + trade-purpose |
| output/POINT_III_DAMAGES_DRAFT.md (51K) | Both | Pleads both measures in alternative |
| output/ POINT_IV_SINGLE_PUBLICATION_REBUTTAL.md | Track 2 | SOL / single-publication anticipated defense |
| output/ POINT_V_FEDERAL_PREEMPTION_REBUTTAL.md | Track 2 | Federal preemption defense |

5. Existing Batch Packages (Hash-Manifested)

Hashes computed in `output/BATCH_PACKAGES_HASH_MANIFEST.csv` (root-level zips + major output binders). Use the hash + custodian declaration template (`output/CUSTODIAN_DECLARATION_TEMPLATE.md`) when serving any of these.

| Package | Track | Notes |
|--|-------|----------------------------|
| <code>Litman_Case_Package_20260418.zip</code> (65M) | Both | Latest comprehensive |
| <code>Litman_InternalCounsel_Package.zip</code> (88M) | Both | Internal counsel materials |
| <code>Litman_Settlement_Package.zip</code> (78M) | Both | Settlement deck |
| <code>Litman_v_Goldberg_INTERNAL_COUNSEL.zip</code> (25M) | Both | Goldberg-specific |
| <code>Litman_Evidence_Package.zip</code> (25M) | Both | Core evidence |
| <code>Litman_v_Goldberg_Evidence_Package.zip</code> (9.3M) | Both | Goldberg sub-package |
| <code>Litman_Settlement_Presentation.zip</code> (6M) | Both | Settlement deck materials |
| <code>Litman_BOP_Package_20260329.zip</code> (576K) | Both | BOP package |
| <code>Litman_Student_Exercise.zip</code> (13M) | — | Educational |
| <code>Model_Submission_Litman_Exercise.zip</code> (15K) | — | Educational |

6. Existing Manifest Infrastructure (Reuse — Don't Duplicate)

These already exist and any restructure should *cite* rather than rebuild.

- `output/PRODUCTION_INDEX.csv` + `.md` — master Bates-organized production index
- `output/AUDIT_BATES_MAP.csv` — Bates mapping audit
- `output/AUDIT_CROSS_REF_INDEX.csv` — cross-reference index
- `output/SUPPLEMENTATION_INDEX.csv` — supplemental production
- `output/DISCOVERY_DEMANDS_INDEX_2026-04-07.md` — demand tracking
- `output/EXHIBIT_INDEX.md` + `exhibits/EXHIBIT_INDEX.md` — exhibit numbering
- `output/attachment_extraction_manifest.csv` (2.4M)
- `output/archive_dedup_manifest.csv` (344K)
- `output/archive_ocr_index.tsv` (967K)
- `output/audit_ocr_20260423/MANIFEST.csv` + `_REMAINING.csv` + `_GOLDBERG_FIN.csv`
- `output/EVIDENCE_INTEGRITY_MANIFEST.json` (1.2M) — checksums / manifest

7. Platform UI — Track Toggle

Suggested platform-side filter behavior: - Top-level toggle: **All** / **Track 1** / **Track 2** (default: All) - Each artifact card carries a `track` tag (`1`, `2`, or `both`) drawn from this index - Search box + glossary check (`output/glossary_check.js`) wraps every text input - Bates / source citation field renders to the same Bates pool regardless of track

8. Maintenance

- **Owner:** Mike (`output/TRACK1_TRACK2_INDEX.md`).
- **Update trigger:** any new analysis memo, binder, or batch package; any change in claim posture or surviving counts.
- **Cross-references:**
 - `output/GLOSSARY.md` (vocabulary used in this index)
 - `output/CUSTODIAN_DECLARATION_TEMPLATE.md` (production paperwork)
 - `output/BATCH_PACKAGES_HASH_MANIFEST.csv` (integrity for packages listed in §5)
 - `output/PRE_LIMITATIONS_FOUNDATION_MEMO.md` (how pre-2020 evidence enters either track)
 - `output/USE_TIER_WEIGHTING_TABLE.md` (Track 2 damages aggregate)
 - `output/IMPRIMATUR_EVIDENCE_BY_CLIENT.md` (Track 2 Purpose-A foundation; in progress)
 - `output/PER_CLIENT_REPETITION/REPETITION_SUMMARY_MEMO.md` (Track 2 pattern visualization)