

**IN THE MONTGOMERY COUNTY COMMON PLEAS COURT
MONTGOMERY COUNTY, OHIO**

LVNV FUNDING, LLC
c/o Resurgent Capital Services LP
55 Beattie Place (Suite 110)
Greenville, SC 29601

PLAINTIFF

v.

MATTHEW KRAUSE
2905 Eckley Boulevard
Dayton, OH 45449

DEFENDANT

* CASE NO. 2025 CV 03423

**[Transferred from Municipal
Case#2025CVF000533]**

*

JUDGE SUSAN D. SOLLE

*

**DEFENDANT'S DISCLOSURE
OF EXPERTS AND
NOTICE OF FILING EXPERT
REPORTS**

COMES NOW Defendant, Matthew Krause (hereinafter, "Defendant" or "Krause"), and in accordance with Ohio R. Civ. P. 26, hereby files Defendant's Disclosure of Experts (hereinafter, "Disclosure"), identifying the following individuals as Defendant's experts:

- (a) Brian Sullivan; and
- (b) Sam Han, Ph.D..

Concurrently with this Disclosure, Defendant also files his Notice of Filing Expert Reports. Please take notice that attached hereto is the Expert Report of Brian Sullivan and Expert Report of Sam Han, Ph.D. (hereinafter collectively "Reports").

Respectfully submitted on October 7, 2025,

/s/ Andrew Barnes
Andrew Barnes (0098065)
90 Rhoads Center Drive
Centerville, OH. 45458
(513) 494-6616 Phone
barnes@abarneslaw.com
Attorney for Defendant

**IN THE MONTGOMERY COUNTY COMMON PLEAS COURT
MONTGOMERY COUNTY, OHIO**

LVNV FUNDING, LLC PLAINTIFF, v. MATTHEW KRAUSE DEFENDANT.	CASE NUMBER CASE NO. 2025 CV 03423 CERTIFICATE OF FILING AND SERVICE
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CERTIFICATE OF FILING AND SERVICE

The undersigned counsel certifies that the above-attached document was filed using this Honorable Court's Case Management / Electronic Case Filing ("CM/ECF") system on the date set forth herein, which will serve electronically a Notice of Electronic Filing ("NEF") on all counsel of record in this matter, all of whom have consented to accepting the NEF as electronic service through the Court's CM/ECF.

[SIGNATURE TO FOLLOW]

Respectfully submitted on 2025-October-07.

/s/ Andrew Barnes
Andrew Barnes (0098065)
90 Rhoads Center Drive
Centerville, OH. 45458
(513) 494-6616 Phone
barnes@abarneslaw.com
Attorney for Defendant

**IN THE MONTGOMERY COUNTY COURT OF COMMON PLEAS, OHIO
CIVIL DIVISION**

LVNV FUNDING, LLC PLAINTIFF, v. MATTHEW KRAUSE DEFENDANT.	CASE NUMBER 2025 CV 03423 EXPERT REPORT OF BRIAN SULLIVAN
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EXPERT REPORT OF BRIAN SULLIVAN

I, Brian Sullivan, declare as follows:

I: Background and Foundational Statements

1. I have been retained as expert witnesses by Counsel for Krause.
2. I am over the age of eighteen years and am competent to make all of the statements in this Expert Report of Brian Sullivan (hereafter, "Expert Report" or "Report").
3. I voluntarily give the statements in this Report in support of Defendant Matthew Krause (hereafter, "Krause") in the above-captioned proceeding.
4. All statements made herein come from personal knowledge unless stated otherwise or clearly apparent by context.
5. Matters of opinion expressed in this Report are opinions formed based upon my own experience and knowledge.
6. My billing rate as an expert witness to evaluate evidence based on electronically stored or electronically transferred documents is \$450 per hour, which I believe to be the normal, customary, and reasonable rate for experts in this technical area of expertise.
7. I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and belief, the statements that are contained in this Report are true and correct.

II: Attachments and Exhibits

8. Attached as **Exhibit A** is my curriculum vitae, which provides, *inter alia*, my education and experience.

9. Attached as **Exhibit B** is an example of metadata uncovered in another case involving LVNV Funding, LLC (hereinafter, "LVNV").

10. Attached as **Exhibit C** are step-by-step instructions that correspond to a method that I have used for inspecting an electronic file and printing the electronic file to paper to make sure that the printout accurately reflects the electronic file.

III: Statements Relating to Scope of Report

11. I have been advised by counsel for Krause that the Court has ordered Krause to "produce to the Court documentation regarding Defendant's 'experts' within 14 days of" 2025-Sep-25.

12. This Report is responsive to the Court's order.

IV: Subject Matter of Testimony under Ohio R. Evid. 702(B)

13. I have been asked to testify about whether documents designated as LVNV52 through LVNV60 (hereinafter, "LVNV Paper File"), which were produced by LVNV Funding, LLC (hereinafter, "LVNV"), are direct paper printouts of an original "Computer File" from a bank (as defined in LVNV38) (hereinafter, "LVNV Electronic File"), or whether the LVNV Electronic File was altered or otherwise modified before being printed as the LVNV Paper File.

V: Specialized Knowledge under Ohio R. Evid. 702(B)

14. I have personally observed and reviewed: (a) a printed document (hereinafter, "Printout") provided by LVNV; and (b) an un-modified and un-redacted "Computer File" that was provided by LVNV, which was allegedly the corresponding "Computer File" that generated the Printout.

15. Present during my observation and review of the "Computer File" were at least the following individuals: **(a)** Sam Han (hereinafter, "Han"); and **(b)** Boyd Gentry (hereinafter, "Gentry").

16. During my observation and review of the "Computer File," I personally observed that the Printout was different than the "Computer File" in at least the following ways:

a. First, the Printout included a column with a heading "FileName," while the "Computer File" had no such "FileName" column.

b. Second, the Printout included a column with a heading "LineNumber," while the "Computer File" had no such "LineNumber" column.

17. Both Han and Gentry can confirm the differences between the Printout and the "Computer File" that I personally observed because Han and Gentry concurrently observed those same differences and concurrently reviewed the same "Computer File."

18. The differences that I observed are not opinions; they are facts.

19. My knowledge about the Printout being different from the "Computer File" is specialized knowledge because I am not aware of many individuals who have had an opportunity to review such an un-modified and un-redacted "Computer File."

20. The specialized knowledge (about the difference between the "Computer File" and the Printout) provides a basis for forming my opinion about differences between the LVNV Electronic File and the LVNV Paper File in this case.

VI: Matters Beyond the Knowledge of Lay Persons under Ohio R. Evid. 702(A)

21. My specialized knowledge about the Printout being different than the "Computer File" is beyond the knowledge possessed by lay persons because: **(a)** lay persons normally do not have access to any similar "Computer File"; and **(b)** lay persons normally do not review documents that are similar to the Printout.

VII: Reliability of Specialized Knowledge under Ohio R. Evid. 702(C)

22. My specialized knowledge about the Printout having an entire "FileName" column and an entire "LineNumber" column, neither of which exists in the "Computer File," is reliable because both Han and Gentry confirmed that neither the "FileName" column nor the "LineNumber" column existed in the "Computer File."

23. In other words, my specialized knowledge about the Printout being different than the "Computer File" is reliable because, *inter alia*, both Han and Gentry confirmed that the "Computer File" was different than the Printout.

VIII: Experience under Ohio R. Evid. 702(B)

24. I have personal experience with documents that are substantially similar to the LVNV Paper File.

25. I have personally reviewed numerous Printouts that are substantially similar to the LVNV Paper File.

26. Based on my personal experience from observing those numerous Printouts, I have personal knowledge that the Printouts include:

- a. An entire column with a heading "FileName."
- b. An entire column with a heading "LineNumber."

27. My experience of personally observing numerous Printouts provides a basis for forming my opinion in this case about the LVNV Paper File (which has an appearance that is substantially similar to the Printouts).

IX: Matters Beyond the Experience of Lay Persons under Ohio R. Evid. 702(A)

28. I believe that my experience with the numerous Printouts is beyond the knowledge possessed by lay persons because, to my knowledge, lay persons normally have not reviewed documents similar to the Printouts that I reviewed (at least not to the extent of reviewing numerous Printouts that are substantially similar in appearance to the LVNV Paper

File).

29. Thus, I do not believe that lay persons would understand the significance of seeing a Printout with:

- a. An entire first column with the heading "FileName."
- b. An entire second column with the heading "LineNumber."

X: *Reliability of Experience under Ohio R. Evid. 702(C)*

30. My experience with Printouts having an entire "FileName" column and an entire "LineNumber" column is reliable because the presence of the "FileName" column and the "LineNumber" column is verifiable by visual inspection.

31. The presence of an entire "FileName" column and an entire "LineNumber" column in a Printout has been actually verified by at least Gentry and Han.

XI: *Education under Ohio R. Evid. 702(B)*

32. My education includes a Bachelor of Electrical Engineering degree from the University of Dayton.

33. My educational background is relevant to the inspection of electronic documents because that education permits me to understand: (a) what metadata to uncover in electronic documents (e.g., Date Created, Content Created, Date Modified, Date Accessed, Owner, etc.); (b) why that metadata is important for determining the integrity of an electronic file; and (c) how to uncover that metadata.

XII: *Matters Beyond the Education of Lay Persons under Ohio R. Evid. 702(A)*

34. My education in electrical engineering is beyond the education possessed by lay persons (other than electrical engineers) because lay persons normally do not have an educational background in electronic computer files.

35. Thus, lay persons normally would not understand: (a) what metadata to uncover;

(b) why that metadata is important; or (c) how to uncover that metadata.

XIII: Reliability of Education under Ohio R. Evid. 702(C)

36. My educational experience in electrical engineering is reliable because of the rigors of an engineering program at the University of Dayton, along with the standards required to obtain an engineering degree from the University of Dayton.

XIV: Reliability of Testimony Based on Specialized Information

37. My testimony about the difference between the LVNV Paper File and the LVNV Electronic File is based on reliable specialized knowledge (see, Sections V, VI, and VII, *supra*), experience (Sections VIII, IX, and X, *supra*), and education (Sections XI, XII, and XIII, *supra*).

XV: Procedure Applied under Ohio R. Evid. 702(C)

38. To the extent that a procedure is applied to the inspection of electronic documents, that procedure is set forth in **Exhibit C**.

39. If given an opportunity to inspect the LVNV Electronic File, I would apply substantially the same procedure that is set forth in **Exhibit C**.

XVI: Objectively Verifiable and Verified Procedure under Ohio R. Evid. 702(C)(1)

40. The procedure as set forth in **Exhibit C** provides step-by-step instructions for another electrical engineer, computer scientist, or other qualified individual to apply every step of the procedure precisely as set forth in **Exhibit C**.

41. As such, the procedure is objectively verifiable.

42. Furthermore, substantially the same procedure as steps 3 through 26 in **Exhibit C** has been objectively verified by Han, who was actually present when those steps were applied personally by Gentry (in the presence of both Han and myself).

43. The results from applying those steps is shown in **Exhibit B**.

XVII: Reliable Implementation of Procedure under Ohio R. Evid. 702(C)(2)

44. To the extent that I apply any procedure at all to the inspection of electronic documents, such as the "Computer File," I would follow the step-by-step procedure as set forth in **Exhibit C**.

45. As long as the procedure is implemented step-by-step, as substantially set forth in **Exhibit C**, the implementation of the procedure is reliable.

46. In fact, a substantially same procedure as that set forth in steps 3 through 26 of **Exhibit C** was reliably implemented by Gentry in the presence of Han and myself.

XVIII: Procedure Conducted in Way to Yield Accurate Result under Ohio R. Evid. 702(C)(3)

47. Implementing the step-by-step procedure as set forth in **Exhibit C** will yield an accurate result.

48. For example, conducting the step-by-step procedure for uncovering the "Date Modified" metadata will accurately yield the "Date Modified" metadata for an electronic file; conducting the step-by-step procedure for uncovering the "Content Created" metadata will accurately yield the "Content Created" metadata; and so on.

49. In fact, when Gentry conducted the procedure in the presence of Han and myself (in substantially the same way as set forth in steps 3 through 26 of **Exhibit C**), Gentry's conducting of the procedure yielded an accurate result.

50. In other words, when Gentry conducted the inspection procedure for the "Date Modified" metadata, the procedure accurately yielded the "Date Modified" metadata; when Gentry conducted the inspection procedure for the "Content Created" metadata, the procedure accurately yielded the "Content Created" metadata; and so on.

51. The results of Gentry's inspection in the presence of Han and myself are recorded in **Exhibit B**.

XIX: Expert Opinion about the LVNV Paper File and the LVNV Electronic File

52. Based on my specialized knowledge (see, Sections V, VI, and VII, *supra*), my experience (Sections VIII, IX, and X, *supra*), and my education (Sections XI, XII, and XIII, *supra*), it is my opinion that:

a. Absent any alteration or modification or some type of intervention (either by a human or by a computer program), the LVNV Electronic File will lack the "FileName" column that is in the LVNV Paper File.

b. Absent any alteration or modification or some type of intervention (either by a human or by a computer program), the LVNV Electronic File will lack the "LineNumber" column that is in the LVNV Paper File.

53. Thus, it is my opinion that the LVNV Electronic File was altered or otherwise modified before being printed as the LVNV Paper File.

XX: Concluding Remarks


54. If original, un-modified and un-redacted electronic documents are provided for review, then I can provide a more accurate assessment of how, precisely, the documents were created, stored, transferred, or otherwise manipulated (if at all) over time.

55. I reserve the right to amend any statements herein, should new information become available (such as a late-filed expert report by LVNV, or late-produced documents that LVNV previously alleged to be irrelevant that LVNV must now produce to overcome the facts recited herein).

FURTHER AFFIANT SAYETH NAUGHT.

[SIGNATURE AND OATH (OR AFFIRMATION) TO FOLLOW]

Executed on October 7, 2025, in Dayton, Ohio.

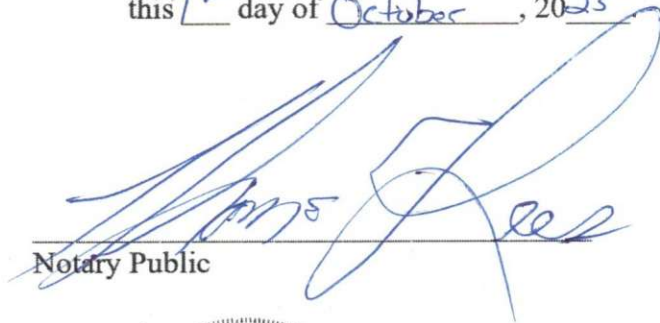


Brian Sullivan

STATE OF OHIO, ||
MONTGOMERY COUNTY || SS:

Sworn to (or affirmed under penalty of perjury) and subscribed in my presence

this 7th day of October, 2025



Notary Public



THOMAS E. LEES, Attorney at Law
Notary Public, State of Ohio
My Commission has no expiration date.
Section 147.03 O. R. C.

CURRICULUM VITAE of BRIAN P. SULLIVAN

Office:

Thomas E. Lees, LLC
70 Rhoads Center Drive, Suite B
Dayton, OH 45458
Phone (937) 610-9888; Facsimile (937) 610-0189
bsullivan@lees-ip.com

Personal Data:

Born in Fairfax, VA, 1973

Certifications:

Registered Patent Attorney, No. 67,840
Ohio State Bar: 0086985
U.S. District Court for the Southern District of Ohio

Professional Activities:

Dayton Intellectual Property Law Association
Ohio State Bar Association

Education:

University of Dayton (Bachelor of Electrical Engineering, 1995)
University of Dayton School of Law (Juris Doctor, 2010 – *Cum Laude*) (Received several CALI awards for excellence)
University of Dayton School Of Law (LL.M. in Intellectual Property and Technology Law, 2010)

Professional Experience:

01/11 – Present	Attorney, Thomas E. Lees, LLC, Dayton, Ohio
05/10 to 12/10	Law Clerk, Thomas E. Lees, LLC, Dayton, Ohio
05/09 to 08/09	Summer Law Clerk, Fay Sharpe, LLC, Cleveland, Ohio
03/03 to 10/07	Altera Dedicated Field Applications Engineer, Arrow Electronics, Dayton Ohio
07/01 to 03/03	Field Applications Engineer, Future Electronics, Dayton, Ohio
09/00 to 06/01	Field Applications Engineering Specialist, Altera Corporation, Schaumburg, Illinois
04/98 to 09/00	Field Applications Engineer, Wyle Design Services, Dayton, Ohio
01/96 to 04/98	Applications Engineer, Altera Corporation, San Jose, California

CURRICULUM VITAE of BRIAN P. SULLIVAN

SPEAKING ENGAGEMENTS

Copyright in the Film Industry; June 2012

Further Information Regarding Professional Experience

Thomas E. Lees, LLC

My current position focuses on patent, trademark, and copyright preparation and prosecution.

Fay Sharpe, LLC

My summer clerkship with Fay Sharpe involved drafting patents and responses to office actions. My other responsibilities included research in trademark law, copyright law, and patent marking.

Arrow Electronics

My responsibilities as an Altera dedicated field applications engineer included assisting designers during the design and debug stages of the design process to use FPGAs (Field Programmable Gate Arrays) for implementing their designs. I assisted designers in aviation, lighting, military applications, lift trucks, digital signal processing, medical applications, printers and print heads, and radar detectors. I also converted old ASIC designs into VHDL for use in an FPGA. I was also responsible for training designers in the use of Altera FPGAs including various FPGA architectures, PCI, PCI-Express, LVDS, Verilog, VHDL, and the Quartus II design software. At Arrow Electronics, I covered a territory including all of Ohio, Indiana, Western Pennsylvania, and Kentucky.

Future Electronics

At Future Electronics, I was a more generalized applications engineer. Instead of focusing purely on FPGAs, I assisted designers in the selection of various semiconductors including microprocessors, memory, DSPs, and linear and mixed-signal devices. The list of semiconductor manufacturers includes Analog Devices, Motorola (Freescale), Micron, and National Semiconductor.

Altera Corporation

I had two opportunities to work directly with Altera. My first opportunity was at the headquarters in Silicon Valley as an applications engineer. I assisted Altera's worldwide customers with second-tier support over the phone. After a while I joined the MegaCore group and helped design several PCI interface MegaCores. My second opportunity was at a field office in Schaumburg, Illinois. There, I provided high-level technical support to Altera and distributor field applications engineers in eastern North America, including training and optimization of FPGA designs for both speed and area.

CURRICULUM VITAE of BRIAN P. SULLIVAN

Wyle Design Services

At Wyle, I provided technical support to top-level Altera customers in Southern Ohio, Indiana, and Western Kentucky including Lucent, Thomson Consumer Electronics, Raytheon, Lexmark, Barco, and Cincinnati Electronics. I also trained customers in all aspects of Altera design including Verilog, VHDL, AHDL, and the Quartus-series design software.

MISCELLANEOUS/PERSONAL

I have volunteered at Advocates for Basic Legal Equality and Legal Aid of Western Ohio at the same office. Upon graduating UDSL, I received a purple cord signifying that I performed over 50 hours of community service in UDSL's Pro Bono Commitment to the Community.

Even though I was born in Fairfax, VA, I was raised in a suburb of Cleveland, Ohio from age two until I left for college. Thus, I am an avid Cleveland Browns fan.

Recently, I have picked up golfing. I enjoy the courses in the Pawleys Island, SC area; maybe it is because I shot a hole-in-one from the tips (Golden Bear) of hole 13 on Pawleys Plantation. Along with the rest of my foursome, I have won a couple scrambles including the 2009 UDSL Kessler Open at Yankee Trace Golf Course.

CHARGE OFF SALE SHER 20230410.TXT

1:40 pm start

LVNV VISIT: FIELDS TO DISPLAY

2024-DEC-16 Date 10:26 AM
 2024-DEC-16 Date Modified 10:26 AM
 2024-DEC-17 Date Created 12:55 pm
 2024-DEC-16 Content Created 10:26 AM
 2024-DEC-17 Date Accessed 12:56 pm
 2024-DEC-16 Date Last Saved 10:26 AM
 Blank Authors Blank
 Blank Contributors Blank
 File Extension .TXT
 Blank File Ownership Blank
 Blank File Version Blank
 Blank Last Change Author Name Blank
 Blank Last Change Message Blank
 Blank Last Printed Blank
 Owner LOORWG 2024 / Boydig
 Blank Pages Blank
 No Shared No
 Blank Shared With Blank
 Size 2303 KB (2.24 MB)
 Blank Total Editing Time Blank

TIME: 1:51 pm
 TIME: NA
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 TIME: 1:51 pm

2024-DEC-17 15:22
 Dec. 17, 2024 3:22 PM

[Handwritten signatures and initials in red and blue ink]

FILE COPIED FOR REVIEW

TIME: 1:53 pm

COPIED FILE OPENED

TIME: 1:53 pm

USR

Modified date: Dec. 16, 2024 10:26:16 AM
 Created date: Dec. 17, 2024
 Accessed: 2024-DEC-17 1:53:09 pm

REVIEW PROCESS FOR OPENED FILE

Search for:

- Wiseman (Cross River Bank)
- Bird (Credit One Bank)
- Bird (Credit One Bank)
- Byrd (Cross River Bank)

[Handwritten note: "Boydig" with an arrow pointing to the list]

ORIGINAL

Created: Dec. 17, 2024 12:55:45 pm
 Modified: Dec. 16, 2024 10:26:14 AM
 Accessed: 2 hours ago

2:46 pm
 requested search for Byrd and declined.

1:59pm Requested that Mr. Chentny load the data as he would load it; he declined.

- Cantrell (Credit One Bank)
- Duvall (Credit One Bank)
- Hicks (Credit One Bank)
- Mahaffey (Credit One Bank)
- Mulholland (Credit One Bank)
- Townsend (Credit One Bank)
- Townsend (Credit One Bank)

DC 3832

Cells w/ data 236,428
 Tables 0
 Formulas 0
 Sheets 1
 Cells w/ data 236,428
 Tables 0
 Formulas 0

FOR COMPARISON TO ELECTRONIC FILE

pan_owner	acct_num	first_name	last_name
[Redacted]	[Redacted]7052	[Redacted]	[Redacted]
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[Redacted]	[Redacted]7627	[Redacted]	[Redacted]
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[Redacted]	[Redacted]9693	[Redacted]	[Redacted]
MPLI Capital Holdings II	44140074	Eric	Wiseman
[Redacted]	[Redacted]0308	[Redacted]	[Redacted]
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[Redacted]	[Redacted]1524	[Redacted]	[Redacted]
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[Redacted]	[Redacted]2170	[Redacted]	[Redacted]

IMPORTANT INITIAL CONDITIONS:

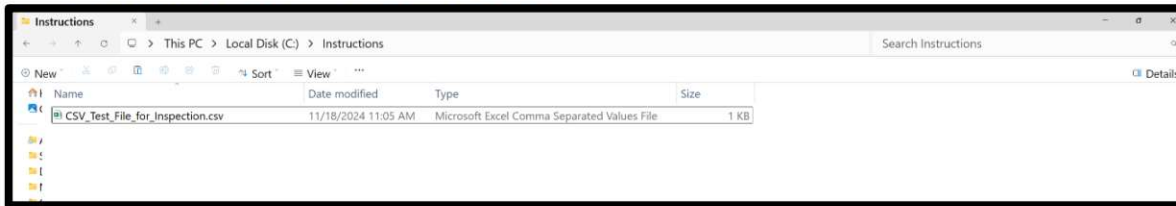
- (a) READ ALL OF THESE INSTRUCTIONS COMPLETELY BEFORE BEGINNING SO THAT THE DATA CAN BE PRESERVED CORRECTLY.
- (a) Please be sure to record by video **the entire process from beginning to end without stopping or pausing the video** so that the video demonstrates continuity in gathering the metadata.
- (b) Please be sure to record in **1080p or better** (so that fine print and smaller details are legible and clearly shown). A 1080p resolution should be readily available, as this has been the standard for many mobile devices since 2013.
- (c) Please be sure that the computer on which the file is reviewed (and for which the video is recorded) is the computer on which the following **original ".csv" file was stored with all of the metadata intact on that particular computer:**



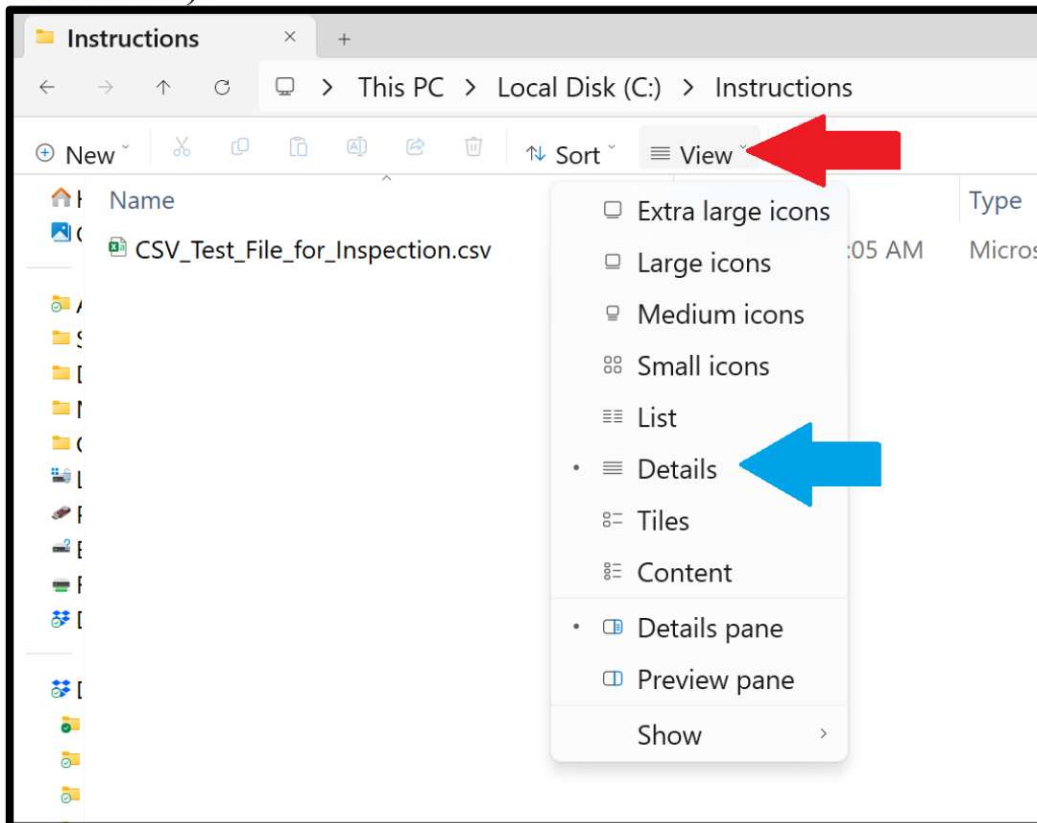
(from Bates Number LVNV68).

1. Aim video camera at computer monitor and bring to focus the entire screen.
2. Start recording video and **do not pause or stop the video until all of these instructions are completed.**
3. **DO NOT PAUSE OR STOP THE VIDEO:** Open the folder that has the file "CHARGEOFF_SALE_SHER_20230410.csv"

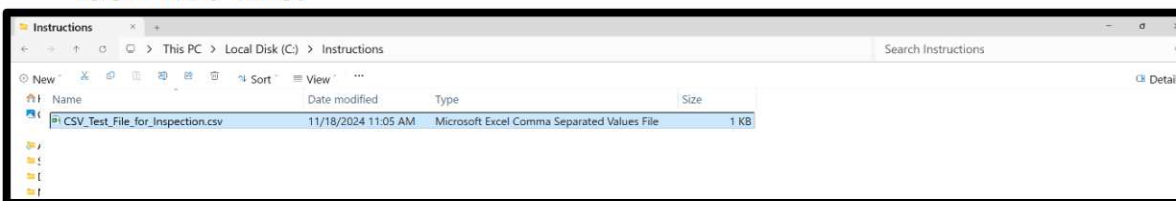
4. DO NOT PAUSE OR STOP THE VIDEO: Your folder should look similar to this on the screen:



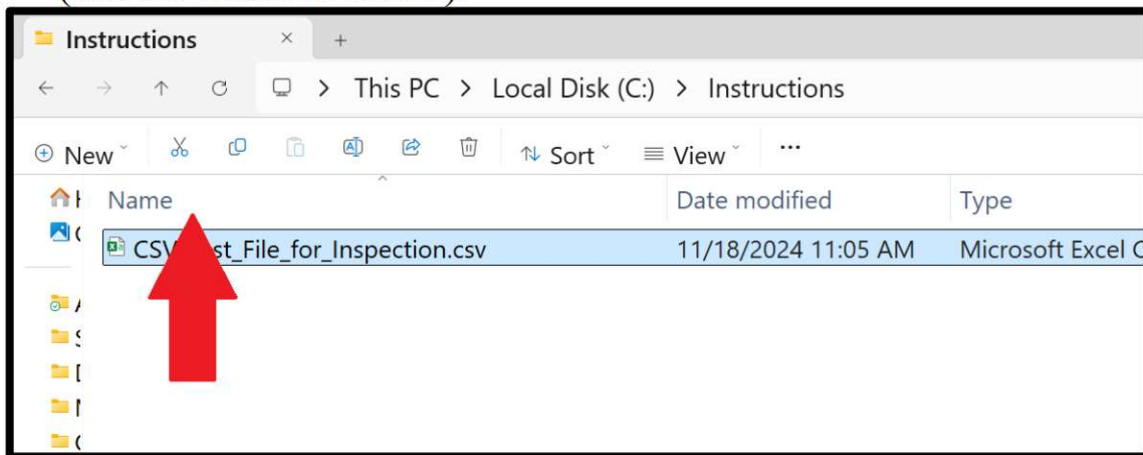
5. DO NOT PAUSE OR STOP THE VIDEO: At the top, select "View" (shown with red arrow) and select "Details" (shown with blue arrow):



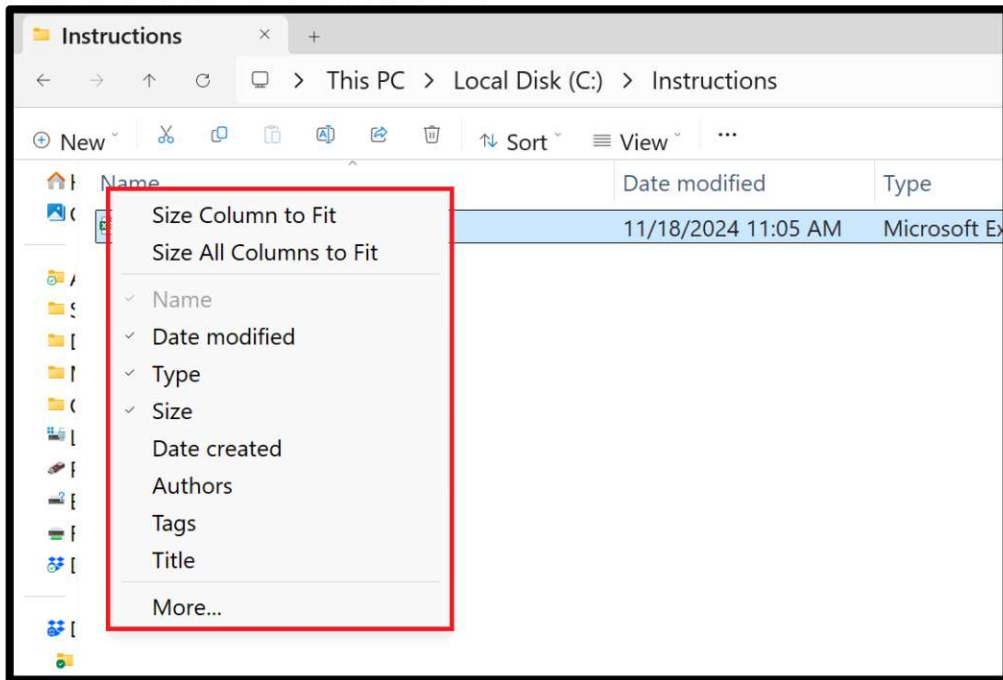
6. DO NOT PAUSE OR STOP THE VIDEO: Your screen should look like this:



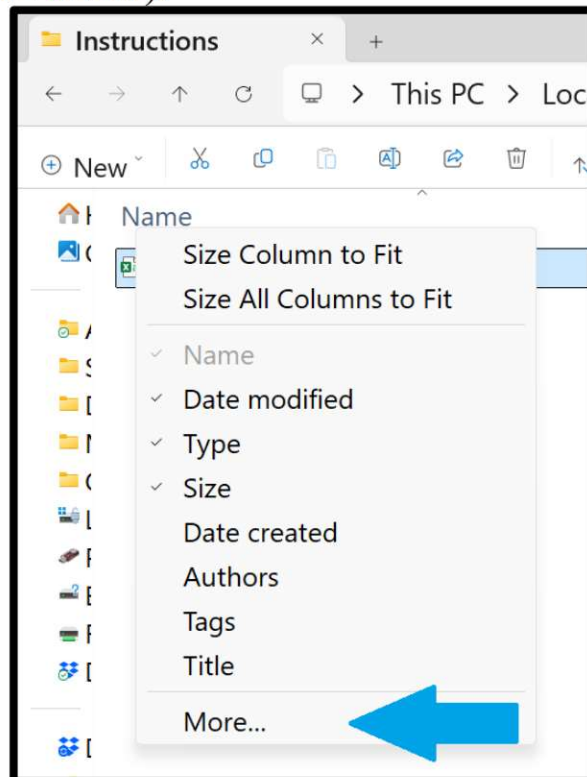
7. DO NOT PAUSE OR STOP THE VIDEO: If "Date modified" is completely and legibly shown (including date and time), then zoom in with the camera so that the "Date modified" is shown clearly and legibly on the video.
8. DO NOT PAUSE OR STOP THE VIDEO: If "Date modified" is only partially shown, then expand the "Date modified" field so that both date and time are shown completely and clearly.
9. DO NOT PAUSE OR STOP THE VIDEO: Zoom in with the camera so that the "Date modified" appears clearly and legibly on the video.
10. DO NOT PAUSE OR STOP THE VIDEO: Right click on "Name" (shown with red arrow):



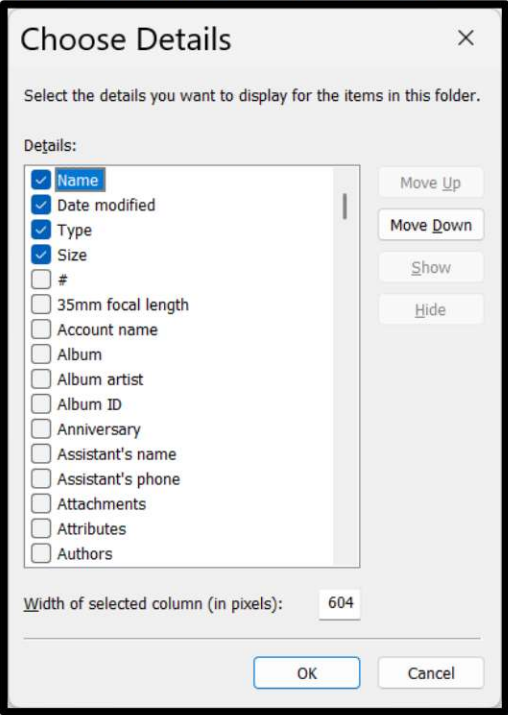
11. DO NOT PAUSE OR STOP THE VIDEO: After right-clicking "Name," the screen should show a selection menu that looks like what is shown in the red box:



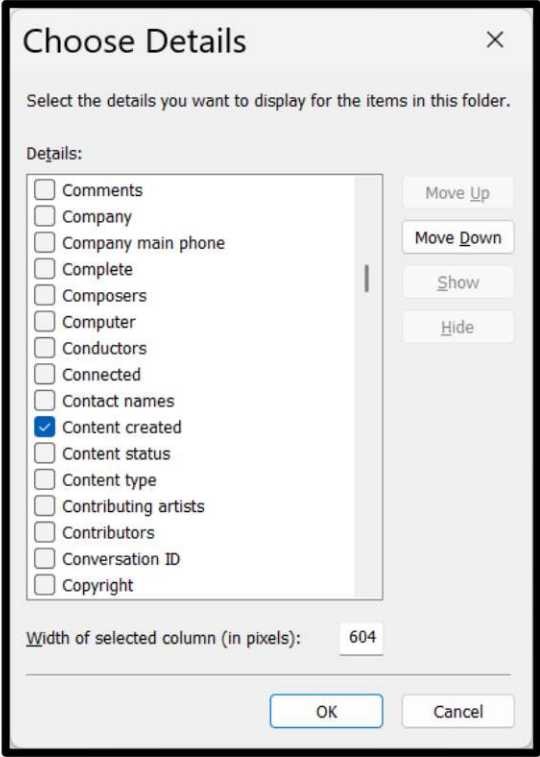
12. DO NOT PAUSE OR STOP THE VIDEO: Select "More..." (shown in blue arrow):



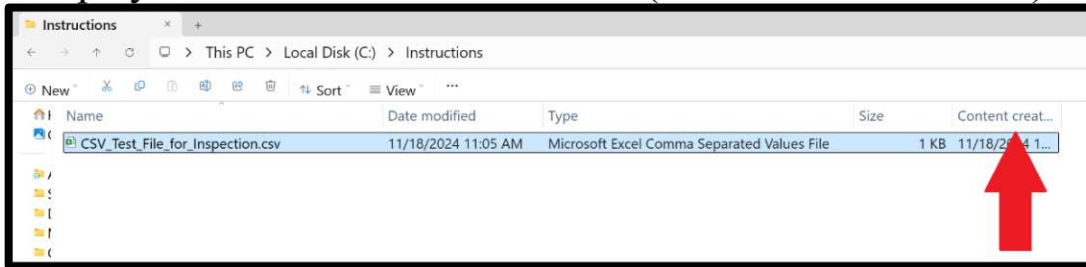
13. DO NOT PAUSE OR STOP THE VIDEO: Selecting "More..." should bring up a menu that looks like this:



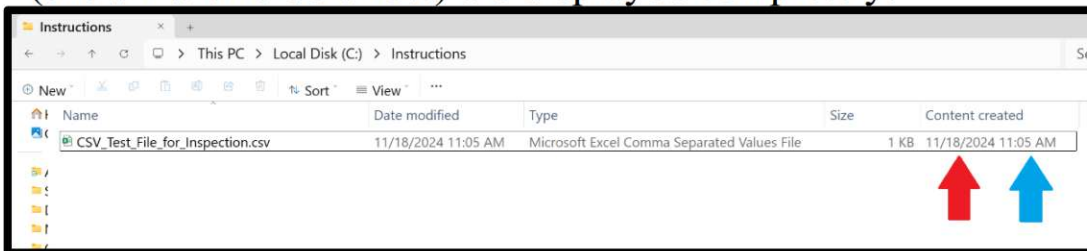
14. DO NOT PAUSE OR STOP THE VIDEO: Scroll down the list to "Content created" (shown here with box checked):



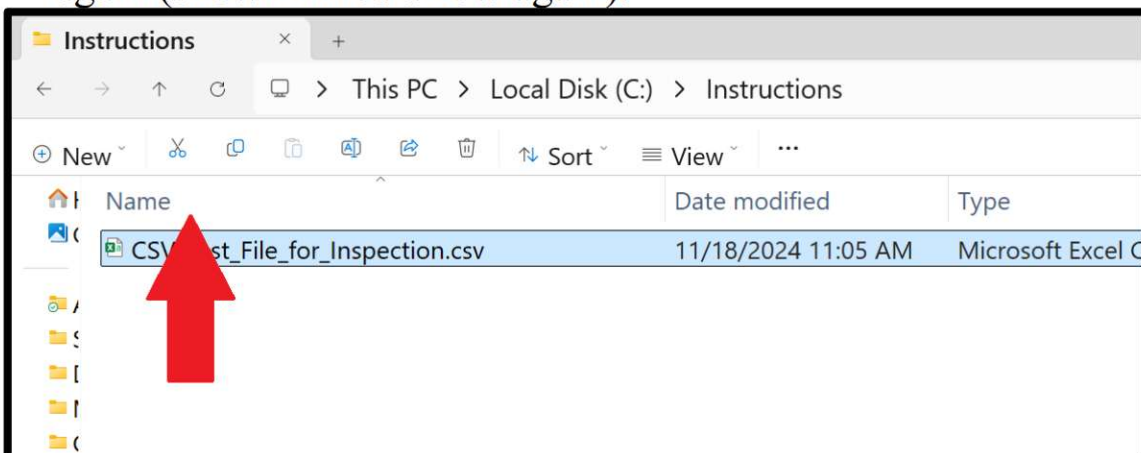
- DO NOT PAUSE OR STOP THE VIDEO: Select "Content created" (so that the box is checked as shown above) and then select the "OK" button.
- DO NOT PAUSE OR STOP THE VIDEO: The screen should then display a "Content created" column (shown with red arrow):



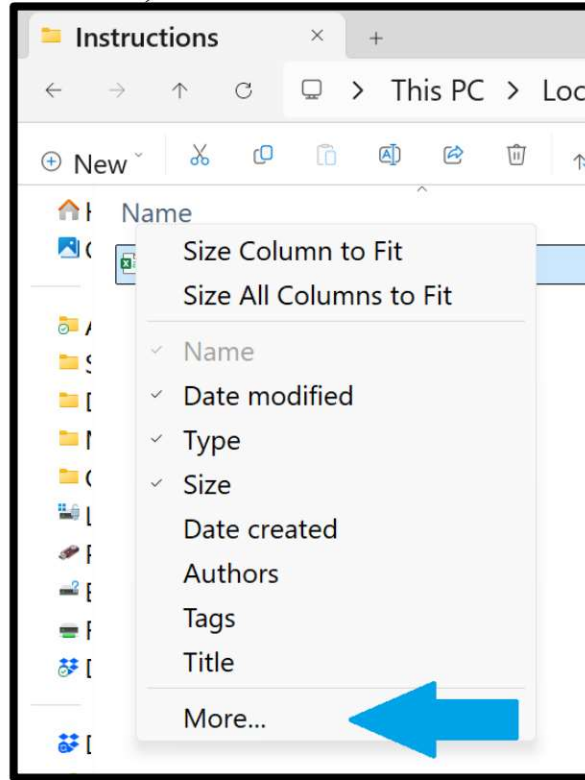
- DO NOT PAUSE OR STOP THE VIDEO: Expand the "Content created" column so that both date (shown with red arrow) and time (shown with blue arrow) are displayed completely:



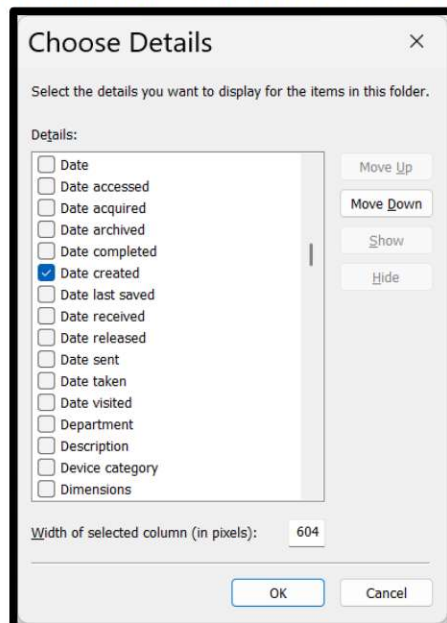
- DO NOT PAUSE OR STOP THE VIDEO: Zoom in with the camera so that the date and time for "Content created" are clearly shown and recorded on video.
- DO NOT PAUSE OR STOP THE VIDEO: Right click on "Name" again (shown in red arrow again):



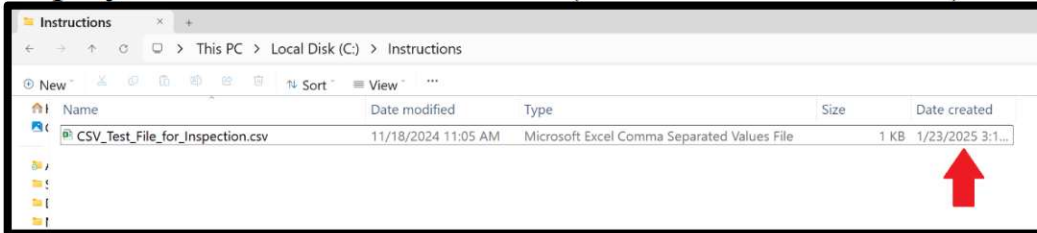
20. DO NOT PAUSE OR STOP THE VIDEO: After right-clicking "Name," un-check the "Content created" box.
21. DO NOT PAUSE OR STOP THE VIDEO: Select "More..." (shown in blue arrow):



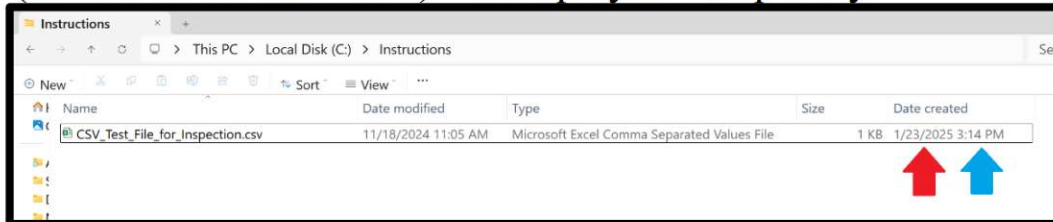
22. DO NOT PAUSE OR STOP THE VIDEO: Scroll down the list to "Date created" (shown here with the box checked):



23. DO NOT PAUSE OR STOP THE VIDEO: Select "Date created" (so that the box is checked as shown here) and then select the "OK" button.
24. DO NOT PAUSE OR STOP THE VIDEO: The screen should then display a "Date created" column (shown with red arrow):



25. DO NOT PAUSE OR STOP THE VIDEO: Expand the "Date created" column so that both date (shown with red arrow) and time (shown with blue arrow) are displayed completely:



26. DO NOT PAUSE OR STOP THE VIDEO: Zoom in with the camera so that the "Date created" appears clearly and legibly on the video.
27. DO NOT PAUSE OR STOP THE VIDEO: Open the file "CHARGEOFF_SALE_SHER_20230410.csv" using the program that LVNV uses during its normal and ordinary course of business.
28. DO NOT PAUSE OR STOP THE VIDEO: Print the file "CHARGEOFF_SALE_SHER_20230410.csv" so that the printout looks exactly like LVNV50 through LVNV64, showing **on video** all of the steps from the opened file to the paper printout without stopping or pausing the video.
29. DO NOT PAUSE OR STOP THE VIDEO: Show **on video** the paper printout that corresponds to LVNV50 through LVNV64.
30. DO NOT PAUSE OR STOP THE VIDEO: Close the file "CHARGEOFF_SALE_SHER_20230410.csv"

31. DO NOT PAUSE OR STOP THE VIDEO: Save "CHARGEOFF_SALE_SHER_20230410.csv" to a **read-only** memory (ROM) medium (e.g., DVD-R) so that all of the metadata shown in the video is preserved on that ROM medium. TO BE CLEAR, DO **NOT** WRITE TO A **READ-WRITE** (RW) MEDIUM.
32. STOP THE VIDEO RECORDING.
33. Save the video recording (preserving the recording date).
34. Send **both** the ROM medium and the video recording to LVNV's counsel for production or inspection by Defendant's counsel and Defendant's experts.
35. Send the paper printout to LVNV's counsel (exactly as it printed from the program that LVNV used in the video recording).

NOTE: This entire process (not including printing) should take less than an hour. Defendant's experts have stepped through this process using a test file and were able to complete the inspection of "Date modified," "Content created," and "Date created" in less than five (5) minutes.

**IN THE MONTGOMERY COUNTY COURT OF COMMON PLEAS, OHIO
CIVIL DIVISION**

LVNV FUNDING, LLC PLAINTIFF, v. MATTHEW KRAUSE DEFENDANT.	CASE NUMBER 2025 CV 03423 EXPERT REPORT BY SAM HAN, PH.D.
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EXPERT REPORT BY SAM HAN, PH.D.

I, Sam Han, declare as follows:

I: Background and Foundational Statements

1. I have been retained as expert witnesses by Counsel for Krause.
2. I am over the age of eighteen years and am competent to make all of the statements in this Expert Report of Sam Han, Ph.D. (hereafter, "Expert Report" or "Report").
3. I voluntarily give the statements in this Report in support of Defendant Matthew Krause (hereafter, "Krause") in the above-captioned proceeding.
4. All statements made herein come from personal knowledge unless stated otherwise or clearly apparent by context.
5. Matters of opinion expressed in this Report are opinions formed based upon my own experience and knowledge.
6. My billing rate as an expert witness to evaluate evidence based on electronically stored or electronically transferred documents is \$450 per hour, which I believe to be the normal, customary, and reasonable rate for experts in this technical area of expertise.
7. I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and belief, the statements that are contained in this Report are true and correct.

II: *Attachments and Exhibits*

8. Attached as **Exhibit A** is my curriculum vitae, which provides, *inter alia*, my education and experience.

9. Attached as **Exhibit B** is an example of metadata uncovered in another case involving LVNV Funding, LLC (hereinafter, "LVNV").

10. Attached as **Exhibit C** are step-by-step instructions that correspond to a method that I have used for inspecting an electronic file and printing the electronic file to paper to make sure that the printout accurately reflects the electronic file.

III: *Statements Relating to Scope of Report*

11. I have been advised by counsel for Krause that the Court has ordered Krause to "produce to the Court documentation regarding Defendant's 'experts' within 14 days of" 2025-Sep-25.

12. This Report is responsive to the Court's order.

IV: *Subject Matter of Testimony under Ohio R. Evid. 702(B)*

13. I have been asked to testify about whether documents designated as LVNV52 through LVNV60 (hereinafter, "LVNV Paper File"), which were produced by LVNV Funding, LLC (hereinafter, "LVNV"), are direct paper printouts of an original "Computer File" from a bank (as defined in LVNV38) (hereinafter, "LVNV Electronic File"), or whether the LVNV Electronic File was altered or otherwise modified before being printed as the LVNV Paper File.

V: *Specialized Knowledge under Ohio R. Evid. 702(B)*

14. I have personally observed and reviewed: (a) a printed document (hereinafter, "Printout") provided by LVNV; and (b) an un-modified and un-redacted "Computer File" that was provided by LVNV, which was allegedly the corresponding "Computer File" that generated the Printout.

15. Present during my observation and review of the "Computer File" were at least the following individuals: **(a)** Brian Sullivan (hereinafter, "Sullivan"); and **(b)** Boyd Gentry (hereinafter, "Gentry").

16. During my observation and review of the "Computer File," I personally observed that the Printout was different than the "Computer File" in at least the following ways:

a. First, the Printout included a column with a heading "FileName," while the "Computer File" had no such "FileName" column.

b. Second, the Printout included a column with a heading "LineNumber," while the "Computer File" had no such "LineNumber" column.

c. Third, the Printout included formatting that made the Printout appear different than the "Computer File."

17. Both Sullivan and Gentry can confirm the differences between the Printout and the "Computer File" that I personally observed because Sullivan and Gentry concurrently observed those same differences and concurrently reviewed the same "Computer File."

18. The differences that I observed are not opinions, but facts.

19. My knowledge about the Printout being different from the "Computer File" is specialized knowledge because I am not aware of many individuals who have had an opportunity to review such an un-modified and un-redacted "Computer File."

20. The specialized knowledge (about the difference between the "Computer File" and the Printout) provides a basis for forming my opinion about differences between the LVNV Electronic File and the LVNV Paper File in this case.

VI: Matters Beyond the Knowledge of Lay Persons under Ohio R. Evid. 702(A)

21. My specialized knowledge about the Printout being different than the "Computer File" is beyond the knowledge possessed by lay persons because: **(a)** lay persons normally do not have access to any similar "Computer File"; and **(b)** lay persons normally do not review documents that are similar to the Printout.

VII: Reliability of Specialized Knowledge under Ohio R. Evid. 702(C)

22. My specialized knowledge about the Printout having an entire "FileName" column and an entire "LineNumber" column, neither of which exists in the "Computer File," is reliable because both Sullivan and Gentry confirmed that neither the "FileName" column nor the "LineNumber" column existed in the "Computer File."

23. In other words, my specialized knowledge about the Printout being different than the "Computer File" is reliable because, *inter alia*, both Sullivan and Gentry confirmed that the "Computer File" was different than the Printout.

24. My specialized knowledge about the Printout being different from the "Computer File" is also reliable because of the additional reason that LVNV's designated corporate witness under Ohio R. Civ. P. 30(B)(5) has testified under oath and under penalty of perjury as follows:

Q: And then so explain how that text file is presented.

MR. GENTRY: Objection. Again, it's not a question.

MR. BARNES: It is.

BY MR. BARNES:

Q: Go ahead, Ms. Henderson.

MR. GENTRY: Ask a question, she'll answer it.

MR. BARNES: Boyd, I appreciate your input.

BY MR. BARNES:

Q: But, Ms. Henderson, if you could answer that question.

A: The text file shows the information and it is separated by commas.

Q: Okay. So is it in lines or is it just this big, massive document?

A: You and I might have different explanations or descriptions of a big, massive document. But just like any text file, it is text that -- it's a little harder for humans to view, works great for computer systems. But it is a text file that shows the information for each account. And the fields are separated by commas.¹

and:

A: The easiest thing we could do if we wanted to lie was to make it look nice and pretty, but we do not. It is exactly how each seller prepares their file and they send it to us. And we do not alter their data or change their data even if

¹ Deposition of Tonya Henderson (hereinafter, "Henderson Deposition") taken for Franklin County Court of Common Pleas, Case Number 24CV000841, at p. 50, line 8 through p. 51, line 8 ("50:8-51:8") (emphasis supplied).

formatting would make it look a whole lot better.²

25. In other words, the substantive differences in missing columns of data, as well as the formatting differences between the "Computer File" and the Printout, were confirmed by LVNV's counsel (Gentry) and LVNV's corporate witness (Henderson).

VIII: Experience under Ohio R. Evid. 702(B)

26. I have personal experience with documents that are substantially similar to the LVNV Paper File.

27. I have personally reviewed numerous Printouts that are substantially similar to the LVNV Paper File.

28. Based on my personal experience from observing those numerous Printouts, I have personal knowledge that the Printouts include:

- a. An entire column with a heading "FileName."
- b. An entire column with a heading "LineNumber."
- c. Formatting that gives those Printouts a substantially uniform appearance.

29. My experience of personally observing numerous Printouts provides a basis for forming my opinion in this case about the LVNV Paper File (which has an appearance that is substantially similar to the Printouts).

IX: Matters Beyond the Experience of Lay Persons under Ohio R. Evid. 702(A)

30. My experience with the numerous Printouts is beyond the knowledge possessed by lay persons because lay persons normally have not reviewed documents similar to the Printouts that I reviewed (at least not to the extent of reviewing numerous Printouts that are substantially similar in appearance to the LVNV Paper File).

31. Thus, lay persons normally would not understand the significance of seeing a Printout with:

² Henderson Deposition at 140:7-140:14 (emphasis supplied).

- a. An entire first column with the heading "FileName."
- b. An entire second column with the heading "LineNumber."
- c. Formatting that makes the Printout look different than the "Computer

File."

X: *Reliability of Experience under Ohio R. Evid. 702(C)*

32. My experience with Printouts having an entire "FileName" column and an entire "LineNumber" column is reliable because the presence of the "FileName" column and the "LineNumber" column is verifiable by visual inspection.

33. The presence of an entire "FileName" column and an entire "LineNumber" column in a Printout has been actually verified by at least Gentry and Sullivan.

XI: *Education under Ohio R. Evid. 702(B)*

34. My education includes a bachelor's degree from the University of Michigan Electrical Engineering and Computer Science (hereinafter, "EECS") Department.

35. My educational background is relevant to the inspection of electronic documents because that education permits me to understand: (a) what metadata to uncover in electronic documents (e.g., Date Created, Content Created, Date Modified, Date Accessed, Owner, etc.); (b) why that metadata is important for determining the integrity of an electronic file; and (c) how to uncover that metadata.

XII: *Matters Beyond the Education of Lay Persons under Ohio R. Evid. 702(A)*

36. My education in electrical engineering and computer science is beyond the education possessed by lay persons (other than electrical engineers or computer scientists) because lay persons normally do not have an educational background in electronic computer files.

37. Thus, lay persons normally would not understand: (a) what metadata to uncover;

(b) why that metadata is important; or (c) how to uncover that metadata.

XIII: Reliability of Education under Ohio R. Evid. 702(C)

38. My educational experience in electrical engineering and computer science is reliable because of the rigors of an engineering program at the University of Michigan, along with the standards required to obtain an engineering degree from the University of Michigan.

XIV: Reliability of Testimony Based on Specialized Information

39. My testimony about the difference between the LVNV Paper File and the LVNV Electronic File is based on reliable specialized knowledge (see, Sections V, VI, and VII, *supra*), experience (Sections VIII, IX, and X, *supra*), and education (Sections XI, XII, and XIII, *supra*).

XV: Procedure Applied under Ohio R. Evid. 702(C)

40. To the extent that a procedure is applied to the inspection of electronic documents, that procedure is set forth in **Exhibit C**.

41. If given an opportunity to inspect the LVNV Electronic File, I would apply substantially the same procedure that is set forth in **Exhibit C**.

XVI: Objectively Verifiable and Verified Procedure under Ohio R. Evid. 702(C)(1)

42. The procedure as set forth in **Exhibit C** provides step-by-step instructions for another electrical engineer, computer scientist, or other qualified individual to apply every step of the procedure precisely as set forth in **Exhibit C**.

43. As such, the procedure is objectively verifiable.

44. Furthermore, substantially the same procedure as steps 3 through 26 in **Exhibit C** has been objectively verified by Sullivan, who was actually present when those steps were applied personally by Gentry (in the presence of both Sullivan and myself).

45. The results from applying those steps is shown in **Exhibit B**.

XVII: Reliable Implementation of Procedure under Ohio R. Evid. 702(C)(2)

46. To the extent that I apply any procedure at all to the inspection of electronic documents, such as the "Computer File," I would follow the step-by-step procedure as set forth in **Exhibit C**.

47. As long as the procedure is implemented step-by-step, as substantially set forth in **Exhibit C**, the implementation of the procedure is reliable.

48. In fact, a substantially same procedure as that set forth in steps 3 through 26 of **Exhibit C** was reliably implemented by Gentry in the presence of Sullivan and myself.

XVIII: Procedure Conducted in Way to Yield Accurate Result under Ohio R. Evid. 702(C)(3)

49. Implementing the step-by-step procedure as set forth in **Exhibit C** will yield an accurate result.

50. For example, conducting the step-by-step procedure for uncovering the "Date Modified" metadata will accurately yield the "Date Modified" metadata for an electronic file; conducting the step-by-step procedure for uncovering the "Content Created" metadata will accurately yield the "Content Created" metadata; and so on.

51. In fact, when Gentry conducted the procedure in the presence of Sullivan and myself (in substantially the same way as set forth in steps 3 through 26 of **Exhibit C**), Gentry's conducting of the procedure yielded an accurate result.

52. In other words, when Gentry conducted the inspection procedure for the "Date Modified" metadata, the procedure accurately yielded the "Date Modified" metadata; when Gentry conducted the inspection procedure for the "Content Created" metadata, the procedure accurately yielded the "Content Created" metadata; and so on.

53. The results of Gentry's inspection in the presence of Sullivan and myself are recorded in **Exhibit B**.

XIX: Expert Opinion about the LVNV Paper File and the LVNV Electronic File

54. Based on my specialized knowledge (see, Sections V, VI, and VII, *supra*), my experience (Sections VIII, IX, and X, *supra*), and my education (Sections XI, XII, and XIII, *supra*), it is my opinion that:

a. Absent any alteration or modification or some type of intervention (either by a human or by a computer program), the LVNV Electronic File will lack the "FileName" column that is in the LVNV Paper File.

b. Absent any alteration or modification or some type of intervention (either by a human or by a computer program), the LVNV Electronic File will lack the "LineNumber" column that is in the LVNV Paper File.

c. Absent any alteration or modification or some type of intervention (either by a human or by a computer program), the LVNV Electronic File will lack the formatting that is in the LVNV Paper File.

55. Thus, it is my opinion that the LVNV Electronic File was altered or otherwise modified before being printed as the LVNV Paper File.

XX: Concluding Remarks

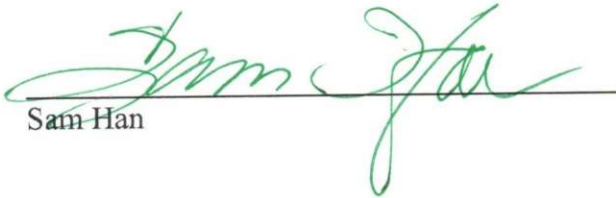
56. If original, un-modified and un-redacted electronic documents are provided for review, then I can provide a more accurate assessment of how, precisely, the documents were created, stored, transferred, or otherwise manipulated (if at all) over time.

57. I reserve the right to amend any statements herein, should new information become available (such as a late-filed expert report by LVNV, or late-produced documents that LVNV previously alleged to be irrelevant that LVNV must now produce to overcome the facts recited herein).

FURTHER AFFIANT SAYETH NAUGHT.

[SIGNATURE AND OATH (OR AFFIRMATION) TO FOLLOW]

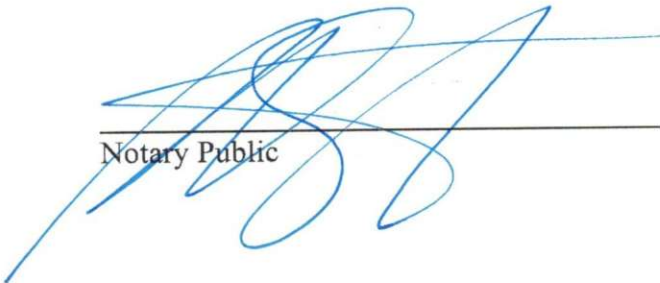
Executed on 2025 - October -02, in Dayton, Ohio.



Sam Han

STATE OF OHIO, ||
MONTGOMERY COUNTY || SS:

Sworn to (or affirmed under penalty of perjury) and subscribed in my presence
this 2nd day of OCTOBER, 20 25.



Notary Public



BRIAN P. SULLIVAN, Attorney at Law
Notary Public, State of Ohio
My Commission has no expiration date.
Section 147.03 O. R. C.

EDUCATION

- Georgia State University* *Atlanta, GA*
- **J.D. (cum laude)**
 - *Class Rank 11 of 163 (Average = 86.50)*
 - *Moot Court*
- Worcester Polytechnic Institute* *Worcester, MA*
- **M.E. (Biomedical Engineering)** February, 1998
 - **Ph.D. (Biomedical Engineering)** May, 1998
- The University of Michigan* *Ann Arbor, MI*
- **B.S.E. (Electrical Engineering)** August, 1992
 - Worked full time concurrent with full time academics*

ADMISSIONS

- Federal Courts of Appeal
 - ◆ Supreme Court of the United States, Admitted 2006-Feb-21
 - ◆ Court of Appeals for the Sixth Circuit, Admitted 2015-May-05
 - ◆ Court of Appeals for the Eleventh Circuit, 2005-Aug-22 and renewed 2022-May-10
 - ◆ Court of Appeals for the Federal Circuit, 2005-Sep-07
- Admitted to practice law in the State of Georgia
 - ◆ Georgia Bar Number 322284
 - Court of Appeals for the State of Georgia, Admitted 2002-Apr-29
 - Supreme Court of Georgia, Admitted 2002-Apr-29
 - United States District Court, Northern District of Georgia, Admitted 2002-Apr-29
- Admitted to practice before the United States Patent and Trademark Office
 - ◆ Registration Number 51,771

WORK EXPERIENCE

- Counsel* *Law Office of Thomas E. Lees, LLC, Dayton, OH*
(2018 - Present)
- Patent
 - Applications
 - Responses to Office Action
 - Appeals
 - Opinions of Counsel
 - Trademark
 - Applications
 - Opposition Proceedings

-
- Appeals

Special Counsel
(2008 - Present)

DeWoskin Law Firm, LLC, Atlanta, GA

- Advise on Fair Debt Collection Practices Act
- Advise on Georgia Practices and Procedures for Superior Court and State Court
- Advise on Federal Rules of Civil Procedure and Local Civil Rules for the Northern District of Georgia
- Example Litigation Matters
 - *A-Team Electrical Services, Inc. v. A-Team Electric, LLC, et al.*, No. 21-CV-0117-1 (Superior Court, Forsyth Co., Georgia)
 - *Church, et al. v. Bodiford, et al.*, No. 2021-CV-0877-HV (Superior Court, Henry Co., Georgia)
 - *Church, et al. v. Caldwell, et al.*, No. 2015-SU-CV-397-BA (Superior Court, Henry Co., Georgia)
 - *Ditech Financial, LLC v. Gage*, No. 19A75091 (State Court, DeKalb Co., Georgia)
 - *Fine & Assoc., P.C. v. Jones*, No. 09-M-16283 (Magistrate Court, Gwinnett Co., Georgia)
 - *Instant One Media, Inc. v. Shank and EZFaux Décor, LLC*, No. 1:19-cv-00540 (N.D. Ga.)
 - *Instant One Media, Inc. v. Mikhael, et al.*, No. 1:19-cv-02906-WMR (N.D. Ga.)
 - *Phan, et al., v. Peak Debt Consumption, LLC, et al.*, No. 1:19-CV-04613-JPB (N.D. Ga.)
 - *Robinson v. Correctional Medical Assoc., et al.*, No. 2009-CV-167587 (Superior Court, Fulton Co., Georgia)
 - *Robinson v. Correctional Medical Assoc., et al.*, No. 1:09-cv-01509 (N.D. Ga.)
 - *Stringer v. Gordon*, No. 09-ED-426587 (Magistrate Court, Fulton Co., Georgia)
 - *Unifund Partners v. Stinyard*, No. 08-VS-135327-G (State Court, Fulton Co., Georgia)
 - *Williams, et al., v. Herschend Family Entertainment Corp.*, No. 17A66931 (State Court, DeKalb Co., Georgia)
- Example Appellate Matters
 - *Beatrice Boyer, et al. v. BNSF Railway Co., dba Burlington Northern and Santa Fe Railway Co.*, No. 16-336 (Supreme Court of the United States)

Of Counsel
(2011 - 2018)

McClure, Qualey & Rodack, LLP, Atlanta, GA

- Patent
 - Applications
 - Responses to Office Action
 - Appeals
 - Opinions of Counsel
- Trademark
 - Applications
 - Opposition Proceedings

-
- Appeals

Of Counsel
(2010 - 2011)

Thomas, Kayden, Horstemeyer, & Risley, LLP, Atlanta, GA

- Patent
 - Applications
 - Responses to Office Action
 - Appeals

Adjunct Professor of Law
(2015)

Indiana Institute of Technology, Fort Wayne, IN

- Publications (*infra*).
- Teaching and Instruction (*infra*).
- Presentations and Conference Proceedings (*infra*).
- Lectures and Speaking Engagements (*infra*).
- Books and Chapters (*infra*).
- Academic Advising (*infra*).
- Fellowships, Scholarships, and Grants (*infra*).
- Awards and Recognitions (*infra*).
- Academic Committees and Service (*infra*).

Assistant Professor of Law
(2008 - 2012)

The University of Dayton, School of Law, Dayton, OH

- Publications (*infra*).
- Teaching and Instruction (*infra*).
- Presentations and Conference Proceedings (*infra*).
- Lectures and Speaking Engagements (*infra*).
- Books and Chapters (*infra*).
- Academic Advising (*infra*).
- Fellowships, Scholarships, and Grants (*infra*).
- Awards and Recognitions (*infra*).
- Academic Committees and Service (*infra*).

Chief Litigation Counsel
(2007 - 2008)

Furukawa Electric North America, Inc. ("FENA"), Norcross, GA

- Example litigation matters
 - *Furukawa Electric North America, Inc. v. Alcatel, Alcatel NA Cable Systems, Inc. d/b/a Alcatel Telecommunications Cable, and Alcatel USA*, C.A. No. 5:03-CV-111-V (W.D.N.C.)
 - *In re FiberCore*, Chapter 11, Case No. 03-46551-HJB, (U.S. Bankr. W.D. Mass.)
 - *Steven Weiss, Trustee on Behalf of FiberCore, Inc. v. OFS Fitel, LLC and Furukawa Electric North America, Inc., f/k/a Fitel USA Corp.*, Adversary Action No. 06-04168-HJB, (U.S. Bankr. W.D. Mass.)
 - *Fitel USA Corp. v. FiberCore, Inc.*, C.A. No. 5:02-CV-163-V (W.D.N.C.)
 - *Furukawa Electric North America, Inc. v. Sterlite Optical Technologies, Ltd., Sterlite Optical Technologies, Inc., Anand Agarwal, and Brian Chomniak*, Civil

Sam S. Han, Ph.D., J.D.

-
- Action No. 1:02-CV-2149-CAP (N.D. Ga.)
 - *Furukawa Electric North America, Inc. and OFS Fitel, LLC v. Nufern, Inc.*, Civil Action Number 03:05-CV-01252 (MRK) (D. Conn.)
 - *Furukawa Electric North America, Inc. and OFS Fitel, LLC v. Yangtze Optical Fibre and Cable Company, Ltd.*, Civil Action Number 05-11219 (RGS) (D. Mass.)
 - *Furukawa Electric North America, Inc. v. Draka Comteq Americas, Inc., et al.*, Civil Action Number 05:07-CV-00058 (RLV) (W.D.N.C.)
 - Legal Counsel
 - Nondisclosure and Confidentiality Agreement for Furukawa Electric North America, Inc.
 - Licensing negotiations and licensing agreements relating to the intellectual property portfolio and intangible assets of Furukawa Electric North America, Inc.
 - Validity/invalidity analyses for patents in portfolio of Furukawa Electric North America, Inc.
 - Freedom-to-use and clearance analyses for business units owned by Furukawa Electric North America, Inc.
 - Negotiation and execution of purchase orders for software upgrades
 - Negotiation and execution of joint development agreements
 - Advise on taxable consequences of transfer of intangible assets
 - Manage trademark portfolio for Furukawa Electric North America, Inc., and OFS Fitel, LLC

Intellectual Property Counsel *OFS Fitel, LLC (Subsidiary of Furukawa), Norcross, GA*
(2006)

- Example intellectual property litigation matters
 - *Furukawa Electric Company of North America, Inc. and OFS Fitel, LLC v. Nufern, Inc.*, Civil Action Number 03:05-CV-01252 (MRK) (D. Conn.)
 - *Furukawa Electric Company of North America, Inc. and OFS Fitel, LLC v. Yangtze Optical Fibre and Cable Company, Ltd.*, Civil Action Number 05-11219 (RGS) (D. Mass.)
- Legal Counsel
 - Nondisclosure and Confidentiality Agreements for OFS Fitel, LLC, and various entities
 - Licensing negotiations and licensing agreements
 - Infringement/non-infringement analyses for technology developed by OFS Fitel, LLC
 - Validity/invalidity analyses for technology developed by OFS Fitel, LLC

Associate (Commercial Litigation) *McGuireWoods LLP, Atlanta, GA*
(2005 - 2006)

- Example Commercial Litigation Matters
 - *Thomas v. Alltel Communications, Inc., et al.*, No. 3:05cv506 (W.D.N.C.)
 - *Digital Envoy, Inc. v. Google, Inc.*, No. C-04-01497-RS (N.D. Cal.)
 - *CBeyond Communications, LLC v. Reignmaker Consortium et al.*, No. 05-1-03939-18 (Superior Court, Cobb Co., Georgia)
 - *Gardendance, Inc. v. Woodstock Copperworks, Ltd.*, No. 1:04-CV-00010

-
- (M.D.N.C.)
 - *Moses v. Traton Corp.*, No. 05-1-08395-35 (Superior Court, Cobb Co., Georgia)
 - Example Pro Bono and Public Service Matters
 - Legal consultation role in *Pressley v. Metropolitan Atlanta Rapid Transit Authority, et al.*, 2003CV76160 (Superior Court, Fulton Co., Georgia)
 - Legal consultation role in *Duong et al. v. Hyun et al.*, Case No. SCN-107635 (Small Claims Court, San Mateo Co., California)
 - Legal consultation role in *Hyun v. Duong, et al.*, Case No. CIV 449385 (Superior Court, San Mateo Co., California)
 - Legal Counsel
 - Nondisclosure and Confidentiality Agreement between Georgia corporation and Illinois corporation
 - Review and advise on open source licensing and ramifications on proprietary software
 - Research and advising on newly-enacted laws related to wholesalers and manufacturers in the pharmaceutical industry
 - Research and analyses on trade dress matters
 - Mediation for civil litigation
 - Commercial arbitration matters
 - Witness interviews for class action lawsuit
 - Breach of contract litigation matters
 - Intellectual Property-Related Matters
 - Patent application for invention related to vinyl siding
 - Patent applications for invention related to waste reclamation and recycling
 - Provisional patent application for invention related to double-knuckle door hinges
 - *Markman* Brief for lighting fixtures-related litigation matter
 - Deposition of witness in relation to claim construction
 - Deposition of witness in relation to infringement issues
 - Review and analyses of patents related to gusset rufflers for manufacturing beds
 - Abbreviated New Drug Application matter
 - Provocation of Interference with the United States Patent and Trademark Office (USPTO)
 - Trademark prosecution matters

Associate
(2001 - 2005)

Thomas, Kayden, Horstemeyer, & Risley, LLP, Atlanta, GA

- Highest billing associate (2003)
- Liaison to various South Korean clients
- Patent
 - Applications
 - Responses to Office Action
 - Patentability Opinions
 - Infringement/Noninfringement Analyses and Opinions
 - Validity/Invalidity Analyses and Opinions
 - Enforceability Analyses

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- Patent Clearance Searches
 - Trademark
 - Applications
 - Office Action Responses
 - Licensing projects
 - Analysis and licensing efforts for patent portfolio of Datascape, Inc.
 - Analysis and licensing efforts for patent portfolio of Paradyne Corp.
 - Analysis and licensing efforts for patent portfolio of Scientific Atlanta
 - Intellectual property-related litigation matters
 - *Datascape v. FleetBoston Financial Corp.*, No.: 1:01-CV-2246-CAP (N.D. Ga.)
 - *Datascape v. Providian Financial Corp.*, No.: 1:01-CV-3252-CAP (N.D. Ga.)
 - *Datascape v. Visa USA, Inc.*, No.: 1:02-CV-0289-CAP (N.D. Ga.)
 - *Safer Display Tech., Ltd. v. Proview Electr. Co., Ltd.*, Case No. 2:04cv161 (E.D. Va.)
 - Pro bono and public service matters
 - Legal consultant on *State v. Pressley*, A04A1197 (Court of Appeals, Georgia)
 - Legal consultant on *State v. Pressley*, 02-CR-271323 (State Court, Fulton Co., Georgia)
 - Non-legal consultation role in *Pressley v. Metropolitan Atlanta Rapid Transit Authority, et al.*, 2003CV76160 (Superior Court, Fulton Co., Georgia)

Technical Advisor
(1999 - 2001)

Thomas, Kayden, Horstemeyer, & Risley, LLP, Atlanta, GA

- Patent
 - Applications
 - Responses to Office Action
 - Patentability Opinions
- Trademark
 - Response to Office Action
 - Infringement Opinion Letter
 - Cease and Desist Letter
- Intellectual property-related litigation research
 - Issues on Willful Patent Infringement
 - Issues Regarding the Waiver of Attorney Client Privilege and Infringement Opinion
 - Trademark Infringement
 - Bankruptcy Issues Related to Intellectual Property as Collateral
 - Contract and Tort Damages in Intellectual Property Litigation

Extern *Hon. Marvin Shoob, U. S. District Court, Northern District of Georgia, Atlanta, GA*
(2000 Fall Term)

- Legal Research
 - Employment Discrimination
 - First Amendment
 - Takings and the Fourteenth Amendment
 - Corporate Law

-
- Observation of Courtroom Proceedings
 - Plea Hearings
 - Sentencing Hearings
 - Probation Revocation Hearings
 - Daubert Hearing
 - Writing Orders for the Court
 - Motion for Summary Judgment in Personal Injury Diversity Case
 - Motion for Summary Judgment in Employment Discrimination Case
 - Motion for Summary Judgment in First Amendment Case
 - Motion for Summary Judgment in Corporate Fraud Case

Summer Associate

Thomas, Kayden, Horstemeyer, & Risley, LLP, Atlanta, GA

(2000 Summer)

- Patent
 - Applications
 - Preliminary Amendment
 - Response to Office Action
 - Request for Correction
- Trademark
 - Response to Office Action
 - Opinion Letter
 - Cease and Desist Letter
- Intellectual property related litigation research
 - Issues on Willful Patent Infringement
 - Issues Regarding the Waiver of Attorney Client Privilege and Infringement Opinion
 - Trademark Infringement
 - Bankruptcy Issues
 - Contract and Tort Damages in Intellectual Property Litigation

Extern

Hon. Wendy L. Shoob, Fulton County Superior Court, Atlanta, GA

(2000 Spring Term)

- Legal Research
 - Divorce
 - Corporate Contract
 - Bankruptcy
 - Appeals from Administrative Proceedings
 - Evidentiary Issues in Criminal Proceedings
- Observation of Courtroom Proceedings
 - Plea and Arraignment
 - Voir Dire of Jury
 - Pre-Trial Conference
 - Criminal and Civil Proceedings
 - Writing Orders for the Court
- Writing Orders for the Court
 - Corporation Contracts

-
- Appeal from Administrative Proceedings

Summer Associate
(1999 Summer)

Jones & Askew, LLP, Atlanta, GA

- Patent
 - Disclosure Meeting with Client
 - Application
 - Response to Office Action
 - Information Disclosure Statement
 - Opinion Letter
- Trademark
 - Response to Office Action
 - Amendment to the Supplemental Register
 - Opinion Letter
- Intellectual property related litigation research
 - Patent Infringement
 - Trademark Infringement
 - Internet Domain Name and Trademark Dispute
 - Trade Secret

Research Scientist / Research Assistant
(1993 - 1998)

Worcester Polytechnic Institute, Worcester, MA

- Scientific presentations and publications
- Design and execution of original scientific and medical experiments
- Collaborative efforts in medicine and experimental biomedicine
- Responsible for animal care and handling

Teaching Assistant / Instructor
(1994 - 1998)

Worcester Polytechnic Institute, Worcester, MA

- Responsible for lab classes and lectures in the Biomedical Engineering Department
- Teaching responsibilities for graduate and undergraduate classes

Systems Administrator
(1994 - 1998)

WPI NMR Research Group, Worcester, MA

- Responsible for maintaining UNIX workstations
- Assisted in writing custom C and IDL code for image processing and analysis
- Integration of HP, SUN, and Silicon Graphics Workstations with PC-based networks

Quality Assurance Engineer *Central Massachusetts Magnetic Imaging Center, Worcester, MA*
(1993 - 1997)

- Responsible for maintaining high level of quality on clinical MRI scanners
- Liaison between clinical branch and research branch of Central Massachusetts Magnetic Imaging Center

Counselor / Teacher
(1991 and 1992 Summer)

Interlochen Center for the Performing Arts, Traverse City, MI

-
- Responsible for the health and well being of students
 - Teaching responsibilities

Lab Assistant *University of Michigan Department of Epidemiology, Ann Arbor, MI*
(1988 - 1990)

- Lab equipment maintenance
- Cell cultures and hazardous materials

SELECT LITIGATION AND TRIAL EXPERIENCE

- *A-Team Electrical Services, Inc. v. A-Team Electric, LLC, et al.*, No. 21-CV-0117-1 (Superior Court, Forsyth Co., Georgia)
- *Abbott Laboratories, Inc. v. Mylan Pharmaceuticals, Inc.*, No. 05 C 6561 (N.D. Ill.)
- *Abbott Laboratories, Inc. v. Mylan Pharmaceuticals, Inc.*, No. 1:05-CV-150 (N.D.W.V.)
- *Arrow Financial Services, LLC v. Wright*, No. 08-VS-130387-F (State Court, Fulton Co., Georgia)
- *CACH, LLC v. Divergilio*, No. 08-VS-136117-C (State Court, Fulton Co., Georgia)
- *CACH, LLC v. Cain*, No. 08-A-90282-3 (State Court, DeKalb Co., Georgia)
- *Carmel Holdings I, LLC v. Sandlin*, No. 08-VS-134346 (State Court, Fulton Co., Georgia)
- *Castang v. Kim*, No. 1:22-cv-5136-CJS (N.D. Ga.)
- *CBeyond Communications, LLC v. Reignmaker Consortium et al.*, No. 05-1-03939-18 (Superior Court, Cobb Co., Georgia)
- *Chattman v. Alpha Receivables, Inc., et al.*, 1:09-CV-1525-GET-ECS (N.D. Ga.)
- *Church, et al. v. Bodiford, et al.*, No. 2021-CV-0877-HV (Superior Court, Henry Co., Georgia)
- *Church, et al. v. Caldwell, et al.*, No. 2015-SU-CV-397-BA (Superior Court, Henry Co., Georgia)
- *Coupons, Inc. v. Value America, Inc.*, No. 1:99-CV-0758 (N.D. Ga.)
- *Datascape v. FleetBoston Financial Corp.*, No. 1:01-CV-2246-CAP (N.D. Ga.)
- *Datascape v. Providian Financial Corp.*, No. 1:01-CV-3252-CAP (N.D. Ga.)
- *Datascape v. Visa USA, Inc.*, No. 1:02-CV-0289-CAP (N.D. Ga.)
- *Dieujuste v. Onyx Waste Services Southeast, Inc.*, Case No. 04-81104 CIV (S.D. Fl., West Palm Beach Division)
- *Digital Envoy, Inc. v. Google, Inc.*, No. C-04-01497-RS (N.D. Cal.)
- *Ditech Financial, LLC v. Gage*, No. 19A75091 (State Court, DeKalb Co., Georgia)
- *Dippin' Dots, Inc. v. Concession Obsession, Inc.*, No. Civil 1:00-Cv-907-TWT (N.D. Ga.)
- *Draka-Comteq Americas, Inc. v. Furukawa Electric North America, Inc. and OFS Fitel, LLC*, No. 2:07-CV-00352-LED (E.D. Tex.)
- *Draka-Comteq Americas, Inc. v. Furukawa Electric North America, Inc. and OFS Fitel, LLC*, No. 2:07-CV-00427 (E.D. Tex.)
- *ESHARE Technologies, Inc., v. Stratasoftware, Inc.*, No. 1:99-CV-2303-RWS (N.D. Ga.)
- *European American Realty, Ltd. and Scott K. Toberman v. David Lang*, No. 2005-CV-105849 (Superior Court, Fulton Co., Georgia)
- *Evans v. Givins*, 06-M-36010 (Magistrate Court, Gwinnett Co., Georgia)
- *Fine & Assoc., P.C. v. Jones*, No. 09-M-16283 (Magistrate Court, Gwinnett Co., Georgia)
- *Fitel USA Corp. v. FiberCore, Inc.*, C.A. No. 5:02-CV-163-V (W.D.N.C.)
- *Frampton & Assoc., Inc. v. Ceco Building Systems*, Case No. 2004-CP-10-1877 (Ct. Common

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- Pleas S.C., 9th Jud. Cir., Charleston Co., South Carolina)
- *Furukawa Electric North America, Inc. and OFS Fitel, LLC v. Nufern, Inc.*, Civil Action Number 03:05-CV-01252 (MRK) (D. Conn.)
 - *Furukawa Electric North America, Inc. and OFS Fitel, LLC v. Yangtze Optical Fibre and Cable Company, Ltd.*, Civil Action Number 05-11219 (RGS) (D. Mass.)
 - *Furukawa Electric North America, Inc. v. Alcatel, Alcatel NA Cable Systems, Inc. d/b/a Alcatel Telecommunications Cable, and Alcatel USA, C.A. No. 5:03-CV-111-V* (W.D.N.C.)
 - *Furukawa Electric North America, Inc. v. Draka Comteq Americas, Inc., et al.*, Civil Action Number 05:07-CV-00058 (RLV) (W.D.N.C.)
 - *Furukawa Electric North America, Inc. v. Sterlite Optical Technologies, Ltd., Sterlite Optical Technologies, Inc., Anand Agarwal, and Brian Chomniak*, Civil Action No. 1:02-CV-2149-CAP (N.D. Ga.)
 - *Gardendance, Inc. v. Woodstock Copperworks, Ltd.*, No. 1:04-CV-00010 (M.D.N.C.)
 - *Han v. The University of Dayton, et al.*, Civil Action No. 2011-CV-08966 (Ct. Common Pleas, Montgomery Co., Ohio)
 - *Humbert v. The City of College Park, et al.*, Civil Action No. 1:05-cv-2740-GET (N.D. Ga.)
 - *In re FiberCore, Inc.*, Chapter 11, Case No. 03-46551-HJB, (U.S. Bankr. W.D. Mass.)
 - *In re Shank (Instant One Media, Inc. v. Shank)*, No. 21-20605 (U.S. Bankr. D. Kan.)
 - *Instant One Media, Inc. v. Shank and EZFaux Décor, LLC*, No. 1:19-cv-00540 (N.D. Ga.)
 - *Instant One Media, Inc. v. Mikhael, et al.*, No. 1:19-cv-02906-WMR (N.D. Ga.)
 - *Johnston Industries Composite Reinforcements, Inc. v. V2 Composite Reinforcements, Inc.*, No. 00-T-728-E (M.D. Ala.)
 - *Kamitani v. Lite-On, Inc.*, No. H-01-4123 (S.D. Tex.)
 - *Lavender v. Lavender*, No. 07-CV-2211-B (Superior Court, Barrow Co., Georgia)
 - *LVNV Financial, LLC v. Gordon*, No. 08-VS-137017 (State Court, Fulton Co., Georgia)
 - *Moses v. Traton Corp. et al.*, No. 05-1-08395-35 (Superior Court, Cobb Co., Georgia)
 - *Moses v. Traton Corp. et al.*, No. 06-1-08441-35 (Superior Court, Cobb Co., Georgia)
 - *NCO Portfolio Management, Inc. v. Jessica N. Buonodono*, No. 2007-A-2264-5 (State Court, Cobb Co., Georgia)
 - *Noguchi v. Cooper, et al.*, No. 07-MS-076113 (Magistrate Court, Gwinnett Co., Georgia)
 - *Phan, et al., v. Peak Debt Consumption, LLC, et al.*, No. 1:19-CV-04613-JPB (N.D. Ga.)
 - *Portfolio Recovery Associates, LLC v. Loncar*, No. 08-VS-130682 (State Court, Fulton Co., Georgia)
 - *Pressley v. Metropolitan Atlanta Rapid Transit Authority, et al.*, No. 2003-CV-76160 (Superior Court, Fulton Co., Georgia)
 - *Prochroma Technologies, Inc. v. U.S.*, No. 97-139C (Ct. Cl.)
 - *Pyen v. Kimsey, et al.*, No. 08A00899-8 (Superior Court, Gwinnett Co., Georgia)
 - *Raines v. Roach*, No. 2006-CV-126099 (Superior Court, Fulton Co., Georgia)
 - *Robinson v. Correctional Medical Assoc., et al.*, No. 2009-CV-167587 (Superior Court, Fulton Co., Georgia)
 - *Robinson v. Correctional Medical Assoc., et al.*, No. 1:09-cv-01509 (N.D. Ga.)
 - *Safer Display Tech., Ltd. v. AmTRAN Technology Corp.*, No. 2:04cv154 (E.D. Va.)
 - *Safer Display Tech., Ltd. v. Proview Electr. Co., Ltd.*, No. 2:04cv161 (E.D. Va.)
 - *State v. Han*, 06-T-9510 (State Court, Cobb Co., Georgia)
 - *State v. Jeon*, 07-T-16826 (State Court, Cobb Co., Georgia)

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- *State v. Pressley*, 02-CR-271323 (State Court, Fulton Co., Georgia)
 - *Steven Weiss, Trustee on Behalf of FiberCore, Inc. v. OFS Fitel, LLC and Furukawa Electric North America, Inc., f/k/a Fitel USA Corp.*, Adversary Action No. 06-04168-HJB, (U.S. Bankr. W.D. Mass.)
 - *Stringer v. Gordon*, No. 09-ED-426587 (Magistrate Court, Fulton Co., Georgia)
 - *Thomas v. Alltel Communications, Inc., et al.*, No. 3:05cv506 (W.D.N.C.)
 - *Toshiba Corporation v. Ultima Electronics Corp.*, No. CV-02-04825 CAS (C.D. Cal.)
 - *Traton News, LLC, v. Traton Corp., et al.*, No. 3:11cv00435-WHR (S.D. Ohio)
 - *Unifund Partners v. Stinyard*, No. 08-VS-135327-G (State Court, Fulton Co., Georgia)
 - *Williams, et al., v. Herschend Family Entertainment Corp.*, No. 17A66931 (State Court, DeKalb Co., Georgia)

SELECT APPELLATE EXPERIENCE

-
- *Beatrice Boyer, et al. v. BNSF Railway Co., dba Burlington Northern and Santa Fe Railway Co.*, No. 16-336 (Supreme Court of the United States)
 - *Castang v. Kim*, No. 23-10426-C (11th Cir.)
 - *Han v. University of Dayton, et al.*, No. 13-1171 (Supreme Court of the United States)
 - *Instant One Media, Inc. v. Amber Kay Shank*, No. 23-016 (10th Cir. BAP)
 - *State v. Pressley*, A04A1197 (Court of Appeals, Georgia)
 - *Moses v. Traton Corp. et al.*, S07A0780 (Supreme Court, Georgia)
 - *Moses v. Traton Corp. et al.*, S07C1858 (Supreme Court, Georgia)
 - *Moses v. Traton Corp. et al.*, A07A1474 (Court of Appeals, Georgia)

LEGAL COUNSELING, LICENSING, AND OPINIONS

-
- Standards Coverage Analysis
 - ◆ ITU G.DMT (Discrete Multi-Tone) Standard (ITU-G.992.1): Asymmetrical Digital Subscriber Line (ADSL) Transceivers
 - ◆ T1.413 Issue 2 Standard: Asynchronous Transfer Mode (ATM) Based Asymmetric Digital Subscriber Line (ADSL) Internet Connection Sharing (ICS)
 - ◆ DOCSIS 1.0 Standard: Data-Over-Cable Service Interface Specification
 - ◆ DOCSIS 1.1 Standard: Data-Over-Cable Service Interface Specification
 - ◆ DOCSIS 2.0 Standard: Data-Over-Cable Service Interface Specification
 - ◆ ITU-T G.729 Standard: Coding of Speech at 8 kbits/s Using Conjugate-Structure Algebraic-Code-Excited Linear-Prediction (CS-ACELP)
 - Agreement on Division of Intellectual Property for Joint Research
 - Intellectual Property Counsel for Various General Practice Attorneys
 - Agreements on Joint Development, Non-Disclosure, and Intellectual Property Division
 - ◆ Furukawa Electric North America, Inc.
 - ◆ OFS Laboratories, LLC
 - ◆ OFS Fitel, LLC
 - Licensing Negotiations
 - Patentability Searches and Opinions
 - Infringement/Noninfringement Opinions

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- Validity/Invalidity Searches and Opinions
 - Freedom-to-Operate (Clearance) Searches and Opinions
 - Analysis of Contested Cases
 - Inventorship Determinations
 - Trademark Opposition Proceedings
 - Trademark Cancellation Proceedings
 - Domain Names and Internet-Related Issues

EXPERT WITNESS

- *Ridge Corp. v. Kirk National Lease, et al.*, Case Number 2:23-cv-03012-ALM-KAJ (S.D. Ohio),
Expert for Defendant Kirk National Lease Engaged 2023-September
- *LVNV Funding, LLC v. Samuel Huff*, Case Number 2023-CVF-00475 (Montgomery County,
Ohio, Western Division (Civil)) Engaged 2023-September
- *National Collegiate Student Loan Trust 2005-2 v. Peters*, Case Number 2023-cv-03105
(Montgomery County, Ohio, Western Division (Civil)) Engaged 2024-January

PATENT AND TRADEMARK PROSECUTION MATTERS

- Australian Patent Office
- Chinese Patent Office
- European Patent Office (EPO)
- French Patent Office
- Japanese Patent Office (JPO)
- Korean Intellectual Property Office (KIPO)
- Patent Applications Filed Under the Patent Cooperation Treaty (PCT)
- Taiwanese Patent Office
- United States Patent and Trademark Office (USPTO) Proceedings
 - ◆ Appeals Before the Board of Patent Appeals and Interferences
 - ◆ Reexamination Requests and Proceedings
 - ◆ Issued Design Patents
 - ◆ Design Patent Applications
 - ◆ Non-Provisional Utility Patent Applications
 - ◆ Provisional Patent Applications
 - ◆ Trademark Applications and Continued Prosecution
 - ◆ Continued Prosecution of Trademark Portfolio of Furukawa Electric North America, Inc.
 - ◆ Trademark Opposition Proceedings

PUBLICATIONS

- S. S. Han, Association of Molecular Pathology *Meets* Therasense: *Analyzing the Unenforceability of Isolated-Sequence-Related Patents for UPenn, Columbia, NYU, Yale, and Emory*, 17 J. Tech. L. & Pol'y 1 (2012).
- S. S. Han, Therasense *Nonsense*, 37 U. Dayton L. Rev. 185 (2012).

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- S. Ganow, S. S. Han, *Model Omnibus Privacy Statute*, 35 U. Dayton L. Rev. 345 (2010).
 - S. S. Han, *Daubert v. Markman: Fact Experts on Issues that are Wholly Devoid of Any Factual Component*, 50 IDEA: J. L. & Tech 367 (2010).
 - S. S. Han, *Predicting the Enforceability of Browse-Wrap Agreements in Ohio*, 36 Ohio N. U. L. Rev. 1 (2010).
 - S. S. Han, *Analyzing the Patentability of "Intangible" Yet "Physical" Subject Matter*, 3 Colum. Sci. & Tech. L. Rev. 2 (February 19, 2001) <<http://www.stlr.org/cite.cgi?volume=3&article=2>>.
 - J. J. Neil, T. Q. Duong, C. S. Springer, C. H. Sotak, G. L. Bretthorst, I. Pályka, G. Véték, S. S. Han, J. J. H. Ackerman, *Evaluation of Equilibrium Transcytolemmal Water Exchange in Rat Brain*, Submitted, Science.
 - M. D. Silva, K. G. Helmer, J-H Lee, S. S. Han, C. S. Springer, C. H. Sotak, *Deconvolution of Compartmental Water Apparent Diffusion Coefficient in Yeast-Cell Suspensions Using Combined T_1 and Diffusion Measurements*, J. Magn. Reson. **156**, 52-63 (2002).
 - Han, S., Gemmell S. J., Helmer, K. G., Grigg, P., Wellen, J. W., Hoffman, A. H., Sotak, C. H., *Changes in ADC Caused by Tensile Loading of Rabbit Achilles Tendon: Evidence for Water Transport*, J. Magn. Reson. **144(2)**, 217 - 227 (2000).
 - F. Li, S. S. Han, T. Tatlisumak, K-F. Liu, J. H. Garcia, C. H. Sotak, M. Fisher, *Reversal of Acute Average Apparent Diffusion Coefficient Abnormalities and Delayed Neuronal Damage Following Varying Periods of Transient Focal Cerebral Ischemia in Rats*, Annals of Neurology **46(3)**, 333-342 (1999).
 - F. Li, S. S. Han, T. Tatlisumak, R. A. D. Carano, K. Irie, C. H. Sotak, M. Fisher, *A New Method to Improve the In-Bore Middle Cerebral Artery Occlusion: Demonstration with Diffusion- and Perfusion-Weighted Imaging*, Stroke **29**, 1715 - 1720 (1998)
 - K. G. Helmer, S. S. Han, C. H. Sotak, *Correlation Between the Apparent Diffusion Coefficient of Tissue Water and Oxygen Tension in RIF-1 Tumors*, NMR in Biomedicine **11**, 120 - 130 (1998)

TEACHING AND INSTRUCTION

- John Paul the Great College Prep Academy, Dayton, OH
 - 2024 Spring (Scheduled)
 - *AP Calculus II.*
 - *Canons of Construction II.*
 - *Pre-Calculus II.*
 - *Statistics II.*
 - 2023 Fall
 - *AP Calculus I.*
 - *Canons of Construction I.*
 - *Pre-Calculus I.*
 - *Statistics I.*
 - 2022 Spring
 - *Constitutional Conflicts I.*
 - *Statistics II.*
 - 2021 Fall
 - *Constitutional Conflicts I.*
 - *Statistics I.*
 - 2021 Spring

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- *AP Calculus II.*
 - *Film Theory II.*
 - 2020 Fall
 - *AP Calculus I.*
 - *Film Theory I.*
 - 2020 Spring
 - *Modern History and Current Affairs II.*
 - *Statistics II.*
 - *Wonders of Weather*
 - 2019 Fall
 - *Modern History and Current Affairs I.*
 - *Statistics I.*
 - 2019 Spring
 - *Behavioral Analysis Through Games.*
 - 2018 Fall
 - *Personal Finance and Economics.*

 - Indiana Institute of Technology, School of Law, Fort Wayne, IN
 - 2015 Fall
 - *Intellectual Property.*

 - The University of Dayton, School of Law, Dayton, OH
 - 2012 Spring
 - *Patent Litigation (LAW 6905-01).*
 - *Licensing Intellectual Property (LAW 6420-01).*
 - *Moot Court (LAW 6872-01).*
 - *Civil Engineering Seminar (CEE 300), April 28, 2011.*
 - *Project Management and Innovation (MEE 433 / ECE 433), March 17, 2011.*
 - 2011 Fall
 - *Patent Law (LAW 6425-01).*
 - *Patent Practice and Procedure (LAW 6940-01).*
 - *Moot Court (LAW 6872-01)*
 - *Civil Engineering Seminar (CEE 300), November 3, 2011.*
 - *Project Management and Innovation (MEE 433 / ECE 433), November 1, 2011.*
 - 2011 Spring
 - *Intellectual Property (LAW 6400-01).*
 - *Licensing Intellectual Property (LAW 6420-01).*
 - *Moot Court (LAW 6872-01)*
 - *Civil Engineering Seminar (CEE 300), April 28, 2011.*
 - *Project Management and Innovation (MEE 433 / ECE 433), March 17, 2011.*
 - 2010 Fall
 - *Patent Law (LAW 6425-01).*
 - *Patent Practice and Procedure (LAW 6940-01).*
 - *Dot.com Law (LAW 6943-01)*
 - *Moot Court (LAW 6872-01)*
 - *Project Management and Innovation (MEE 433 / ECE 433), September 30, 2010.*

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- 2010 Spring
 - *Licensing Intellectual Property* (LAW 6420-01).
 - *Patent Litigation* (LAW 6905-01)
 - *Project Management and Innovation* (MEE 433 / ECE 433), February 18, 2010.
 - 2009 Fall
 - *Patent Law* (LAW 6425-01).
 - *Patent Practice and Procedure* (LAW 6940-01).
 - *Project Management and Innovation* (MEE 433 / ECE 433), October 23, 2009.
 - 2009 Spring
 - *Licensing Intellectual Property* (LAW 6420-01).
 - *Patent Practice and Procedure* (LAW 6940-01).
 - *Intellectual Property Law* (Law 6400), March 10, 2009.
 - *Intellectual Property Law* (Law 6832), February 3, 2009.
 - 2008 Fall
 - *Patent Law* (LAW 6425-01).
 - *Project Management and Innovation* (MEE 433 / ECE 433), November 14, 2008.
 - *Intellectual Property Law* (LAW 6400), September 25, 2008.
 - Worcester Polytechnic Institute, Department of Biomedical Engineering, Worcester, MA
 - 1994-1998 (Teaching Assistant / Instructor)
 - *Principles of In Vivo Nuclear Magnetic Resonance* (BME 582).
 - *Laboratory Animal Surgery* (BME 562).
 - *Biomedical Instrumentation* (BME 523).
 - *Biomedical Signal Analysis* (BME 4011).

SELECT PRESENTATIONS AND CONFERENCE PROCEEDINGS

- S. S. Han, *Uncovering Manufactured Evidence from File Metadata*, Invited Speaker, Dayton Intellectual Property Law Association, Dayton, OH (scheduled April 12, 2024)
- S. S. Han, *Ethics, Professionalism, and the Propensity for Substance Abuse*, Invited Speaker, Dayton Intellectual Property Law Association, Dayton, OH, October 12, 2018
- S. S. Han, *Manufactured Evidence in Debt Collection Cases*, Protecting the Consumer (Symposium), Indiana Tech Law School, Fort Wayne, IN, November 17, 2015
- C. R. Miller, S. S. Han, *ENCODE: The End of an Established Era*, Dayton Intellectual Property Law Association, Dayton, OH, September 13, 2013.
- S. S. Han, C.R. Miller, *Gene: the New Four Letter Word*, CincyBio 2013, Cincinnati, OH, April 30, 2013.
- S. S. Han, *Substance Abuse*, Continuing Legal Education, The University of Dayton, School of Law, Dayton, OH, May 19, 2012.
- S. S. Han, H. Farrell, *Dynamics for Personal Motivation and Chemical Addiction*, Ohio State Bar Association, Annual Convention, Cincinnati, OH, May 3, 2012.
- S. S. Han, *A Confrontation of Epic Proportions: Prometheus v. Mayo*, CincyBio 2012, Cincinnati, OH, April 17, 2012.
- S. S. Han, *Biochemical Pathways: A Presentation on Substance Abuse*, Toledo Intellectual Property Law Association, The University of Toledo College of Law, Toledo, OH, March 7, 2012.
- S. S. Han and J. Huebert, *Do We Need Copyrights and Patents?*, Federalist Society, The

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- University of Dayton School of Law, Dayton, OH, February 27, 2012.
- S. S. Han, *Therasense Nonsense*, Ohio Legal Scholarship Workshop, Capital University Law School, Columbus, OH, February 25, 2012.
 - S. S. Han, Commenter for Presentation by K. A. Behre on *Motivation for Law Student Pro Bono Work: Lessons Learned from the Tuscaloosa Tornado*, Ohio Legal Scholarship Workshop, Capital University Law School, Columbus, OH, February 25, 2012.
 - S. S. Han, *Human Decision-Making and Substance Abuse*, Dayton Intellectual Property Law Association, The University of Dayton, Dayton, OH, October 14, 2011.
 - S. S. Han, *Association of Molecular Pathology Meets Therasense: Analyzing the Unenforceability of Isolated-Sequence-Related Patents for UPenn, Columbia, NYU, Yale, and Emory*, Faculty Colloquium, The University of Dayton, Dayton, OH, October 3, 2011.
 - S. S. Han, H. Farrell, *Substance Abuse - Addicted Attorneys Should Understand the Dynamics that Drive Motivation, Success, and Chemical Dependency*, The 21st All Ohio Annual Institute on Intellectual Property, Cleveland and Cincinnati, OH, September 20-21, 2011.
 - S. S. Han, *Therasense Meets the ACLU*, Toledo Intellectual Property Law Association, The Toledo Club, Toledo, OH, September 15, 2011.
 - S. S. Han, *The Unenforceability of Isolated-Sequence-Related Patents for Yale, Emory, UPenn, Columbia, and NYU*, Intellectual Property Scholars Conference 2011, DePaul University College of Law, Chicago, IL, August 10-12, 2011.
 - S. S. Han, *The Unenforceability of Gene-Related Patents for Yale, Emory, UPenn, Columbia, and NYU*, Ohio Legal Scholarship Workshop, Cleveland-Marshall College of Law, Cleveland, OH, June 23, 2011.
 - S. S. Han, Commenter for Presentation by P. Lee on *Innovation and Entrepreneurship in Evolving Economies: The Role of Law*, Ohio Legal Scholarship Workshop, Cleveland-Marshall College of Law, Cleveland, OH, June 23, 2011.
 - S. S. Han, *Are the Offspring of Harvard Mice the Product of Unprotected Sex?*, Continuing Legal Education, The University of Dayton, School of Law, Dayton, OH, May 14, 2011.
 - S. S. Han, Invited Conference Fellow, *Some Modest Proposals 4.0: A Conference About Pouring Academic Ideas into Legislative Bottles*, Cardozo IP & Information Law Program, Benjamin N. Cardozo School of Law, Yeshiva University, NY, April 8, 2011.
 - S. S. Han, *Man v. Nature: Patentability of Second-Generation Biological Organisms*, CincyBio 2011, Cincinnati, OH, March 8, 2011.
 - S. S. Han, *Nature Abhors a Vacuum: Propheying Why China Will Fill the Sucking Void Created by the Collapse of North Korea*, Ohio Legal Scholarship Workshop, Capital University Law School, Columbus, OH, February 5, 2011.
 - S. S. Han, T. Reilly, J. Zink, M. Lampke, *Scholarly Presentations on Issues Related to Intellectual Property Law*, Dayton Intellectual Property Law Association, The University of Dayton, School of Law, Dayton, OH, January 13, 2011.
 - S. S. Han, *Are the Offspring of Harvard Mice the Product of Unprotected Sex?*, Dayton Intellectual Property Law Association, The University of Dayton, School of Law, Dayton, OH, October 8, 2010.
 - S. S. Han, *The BRCA Battle*, Dayton Intellectual Property Law Association, The University of Dayton, School of Law, Dayton, OH, February 12, 2010.
 - S. S. Han, *What Nature Giveth, the Law Taketh Away*, Continuing Legal Education, The University of Dayton, School of Law, Dayton, OH, December 21, 2009.
 - S. S. Han, *Bickering Over BRCA*, CincyBio 2009, Cincinnati, OH, November 4, 2009.

-
- S. S. Han, M. Willenbrink, D. M. Lechleiter, *The Importance of Patent Law in Technical Innovation and Entrepreneurship*, Innovation Center, School of Engineering, The University of Dayton, Dayton, OH, March 13, 2009.
 - S. S. Han, *Browse-Wrap Agreements in Ohio*, Dayton Intellectual Property Law Association, The University of Dayton, School of Law, Dayton, OH, November 14, 2008.
 - K. G. Helmer, S. S. Han, C. H. Sotak, *Correlation Between 1H Diffusion Coefficient and Oxygen Tension in RIF-1 Tumors*, Abstracts, Oral Presentation, In. Proc. of the 4th International Society for Magnetic Resonance in Medicine (1), 264, New York, NY, 1996.
 - S. J. Gemmell, S. S. Han, K. G. Helmer, A. H. Hoffman, P. Grigg, C. H. Sotak, *Anisotropic and Time Dependent Diffusion of Water in Tendon Under Static Loading*, Abstracts, Poster Presentation, 38th Experimental Nuclear Magnetic Resonance Conference, Orlando, FL, 1997.
 - T. Q. Duong, J. J. Neil, H. A. Stark, I. Pályka, C. S. Springer, S. S. Han, C. H. Sotak, J. J. H. Ackerman, *Intracerebroventricular Administration of Compartment-Specific NMR Agents*, Abstracts, Poster Presentation, In. Proc. of the 5th International Society for Magnetic Resonance in Medicine (3), 1613, Vancouver, British Columbia, Canada, 1997.
 - S. S. Han, B. J. Dardzinski, C. H. Sotak, *Reconciling Differences between Tumor Oxygenation Measurements Performed Using ^{19}F NMR Spectroscopy and Imaging of Perfluorocarbon Emulsions*, Abstracts, Oral Presentation, In. Proc. IEEE 23rd Annual Northeast Bioengineering Conference, Durham, NH, 1997.
 - F. Li, T. Tatlisumak, S. S. Han, K. Irie, K. F. Liu, J. H. Garcia, C. H. Sotak, M. Fisher, *Apparent Diffusion Coefficient Maps and Histological Analysis of Varying Time Periods of Temporary Focal Brain Ischemia in the Rat*, Abstracts, Poster Presentation, 23rd International Joint Conference on Stroke and Cerebral Circulation, Orlando, FL, 1998.
 - S. S. Han, G. Vetek, M. D. Silva, C. S. Springer, C. H. Sotak, *Deconvolution of Restriction Effects on Compartmental Diffusion Using Combined Relaxography and Diffusion Measurements*, Abstracts, Poster Presentation, 39th Experimental Nuclear Magnetic Resonance Conference, Pacific Grove, CA, 1998.
 - M. D. Silva, S. S. Han, C. H. Sotak, *Effects of Signal-to-Noise and Parametric Limitations on Fitting Biexponential Magnetic Resonance (MR) Inversion-Recovery Curves Using a Constrained Nonlinear Least Squares Algorithm*, Abstracts, Oral Presentation, IEEE 24th Annual Northeast Bioengineering Conference, Hershey, PA, 1998.
 - S. S. Han, G. Vetek, C. S. Springer, C. H. Sotak, *Apparent Diffusion Coefficient of Intra- and Extracellular Water in Yeast Suspension Measured by Combined Diffusion and Relaxography*, Abstracts, Oral Presentation, In. Proc. of the 6th International Society for Magnetic Resonance in Medicine (1), 535, Sydney, Australia, 1998.
 - S. S. Han, P. Grigg, K. G. Helmer, A. H. Hoffman, C. H. Sotak, *Characterization of Water ADC Behavior Under Tensile Loading and Recovery in Rabbit Achilles Tendon Using NMR*, Abstracts, Oral Presentation, International Society for Magnetic Resonance in Medicine: Workshop on Magnetic Resonance of Connective Tissues and Biomaterials, Philadelphia, PA, 1998.
 - K. G. Helmer, S. S. Han, M. Meiler, C. H. Sotak, *The Use of pO_2 and Diffusion Measurements for Characterizing Treatment Response in RIF-1 Tumors*, Syllabus, Oral Presentation, Workshop on Magnetic Resonance in Experimental and Clinical Cancer Research, St. Louis, Missouri, 1998.

SELECT LECTURES AND SPEAKING ENGAGEMENTS

-
- S. S. Han, *Fundamental Concepts for Applying Intellectual Property*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Kettering Laboratories, Dayton, OH, March 29, 2012.
 - S. S. Han, *Fundamental Concepts for Applying Intellectual Property*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Kettering Laboratories, Dayton, OH, March 27, 2012.
 - S. S. Han, *Survey of Intellectual Property Concepts*, Invited Lecture (CEE 300), The University of Dayton, Chudd Auditorium, Dayton, OH, November 3, 2011.
 - S. S. Han, *Business Considerations for Intellectual Property*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Keller Hall, Dayton, OH, November 1, 2011.
 - S. S. Han, *The Power of Intellectual Property when Properly Applied in Business*, Invited Lecture (CEE 300), The University of Dayton, Chudd Auditorium, Dayton, OH, April 28, 2011.
 - S. S. Han, *Business Drives Everything: Using Intellectual Property as Business Capital*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Keller Hall, Dayton, OH, March 17, 2011.
 - S. S. Han, *Intelligent Intellectual Property*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Keller Hall, Dayton, OH, September 30, 2010.
 - S. S. Han, *Social Justice and the Greater Call*, Law and Leadership Institute, The University of Dayton, Dayton, OH, July 14, 2010.
 - S. S. Han, *Product Development, Experiences, and Intellectual Property*, Sears Recital Hall, The University of Dayton, Dayton, OH, February 18, 2010.
 - S. S. Han, *Using Intellectual Property as a Business Asset*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Department of Mechanical Engineering, Dayton, OH, October 23, 2009.
 - S. S. Han, *Business Considerations in Legal Matters*, Project Management and Innovation (MEE 433 / ECE 433), The University of Dayton, Department of Mechanical Engineering, Dayton, OH, November 21, 2008.
 - S. S. Han, *The Meaning of Christianity*, Christian Legal Society, The University of Dayton, School of Law, Dayton, OH, November 20, 2008.
 - S. S. Han, M. A. Morra, *General Discussion on Patent Evaluation*, OFS Fitel, LLC, Norcross, GA, March 8, 2007.
 - S. S. Han, *Anatomy of Patent Litigation*, OFS Laboratories, LLC, Somerset, NJ, September 13, 2006.
 - S. S. Han, *Becoming Ambassadors*, Asian Christian Fellowship, Georgia Institute of Technology, Atlanta, GA, January 18, 2006.
 - S. S. Han, *God's Plan for Outreach and Ministry*, Asian Christian Fellowship, Georgia Institute of Technology, Atlanta, GA, September 28, 2005.
 - S. S. Han, *Constitutional Bases for Intellectual Property*, Handong International Law School (HILS), Pohang Korea, March 11, 2005.
 - S. S. Han, *The Biblical Plan for Being Witnesses*, Bulldog Christian Fellowship, The University of Georgia, Athens, GA, February 24, 2005.
 - S. S. Han, *The Foolishness of the Cross and the Wisdom of God*, Asian Christian Fellowship, Georgia Institute of Technology, Atlanta, GA, February 23, 2005.
 - S. S. Han, D. R. Risley, *Patents and Academia*, Office of Technology Transfer, Pohang University of Science and Technology (POSTECH), Pohang, Korea, November 19, 2004.
 - S. S. Han, D. R. Risley, *Academic Pitfalls in Patenting*, Office of Technology Transfer, Seoul

-
- National University Industry Foundation (SNU-IF), Seoul, Korea, November 17, 2004.
 - S. S. Han, D. R. Risley, *Intellectual Property Primer*, Department of Industrial Engineering, Hanyang University, Seoul, Korea, November 16, 2004.
 - S. S. Han, *Contrasting the Biblical Jesus with the Cultural Jesus*, Asian Christian Fellowship, Georgia Institute of Technology, Atlanta, GA, October 6, 2004.
 - S. S. Han, S. R. Risley, *Malpractice Overview*, Patent Litigation Group Meeting, TKHR, Atlanta, GA, August 18, 2004.
 - S. S. Han, D. R. McClure, M. Nguyen, *Problems with Ownership*, Patent Prosecution Group Meeting, TKHR, Atlanta, GA, August 4, 2004.
 - S. S. Han, T. Deveau, *Prosecution War Stories*, Patent Prosecution Group Meeting, TKHR, Atlanta, GA, May 26, 2004
 - S. S. Han, D. R. Risley, *Interplay of Patents and Academic Research*, Office of Technology Transfer, Seoul National University Industry Foundation (SNU-IF), Seoul, Korea, April 30, 2004
 - S. S. Han, D. R. Risley, *Patents and Academia*, Office of Technology Transfer, Hanyang University, Seoul, Korea, April 27, 2004
 - S. S. Han, *Tension Between Intellectual Property and Academia*, Biomedical Engineering Department, Worcester Polytechnic Institute, Worcester, MA, October 20, 2003
 - S. S. Han, *The Continuing Need for Jesus Christ*, Asian Christian Fellowship, Georgia Institute of Technology, Atlanta, GA, 2002.
 - S. S. Han, *The Inadequacy of Man and the Sufficiency of Jesus Christ*, Asian Christian Fellowship, Georgia Institute of Technology, Atlanta, GA, 2001.

BOOKS AND CHAPTERS

- S. S. Han, *Characterization of Biological Systems Via Relaxometric and Diffusimetric NMR*, University Microfilms International - Dissertation Services / Bell & Howell Co., Ann Arbor, Michigan, 1998.
- S. S. Han, *Conventional Wisdom*, ISBN Number 979-8522481872, Published 2021.
- S. Han, *Constitutional Conflicts: Course Materials for 2021-2022*, ISBN Number 979-8458097437, Published 2021.

ACADEMIC ADVISING

- The University of Dayton, School of Law, Dayton, OH
 - 2012 Spring
 - Renee Thayer Wilkerson, Directed Reading
 - Erik Reicis, Directed Reading
 - Patrick Lynch, Law Review
 - Stephen Allhoff, Moot Court
 - Benjamin Christoff, Moot Court
 - 2011 Fall
 - Renee Thayer Wilkerson, Law Review
 - Patrick Lynch, Law Review
 - Stephen Allhoff, Moot Court
 - Benjamin Christoff, Moot Court
 - 2011 Spring

-
- Renee Thayer Wilkerson, Law Review
 - Sly Ayoubi, Independent Studies
 - 2010 Fall
 - Darin Barber, Independent Studies, Graduate Studies
 - Caitlin Carreiro, Externship
 - John Prince, Independent Studies, Graduate Studies
 - Brian Sullivan, Independent Studies, Graduate Studies
 - Renee Thayer Wilkerson, Law Review
 - 2010 Spring
 - Jeffrey Brown, Independent Studies.
 - Caitlin Carreiro, Independent Studies.
 - Nancy Green, Independent Studies.
 - Randall Stevenson, Independent Studies.
 - Brian Sullivan, Law Review.
 - Jason Williams, Independent Studies.
 - April Ward, Law Review.
 - 2009 Fall
 - M. Fran Sweeney, Externship.
 - Paul Harkleroad, Law Review.
 - Danielle Hammer, Independent Studies.
 - Walter "Chip" Herin, Law Review.
 - 2009 Spring
 - Timothy S. Ganow, Independent Studies.
 - Hannah Livingstone, Independent Studies.
 - Thomas Hahn, Law Review.
 - 2008 Fall
 - Rebecca Greendyke, Law Review.

FELLOWSHIPS, SCHOLARSHIPS, AND GRANTS

- *GAANN Fellowship* 1997 - 1998
- *Travel Grant - International Society for Magnetic Resonance in Medicine* 1998
- *Michigan Competitive Scholarship* 1988 - 1992

AWARDS AND RECOGNITIONS

- *Paper Airplane Competition, 1st Place* 2024
- *JPGHE Science Award (Math and Magic), 1st Place* 2019
- *Foil Boat Competition, 1st Place* 2017
- *Newspaper Tower Building Competition, 1st Place* 2015
- *Nominee for Judicial Appointment to Cobb County Superior Court* 2007
- *Founding Member - Intellectual Property Board, Georgia State University, Atlanta, GA* 2004
- *Who's Who in Science and Engineering* 2002 - 2003
- *CALI Excellence for the Future Award - Georgia Practice and Procedure* 2001
- *CALI Excellence for the Future Award - Constitutional Law: Survey of the First Amendment*

-
- *CALI Excellence for the Future Award - Antitrust Law* 2001
 - *Who's Who: American Law Students - 21st Edition* 2001
 - *National Appellate Advocacy Moot Court Competition Semi-Finalist, Southeast Regional Competition* 2001
 - *CALI Excellence for the Future Award - Federal Courts* 2000
 - *Who's Who: American Law Students - 20th Edition* 2000
 - *Saul Lefkowitz Trademarks Moot Court Competition 3rd Place, Southeast Regional Competition* 2000
 - *IEEE Student Paper Competition 1st Place (23rd Northeast Bioengineering Conference)* 1997
 - *Dean's List (The University of Michigan)* 1992
 - *Renaissance Man Award* 1988

ACADEMIC COMMITTEES AND SERVICE

- The University of Dayton, School of Law, Dayton, OH
 - Colloquium Committee, Member (2009-2012).
 - Moot Court Board, Advisor, (2010-2012).
 - LL.M. and M.S.L. Graduate Studies Committee, Member (2009-2012).
 - International Studies Committee, Member (2009-2010).
 - Judge, Walter H. Rice Moot Court Competition, The University of Dayton, School of Law (2008-2012).
 - Judge, Dayton Bar Association Moot Court Competition, The University of Dayton, School of Law (2008-2012).

INVENTIVE ACTIVITY

- Issued Patents
 - ◆ U.S. Patent Number 6,764,053, Object Holder, issued on July 20, 2004, by Han.
 - ◆ U.S. Patent Number 8,852,012, Storage at Indoor Golf Driving Range, issued on October 7, 2014, by O'Grady and Han
 - ◆ U.S. Patent Number 9,597,575, Storage at Indoor Golf Driving Range, issued on March 21, 2017, by O'Grady and Han
- Patent Applications
 - ◆ U.S. Patent Application Serial Number 11/456,439, Systems and Methods for Remotely Enabling and Disabling Non-Voice-Related Functions on Portable Communication Devices, filed on July 10, 2006, by Han.

MEMBERSHIPS

- American Intellectual Property Law Association 2011 - 2012
- Dayton Intellectual Property Law Association Member Since 2008
- State Bar of Georgia Member Since 2001
- Intellectual Property Section of the Georgia Bar 2001 - 2008

-
- American Bar Association 2001 - 2005, 2008 - 2010
 - American Bar Association - Student Member 1998 - 2001
 - Christian Legal Society - Georgia State University 1998 - 2001
 - International Society for Magnetic Resonance in Medicine 1994 - 1998

OFFICES

Organizer, Member, Officer *DocketSearcher, LLC, Dayton, OH*
(2024-Present)

- Founding Member and Organizer

Organizer, Member, Officer *Ready Made Registration, LLC, Dayton, OH*
(2023)

- Founding Member and Organizer

Member, Board of Directors *Engineering and Science Hall of Fame, Dayton, OH*
(2011-2015)

- Non-profit (501(c)(3)) international organization established to honor engineers and scientists who have made a significant contribution to human well-being

President and Chief Executive Officer *Traton News, LLC, Beavercreek, OH*
(2011-2014)

- News-reporting organization
- Founding member and organizer

Member, Board of Directors *OURS, Inc., Los Angeles, CA*
(2008-2010)

- Religious non-profit (501(c)(3)) organization for ministry to at-risk youth
- Non-managing member of the Board of Directors

Organizer, Member, Officer *ExhibitView Solutions, LLC, Rome, GA*
(2009-2011)

Organizer, Member, Officer *ExhibitView Management, LLC, Rome, GA*
(2008-2011)

Organizer, Member, Officer *ExhibitView, LLC, Rome, GA*
(2006-2008)

- Founding Member and Organizer
- Software development company
- Advise on intellectual property and outsourcing matters

President and Chief Executive Officer *Sam Han, P.C., Marietta, GA*
(2006-2009)

- Founding Member and Organizer
- Pro bono legal cases
- Non-legal public service
- Non-intellectual-property-related legal matters

Organizer, Member, Officer *Adverless, LLC, Marietta, GA*
(2006-2008)

- Founding Member and Organizer
- Corporate governance and operation of Internet-related advertising, including operation of <<http://www.unhappysociety.com>>

Organizer, Member, Officer *Renter Network, LLC, Marietta, GA*
(2005-2008)

- Founding Member and Organizer
- Developing avenues for sales and marketing of rental property through various Internet resources

Organizer, Member, Secretary *Breakfast Technologies, LLC, Marietta, GA*
(2005-2009)

- Founding Member and Organizer
- Maintain records for corporation
- Corporate think-tank for generating intellectual property
- Intellectual property valuation and licensing

President and Chief Executive Officer *Samster, Inc., Marietta, GA*
(2005-2008)

- Founding Member and Organizer
- Corporate governance and operation for Exhibit View, LLC, Adverless, LLC, Breakfast Technologies, LLC, and Renter Network, LLC
- Maintain records and finances for corporation

President *Asian American Law Students Association, Georgia State University, Atlanta, GA*
(1999-2000)

Secretary *Intellectual Property Law Society, Georgia State University, Atlanta, GA*
(1999-2000)

SPECIAL SKILLS

- **Data Analyses**
 - Various Statistical Methods
 - Document Metadata Analysis
- **Trilingual**
 - English (Fluent)
 - Korean (Fluent)
 - Spanish (Proficient)
- **Programming Skills**
 - Fortran

-
- Pascal
 - Assembler Code (Intel™ 8086)
 - CAD
 - Spice
 - C

 - **Systems Administration**
 - Hewlett Packard™ HP-UX
 - Silicon Graphics IRIX™
 - Sun SPARC SUNVIEW

EXTRA CURRICULAR ACTIVITIES

- Instructor
 - John Paul the Great College Prep Academy 2018 - present
 - Personal Finance and Economics 2018 Fall
 - Behavioral Analysis Through Games 2019 Spring
 - Modern History and Current Events 2019 - 2020
 - Statistics 2019 - 2024
 - Wonders of Weather 2020 Spring
 - Film Theory 2020 - 2021
 - AP Calculus 2020 - 2024
 - Constitutional Conflicts 2021 - 2022
 - Canons of Construction 2023 - 2024
- Sunday School Teacher
 - Bethany Presbyterian Church, Atlanta, GA 2003 - 2006
 - Korean United Methodist Church, Atlanta, GA 1998 - 2001
 - St. John's Korean United Methodist Church, Lexington, MA 1995 - 1996
 - Chinese Christian Fellowship Church, Ann Arbor, MI 1991 - 1992
- Bible Study Leader
 - Bethany Presbyterian Church, Atlanta, GA 2003 - 2006
 - Korean United Methodist Church, Atlanta, GA 1998 - 2001
 - Christian Bible Fellowship, WPI, Worcester, MA 1997 - 1998
 - Chinese Christian Fellowship, Ann Arbor, MI 1991 - 1992
 - Korean Bible Church, Ann Arbor, MI 1988 - 1992
- Geometry Tutor for Harrison High School Student, Acworth, GA 2005
- Calculus Tutor for Pope High School Student, Marietta, GA 2004
- Mentorship Program, Georgia State University, College of Law, Atlanta, GA 2003 - 2004
- Youth Minister
 - Korean United Methodist Church, Atlanta, GA 2000 - 2001
- The Honorable Thomas Tang National Moot Court Competition 1999
 - Sponsor (GSU-AALSA)
- BAR/BRI Student Representative - Georgia State University, Atlanta, GA 1998 - 2001
 - Senior Representative 1999 - 2000
- University Lutheran Homeless Shelter Volunteer: Harvard Square, Cambridge, MA 1996 - 1997

-
-
- Cell Group Leader: St. John's Korean United Methodist Church, Lexington, MA
1996 - 1997
 - Minister of Transportation: St. John's Korean United Methodist Church, Lexington, MA
1994 - 1995
 - Short Term Missionary to Korea
1993
 - Physics Student Instructor: The University of Michigan, Ann Arbor, MI
1992
 - The University of Michigan Men's Glee Club, Ann Arbor, MI
1989 - 1992
 - Motorcycle Safety: Advanced Rider's Course, Ypsilanti, MI
1993
 - Ultimate (Frisbee)
2023
 - Rowing
 - Chess
 - Close-up Magic
 - Tennis
 - Classical and Folk Guitar

REFERENCES AVAILABLE UPON REQUEST

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LVNV VISIT: FIELDS TO DISPLAY

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 2024-DEC-17 Date Created 12:55 pm
 2024-DEC-16 Content Created 10:26 AM
 2024-DEC-17 Date Accessed 12:56 pm
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TIME: 1:53 pm

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 Accessed: 2024-DEC-17 1:53:09 pm

REVIEW PROCESS FOR OPENED FILE

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- Bird (Credit One Bank)
- Bird (Credit One Bank)
- Byrd (Cross River Bank)

[Handwritten note: "Branney"]

ORIGINAL

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 Accessed: 2 hours ago

2:46 pm
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1:59pm Requested that Mr. Century load the data as he would load it; he declined.

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- Duvall (Credit One Bank)
- Hicks (Credit One Bank)
- Mahaffey (Credit One Bank)
- Mulholland (Credit One Bank)
- Townsend (Credit One Bank)
- Townsend (Credit One Bank)

DC 3832

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 Formulas 0
 Sheets 1
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 Formulas 0

FOR COMPARISON TO ELECTRONIC FILE

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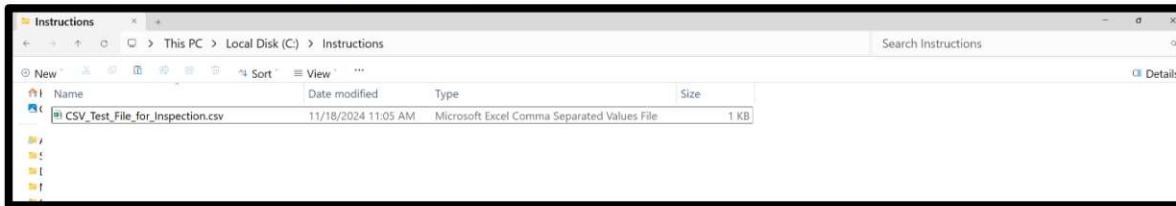
- (a) READ ALL OF THESE INSTRUCTIONS COMPLETELY BEFORE BEGINNING SO THAT THE DATA CAN BE PRESERVED CORRECTLY.
- (a) Please be sure to record by video **the entire process from beginning to end without stopping or pausing the video** so that the video demonstrates continuity in gathering the metadata.
- (b) Please be sure to record in **1080p or better** (so that fine print and smaller details are legible and clearly shown). A 1080p resolution should be readily available, as this has been the standard for many mobile devices since 2013.
- (c) Please be sure that the computer on which the file is reviewed (and for which the video is recorded) is the computer on which the following **original ".csv" file was stored with all of the metadata intact on that particular computer:**



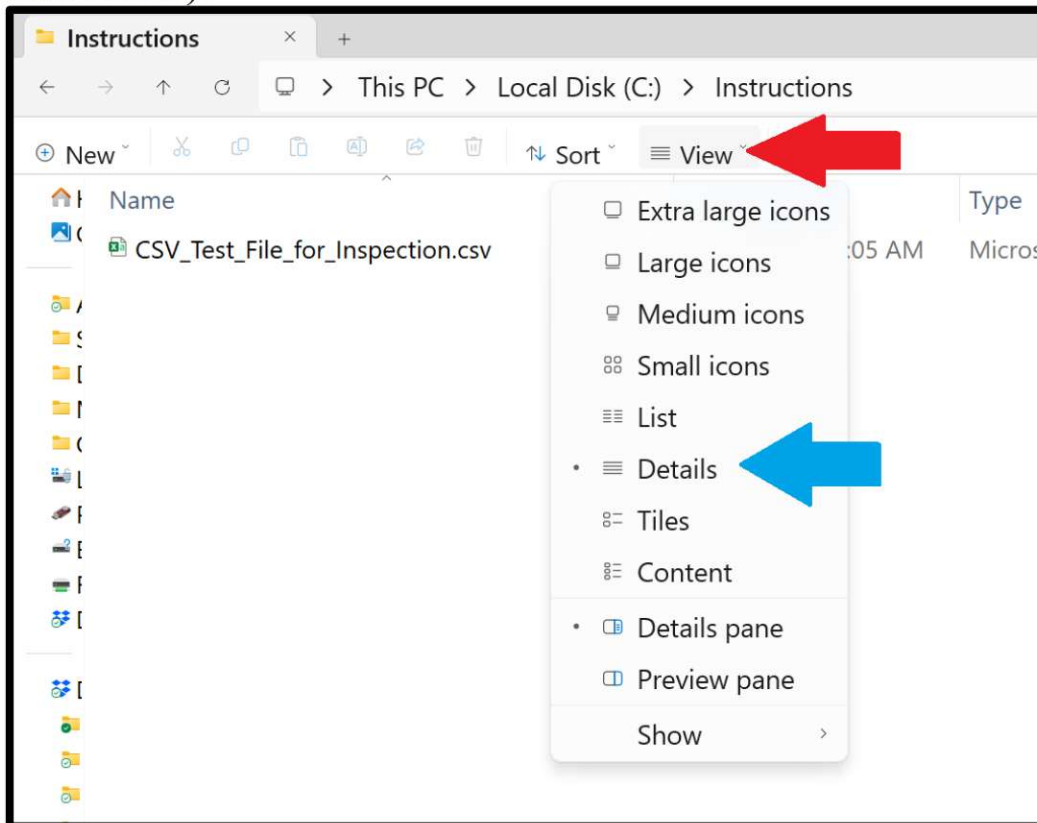
(from Bates Number LVNV68).

1. Aim video camera at computer monitor and bring to focus the entire screen.
2. Start recording video and **do not pause or stop the video until all of these instructions are completed.**
3. **DO NOT PAUSE OR STOP THE VIDEO:** Open the folder that has the file "CHARGEOFF_SALE_SHER_20230410.csv"

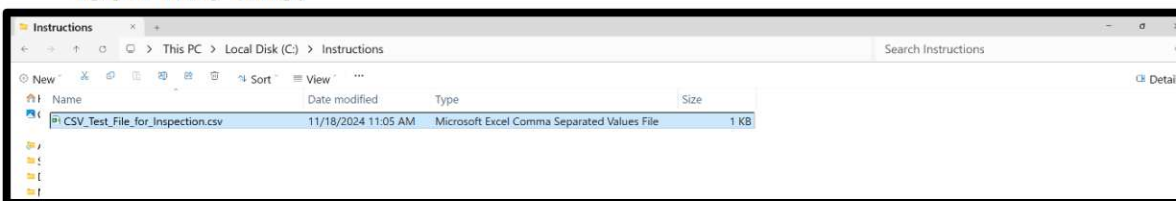
4. DO NOT PAUSE OR STOP THE VIDEO: Your folder should look similar to this on the screen:



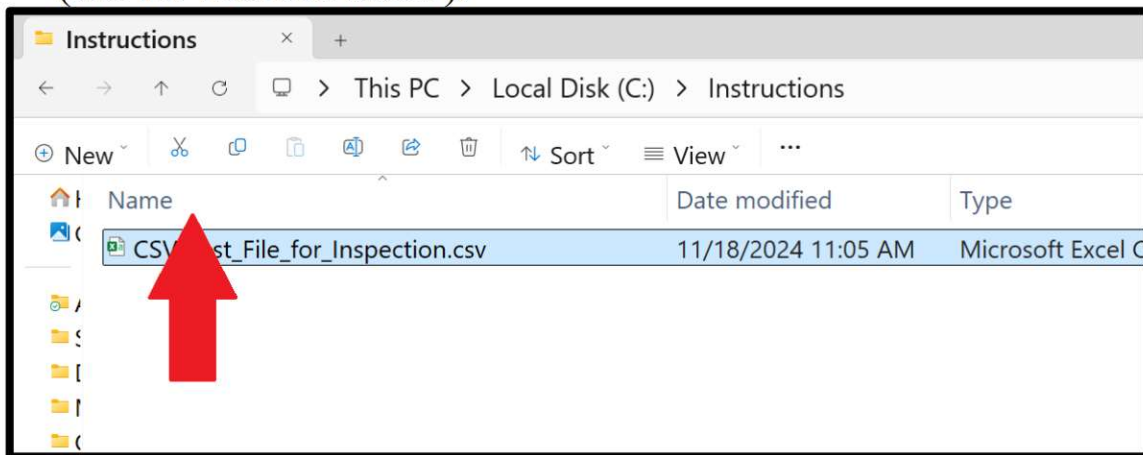
5. DO NOT PAUSE OR STOP THE VIDEO: At the top, select "View" (shown with red arrow) and select "Details" (shown with blue arrow):



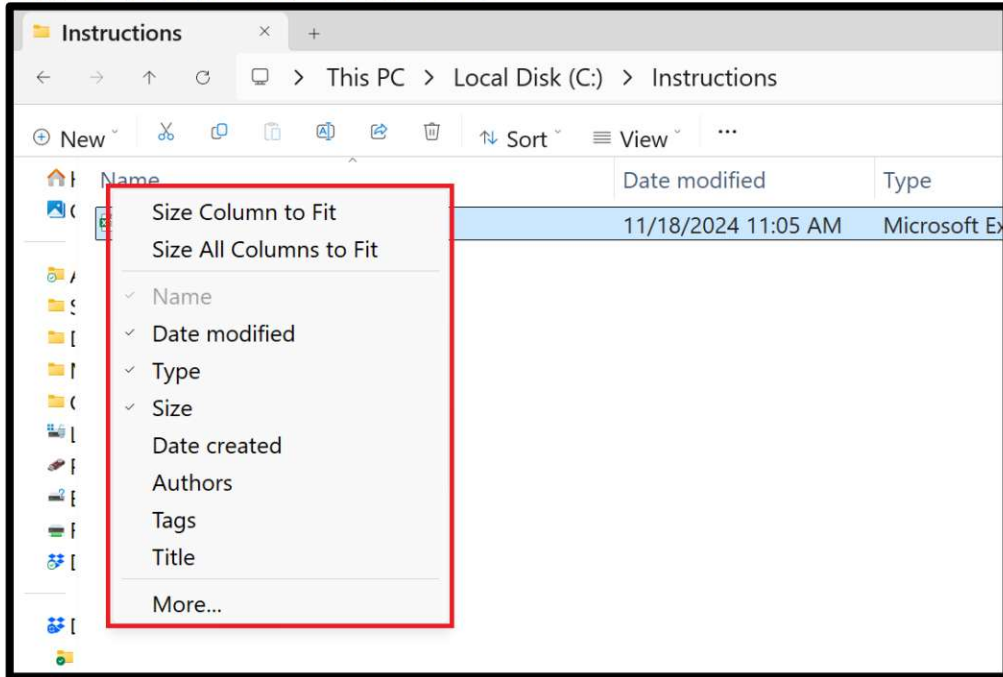
6. DO NOT PAUSE OR STOP THE VIDEO: Your screen should look like this:



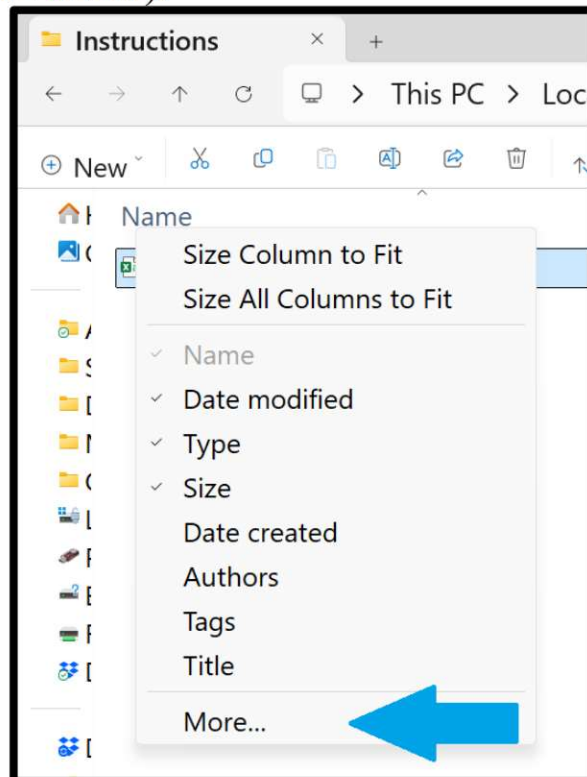
7. DO NOT PAUSE OR STOP THE VIDEO: If "Date modified" is completely and legibly shown (including date and time), then zoom in with the camera so that the "Date modified" is shown clearly and legibly on the video.
8. DO NOT PAUSE OR STOP THE VIDEO: If "Date modified" is only partially shown, then expand the "Date modified" field so that both date and time are shown completely and clearly.
9. DO NOT PAUSE OR STOP THE VIDEO: Zoom in with the camera so that the "Date modified" appears clearly and legibly on the video.
10. DO NOT PAUSE OR STOP THE VIDEO: Right click on "Name" (shown with red arrow):



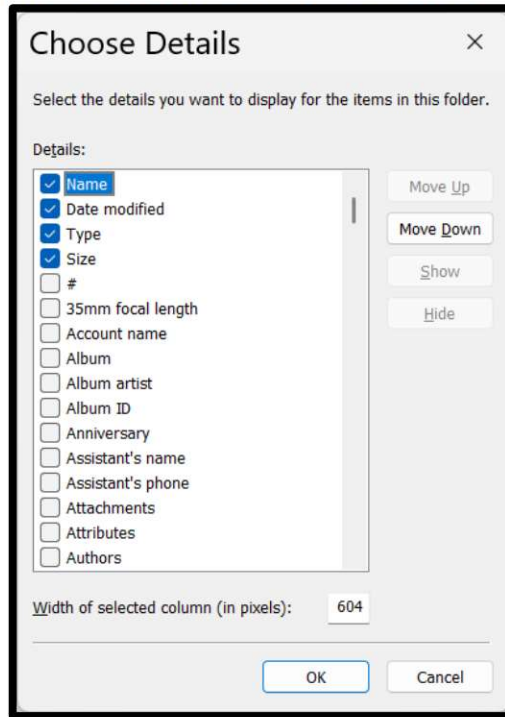
11. DO NOT PAUSE OR STOP THE VIDEO: After right-clicking "Name," the screen should show a selection menu that looks like what is shown in the red box:



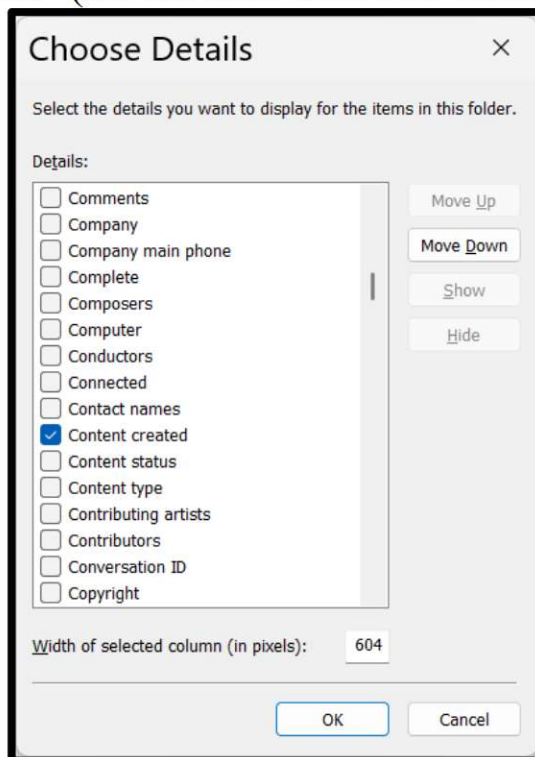
12. DO NOT PAUSE OR STOP THE VIDEO: Select "More..." (shown in blue arrow):



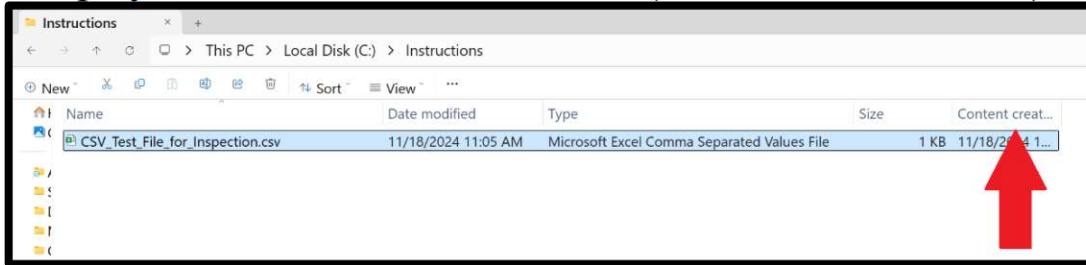
13. DO NOT PAUSE OR STOP THE VIDEO: Selecting "More..." should bring up a menu that looks like this:



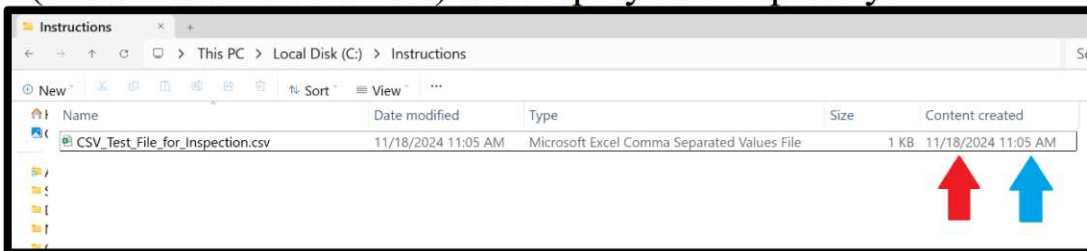
14. DO NOT PAUSE OR STOP THE VIDEO: Scroll down the list to "Content created" (shown here with box checked):



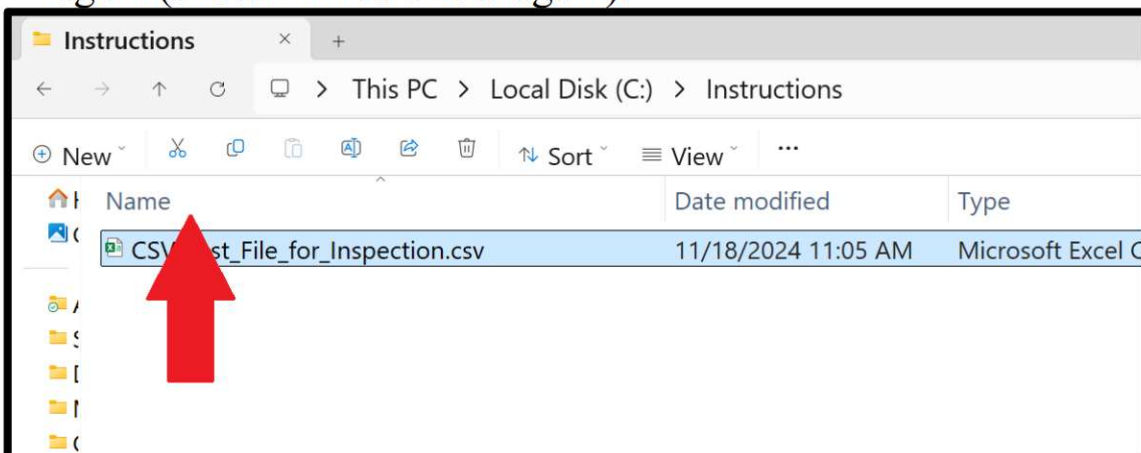
- DO NOT PAUSE OR STOP THE VIDEO: Select "Content created" (so that the box is checked as shown above) and then select the "OK" button.
- DO NOT PAUSE OR STOP THE VIDEO: The screen should then display a "Content created" column (shown with red arrow):



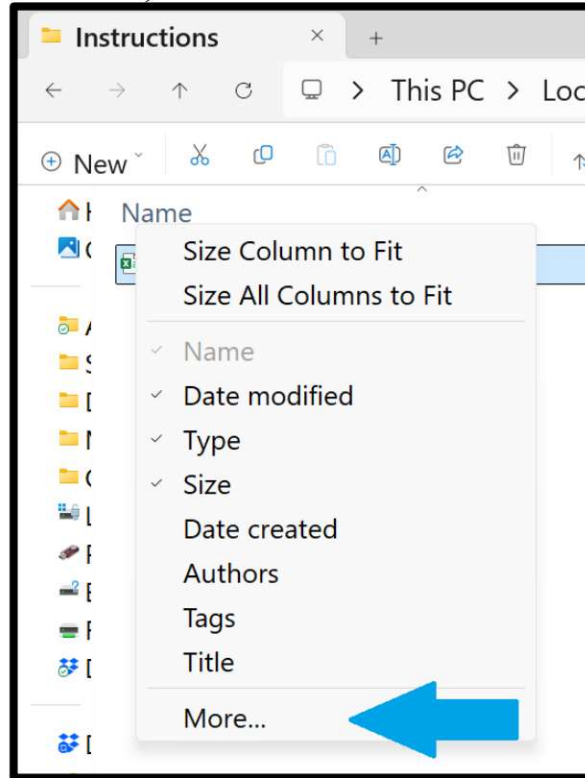
- DO NOT PAUSE OR STOP THE VIDEO: Expand the "Content created" column so that both date (shown with red arrow) and time (shown with blue arrow) are displayed completely:



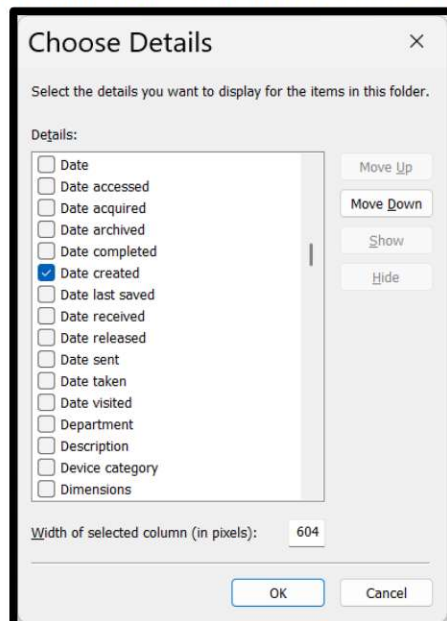
- DO NOT PAUSE OR STOP THE VIDEO: Zoom in with the camera so that the date and time for "Content created" are clearly shown and recorded on video.
- DO NOT PAUSE OR STOP THE VIDEO: Right click on "Name" again (shown in red arrow again):



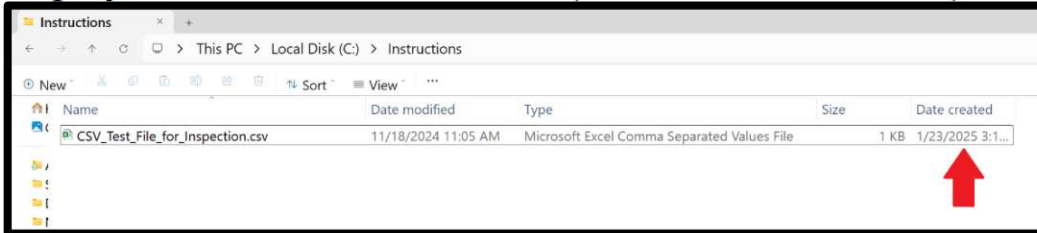
20. DO NOT PAUSE OR STOP THE VIDEO: After right-clicking "Name," un-check the "Content created" box.
21. DO NOT PAUSE OR STOP THE VIDEO: Select "More..." (shown in blue arrow):



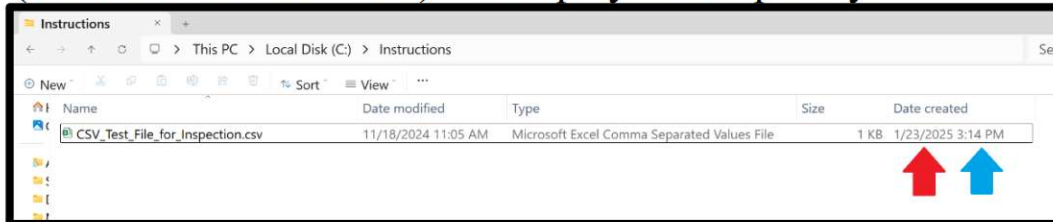
22. DO NOT PAUSE OR STOP THE VIDEO: Scroll down the list to "Date created" (shown here with the box checked):



23. DO NOT PAUSE OR STOP THE VIDEO: Select "Date created" (so that the box is checked as shown here) and then select the "OK" button.
24. DO NOT PAUSE OR STOP THE VIDEO: The screen should then display a "Date created" column (shown with red arrow):



25. DO NOT PAUSE OR STOP THE VIDEO: Expand the "Date created" column so that both date (shown with red arrow) and time (shown with blue arrow) are displayed completely:



26. DO NOT PAUSE OR STOP THE VIDEO: Zoom in with the camera so that the "Date created" appears clearly and legibly on the video.
27. DO NOT PAUSE OR STOP THE VIDEO: Open the file "CHARGEOFF_SALE_SHER_20230410.csv" using the program that LVNV uses during its normal and ordinary course of business.
28. DO NOT PAUSE OR STOP THE VIDEO: Print the file "CHARGEOFF_SALE_SHER_20230410.csv" so that the printout looks exactly like LVNV50 through LVNV64, showing **on video** all of the steps from the opened file to the paper printout without stopping or pausing the video.
29. DO NOT PAUSE OR STOP THE VIDEO: Show **on video** the paper printout that corresponds to LVNV50 through LVNV64.
30. DO NOT PAUSE OR STOP THE VIDEO: Close the file "CHARGEOFF_SALE_SHER_20230410.csv"

31. DO NOT PAUSE OR STOP THE VIDEO: Save "CHARGEOFF_SALE_SHER_20230410.csv" to a **read-only** memory (ROM) medium (e.g., DVD-R) so that all of the metadata shown in the video is preserved on that ROM medium. TO BE CLEAR, DO **NOT** WRITE TO A **READ-WRITE** (RW) MEDIUM.
32. STOP THE VIDEO RECORDING.
33. Save the video recording (preserving the recording date).
34. Send **both** the ROM medium and the video recording to LVNV's counsel for production or inspection by Defendant's counsel and Defendant's experts.
35. Send the paper printout to LVNV's counsel (exactly as it printed from the program that LVNV used in the video recording).

NOTE: This entire process (not including printing) should take less than an hour. Defendant's experts have stepped through this process using a test file and were able to complete the inspection of "Date modified," "Content created," and "Date created" in less than five (5) minutes.