

IN THE WARREN COUNTY COURT OF COMMON PLEAS, OHIO  
CIVIL DIVISION

MIDLAND CREDIT MANAGEMENT, INC. PLAINTIFF,  v.  RACHEL MOUTOUX DEFENDANT.	CASE NUMBER 24CV098159  <b>NOTICE OF FILING EXPERT REPORT</b>
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**NOTICE OF FILING EXPERT REPORT**

COMES NOW Defendant, Rachel Moutoux (hereinafter, "Defendant" or "Moutoux"), and in accordance with Ohio R. Civ. P. 26 and any applicable orders entered by this Honorable Court, hereby files Defendant's Notice of Filing Expert Report, thereby providing notice to this Honorable Court and all Parties to this action that the following was filed and made of record in the above-captioned matter:

Please take notice that attached hereto is the Expert Report of Sam Han, Ph.D., with Curriculum Vitae of Sam Han.

[SIGNATURE TO FOLLOW]

Respectfully submitted on 2025-March-10.

/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 WARREN COUNTY COURT OF COMMON PLEAS, OHIO  
CIVIL DIVISION

MIDLAND CREDIT MANAGEMENT, INC. PLAINTIFF,  v.  RACHEL MOUTOUX DEFENDANT.	CASE NUMBER 24CV098159  <b>CERTIFICATE OF FILING AND SERVICE</b>
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**CERTIFICATE OF FILING AND SERVICE**

The undersigned counsel certifies that the above-attached Defendant's Notice of Filing Expert Report 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. For redundancy, undersigned counsel also served the above-attached Defendant's Notice of Filing Expert Report by email to all counsel of record in this matter.

[SIGNATURE TO FOLLOW]

Respectfully submitted on 2025-March-10.

/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 WARREN COUNTY COURT OF COMMON PLEAS, OHIO  
CIVIL DIVISION**

<b>MIDLAND CREDIT MANAGEMENT, INC.</b>  <b>PLAINTIFF,</b>  <b>v.</b>  <b>RACHEL MOUTOUX DEFENDANT.</b>	<b>CASE NUMBER 24CV098159</b>  <b>EXPERT REPORT OF SAM HAN, PH.D.</b>
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**EXPERT REPORT OF SAM HAN, PH.D.**

I, Sam Han, declare as follows:

***Background and Foundational Statements***

1. 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").
2. I voluntarily give the statements in this Report in support of Defendant Rachel Moutoux (hereafter, "Moutoux") in the above-captioned proceeding.
3. All statements made herein come from personal knowledge unless stated otherwise or clearly apparent by context.
4. Matters of opinion expressed in this Report are opinions formed based upon my own experience and knowledge.
5. 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.
6. I have been retained as expert witnesses by Counsel for Moutoux.

***Preliminary Statements Relating to Materials Considered***

7. I have been advised that Plaintiff Midland Credit Management, Inc. (hereafter, "Midland") has not identified an expert and no expert report from Midland has been provided to us.

8. I do not expect to rely on any expert report from Midland in forming the opinions herein, however, should Midland provide an expert report that affects the conclusions herein, then intellectual honesty requires me to review Midland's expert's report to determine whether the conclusions herein are sound in view of newly discovered information.

***Experience and General Background Information for Sam Han, Ph.D.***

9. In compliance with Ohio Civ. R. 26(B)(7)(c), I have provided my most-current CV.

10. I am a member in good standing in the following jurisdictions, bars, or courts:

- a. The Supreme Court of the United States
- b. The Court of Appeals for the Federal Circuit;
- c. The Court of Appeals for the Eleventh Circuit;
- d. The Court of Appeals for the Ninth Circuit;
- e. The Court of Appeals for the Sixth Circuit;
- f. The United States Bankruptcy Appellate Panel for the Tenth Circuit;
- g. The United States District Court for the Northern District of Georgia;
- h. The State Bar of Georgia;
- i. The Supreme Court of Georgia;
- j. The Georgia Court of Appeals; and
- k. The United States Patent and Trademark Office.

11. I am a 2001 graduate of Georgia State University School of Law in Atlanta, Georgia.
12. I have a doctorate (Ph.D.) in Biomedical Engineering from Worcester Polytechnic Institute (hereafter, "WPI").
13. I also have a Master's degree in Biomedical Engineering from WPI.
14. During my time at WPI, I worked with graphics and image processors for sophisticated magnetic resonance imaging (MRI) and magnetic resonance spectroscopy (MRS) systems.
15. Also, during my time at WPI, I was the systems administrator for several computer networks, including UNIX-based networks with workstations from Sun Microsystems, Hewlett-Packard, Digital Equipment Corporation (DEC) Alpha, and Silicon Graphics systems, among others.
16. I also have a bachelor's degree in Electrical Engineering and Computer Science from the University of Michigan.
17. Given my educational background and experience, I am familiar with the format of various electronically stored documents and metadata associated with various electronically stored documents, including Microsoft® Excel® spreadsheets.
18. Within the Excel environment, I am familiar with different file extensions, such as ".xls," ".xlsx," ".csv," etc.
19. I have practiced law since 2001.
20. My law practice involves multiple areas of the law, including patent law (where I am required to understand the cutting edge of technology for sophisticated clients) and consumer law (where I represent consumers in debt collection lawsuits as well as in Fair Debt Collection

Practices Act lawsuits and counterclaims).

21. I have given professional presentations based on evidence that I have collected from debt-collection cases, which have shown: **(a)** manufactured documents that appear to be original documents; and **(b)** printouts that appear to be from original spreadsheets when they are not.

22. I have been involved in numerous consumer law cases, including (but not limited to) the cases that are listed in my CV.

***Compensation Under Ohio Civ. R. 26(B)(7)(c)***

23. 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 area of the law.

24. The reason that \$450/hour is a reasonable and customary rate for reviewing electronically stored files is because the metadata and other hidden information in the electronically stored files are susceptible to corruption and changes unless handled properly, thereby requiring original electronic files to be handled with a certain degree of care or to be saved on an unchangeable medium, such as a compact-disc read-only memory (CDROM).

25. My billing rates as an expert witness to evaluate complex business contracts with multiple sub-parts is \$450 per hour, which I believe to be the normal, customary, and reasonable rate for experts in this area of the law.

26. The reason that \$450/hour is a reasonable and customary rate for reviewing business documents is because such a review requires meticulous attention to detail. The complexity of the documents will become evident from: **(a)** the list of documents themselves; **(b)** the other documents referenced within other documents; and **(c)** the interplay of terms

between various cross-referenced documents.

27. In compliance with Ohio Civ. R. 26(B)(7)(c), I declare that the compensation for this particular case is \$450/hour, which I believe to be a reasonable and customary rate for which I have been retained.

***Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Documents Reviewed***

28. In compliance with Ohio Civ. R. 26(B)(7)(c), I declare that this Report is the complete report (based on the information that is currently available to me), including all of the facts and evidence on which I have relied, along with the methodology that I applied (to the extent that it is not self-evident from the statements herein).

29. I have been retained as an expert to review and form an opinion about whether or not the documents produced by Midland have been altered, destroyed, concealed, or otherwise modified to impair their value as evidence.

30. It is my understanding that the documents that I reviewed included documents that were produced by Midland.

31. The documents that I reviewed include all of the documents that have been filed in this case on or before 2025-March-10 and all of the documents that have been produced by Midland in this case on or before 2025-March-10.

32. Significantly, what has not been filed or produced in this case, so far, are: **(a)** a "Master Account Sale Agreement dated April 23, 2021"; **(b)** an "Account Sale Addendum dated March 1, 2023"; **(c)** any "Sale File"; **(d)** an electronic file named "OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_customer.dat.gz"; **(e)** an electronic file named "OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_main.dat.gz"; or **(f)** an electronic file named

"OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_phone.dat.gz."

33. In applying the methodology for this expert opinion, I rely on the documents, facts, data, and Midland's admissions that are recited herein (hereafter, "Supporting Materials"), all of which I have been made aware of or personally observed.

34. These Supporting Materials are the kinds of facts or data on which experts in this particular field would reasonably rely in forming an opinion on the subject.

### ***Dispelling Commonly Held Misconceptions About Electronic Documents***

35. At the outset, there are some commonly held misconceptions that I wish to dispel.

36. By way of background, there are many different types of electronic files, including Microsoft® Excel® spreadsheets (e.g., files with ".xls" or ".xlsx" extensions), Portable Document Format ("PDF") (files with ".pdf" extensions), Microsoft® Word® document (e.g., files with ".doc" or ".docx" extensions), data files (with ".dat" extension), text file (files with ".txt" extensions), comma-separated-value files (e.g., files with ".csv" extensions), compressed files (e.g., with ".gz" or ".zip" extensions), etc.

37. These types of electronic files are used in many different environments or fields, including finance, banking, engineering, science, government, schools, personal use, courts, debt collection, etc.

38. The environment in which an electronic file is used does not change the fundamental nature of the electronic file itself.

39. Thus, a Microsoft® Excel® file is an Excel® file when used at a bank; the Excel® file is an Excel® file when used by a governmental entity; the Excel® file is an Excel® file when used for debt collection; etc.

40. As such, the first common misconception that I wish to dispel is the

misconception that an expert for determining whether a particular electronic file has been modified or altered must also be an expert in the particular environment or field where that electronic file is used (e.g., banking, science, etc.); he or she does not need to be an expert in both electronic files and the field-of-use.

**41.** In other words, as an expert on a particular type of electronic file, I can provide a reliable opinion about whether or not a particular file has been modified regardless of the environment in which the electronic file is used.

**42.** The second misconception that I wish to dispel is the misconception that an expert for determining whether or not a particular paper printout of an alleged electronic document accurately reflects the actual electronic document must also be an expert in the particular field-of-use; he or she does not need to be an expert in both.

**43.** In other words, as an expert on a particular type of electronic file, I can provide a reliable opinion about whether or not a particular paper printout accurately reflects an original electronic file regardless of the environment in which the electronic file is used.

**44.** For example, if a paper printout has page numbers, then I can reliably determine (and reasonably conclude) that the original document has at least the number of pages that are shown on the paper printout.

**45.** For example, if a single-page paper printout shows "Page 33" at the bottom of the paper, then I can reliably (and reasonably) conclude that there were thirty-two (32) pages that preceded "Page 33"; what I cannot determine (in the absence of the complete document) is whether there are any pages after "Page 33" or what precisely are the total number of pages on the original document.

**46.** The third misconception that I wish to dispel is the misconception that one cannot

determine how a paper printout from a particular electronic document should appear visually in the absence of tampering or other document manipulation.

**47.** For example, a paper printout from an electronic PDF file (file extension with ".pdf") should appear substantially identical on paper as it does when viewed on a computer screen.

**48.** Similarly, a printout from a MSWORD file (e.g., file extensions of ".doc" or ".docx") should appear similar on paper as when viewed on a computer screen, with possible minor discrepancies in pagination or other non-substantive formatting issues that arise when the electronic files are transmitted to a printer.

**49.** For Microsoft® Excel® files (e.g., file extensions of ".xls" or ".xlsx"), the paper printout (even without review of the electronic document) can reveal: **(a)** whether or not a "freeze row" or "freeze column" was applied to the file when printed; **(b)** whether certain cells were modified or altered (based on how the contents of those cells were printed); **(c)** how certain number formats were applied (e.g., settings for decimal places), either consistently or inconsistently for the same number type (e.g., currency, scientific, etc.); and **(d)** how certain date formats were applied and whether they were applied consistently.

**50.** For text files (e.g., file extension of ".txt"), the paper printout should not exhibit any formatting at all (meaning no differences in font type, no differences in font size, no background shading, no ability to freeze rows or columns, etc.) because text files do not have the ability to preserve formatting within the electronic file itself.

**51.** Ultimately, there is a misconception that the original electronic document is always necessary to determine whether or not an allegedly corresponding paper copy accurately reflects the contents of the original electronic document; depending on how a printout of a file

appears on paper, and depending on what filetype was printed, it is possible to determine with a reasonable degree of certainty that the printout does not accurately reflect the original file from which it was allegedly printed.

52. This type of knowledge is not normally within the scope of a layperson, thereby resulting in this third misconception.

53. The fourth misconception that I wish to dispel is the misconception that I have been retained as anything other than: (a) a technical expert with reference to electronic files; and (b) a legal expert with reference to incompleteness and brokenness of documents.

54. Thus, I am not a banking expert; I am not a finance expert; I am not a sales expert; I am not any other type of expert than what I specifically identify myself to be herein, namely, an electronic file expert and a legal expert.

55. To be clear, my expertise is electronic files and the completeness of documents.

56. I am qualified to address these commonly held misconceptions because of my knowledge of electronic files and my knowledge of documents.

***Specific Background Relating to Uncovering Fabricated Documents, Uncovering Proof of Tampering with Evidence, and Uncovering Anomalies with Electronic Documents***

57. Based on my education, experience, and training, I have been able to uncover fabricated or manufactured documents in several other cases, uncover tampering with evidence in several other cases, and uncover anomalies with electronic documents.

58. For example, I was one of the experts that demonstrated that National Collegiate Student Loan Trust 2005-2 (hereafter, "NCSLT") had tampered with evidence and then testified falsely to hide its fabrication of documents in *National Collegiate Student Loan Trust 2005-2 v. Peters*, Case Number 2023-CV-03105 (Montgomery County Court of Common Pleas, Ohio)

(hereafter, "Peters Case").

**59.** The step-by-step explanation and documented proof are demonstrated in the following two (2) filings in the Peters Case: **(a)** Defendant's Reply Brief on Defendant's Motion for Summary Judgment, filed on 2024-MAR-20; and **(b)** Defendant's Motion to Sanction Plaintiff and Plaintiff's Counsel for Fraud Upon the Court, filed on 2024-MAR-20.

**60.** I was also the experts that uncovered discrepancies between a paper printout and its allegedly corresponding electronic file in *Midland Credit Management, Inc. v. Eric Wiseman*, Case Number 24CV000841 (Franklin County Court of Common Pleas) (hereinafter, "Wiseman Case").

**61.** The methodology for inspecting and examining electronic documents in the Wiseman Case was actually implemented and applied by Mr. Boyd Gentry (who was counsel of record for Plaintiff Midland Credit Management, Inc. (hereinafter, "Midland") in the Wiseman Case), following step-by-step, in near real time, the inspection procedure exactly as instructed on 2024-Dec-17 for the Wiseman Case.

**62.** For example, Gentry himself was able to follow the same process that we apply in examining electronic documents, and Gentry himself observed that: **(a)** the electronic file inspected by Gentry in the Wiseman Case was not even the correct file type; **(b)** the electronic file inspected by Gentry in the Wiseman Case was missing two entire columns that existed in the printed document; **(c)** the electronic file inspected by Gentry in the Wiseman Case had a "Content Created" date that was different from the alleged transaction date; and **(d)** the electronic file inspected by Gentry in the Wiseman Case had columns of data that were out of sequence from the printed document.

**63.** At a minimum, Gentry himself can confirm that: **(a)** the process that we apply

can reliably uncover underlying metadata for electronic files (as Gentry himself did in the Wiseman Case); and **(b)** the process that we apply can reliably uncover any differences between paper copies and alleged original electronic files from which those paper copies are printed, should any such differences exist (as Gentry himself did in the Wiseman Case).

**64.** I have applied the same rigorous methodology and the same rigorous analysis in this case as I did for the Peters Case and the Wiseman Case.

**65.** The particular education, training, and experience that is pertinent to my document analysis is my background in electrical engineering and computer science, along with my experience with computers, from which I was able to determine with a reasonable degree of confidence how different document types (e.g., word-processing documents (e.g., ".docx" files), spreadsheets (e.g., ".xlsx" files), portable document format ("PDF") files, etc.) appear in their respective native electronic formats and, further, how those particular documents will appear when printed to paper from their native electronic formats.

**66.** Additional education, training, and experience as a patent attorney reinforces my knowledge of the different word-processing, spreadsheet, and other document types.

**67.** With this salient technological background in mind, my methodology in analyzing the documents for potential fraud or fabrication includes: **(a)** inspecting paper copies of the documents produced to determine whether or not there are any inconsistencies that are readily apparent in the printed (paper) form of the document; **(b)** inspecting any electronic form of the documents (should such electronic documents be available for inspection) from which the paper copies were printed to determine whether or not the printed document is an identical copy of the electronic document; and **(c)** inspecting any underlying metadata of the electronic documents (should such metadata be available) to determine whether or not there has been evidence of

tampering or other issues that affect the reliability of the electronic documents.

**68.** The methodology explained and applied herein for detecting potential fraud or fabrication of documents is a customary and accepted methodology.

***Specific Background Relating to Legal Documents***

**69.** Based on my education, experience, and training, I am qualified to provide expert testimony about what is necessary to show a complete and unbroken chain of title.

**70.** The methodology that I employ for determining a complete and unbroken chain of title is a customary and accepted methodology employed by others in this field.

**71.** Specifically, I first determine whether or not the documentation is complete.

**72.** Thereafter, I determine whether or not the chain of title is unbroken.

**73.** My methodology for determining whether or not the documentation is complete is by: **(a)** reviewing each document; **(b)** determining whether or not the reviewed document cross-references another document (hereafter, "cross-referenced document"); **(c)** listing every cross-referenced document; **(d)** determining whether or not the cross-referenced document has been produced (or even exists); **(e)** if the cross-referenced document has been produced, then repeating **(a)** through **(d)** for the cross-referenced document.

**74.** This step-by-step methodology is repeated until, either: **(a)** all cross-referenced documents are collected; or **(b)** missing documents are identified.

**75.** If there are no missing documents, then the conclusion is that the documentation is complete.

**76.** If there are missing documents, then the conclusion is that the documentation is not complete.

**77.** My methodology for determining whether or not the chain of title is unbroken is

by tracing forward (from the original owner) every transaction until the last transaction.

**78.** If there are no gaps from the original owner to the last owner, then the conclusion is that the chain of title is unbroken.

**79.** If there are gaps from the original owner to the last owner, then the conclusion is that the chain of title is broken.

**80.** The methodology explained and applied herein for determining completeness and unbrokenness of chain of title is a customary and accepted methodology.

***Specific Background for Expert Opinion Relating to Electronic Data Files or Computer Files***

**81.** By way of background for my expert opinion relating to electronic data files or computer files, I note that a spreadsheet, such as Microsoft® Excel® (even when saved as a comma-separated-value file (meaning, with a ".csv" extension)), has cells that contain information or data in various forms.

**82.** Specifically, a ".csv" extension on a file indicates that the file is a comma-separated-value file (hence, the "csv" extension, with each letter representing the words "comma," "separated," and "value," respectively).

**83.** A comma-separated-value (CSV) file uses a text file format with commas to separate values.

**84.** Thus, a CSV file stores tabular data (numbers and text) in plain text, where each line of the file typically represents one data record.

**85.** Thus, unlike ".xls" or ".xlsx" file formats, which preserve the formatting of each cell (e.g., bold, italic, formula, underline, etc.), a ".csv" file does not preserve the formatting of the cells, but instead every cell is treated as a text-formatted cell.

**86.** The following entry in Wikipedia provides an explanation of ".csv" files:

[https://en.wikipedia.org/wiki/Comma-separated\\_values](https://en.wikipedia.org/wiki/Comma-separated_values).

87. With all of this background and methodology explained, my opinion (all of which I can state with at least a reasonable degree of certainty) is as follows.

***Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Opinion - The Chain of Title Is Incomplete Because the Documents Referenced in the Alleged Bill of Sale Are Missing***

88. My first (1st) opinion is that the chain of title is incomplete because the documents referenced in the alleged "Bill of Sale" are missing.

89. Specifically, Midland's alleged "Bill of Sale" shows the following information:

Master Account Sale Agreement dated April 23, 2021  
Account Sale Addendum dated March 1, 2023

**BILL OF SALE**

Closing Date: July 17, 2023

Capital One, N.A. ("Seller"), in consideration of a Purchase Price of [REDACTED] and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, hereby sells, assigns, conveys, sets over, and transfers all right, title and interest in the Accounts identified in the Sale File entitled

OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_customer.dat.gz  
OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_main.dat.gz  
OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_phone.dat.gz

(which may be in electronic form) to Midland Credit Management, Inc., a Kansas corporation ("Buyer"), and including all proceeds thereof of any kind, without recourse or representation except as expressly provided herein or on the terms, and subject to the conditions, set forth in the Agreement (as defined below).

This Bill of Sale is delivered pursuant to and in accordance with the terms of that certain Master Account Sale Agreement, dated as of April 23, 2021, by and between Seller and Buyer (as amended, restated or otherwise modified from time to time, the "Agreement"). All capitalized terms used, but not defined, in this Bill of Sale shall have the meanings assigned to such terms in the Agreement. This Bill of Sale does not amend the terms of the Agreement in any respect. The representations, warranties, covenants, agreements and indemnities contained in the Agreement shall not be superseded hereby but shall remain in full force and effect as and to the extent provided in the Agreement.

90. Significantly, Midland's alleged "Bill of Sale" clearly references the following:

(a) a "Master Account Sale Agreement dated April 23, 2021" (as shown here):

**Master Account Sale Agreement dated April 23, 2021**

 and

This Bill of Sale is delivered pursuant to and in accordance with the terms of that certain Master Account Sale Agreement, dated as of April 23, 2021, by and between Seller and Buyer (as amended, restated or otherwise modified from time to time, the "Agreement"). All capitalized terms used, but not defined, in this Bill of Sale shall have the meanings assigned to such terms in the Agreement. This Bill of Sale does not amend the terms of the Agreement in any respect. The representations, warranties, covenants, agreements and indemnities contained in the Agreement shall not be superseded hereby but shall remain in full force and effect as and to the extent provided in the Agreement.

(b) an "Account Sale Addendum dated March 1, 2023" (as shown here):

**Account Sale Addendum dated March 1, 2023**

(c) a "Sale File" (as shown here):

**transfers all right, title and interest in the Accounts identified in the Sale File**

(d) an electronic file named "OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_customer.dat.gz" (as shown below);

(e) an electronic file named "OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_main.dat.gz" (as shown below); and

(f) an electronic file named "OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_phone.dat.gz" (references to all three (3) files shown here):

OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_customer.dat.gz  
OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_main.dat.gz  
OMEGA.BN0076.SALES.PROD-EAST.PCBLE20230712\_BN0076\_phone.dat.gz

91. The alleged "Bill of Sale" clearly notes:

(a) "This Bill of Sale is delivered pursuant to and in accordance with the terms of that certain Master Account Sale Agreement, dated as of April 23, 2021," which requires the "Master Account Sale Agreement" (hereinafter, "Agreement") to determine whether or not any conditions precedent to any alleged sale were met;

(b) "All capitalized terms used, but not defined, in this Bill of Sale shall have

the meanings assigned to such terms in the Agreement" [i.e., the "Master Account Sale Agreement" and any amendments thereto], which requires the Agreement to determine what precisely was allegedly transferred; and

(c) "The representations, warranties, covenants, agreements and indemnities contained in the Agreement shall not be superseded hereby but shall remain in full force and effect as to the extent provided in the Agreement," which (again) requires the Agreement to determine what (if any) conditions precedent were (or were not) met.

92. Because of the incorporated-by-reference-but-missing documents, I can say with a reasonable degree of certainty that the chain of title is incomplete.

### ***Concluding Remarks***

93. If original, unmodified 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 over time.

94. If the missing documents (which were referenced in the alleged "Bill of Sale") are provided for review, then I can provide a more complete assessment of any issues with reference to the chain of title.

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

**FURTHER DECLARANT SAYETH NAUGHT.**

[SIGNATURE AND OATH TO FOLLOW]

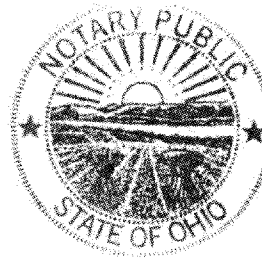
Executed on 2025-MARCH-10, in Dayton, Ohio.

  
\_\_\_\_\_  
Sam Han

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

Sworn to and subscribed in my presence this 10<sup>th</sup> day of March, 2025.

  
\_\_\_\_\_  
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.

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**EDUCATION**

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- Georgia State University* *Atlanta, GA*
- **J.D. (cum laude)** May, 2001
    - *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*

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**ADMISSIONS**

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- 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

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**WORK EXPERIENCE**

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- 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

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- 
- 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

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- 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

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- (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

- 
- Patent Clearance Searches
  - Trademark
    - Applications
    - Office Action Responses
  - Licensing projects
    - Analysis and licensing efforts for patent portfolio of Datascope, 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
    - *Datascope v. FleetBoston Financial Corp.*, No.: 1:01-CV-2246-CAP (N.D. Ga.)
    - *Datascope v. Providian Financial Corp.*, No.: 1:01-CV-3252-CAP (N.D. Ga.)
    - *Datascope 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***  
(2000 Summer)

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

- 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***  
(2000 Spring Term)

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

- 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

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- 
- 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*

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- 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

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## **SELECT LITIGATION AND TRIAL EXPERIENCE**

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- *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

- 
- 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

- 
- 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**

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- *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**

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- 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**

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- 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).

- 
- 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)

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## TEACHING AND INSTRUCTION

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- 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.*

- 
- 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.

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- 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  $^1\text{H}$  Diffusion Coefficient and Oxygen Tension in RIF-1 Tumors*, Abstracts, Oral Presentation, In. Proc. of the 4<sup>th</sup> 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, 38<sup>th</sup> 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 5<sup>th</sup> 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  $^{19}\text{F}$  NMR Spectroscopy and Imaging of Perfluorocarbon Emulsions*, Abstracts, Oral Presentation, In. Proc. IEEE 23<sup>rd</sup> 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, 23<sup>rd</sup> 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, 39<sup>th</sup> 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 24<sup>th</sup> 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 6<sup>th</sup> 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  $p\text{O}_2$  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.

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**SELECT LECTURES AND SPEAKING ENGAGEMENTS**

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- 
- 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

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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.

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## **FELLOWSHIPS, SCHOLARSHIPS, AND GRANTS**

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

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## **AWARDS AND RECOGNITIONS**

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- *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*

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- *CALI Excellence for the Future Award - Antitrust Law* 2001
  - *Who's Who: American Law Students - 21<sup>st</sup> 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 - 20<sup>th</sup> Edition* 2000
  - *Saul Lefkowitz Trademarks Moot Court Competition 3<sup>rd</sup> Place, Southeast Regional Competition* 2000
  - *IEEE Student Paper Competition 1<sup>st</sup> Place (23<sup>rd</sup> 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**

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- 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**

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- 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

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- 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**

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**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

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**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)

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## **SPECIAL SKILLS**

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

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- Pascal
  - Assembler Code (Intel™ 8086)
  - CAD
  - Spice
  - C
  
  - **Systems Administration**
    - Hewlett Packard™ HP-UX
    - Silicon Graphics IRIX™
    - Sun SPARC SUNVIEW

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**EXTRA CURRICULAR ACTIVITIES**

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- 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

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- 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**