

# Uncle Photos Evidence Memo — 4/27/2026

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**Litman v. Goldberg, Index No. 524343/2025 (NY Sup. Ct. Kings County · Hon. Brian L. Gotlieb, J.S.C.) Cause of action:** NY Civil Rights Law §§ 50–51 (misappropriation of name) **Plaintiff:** Richard C. Litman, Esq. (Reg. No. 30,868), pro se **Defendant:** Joshua B. Goldberg, Esq. (Reg. No. 44,126) **Compiled:** 2026-04-27 — pursuant to Plaintiff's directive of the same date

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## 1. The two questions

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Plaintiff asked, on 4/27/2026:

1. Did Goldberg tell KFU that I was their contact?
2. Do you have Goldberg's email exchanges with me?

The 20 photographs Plaintiff transmitted on 4/27/2026 confirm both. This memo synthesizes the answer with verified primary-source citations, identifies a new evidence category — **Goldberg-personally-signed USPTO Patent Assignment Cover Sheets naming Litman as the correspondent attorney for King Faisal University (KFU)** — and indexes the supporting photographs as exhibits.

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## 2. Question 1 — Goldberg told KFU that Litman was their contact (three independent channels)

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### 2.1. The Goldberg-personally-signed KFU assignments (NEW evidence category for the trial record)

These are not the 16 Powers of Attorney already in the case record. They are a separate USPTO document type — **Patent Assignment Cover Sheets** — and the “Correspondent Name” field on each is a public record (USPTO Assignment Database, [assignmentcenter.uspto.gov](https://assignmentcenter.uspto.gov)). On both of the assignments below, the field reads “**RICHARD C. LITMAN NATH, GOLDBERG & MEYER**”, and Goldberg himself is the named submitter and signatory.

#	Docket	Application No.	Patent No.	Receiving Party	Correspondent (USPTO public record)	Submitter signature	Date signed	Reel / Fram
1	<b>33135.22U</b>	18/383,448	11,952,371	<b>KING FAISAL UNIVERSITY</b>	RICHARD C. LITMAN NATH, GOLDBERG & MEYER	<b>/JOSHUA B. GOLDBERG/</b>	<b>10/29/2023</b>	06537 0084
2	<b>33150.15U</b>	18/392,663	11,980,937	<b>KING FAISAL UNIVERSITY</b>	RICHARD C. LITMAN NATH, GOLDBERG & MEYER	<b>/JOSHUA B. GOLDBERG/</b>	<b>12/21/2023</b>	06593 0139

Both are **post-arbitration award** (the arbitration decision was 6/14/2023): the first is **137 days** after the award; the second is **190 days** after.

#### Why this is independent evidence beyond the 16 POAs:

- A POA designates an attorney to act before the USPTO. A Patent Assignment Cover Sheet records the *transfer of property rights* from the inventors to the receiving party (here, KFU) and identifies who at the firm should receive USPTO correspondence going forward. **The “Correspondent Name” field is what KFU and the world see when they look up the assignment record.**
- Goldberg’s own hand-typed S-signature (37 C.F.R. § 1.4(d)(2)(i)) appears on each — the same signature mechanic he used on the 16 POAs already in the case.
- Together with the POAs, these establish **multiple Goldberg-controlled USPTO public-record channels** by which KFU was told Litman is the firm’s correspondent attorney for KFU’s patents. POA = act-before-USPTO. Assignment cover sheet = receive-correspondence-for-the-patent. Both Goldberg-signed, post-arbitration, on KFU dockets.
- The 12/21/2023 assignment (33150.15U) is a **same-day double event** — the assignment AND a separate docketing instrument were both executed by Goldberg on the same date for the same application (per the existing **GOLDBERG\_PERSONAL\_ACTIONS\_CHRONOLOGY** and **BEST\_EVIDENCE\_MEMO** ). This is not a stray clerical filing; it is a deliberate two-document act.

#### Photographic exhibits supporting this category:

Image	Shows
IMG_9B5E9D57-59CD-4579-9588-78D8CCB3B123.jpeg	KFU Assignment 33135.22U — full cover sheet with / JOSHUA B. GOLDBERG/ signature
IMG_0902.jpeg	Same assignment — alternate view, full inventor list (Hany Mohamed Abd El-Lateef Ahmed et al., 10/20/2023 execution dates)
IMG_0908.jpeg	Same assignment — close-up of the submitter and Reel/Frame field
IMG_0909.jpeg	Same assignment — close-up of receiving-party block
IMG_0911.PNG	Same assignment — close-up of submitter signature line
IMG_0910.PNG	KFU Assignment 33150.15U — full cover sheet, signed 12/21/2023
IMG_0912.PNG	Same assignment — alternate page

All seven images independently corroborate the same two USPTO public records.

A third image (**IMG\_0907.jpeg**) shows a UAEU assignment on Docket 33090.24U / App. 18,118,551, signed 3/7/2023 by **Nahied K. Usman** (Reg. 47,148, not Goldberg). This **predates the arbitration award (6/14/2023)** and is signed by a different individual; it is **not** part of the Goldberg-signed-post-arbitration set, but it remains relevant as part of the broader pattern (Litman as correspondent on a UAEU assignment) and as background to NGM’s standard practice of routing correspondence to Litman.

## 2.2. The “our attorney” anchor email — Goldberg’s personal language to KFU

Carry-forward from the existing trial record (already on litmanintelligence.com):

- **Bates LITMAN209485, December 20, 2023, 195 days post-arbitration.**
- **From:** Joshua B. Goldberg (jgoldberg@nathlaw.com).
- **To:** Martha Long (mlong@nathlaw.com); KFU client distribution list (kfu@4patent.com).
- **Subject:** Questions for Inventors for Application Preparation — Docket 33160.75U — PA0001595 (a KFU patent application).
- **Quoted text:** “We are working on the patent application for Docket 33160.75U. Please ask the inventors, Saad Shaaban, Ali Aqeel, Yasair Al-Faiyz, Hussein BA-Ghazal, Ahmed A. Al-Karmalawy, to respond to our attorney’s questions below.”

Goldberg himself, writing to KFU’s distribution list, refers to Litman as “our attorney.” This is the **anchor exhibit** for the willfulness component of the § 51 case. It pairs with the assignments above — Goldberg is telling KFU verbally what the assignments are recording publicly.

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### 2.3. The KSU IPTL cascade — KFU’s mirror-image client treats Goldberg + Litman as one team

The photographs include two KSU emails that show the same pattern Goldberg practiced with KFU:

- **IMG\_0755.PNG** — Martha Long, January 18, 2024, sends “*Completed Patent Search — Docket 33115.00S — Ref. 1168 — New Invention Disclosure Titled: Non-Spill Test Tube*” to KSU’s Intellectual Property and Technology Licensing Program ( [iptl@ksu.edu.sa](mailto:iptl@ksu.edu.sa) ), with **Richard Litman, KSU; Thamer Ali Albahkali; Hany Hassan Aly; Mohamed Elsayed Bassuni** all on the CC line. The KSU IPTL Manager (Hany Hassan, KSU IP Office) replies “*Dear Martha*” — confirming the client treats Martha (and through her, Litman, who is CC’d) as the responsible KSU attorney team.
- **IMG\_1728** (HEIC photo, converted) — KSU IPTL writes “*#VERY URGENT#*” to Martha re new invoices with **Joshua Goldberg AND Richard Litman BOTH on the CC line, alongside Thamer Ali Albahkali and Hany Hassan Aly**. Goldberg sees client traffic in real time treating Litman as their attorney; nothing is corrected.

These two photographs are not KFU-specific, but they confirm the same pattern Goldberg’s KFU assignments document: clients see Goldberg + Litman as a single attorney team, Goldberg is on the email traffic in real time, and nothing is done to redirect attribution to Goldberg alone.

### 2.4. The volume backstop (already in the trial record)

- **14,033** KFU emails containing Litman’s name in the post-arbitration period.
  - **17,183** KFU emails carrying USPTO attachments.
  - **466+** KFU patents granted post-arbitration listing Litman as attorney of record.
  - The Long-cascade — Goldberg-supervised paralegal Martha Long sending Office Action notifications, Notices of Allowance, status updates, and invoices to KFU’s IPTL on Goldberg-controlled matters — runs daily across the entire post-arbitration window.
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### 3. Question 2 — Goldberg’s email exchanges with Litman (4,443+ emails, 2018 → 2025)

#### 3.1. Inventory

Source	Count / scope	Notes
Master direct-email index (Plaintiff-side custodian)	4,014 distinct Litman ↔ Goldberg emails	Spans 12/2018 – 9/2025
PROD001 (Defendant’s first rolling production, 4/23/2026 ingest)	30+ emails in the June 2025 cluster alone	Bates <b>GOLDBERG0007058</b> – <b>GOLDBERG0011328</b> , dates 6/2 – 6/25/2025 – the entire pre-litigation accounting-demand window
Plaintiff’s outbox / iCloud / Apple Mail copies	38 Litman- initiated; ~22 NOT in PROD001	Defendant should have produced these and didn’t – discovery-gap target
Post-7/18/2025 emails (after the alleged “elimination”)	Yes – 7/21, 7/23, 7/31, 8/1, 9/9/2025	Contradicts Defendant’s “eliminated” framing
Litman ↔ Goldberg text- message thread	5/2020 – 7/2025 complete	283 screenshots in Plaintiff’s iCloud Photos

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### 3.2. Photographic exhibits confirming specific Goldberg ↔ Litman emails

Image	Captures
IMG_0732.PNG	Goldberg → Litman, <b>3/6/2023, 4:34 PM</b> , “FW: wire transfer with amount (\$1,437,568.00)”: “Rich, Thank you again for the time and discussion on Friday. I felt like we had a good talk. It will be important to keep the momentum going. I looked into where I thought I remembered seeing that KSU was going to pay us some additional monies based on old outstanding invoices...” Signed Joshua B. Goldberg, Co-Managing Partner, “Green Patent Guy”, Brooklyn, NY. Direct evidence Goldberg ran the KSU receivables relationship in Litman’s name.
IMG_1728 (HEIC)	KSU IPTL # <b>VERY URGENT</b> # invoice request to Martha Long with <b>Joshua Goldberg AND Richard Litman BOTH on CC</b> .
IMG_0755.PNG	Martha Long → KSU IPTL with Litman CC’d; KSU’s reply addresses Martha by name — direct cascade evidence.
IMG_0741.PNG	Jerry Meyer → Litman, <b>3/9/2021</b> , “Re: CASE Act” — discusses KSU relationship and the “5-year tail of the agreement.” Highlighted text indicates Litman pre-marked these for case use.
IMG_1788.png	Aaron Gould (Connell Foley, Defendant’s outside counsel) → Litman, “RE: Litman — quarterly reconciliations”: “You received the attached reconciliation report and all payments listed therein. You also received at the time of payment like you did for 3rd Quarter 2025, monthly Payment Allocation by Client reports, monthly Receivables by Client reports...” — confirms quarterly true-up reporting cadence and identifies the production-source PARs.
IMG_0858.PNG + IMG_0859.PNG + IMG_DA6153AD-... JPG	Litman → Aaron Gould, <b>11/13/2025, 4:58 PM</b> , “Litman v NGM (EDNY) — phase 1 limited discovery proposal” — proposing focused discovery on (a) use of Plaintiff’s patent-attorney identity and image, (b) Plaintiff’s patent-attorney e-signature, (c) identifying Plaintiff as Attorney of Record, (d) post-6/14/2023 USPTO patents for KFU and KSU, (e) post-6/14/2023 USPTO patent documents for KFU and KSU, (f) website representations of Plaintiff as Patent Attorney, (g) website representations of Plaintiff as Patent Attorney – Retired, (h) use of email identifiers resolving as Richard Litman. Gould’s full reply (Friday, November 14): “ <b>Richard: No.</b> ” This is now the ground-truth refusal of phase-1 limited discovery, on the record.
IMG_1824.PNG	Official USPTO trademark notification, <b>10/30/2025</b> , addressed to <b>Howard Kline, Richard Litman, Docketing, Efile</b> for U.S. Trademark Application SN 88,205,019 / Docket 6217.50. <b>Three months post-litigation filing, Plaintiff’s name still on USPTO’s correspondent list for an NGM trademark.</b> Goes directly to Question 1 above and to the trademark Track 2 § IV.2 of the Counsel Directions.

Image	Captures
IMG_1705.JPG	Email from <b>Howard W. Kline, Partner</b> (NGM), to outside client <b>jfus@wi.rr.com</b> , with <b>Richard Litman on CC</b> , <b>7/25/2025 at 10:32</b> , Subject “ <i>TM Renewal due in July 2026; QUICK BIB; NGM Ref: 23752.02</i> ”. Body: “ <i>Dear James, Please find attached our letter reporting that to keep the above-referenced US trademark registration in force it will be necessary to file a trademark renewal with the USPTO by July 25, 2026.</i> ” Sent on NGM letterhead, signed Howard W. Kline, Partner. <b>NEW LATEST-CONFIRMED NAME-USE ANCHOR: 7/25/2025 — one day after the 7/24/2025 Hashtag Sports cease-and-desist and SEVEN DAYS AFTER Plaintiff’s email accounts were allegedly “eliminated” on 7/18/2025.</b> This pushes the latest confirmed Litman-name-use act in the entire case from 7/24/2025 to 7/25/2025 and proves NGM continued sending NGM-letterhead client correspondence CC’ing Plaintiff after access was supposedly cut.
IMG_1822.PNG	Litman’s Pro Se signature block — current contact info: 172 Sterling Place, Apt. 8, Brooklyn, NY 11217; (703) 409-8850; rclitman@gmail.com (formal-recital-ready).
IMG_1765.PNG	EDNY pro se filing portal — context for filing track, not § 51 substance.
IMG_1915.PNG	“Why USPTO Authority Is Personal” — commentary on MPEP § 402 and 37 C.F.R. § 1.34 confirming individual-not-firm registration authority. Theoretical background, not § 51 evidence.

### 3.3. Production gap to flag

The June 2025 PROD001 cluster (30+ emails, **GOLDBERG0007058 – GOLDBERG0011328**) does not exhaust the Goldberg ↔ Litman channel. The Plaintiff-side master index reaches **4,014 distinct emails over 7+ years**. Of the 38 Litman-initiated messages in our index, **approximately 22 are not in PROD001**. These should be cross-checked against the next rolling production (PROD002) demand list (Counsel Directions § VI.4, items 1–3).

## 4. Recommendations for counsel

1. **Add the two Goldberg-signed KFU Patent Assignment Cover Sheets as a new evidence category in the trial record** — distinct from the 16 POAs and the 12 PTOL-85B Box-2 forms. Mark each with its USPTO Assignment Database Reel/Frame citation (065379/0084 and 065933/0139). The 12/21/2023 entry pairs with the existing same-day double-document finding for App. 18,392,663.
2. **Cite the “our attorney” anchor email (LITMAN209485, 12/20/2023) directly alongside the assignments** — verbal channel + public-record channel converge on the same fact pattern within a 60-day window in late 2023.
3. **Add the Aaron Gould 11/14/2025 “Richard: No.” refusal of Phase-1 limited discovery (IMG\_0858 / IMG\_0859) to the discovery-record exhibit set** — it documents Defendant’s contemporaneous refusal to produce the exact materials Plaintiff requested on the use-of-name claim.
4. **Add the 10/30/2025 USPTO trademark notification (IMG\_1824) to the Track 2 trademark sub-track** as the latest confirmed *incoming* USPTO correspondent listing for Plaintiff’s name — three



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months post-litigation. 4a. **Update Track 2 latest-confirmed-name-use anchor to 7/25/2025 (IMG\_1705)** — Kline’s TM renewal email to jfus@wi.rr.com, NGM letterhead, Litman on CC, seven days post-elimination. Replaces the prior 7/24/2025 Hashtag Sports anchor as the latest *outgoing* signed correspondence.

5. **Cross-reference the 22-email production gap** with the PROD002 demand list (item 1 of Counsel Directions § VI.4: “Post-7/21/2025 emails — all Goldberg emails”). This is empirical evidence Defendant’s first rolling production was filtered.

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*Prepared 2026-04-27 by Litman Intelligence Research Team in support of Plaintiff Richard C. Litman, pro se. Attorney work product — privileged and confidential.*