

EXHIBIT B — Capability Roll-Up

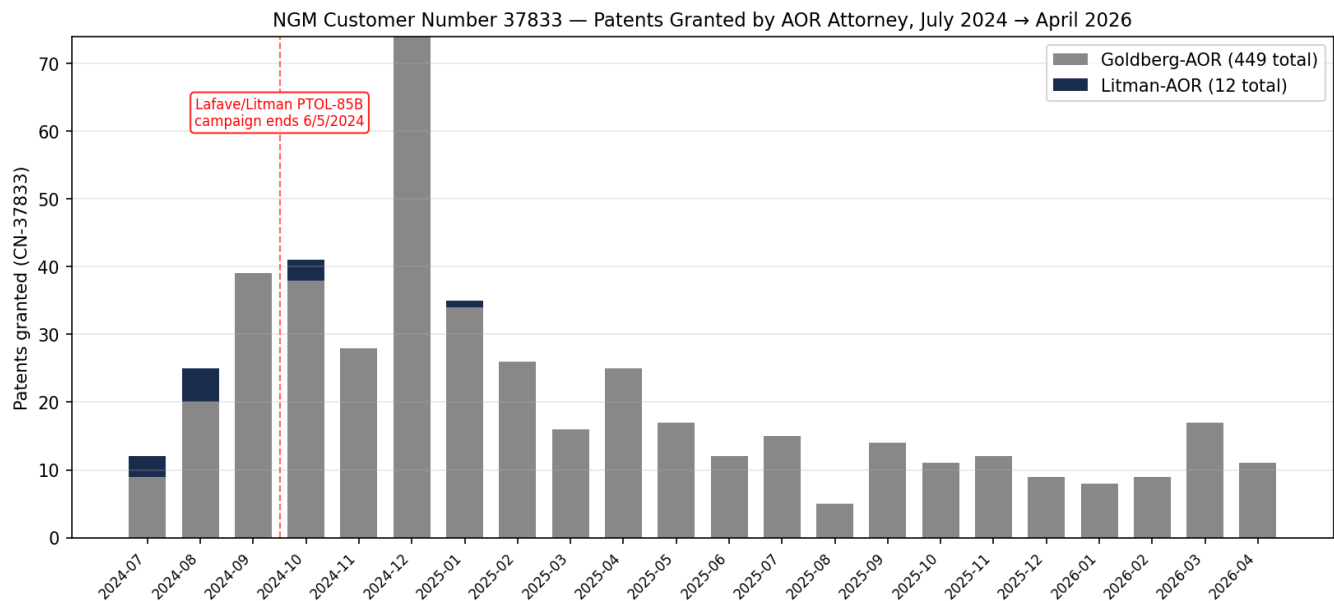
449 Goldberg-AOR Patents in the Same NGM CN-37833 SOL Window

Litman v. Goldberg · Index No. 524343/2025 · NY Sup. Ct. Kings County · Hon. Brian L. Gottlieb, J.S.C.

What this exhibit shows

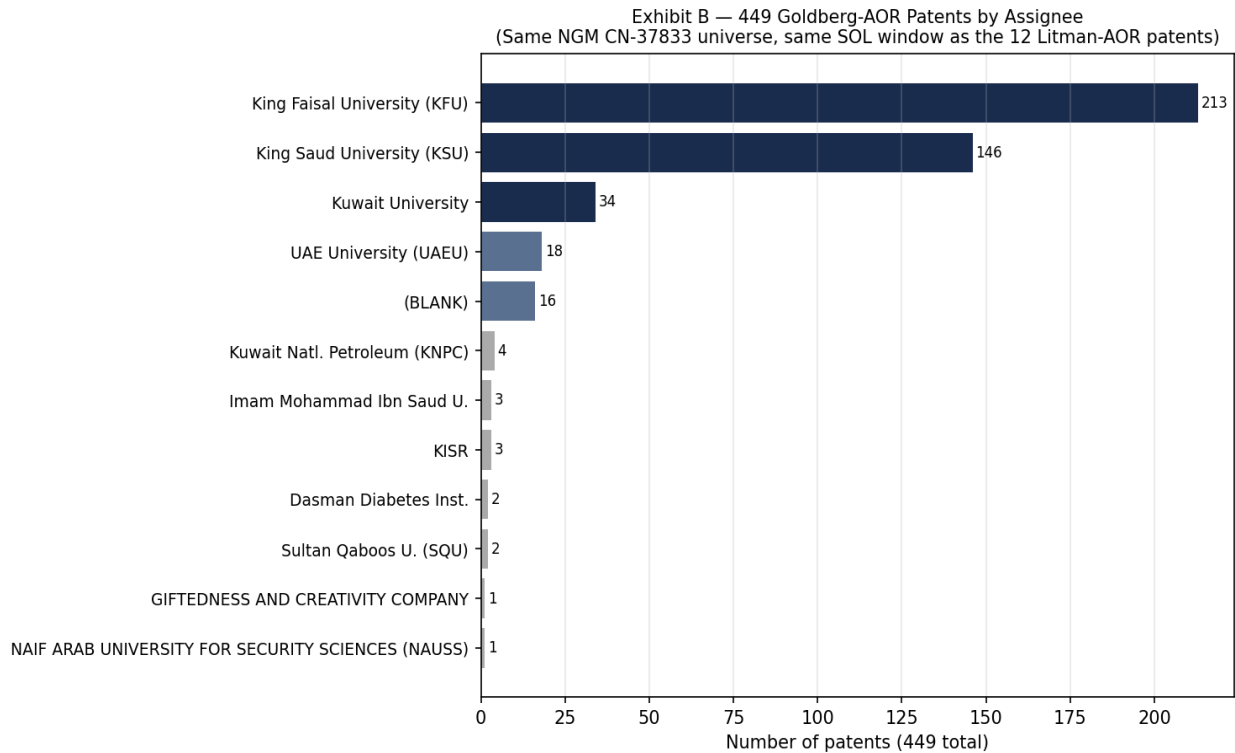
Within the same time window as Exhibit A (July 21, 2024 → April 25, 2026), the same NGM Customer Number 37833 caused **449 additional U.S. patents** to issue listing **Joshua B. Goldberg** as Attorney/Agent/Firm — as compared with the 12 patents listing Plaintiff Richard C. Litman, and 1 patent listing James Lafave. This Exhibit B documents the 449 to foreclose any defense theory that Plaintiff's name appearance was a system default, routing artifact, or clerical inertia. NGM controls the customer-number routing entirely; they elected Goldberg attribution 449 times in the same window.

Monthly distribution — full SOL window



Note the abrupt 9/2024 step-function — first month with 0% Litman attribution. After January 2025 (the final straggler grant US 12,194,434), every subsequent month showed 0 Litman attribution across 216 patents.

Assignee distribution — 449 Goldberg-AOR patents



The same Middle East government clients that received Litman attribution on 12 patents in this window received Goldberg attribution on 395+ patents (KFU 213, KSU 146, Kuwait U 34, UAEU 18, etc.) — proving the Litman elections were not client-specific, and that NGM had full capability to attribute Goldberg to each of the same client portfolios.

Pre-SOL course of conduct context (CONTEXT, not standalone liability)

Window	Duration	Litman	Goldberg	Lafave	Litman %
Pre-SOL (2020-06-15 → 2024-07-20)	4yr 1mo	875	5	0	99.4%
Post-SOL (2024-07-21 → 2026-04-25)	21 mo	12	449	1	2.6%
TOTAL	5yr 10mo	887	454	1	66.1%

The 875 pre-SOL Litman attributions are not standalone liability under CPLR 215(3) but are heavily probative of (i) the commercial value of Plaintiff's name to Defendants, (ii) Defendants' knowledge that Plaintiff's name was being used in connection with each patent, (iii) Defendants' course of conduct under *Halloran v. Va. Chems.*, 41 N.Y.2d 386 (1977), and (iv) the damages-calculation context for the 12 within-SOL uses. **Of the 5 pre-SOL Goldberg attributions**, 1 occurred on 1/2/2024 (a single anomaly) and 4 cluster on a single day — **2024-07-16** — **five days before the SOL cutoff of 2024-07-21** — suggesting deliberate pre-SOL rehearsal of the post-flip attribution scheme.

Reproducibility

All data drawn from live USPTO Open Data Portal (api.uspto.gov) queries on April 25, 2026, with X-API-Key authentication. Raw data: `output/patent_count_refresh/ngm_cn37833_grants_classified.csv`

(post-SOL 463 rows) and

output/patent_count_refresh/ngm_cn37833_grants_PRE_SOL_classified.csv (pre-SOL 894 rows). Methodology and complete findings:

output/patent_count_refresh/findings/POST_SOL_AOR_DEEP_DIVE_2026-04-25.md.