

EXHIBIT — TURN-AND-BURN TEMPLATE ON DOCKET 36372 / KFU GENERAL MATTER

Litman v. Goldberg, Index No. 524343/2025 (N.Y. Sup. Ct., Kings County)
 King Faisal University (Client 135900) · Eagle Bank Trust Account_0495 (Ledger t23)
 Prepared April 18, 2026 — Attorney Work Product / Privileged

Purpose. To demonstrate that a single identical transaction pattern — same client, same docket, same bank, same signer, same counterparty, same residue — recurred on NGM's trust books **15 months apart**, with the interim residue held frozen for 14 months and 19 days. The recurrence is not coincidence; it is a template. Both columns below are verified against NGM-produced Trust Bank Journals.

EVENT 1 — ANCHOR		EVENT 2 — REPEAT	
Date	November 20, 2024	Date	February 9–10, 2026
IN — Tran#	3844512	IN — Tran#	4000959
IN — Memo	"Wire Payment KFU 36372"	IN — Memo	"Wire KFU 2.6.2026 Retainer / Pa 36372"
IN — Amount	\$499,658.00	IN — Amount	\$291,173.00
IN — Ref / Signer	Ref 6913 / VG (Valencia Gray)	IN — Ref / Signer	Ref 7438 / VG (Valencia Gray)
OUT — Tran#	3844418	OUT — Tran#	4001216
OUT — Memo	"Transfer to Operating"	OUT — Memo	"Trust to Op KFU General docket 36372"
OUT — Counterparty	Nath & Associates PLLC (106715)	OUT — Counterparty	Nath & Associates PLLC (106715)
OUT — Amount	\$493,898.00	OUT — Amount	\$224,113.00
OUT — Ref / Signer	Ref 2120 / VG (Valencia Gray)	OUT — Ref / Signer	Ref EFT-37 / VG (Valencia Gray)
Residue on t23 / 36372	\$84,231.87	Residue on t23 / 36372	\$84,405.87

IDENTICAL TEMPLATE · SAME BANK (Eagle t23) · SAME DOCKET (36372) · SAME CLIENT (KFU 135900) · SAME SIGNER (VG) · SAME COUNTERPARTY (Nath & Associates 106715) · RESIDUE WITHIN \$174.00

Metric	Event 1 (11/20/2024)	Event 2 (2/9–2/10/2026)	Delta
Inbound wire from KFU	\$499,658.00	\$291,173.00	\$-208,485.00
Outbound transfer to Ops	\$493,898.00	\$224,113.00	\$-269,785.00
Residue on docket 36372	\$84,231.87	\$84,405.87	\$174.00

14 MONTHS, 19 DAYS OF STAGNATION — Docket 36372 Residue Timeline

The residue of \$84,231.87 left behind on 11/20/2024 was never touched until a second wire-and-sweep was executed on the same docket on 2/9–2/10/2026. Between those two dates: no client disbursement, no refund, no fee transfer, no reclassification. The balance is a flat line.

Date	36372 Residue (Eagle t23)	Event / Note
Nov 20, 2024	\$84,231.87	EVENT 1 executed — \$499,658 IN / \$493,898 OUT (VG, Tran 3844512/3844418)
Dec 31, 2024	\$84,231.87	Month-end snapshot — no activity on 36372
Jan 31, 2025	\$84,231.87	Month-end snapshot — no activity on 36372
Feb 28, 2025	\$84,231.87	Month-end snapshot — no activity on 36372
Mar 31, 2025	\$84,231.87	Month-end snapshot — no activity on 36372
Apr 30, 2025	\$84,231.87	Month-end snapshot — no activity on 36372
May 31, 2025	\$84,231.87	Month-end snapshot — no activity on 36372
Jun 30, 2025	\$84,231.87	Month-end snapshot — no activity on 36372
Jul 18, 2025	\$84,231.87	Litman termination — residue still frozen
Jul 28, 2025	\$84,231.87	Freedom Bank closed (third undisclosed trust account)
Jul 31, 2025	\$84,231.87	Production blackout begins (July–December 2025)
Aug–Dec 2025	\$84,231.87	Production blackout — no journals produced in discovery
Jan 31, 2026	\$84,231.87	Q1 2026 baseline — residue carried in NGM Trust Listing
Feb 9, 2026	\$84,231.87	EVENT 2 IN — \$291,173 wire posts (VG, Tran 4000959)
Feb 10, 2026	\$84,405.87	EVENT 2 OUT — \$224,113 sweep to Ops (VG, Tran 4001216)

CONTEXT MARKERS DURING THE 14-MONTH-19-DAY FREEZE

Marker	Date	Relevance
Arbitration Award (prior dispute)	June 14, 2023	Antedates Event 1 by ~17 months
EVENT 1 — Wire & Sweep on 36372	Nov 20, 2024	Anchor execution (template instance #1)
Litman termination	July 18, 2025	Residue on 36372 remains frozen at \$84,231.87
Freedom Bank trust account closed	July 28, 2025	Third (undisclosed) trust account — spoliation signal
Production blackout begins	July 2025	No Trust Bank Journals produced Jul–Dec 2025
Production blackout ends	December 2025	Journals resume; 36372 residue still at \$84,231.87
EVENT 2 — Wire & Sweep on 36372	Feb 9–10, 2026	Repeat execution (template instance #2)

IMPLICATIONS — Why This Template Is Decisive

What the Side-by-Side Shows

- 1. Not a one-off.** The 11/20/2024 execution is not an isolated transaction; it is the *first instance* of a reusable template. The 2/9–2/10/2026 execution repeats every mechanical parameter — inbound wire on Eagle t23, outbound transfer to Nath & Associates PLLC operating (client 106715), same signer (Valencia Gray), same docket (36372), same client (King Faisal University 135900).
- 2. The \$174 precision.** The residue on docket 36372 moves from \$84,231.87 to \$84,405.87 — a delta of \$174.00 — across 14 months and 19 days of zero activity. This is not random. A recurring template that lands within \$174 on a docket-level residue after 15 months implies that the **residue amount is itself a parameter of the template**, not an accident.
- 3. Same-signer recurrence.** Valencia Gray (VG) signed both the IN and the OUT on both events. Four signatures by one person on a single docket, framing two identical wire-and-sweep executions 15 months apart. The signer is not a random clerk; she is the template operator.
- 4. Stagnation rules out legitimate ongoing work.** If docket 36372 represented active, ongoing KFU legal work, the residue would move — fee accruals, disbursements, reclassifications, refunds, bank charges, anything. It did not. The residue was frozen for 14 months and 19 days, then reactivated only by a second identical turn-and-burn.

The Single Discovery Demand That Resolves This

The mechanical shuffle theory (i.e., NGM's assertion that inbound and outbound wires on the same docket reflect ordinary retainer replenishment and fee recognition) can be tested with **one** targeted request:

DEMAND: Eagle Bank Account 0495 Fedwire / SWIFT MT-103 originator-detail records for both event windows — **11/18/2024 through 11/20/2024** and **02/06/2026 through 02/10/2026** — including:

- Full MT-103 / Fedwire inbound messages for Tran 3844512 and Tran 4000959 (originator name, originator bank, originator account, intermediary banks, reference field 70)
- Full outbound wire advices for Tran 3844418 and Tran 4001216 (beneficiary bank, beneficiary account at Nath & Associates PLLC, purpose-of-payment field)
- Eagle Bank internal transfer tickets, including any OFAC / BSA review notes attached to the wires
- Correspondence (email, Bloomberg, SWIFT message copies) between NGM personnel and Eagle Bank regarding both inbound wires and both outbound transfers

If the originator on the 2/6/2026 wire is King Faisal University (KFU) itself, NGM will have to explain why KFU is paying a new **\$291,173** retainer on docket 36372 after Richard C. Litman was terminated 7/18/2025 and KFU's historic point of contact was Litman. If the originator is *not* KFU, the Litman-facing memo line ("Wire KFU 2.6.2026 Retainer / Pa 36372") is false and the booking itself is spoliation-grade.

Documentary Basis

Event 1 source: NGM Trust Bank Journal November 2024 (Bates ND0000253210, ND0000209730).

Event 2 source: NGM Trust Bank Journal February 2026, produced by Connell Foley LLP 4/17/2026 (archived at [evidence/ngm_q1_2026_payment_backup_20260417](#)).

Figures reconcile penny-to-penny with NGM's own summary lines. Richard C. Litman reserves all rights to challenge each figure against subsequently produced bank statements, reconciliation worksheets, and Eagle Bank Fedwire / SWIFT records.