

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

----- X:  
RICHARD C. LITMAN, :  
: Plaintiff, :  
: -against- :  
JOSHUA B. GOLDBERG, :  
: Defendant. :  
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Index No.: 524343/2025

**DEMAND FOR A BILL OF  
PARTICULARS TO PLAINTIFF  
RICHARD C. LITMAN**

To: Richard C. Litman  
459 Vanderbilt Avenue  
Brooklyn, New York 11238  
*Pro Se Plaintiff*

**PLEASE TAKE NOTICE** that the undersigned demands that Plaintiff, Richard C. Litman, serve a Bill of Particulars upon Connell Foley LLP, Harborside 5, 185 Hudson Street, Suite 2510, Jersey City, New Jersey 07311, counsel for Defendant, Joshua B. Goldberg, within thirty (30) days of the service of this demand pursuant to CPLR §§ 3041 through 3044, in which Plaintiff shall set forth and specify:

1. Identify and set forth the patent number for each patent you claim evidences a violation of New York Civil Rights Law §§ 50-51 by Defendant.
  - a. Describe in detail how the patents identified herein violate New York Civil Rights Law §§ 50-51.
  - b. State with specificity every item of damage that was caused to you by the publication of the patents identified herein including the total amount you claim for each damage item.

- c. Describe in detail how the alleged use of your name on the identified patents caused each item of damage set forth above in subsection (b).
2. Aside from the patents listed above, identify and set forth in detail all other use(s) of your name or likeness that you claim evidences a violation of New York Civil Rights Law §§ 50-51 by Defendant.
  - a. Describe in detail how the use(s) identified above violate New York Civil Rights Law §§ 50-51.
  - b. State with specificity every item of damage that was caused by the alleged use(s) of your name or likeness including the total amount you claim for each damage item.
  - c. Describe in detail how the alleged use(s) of your name or likeness caused each item of damage set forth above in subsection (b).
3. Describe in detail the audience(s) for each alleged publication of your name or likeness that you allege evidence a violation New York Civil Rights Law §§ 50-51 by Defendant.

**PLEASE TAKE FURTHER NOTICE** that each item and subdivision of this Demand must be answered separately and categorically under its own number without reference to the Complaint or to other portions of the Bill of Particulars. *Whirl Knits, Inc. v Adler Business Machines, Inc.*, 54 AD2d 760 (2d Dept 1976).

**PLEASE TAKE FURTHER NOTICE** that in the event of Plaintiff's failure to comply with the foregoing demand within thirty (30) days, Defendant will move to preclude the offering of any evidence as to the matters herein demanded, together with the costs of such application.

Dated: Jersey City, New Jersey  
February 13, 2026

**CONNELL FOLEY LLP**

By: /s/ Aaron H. Gould

Leo J. Hurley, Jr., Esq.

Aaron H. Gould, Esq.

185 Hudson Street

Suite 2510

Jersey City, NJ 07311

*Attorneys for Defendant*

*Joshua B. Goldberg*