

# Litman v. Goldberg — Session Summary

*Index No. 524343/2025 · NY Sup. Ct., Kings County · Hon. Brian L. Gotlieb, J.S.C.*

*A lawyer-facing index to the surviving Count V (NY Civ Rights L §§ 50-51) and the parallel practice-payout enforcement track. Each headline below links to its source document.*

<b>Date</b>	2026-04-25
<b>Author</b>	Mike (per Plaintiff R.C. Litman directive)
<b>Tracks</b>	Track 1 (payout enforcement) + Track 2 (§§ 50-51 name-use)
<b>Status</b>	11/11 build tasks complete · 2 corrections applied · 2 memory rules locked
<b>Lead exhibits</b>	4 anchor 'our attorney' Goldberg admissions + 5-exhibit Sept 2021 KFU 'new dean' thread
<b>Damages corridor</b>	\$14.59M – \$27.76M aggregate § 51 (5-tier framework)
<b>Use volume</b>	23,508 catalogued post-arbitration commercial uses across 6 ME clients

## How to use this document

Headlines and exhibit cards are at the front. The framework, charts, and analysis sit in the middle. The full hyperlinked Evidence Library appendix is at the back — every exhibit, binder, deck, and reference memo can be opened directly from there. Underlined navy text is a clickable hyperlink to a PDF or interactive deck.

# 1. At-a-Glance Damages Headline

Back-pay owed (NGM's own 20% calc, 22 mo Jul'23–Apr'25)	Back-pay owed (24 mo Jun'23–May'25, with arbitration catch-up)	Plaintiff's independent reconstruction (cross-check ±0.4%)
<b>\$2,108,387</b>	<b>\$2,412,428</b>	<b>\$2,403,125</b>
§ 51 damages aggregate (5-tier framework)	Catalogued post-arbitration commercial uses	Anchor willfulness 'our attorney' admissions
<b>\$14.59M – \$27.76M</b>	<b>23,508</b>	<b>4 (+5 thread)</b>

**Defensible back-pay anchor (NGM-produced figures, no inference required): \$2,108,387** over the 22-month documented period (July 2023 – April 2025), or **\$2,412,428** extended to 24 months (June 2023 – May 2025) with the July 17, 2023 arbitration catch-up payment plus the May 2025 unpaid month. Both figures are taken directly from NGM's own contemporaneous Payment Allocation by Client Reports (produced by Defendant's counsel, Aaron Gould of Connell Foley) and represent exactly 20.00% of the \$10.5M – \$12.1M in collected fees NGM allocated to Plaintiff-originated matters during the period. Plaintiff's independent reconstruction of **\$2,403,125.66** cross-checks within 0.4% of NGM's own total — independent triangulation, not adversary calculation.

**Layered above the back-pay base** (do not double-count): ~\$1.07M outstanding accounts receivable as of December 2025, 100% Litman-attributed per NGM's own AR ledger; ~\$2.69M January 2026 trust positions still attributed to Plaintiff; an additional ~\$246,628+ in 20% share since May 2025 has not been calculated by NGM in produced records. The previously circulated \$424K – \$928K range is the **unpaid shortfall** (variance between NGM's own 20% calculation and what NGM actually wired) — it is one component of the back-pay total, not the total itself. **Aspirational ceiling:** \$6.1M – \$77.9M MSJ Point III range with the 5-tier § 51 framework above as the independently-triangulated middle anchor. Per-patent fee baseline: \$15,000 – \$20,000 (Plaintiff's directive 4/16/2026). Full breakdown: [Use-Tier Weighting Table](#).

**Two boundary dates control.** 6/15/2020 = judge-set start of post-termination period (court-recognized scope of conduct). 7/21/2024 = SOL cutoff under CPLR 215(3). Pre-7/21/2024 uses are admissible for willfulness, course, notice, and value — but are not standalone § 51 claims. Post-7/21/2024 uses are independently actionable.

## 2. Anchor Willfulness Exhibits — Goldberg's 'Our Attorney' Admissions

Four single-source admissions in which the named defendant himself describes Plaintiff to the relevant client as 'our attorney' (or 'one of our attorneys') while substituting himself as actual counsel — then five companion exhibits from a Sept 2021 KFJ 'new dean' thread that establish the same pattern earlier and internally. Open each from its underlined Bates number to view the produced PDF.

### KFU — Anchor Exhibit - [LITMAN209485](#)

**Date of use:** 12/20/2023  
**From:** Joshua B. Goldberg  
**To:** Prof. Hany (KFU) via kfu@4patent.com  
**Docket:** 33160.75U  
**Window:** Post-Termination, Pre-SOL · Willfulness anchor

*Key phrase: "respond to our attorney's questions below"*

**Significance:** First and clearest 'our attorney' admission. Six months post-arbitration. Litman not on chain.

→ Open the produced PDF: [LITMAN209485.pdf](#)

CONFIDENTIAL - ATTORNEY EYES ONLY | LITMAN209485

From: Joshua Goldberg <JGoldberg@natlaw.com>  
To: 'Martha Long' <mlong@natlaw.com>; 'KFU' <kfu@4patent.com>  
Date: 2023-12-20 22:58:05-0500  
Subject: "Questions for Inventors for Application Preparation - Docket 33160.75U - PA0001096"  
Attachments: 6 - image001.png (12KB); image002.png (1KB); image003.png (1KB); image004.png (1KB); image005.png (1KB) (+7 more)

Dear Prof. Hany!  
I hope you are well.

We are working on the patent application for Docket 33160.75U. Please ask the inventors, Saad Dhanah, Ali Aggel, Tassir Al-Fajiy, Hussein Bak Ghazal, Ahmed A. Al-Rachalwy, to respond to our attorney's questions below.

- \* Please ask the inventors if they have any specific synthetic examples showing reaction conditions, amounts, and the like for the compounds named in the disclosure.
- \* Please ask the inventors if they have any chemical analysis data for their specific compounds.
- \* Please ask the inventors if they have any data or have conducted any experiments to demonstrate the effectiveness of any of their specific compounds, including data conducted in a well plate, an assay, or in an animal model. Please also provide the testing protocols used to generate the data.

Please feel free to call or email me any time.

With best regards,  
Joah

With best regards,  
Joah

Joshua B. Goldberg  
Co-Managing Partner  
"The Green Patent Guy"  
(Logo, company name Description automatically generated)

NATH, GOLDBERG & MEYER  
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[cid:image002.png@01D33396.E2F81221] <http://www.twitter.com/nathlawgroup?cid:image003.png@01D33396.E2F81221> <https://www.linkedin.com/company/the-nath-law-group/?cid:image004.png@01D33396.E2F81221> <https://www.youtube.com/channel/UCF1ODY9MAYm1w1wPQrAw?cid:image005.png@01D33396.E2F81221> <https://www.nathlaw.com/>

[A picture containing text, crossword puzzle Description automatically generated]

The information in this email is confidential and may be subject to the attorney-client privilege. Transmission of this email does not constitute a waiver of any privilege or

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### KSU (King Saud University) — Anchor Exhibit - [LITMAN250428](#)

**Date of use:** 8/26/2024  
**From:** Joshua B. Goldberg  
**To:** KSU via ksu@4patent.com  
**Docket:** 33007.94 (NOA)  
**Window:** Within-SOL · Strongest willfulness anchor

*Key phrase: "our attorney"*

**Significance:** STRONGEST anchor — POST-SOL-SAFE (after 7/21/2024). Within-SOL window willfulness, contemporaneous with actionable claims.

→ Open the produced PDF: [LITMAN250428.pdf](#)

CONFIDENTIAL - ATTORNEY EYES ONLY | LITMAN250428

From: Joshua Goldberg <JGoldberg@natlaw.com>  
To: 'Martha Long' <mlong@natlaw.com>; CC: 'KSU' <ksu@4patent.com>  
Date: 2024-08-26 15:20:48-0500  
Subject: RE: Notice of Allowance to King Saud University - Docket 33007.94  
Attachments: 12 - image007.png (12KB); image008.png (1KB); image009.png (1KB); image010.png (1KB); image011.png (1KB) (+7 more)

Thank you, Martha. For this to have a chance of success, we would need information from KSU about the specifics of why this was not timely paid, similar to what we have been doing in other cases recently. The below is an example of language we have used in other cases:

Our attorneys have now reviewed the status of this application in greater detail. They note that this application was abandoned over two years ago, and accordingly in order to be persuasive the petition will need to be accompanied by an explanation of why the entire period of delay was unintentional. We can note that the response was not possible at the time it was originally due as a result of the COVID-19 pandemic. However, the USPTO has recently been unwilling to accept this explanation on its own, in part due to the passage of a significant period of time since most countries lifted their COVID-19 lockdowns. Accordingly, if we are going to rely upon this reasoning we will need to explain (i) when King Saud University was engaged from any COVID-related lockdown and (2) why the delays from responding to today constitute an unintentional delay.

For example, it is our understanding that during the delay period, there was an inability to transfer funds between different parties. It would be helpful if you can provide us with any credible evidence showing that there was in fact an inability to transfer funds. Other reasons preventing King Saud University from timely proceeding to respond to the previous Office Action (with potential supporting documentation) will similarly increase our likelihood of reviving the patent application.

In other words, the idea is to provide the USPTO with credible evidence showing that King Saud University intended to proceed with responding to the previous Office Action in a timely fashion but was unable to do so due to circumstances outside of its control whether those circumstances were related to COVID-19 alone, COVID-19 combined with some other reason, etc.).

Accordingly, we would appreciate any additional information you can provide that may assist us in preparing a petition that the USPTO may find persuasive.

We would be happy to schedule a call to discuss this matter further, if that would be helpful.

With best regards,  
Joah

Joshua B. Goldberg  
Co-Managing Partner  
"The Green Patent Guy"  
(Logo, company name Description automatically generated)

NATH, GOLDBERG & MEYER

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### 3. Sept 2021 KFU 'New Dean' Thread — Five Companion Exhibits

Five-exhibit thread from Sept 1-7, 2021, in which Goldberg introduces Plaintiff to KFU's new dean (Abdul Allily) as co-counsel. Pre-arbitration, internal-then-outbound. Each exhibit is independently dated and admissible; together they establish the pattern that the post-arbitration 'our attorney' admissions ratify and continue.

Bates	Date	Sender → Recipient	Excerpt	Open
LITMAN272429	9/1/2021	Internal: Goldberg → Martha Long	"Abdul specifically asked to speak with me and Richard"	<a href="#">PDF</a>
LITMAN272449	9/2/2021	Goldberg → KFU Dean Allily	Introduces Plaintiff to new dean as co-attorney	<a href="#">PDF</a>
LITMAN274979	9/2/2021	Goldberg → Dean Allily	Companion to 272449 — same intro pattern, sibling docket	<a href="#">PDF</a>
LITMAN272454	9/7/2021	Goldberg → Dean Allily	"Richard and I both enjoyed our discussion last week"	<a href="#">PDF</a>
LITMAN274981	9/7/2021	Goldberg → Dean Allily	Companion to 272454 — same Plaintiff-as-co-counsel framing	<a href="#">PDF</a>

## 4. Two Parallel Tracks — One Shared Evidence Pool

Track 1 enforces the AAA payout award and litigates the post-2023 NGM accounting; Track 2 prosecutes the surviving Count V (NY Civ Rights L §§ 50-51 misappropriation of name). Both pull from one Bates-numbered evidence pool. Cross-listed items appear in both tracks with a primary-track designation. Master organizing index: [Track 1 / Track 2 Master Index](#).

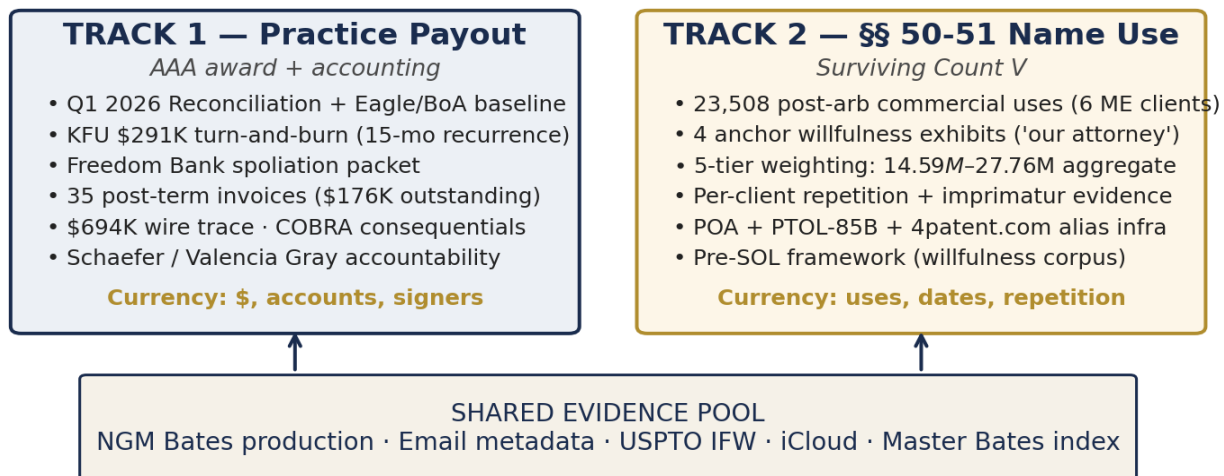


Figure 1. Track architecture. Both tracks share one Bates-numbered evidence pool. Cross-listed items appear in both with a primary-track tag.

## 5. Three Time Windows — The Two Boundary Dates

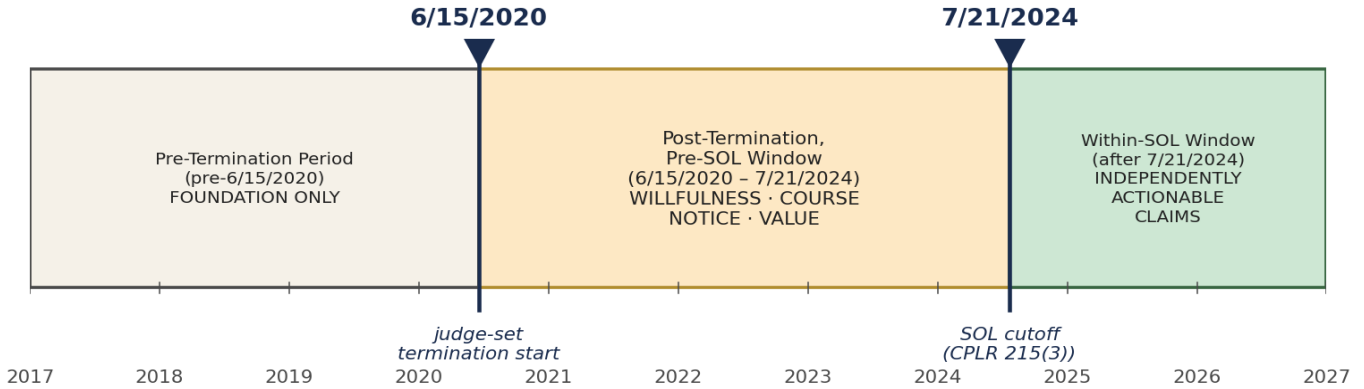


Figure 2. Three time windows. 6/15/2020 = judge-set termination start. 7/21/2024 = SOL cutoff (CPLR 215(3) 1-year). Pre-7/21/2024 uses are admissible for willfulness, course, notice, and value — not standalone § 51 claims.

**Pleading rule.** Plead the post-7/21/2024 uses as the actionable § 51 wrongs on Count V. The 6/15/2020 – 7/21/2024 record (the bulk of the 23,508-use ME-client corpus) is the willfulness anchor and per-use-value foundation, not a separate set of claims. Pre-6/15/2020 evidence supplies pre-existing commercial value of name (imprimatur foundation). Full framework: [Pre-SOL Foundation Memo](#).

### 5.1 Correction Locked: NY State Rules Apply (CPLR - Not FRE)

Topic	Use this NY rule	(Not this federal rule)
Affirmation in lieu of affidavit	CPLR 2106 (any person, since 1/1/2024 amendment)	28 U.S.C. § 1746
Business-record certification	CPLR 3122-a	FRE 902(11)
Business-record exception	CPLR 4518(a)	FRE 803(6)
Self-authentication of public records	CPLR 4540	FRE 902(4) / (13) / (14)
Habit / routine practice	Halloran v. Va. Chems., 41 N.Y.2d 386 (1977)	FRE 406
E-filing format / OCR / exhibit conventions	22 NYCRR 202.5-b + assigned justice's Part rules	—

Custodian affirmation forms (three CPLR-compliant variants for NGM-produced, USPTO-pulled, and Plaintiff-own batches): [Custodian Affirmation Template](#).

### 5.2 Correction Locked: SOL Cutoff is 7/21/2024 (Distinct from 6/15/2020)

Date	Legal significance	Evidentiary use
6/15/2020	Judge-set start of post-termination period (court-recognized scope of conduct).	Boundary between 'pre-termination' (background / value foundation only) and 'post-termination' (within case scope).
7/21/2024	Statute-of-limitations cutoff (CPLR 215(3), 1-year SOL; complaint filed ~7/21/2025).	Boundary between 'pre-SOL' (willfulness, course, notice, value) and 'within-SOL' (independently actionable claims).

**Hard limit:** Do NOT call 6/15/2020 the 'SOL cutoff' or 'limitations boundary.' It is the judge-set termination boundary. The platform glossary check flags this conflation automatically.

## 6. Per-Client Name-Use Repetition Pattern

23,508 commercial uses post-arbitration across the six ME clients (KFU 14,033 + KSU 6,051 + UAEU 1,477 + Kuwait U 1,637 + SQU 268 + QF 42, per the existing exhibit binders). Adding pre-arbitration plus late-period gives 47,657 total uses 2020-06 → present. KFU and KSU are the daily-drumbeat anchors; UAEU and Kuwait U sustain lower-amplitude continuous activity; SQU and QF are sparse but useful for breadth. Full per-client analysis: [Per-Client Repetition Summary](#).

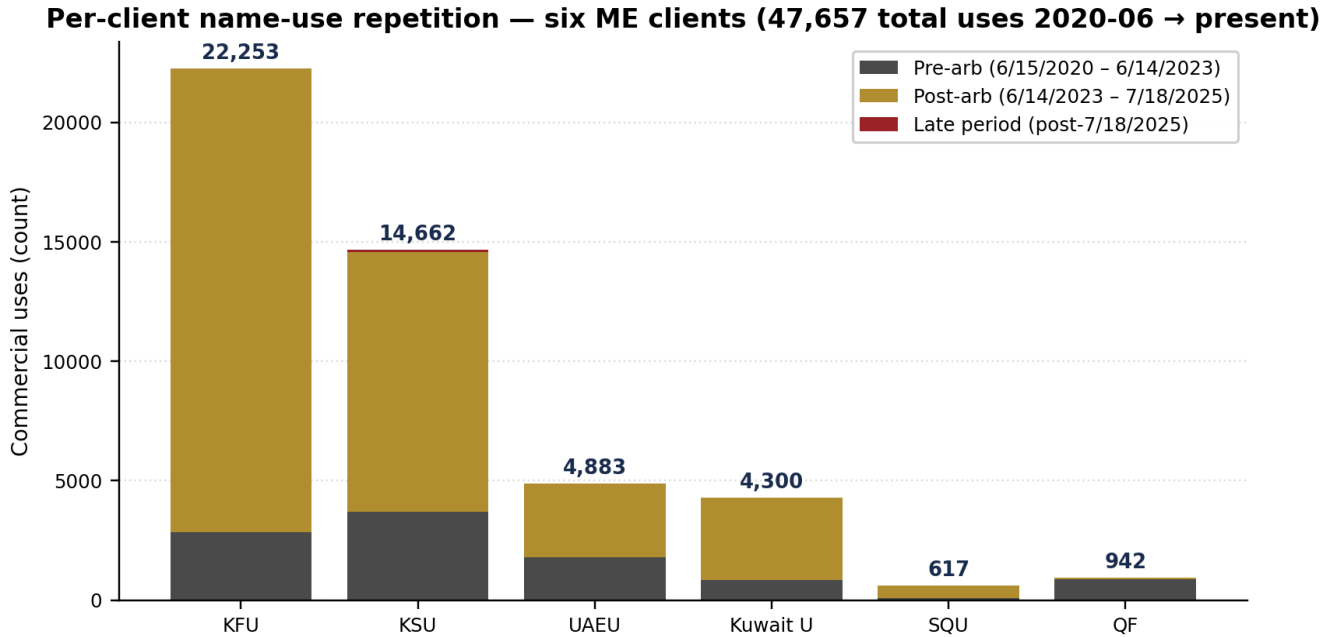


Figure 3. Per-client name-use volume across pre-arbitration, post-arbitration, and late-period sub-windows. Total above each bar.

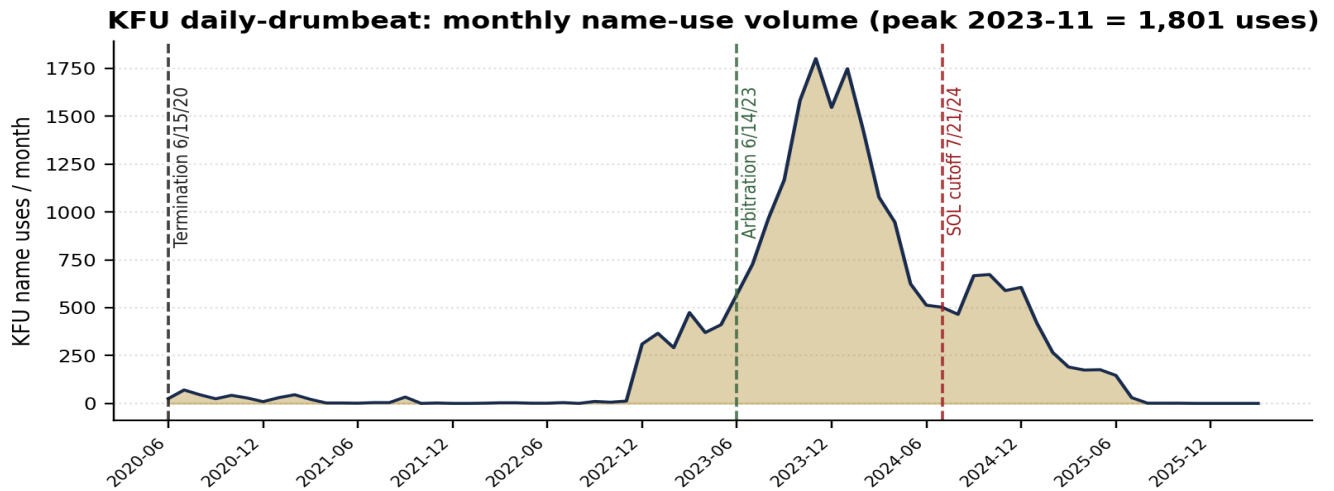


Figure 4. KFU monthly time-series (the 'daily drumbeat'). Boundaries marked: termination 6/15/20, arbitration 6/14/23, SOL cutoff 7/21/24. Peak month 2023-11 = 1,801 uses.

## 7. Use-Tier Weighting — § 51 Damages Aggregate

Five-tier framework with per-use dollar ranges anchored in the \$15,000–\$20,000 per patent fee baseline (Plaintiff’s directive 4/16/2026), the KISR flat-fee schedule, and Martha Long quoted pricing. Aggregate \$14.59M – \$27.76M sits inside the existing \$11.1M – \$29.6M corridor (independent triangulation). Tier 1 contains only 13 post-7/21/2024 (post-SOL-safe) patents — that subset uses the corrected SOL boundary. Full tier-by-tier breakdown: [Use-Tier Weighting Table](#).

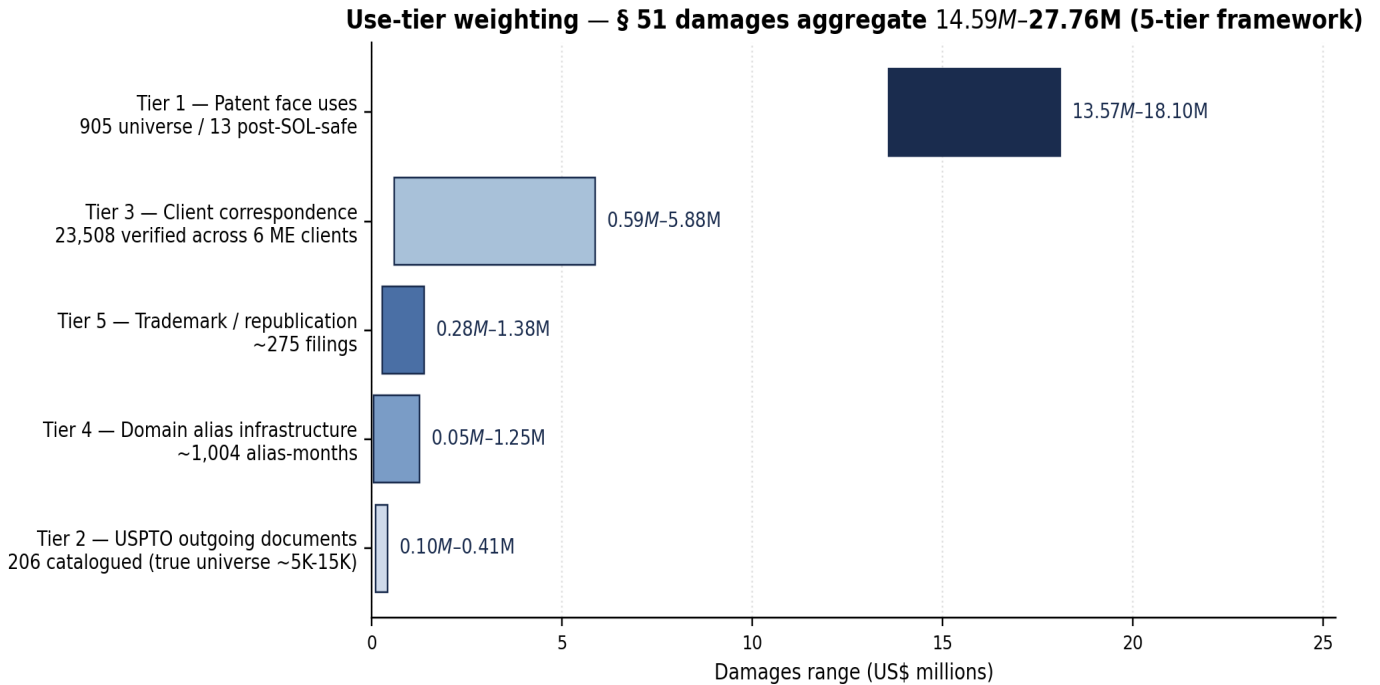


Figure 5. Five-tier weighting framework. Per-tier dollar range x catalogued count. Tier 1 is patent-face uses (highest unit value, smallest count); Tier 3 is client correspondence (largest count, lower unit value).

## 8. Track 1 — Practice Payout & Spoliation Highlights

Track 1 reframes NGM's accounting opacity as litigable spoliation. The Q1 2026 reconciliation establishes pre-subpoena baselines; the 15-month KFU turn-and-burn template establishes pattern (not coincidence); the Freedom Bank disclosure shows a third trust account closed one week after the federal complaint was filed. Served-ready Q1 2026 baseline exhibit: [Q1 2026 Eagle/BoA Baseline Exhibit](#). Turn-and-burn template exhibit: [Template Exhibit — KFU 36372 Turn-and-Burn](#).

### Three locked spoliation items (no bank statement needed)

- **\$1.78M BoA Escrow phantom** — January RCL Trust Listing vs. January Trust Register, same day, same account. Provable on the face of NGM-produced records.
- **\$13,326 Eagle Bank Jan→Feb continuity gap** — January closing balance vs. February opening balance, no bank movement explains the difference.
- **\$68,280 RCL reassignment with zero bank movement** — five Kuwait U dockets vanished off Jan→Feb listings with nothing in the bank journal to support the move.

### Headline figures for the settlement table

- Defensible damages anchor: **\$424K – \$928K** (Plaintiff's 20% share validated against NGM-produced \$2,108,387 / \$2,412,428 totals).
- KFU-only unpaid 20% ceiling: **\$1.98M** (KFU\_RCL\_Missing\_Allocations).
- 35 post-termination invoices issued in 2025 = **\$176K all outstanding**.
- KFU \$291,173 wire IN 2/9/2026 → \$224,113 OUT 2/10/2026 to Nath & Associates operating, signed Valencia Gray. Residue \$84,405.87 = within \$174 of the 11/20/2024 stagnant balance (\$84,231.87). 15-month template recurrence.
- COBRA out-of-pocket consequential damages: **\$2,867.11/month escalating to \$2,895.54/month** after NGM cut off health coverage.

## 9. Per-Client Imprimatur — Strongest Findings

§ 51 measures the commercial value of Plaintiff's name. For each ME client, the imprimatur is established through (a) engagement-origin documents predating the 6/15/2020 termination, (b) client-side correspondence addressing Plaintiff personally, and (c) post-arbitration continuation evidence that NGM monetized the imprimatur after the AAA award. Full per-client analysis: [Imprimatur Evidence by Client](#).

Client	Strength	Strongest single finding
<b>KFU</b>	Strongest	LITMAN209485 (12/20/2023) Goldberg 'our attorney' anchor + 1/26/2024 KFU engagement letter naming Goldberg as Co-Managing Partner without naming Plaintiff (engagement-origin negative).
<b>KSU</b>	Strongest	64 client-side 'Dear Richard' inbound from KSU faculty over multiple years (LITMAN181764 → LITMAN229043) + Goldberg 8/26/2024 'our attorney' (LITMAN250428/250429) — largest sustained personal-salutation corpus in the production.
<b>UAEU</b>	Strong	LITMAN183061 (1/30/2020): Salah Al-Omari direct attribution 'the support always received from Mr. Litman' + LITMAN255520 (1/18/2023): UAEU IP Office tells Clarivate 'one of our attorney' referring to Plaintiff (third-party-recipient admission) + Goldberg 6/11/2024 anchor.
<b>Kuwait U</b>	Strong	LITMAN056765/042872 (9/7/2022): 'Dear Prof. Richard C. Litman' — single most explicit personal-attorney salutation in any client corpus. Active client through 7/8/2025.
<b>SQU</b>	Strong	LITMAN002686 (10/9/2019): SQU staff request 'Services from NATH, GOLDBERG & MEYER' addressed 'Dear Litman & Martha' — equates the firm name with 'Litman.' Purest imprimatur evidence in the corpus, lowest volume.
<b>Qatar Foundation</b>	Moderate	LITMAN014149 (6/8/2020) 'discuss the case with the attorney' + 189 inbound name-references — highest pre-arb count of any client. No direct inbound from qf.org.qa after 6/14/2023 — needs deposition follow-up.

## 10. Open Follow-Ups (Flagged but Not Done)

- **Re-segment the existing exhibit binders.** KFU/ME exhibit binders currently group by 6/14/2023 arbitration boundary. They should be re-segmented into 'willfulness anchor' (6/15/2020 – 7/21/2024) and 'actionable claims' (post-7/21/2024) sub-binders to match the corrected SOL framework.
- **Per-batch CPLR 2106 affirmations.** Master batch hash manifest is built; per-batch affirmations are now a fill-in-the-template exercise — generate on demand when each batch is sealed for service.
- **Tier 2 IFW pull.** Use-tier table shows 206 USPTO outgoing documents catalogued; true universe is 5K-15K. Full IFW pull across all 905 application numbers would close the largest data gap.
- **Native client@4patent.com PSTs.** Imprimatur agent flagged that virtually all KFU institutional traffic flows through the NGM-controlled kfu@4patent.com alias; demand for native PST production would multiply client-side imprimatur evidence ~10-20x.
- **Justice Gotlieb Part rules verification.** The custodian affirmation forms reference the assigned justice's individual Part rules — verify current Part rules on NYSCEF before serving any motion exhibits, as conventions may differ from Maslow's Part 2.

## Appendix — Evidence Library

Every item below is either a clickable hyperlink to the live site at [litmanintelligence.com](https://litmanintelligence.com) or an attachment embedded directly in this PDF (open via the attachments panel of any PDF viewer — Adobe, Preview, Foxit, etc.). Underlined navy text opens the source document in your browser; embedded items are labeled as such with their attachment filename.

**How to open an embedded attachment: Adobe Reader / Acrobat:** View → Show/Hide → Navigation Panes → Attachments (or paperclip icon at left). **macOS Preview:** View → Show Highlights and Notes (then click the paperclip in the sidebar) — or right-click the embedded file and choose 'Save Attachment'. **Foxit / PDF-XChange:** View → Navigation Panels → Attachments.

### A. Anchor Willfulness Exhibits (Goldberg 'our attorney' admissions)

Title (open it)	Description	How served	Size · pages
<a href="#">LITMAN209485 — Goldberg → KFU 12/20/2023</a>	First 'our attorney' admission · KFU docket 33160.75U	web link	4.0 KB · 2 pp
<a href="#">LITMAN250428 — Goldberg → KSU 8/26/2024</a>	STRONGEST · POST-SOL-SAFE · KSU docket 33007.94 NOA	web link	7.8 KB · 3 pp
<a href="#">LITMAN250429 — Goldberg → KSU 8/26/2024</a>	Companion to 250428 · KSU docket 33056.63	web link	8.0 KB · 3 pp
<a href="#">LITMAN267104 — Goldberg → UAEU 6/11/2024</a>	'One of our attorneys' · UAEU docket 33090.41U	web link	7.7 KB · 3 pp
<a href="#">LITMAN272429 — Internal Goldberg → Long 9/1/2021</a>	Sept 2021 KFU 'new dean' thread (1/5)	web link	8.2 KB · 4 pp
<a href="#">LITMAN272449 — Goldberg → Dean Allily 9/2/2021</a>	Sept 2021 KFU 'new dean' thread (2/5)	web link	7.9 KB · 3 pp
<a href="#">LITMAN274979 — Goldberg → Dean Allily 9/2/2021</a>	Sept 2021 KFU 'new dean' thread (3/5)	web link	7.9 KB · 3 pp
<a href="#">LITMAN272454 — Goldberg → Dean Allily 9/7/2021</a>	Sept 2021 KFU 'new dean' thread (4/5)	web link	9.3 KB · 5 pp
<a href="#">LITMAN274981 — Goldberg → Dean Allily 9/7/2021</a>	Sept 2021 KFU 'new dean' thread (5/5)	web link	9.3 KB · 5 pp

### B. Headline Binders & Decks (production-scale)

Title (open it)	Description	How served	Size · pages
<a href="#">KFU § 51 Exhibit Binder — 1,000 exhibits</a>	Settlement-deck scale · 1,001 pages · cover by anchor willfulness	web link	2.7 MB · 1002 pp
<a href="#">KFU § 51 Exhibit Binder — Complete (14.033)</a>	Comprehensive § 51 record · all KFU post-arb commercial uses	web link	37.5 MB · 14034 pp
<a href="#">Multi-Client Saturation Deck</a>	Cross-ME pattern: KFU + KSU + UAEU + Kuwait U + SQU + QF aggregated	web link	242.7 KB · 4 pp
<a href="#">KFU Saturation Visual — Post-Arbitration</a>	Density visualization of KFU post-arb name-use pattern	web link	472.0 KB · 7 pp
<a href="#">KFU Use-Date Clustered Binder</a>	KFU exhibits grouped by use date for chronology argument	web link	26.0 KB · 13 pp

Title (open it)	Description	How served	Size · pages
<a href="#">KFU Use-Volume One-Pager</a>	Single-page volume summary for settlement table	web link	128.4 KB · 1 pp
<a href="#">KSU Exhibit Binder (500)</a>	King Saud University production-scale binder	web link	1.4 MB · 502 pp
<a href="#">UAEU Exhibit Binder (500)</a>	United Arab Emirates University production-scale binder	web link	1.4 MB · 502 pp
<a href="#">Kuwait U Exhibit Binder (500)</a>	Kuwait University production-scale binder	web link	1.4 MB · 501 pp
<a href="#">SQU Exhibit Binder (268)</a>	Sultan Qaboos University full pool	web link	746.2 KB · 269 pp
<a href="#">QF Exhibit Binder (42)</a>	Qatar Foundation full pool	web link	125.2 KB · 43 pp
<a href="#">Discovery Batch 01 — Exhibit Binder</a>	Initial 9-exhibit binder served 4/17/2026	web link	2.5 MB · 34 pp
<a href="#">Daily Reminders Binder — KFU</a>	Day-by-day-drumbeat KFU reminders sequence	web link	123.4 KB · 63 pp

### C. Track 1 — Practice Payout Enforcement

Title (open it)	Description	How served	Size · pages
<a href="#">Q1 2026 Eagle/BoA Baseline Exhibit</a>	Served-ready exhibit for Connell Foley · 6-table baseline	web link	10.6 KB · 3 pp
<a href="#">Goldberg–Litman Text Thread (compiled)</a>	Complete text-message compilation · 50 MB	web link	50.5 MB · 229 pp
<a href="#">Template Exhibit — KFU 36372 Turn-and-Burn</a>	15-month turn-and-burn template (11/20/24 + 2/9/26)	web link	10.2 KB · 3 pp
<a href="#">Trust Red-Flags Audit Checklist</a>	Departure-from-handbook trust accounting audit	web link	97.5 KB · 4 pp

### D. Reference Memos (case framework — newly converted)

Title (open it)	Description	How served	Size · pages
<a href="#">Case Glossary (lexicon)</a>	Statutory + claim + damages + time-window + banned terms	web link	122.5 KB · 10 pp
<a href="#">Custodian Affirmation Template (CPLR 2106 / 3122-a)</a>	Three variants: NGM-produced · USPTO · Plaintiff's own	web link	109.6 KB · 12 pp
<a href="#">Pre-SOL Foundation Memo (v1.2)</a>	Four-purpose framework for pre-7/21/2024 evidence	web link	102.0 KB · 7 pp
<a href="#">Use-Tier Weighting Table</a>	5-tier § 51 damages framework · \$14.59M-\$27.76M aggregate	web link	139.0 KB · 9 pp
<a href="#">Track 1 / Track 2 Master Index</a>	Master organizing index · 200+ files categorized · 8 sections	web link	178.5 KB · 14 pp
<a href="#">Imprimatur Evidence by Client</a>	Per-client (a) origin · (b) name-refs · (c) post-arb continuation	web link	295.1 KB · 13 pp

Title (open it)	Description	How served	Size · pages
<a href="#">Per-Client Repetition Summary</a>	Daily-drumbeat patterns across 6 ME clients	web link	93.3 KB · 5 pp

## E. Interactive Decks (HTML — open in browser)

Title (open it)	Description	How served	Size · pages
<a href="#">Internal Counsel Package</a>	Interactive case-theory + evidence package (root-level)	web link	114.8 KB
<a href="#">Case Walkthrough</a>	Interactive walkthrough for counsel (root-level)	web link	11.8 KB
<a href="#">Easy Mode (offline evidence explorer)</a>	Browser-side evidence explorer · no server needed (root-level)	web link	91.4 KB
<a href="#">Settlement Evidence Presentation</a>	Settlement-table-ready presentation deck (root-level)	web link	84.0 KB
<a href="#">Counsel Dashboard (website)</a>	Web-hosted counsel dashboard	web link	122.6 KB
<a href="#">Damages Calculator (website)</a>	Web-hosted damages calculator	web link	46.9 KB
<a href="#">Damages Three-Tier Visualization</a>	Three-tier damages chart (website)	web link	11.0 KB
<a href="#">Discovery Production Portal</a>	1,169-doc Bates production HTML viewer (website)	web link	89.1 KB
<a href="#">Coercion + Control Memo (website)</a>	Track-1 narrative deck (website)	web link	56.6 KB
<a href="#">Concealment Timeline (website)</a>	Spoliation chronology visualization (website)	web link	17.5 KB