

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

LVNV FUNDING, LLC PLAINTIFF, v. DAVE SALMON DEFENDANT.	CASE NUMBER CV2024040735 JUDGE: HON. MUENCH-MCELFRESH NOTICE OF FILING EXPERT REPORT
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NOTICE OF FILING EXPERT REPORT

COMES NOW Defendant, Dave Salmon (hereinafter, "Defendant" or "Salmon"), 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 are:

- (a) Joint Expert Report of Brian Sullivan and Sam Han, Ph.D.; and
- (b) Curriculum Vitae of Brian Sullivan; and
- (c) Curriculum Vitae of Sam Han.

[SIGNATURE TO FOLLOW]

Respectfully submitted on 2025-January-14.

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

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

LVNV FUNDING, LLC PLAINTIFF, v. DAVE SALMON DEFENDANT.	CASE NUMBER CV2024040735 JUDGE: HON. MUENCH-MCELFRISH CERTIFICATE OF FILING AND SERVICE
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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.

[SIGNATURE TO FOLLOW]

Respectfully submitted on 2025-January-14.

/s/ Andrew Barnes
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barnes@abarneslaw.com
Attorney for Defendant

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

LVNV FUNDING, LLC PLAINTIFF, v. DAVE SALMON DEFENDANT.	CASE NUMBER CV2024040735 JOINT EXPERT REPORT OF BRIAN SULLIVAN AND SAM HAN, PH.D.
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JOINT EXPERT REPORT OF BRIAN SULLIVAN AND SAM HAN, PH.D.

We, Brian Sullivan and Sam Han, declare as follows:

Background and Foundational Statements

1. Both of us are over the age of eighteen years and are competent to make all of the statements in this Joint Expert Report of Brian Sullivan and Sam Han, Ph.D. (hereafter, "Expert Report" or "Report").
2. We voluntarily give the statements in this Report in support of Defendant Dave Salmon (hereafter, "Salmon") 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 our own experiences and knowledge.
5. We declare under penalty of perjury under the laws of the United States of America that, to the best of our knowledge and belief, the statements that are contained in this Report are true and correct.
6. We have been retained as expert witnesses by Counsel for Salmon.
7. If there are any statements on which we disagree, those statements are clearly

identified and the reasons for disagreement are clearly stated herein.

Preliminary Statements Relating to Materials Considered

8. We have been advised that Plaintiff LVNV Funding, LLC (hereafter, "LVNV") has not identified an expert and no expert report from LVNV has been provided to us.

9. We do not expect to rely on any expert report from LVNV in forming our opinions herein, however, should LVNV provide an expert report that affects our conclusions herein, then intellectual honesty requires us to review LVNV's expert's report to determine whether our conclusions herein are sound in view of newly discovered information.

Experience and General Background Information for Brian Sullivan

10. In compliance with Ohio Civ. R. 26(B)(7)(b), I have provided my most-current curriculum vitae (hereinafter, "CV").

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

- a. The Court of Appeals for the Federal Circuit;
- b. The Court of Appeals for the Sixth Circuit;
- c. The United States District Court for the Southern District of Ohio;
- d. The State Bar of Ohio; and
- e. The United States Patent and Trademark Office.

12. I am an attorney in good standing with the State Bar of Ohio and with the Supreme Court of Ohio.

13. I have not been disciplined, sanctioned, or otherwise reprimanded in any jurisdiction where I am licensed to practice.

14. As an Ohio attorney, I am familiar with my ethical obligations under the Ohio R. Prof. Cond. (hereinafter, "Ethical Rules"), including Ethical Rules 3.3 (Candor Toward the Tribunal).

15. I received my electrical engineering degree and my law degrees from the University of Dayton.

16. Prior to becoming a lawyer, I worked as an engineer for several years.

17. In my work as an attorney, I work regularly with Microsoft® Excel® (hereinafter, "Excel"), Microsoft® Word® (hereinafter, "MSWORD"), and portable document format (hereinafter, "PDF") files.

18. Within the Excel environment, I am familiar with different file extensions, such as ".xls" (original Excel extension), ".xlsx" (Excel with XML (extensible markup language) features, ".csv" (comma-separated values), etc.

19. Furthermore, based on my education, training, and experience, I am familiar with how a spreadsheet can be printed to a PDF file.

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

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

21. 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.

22. I am a 2001 graduate of Georgia State University School of Law in Atlanta, Georgia.

23. I have a doctorate (Ph.D.) in Biomedical Engineering from Worcester Polytechnic Institute (hereafter, "WPI").

24. I also have a Master's degree in Biomedical Engineering from WPI.

25. During my time at WPI, I worked with graphics and image processors for sophisticated magnetic resonance imaging (MRI) and magnetic resonance spectroscopy (MRS) systems.

26. 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.

27. I also have a bachelor's degree in Electrical Engineering and Computer Science from the University of Michigan.

28. 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.

29. Within the Excel environment, I am familiar with different file extensions, such as ".xls," ".xlsx," ".csv," etc.

30. I have practiced law since 2001.

31. 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).

32. 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.

33. 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)

34. Our billing rate as expert witnesses to evaluate evidence based on electronically stored or electronically transferred documents is \$450 per hour, which we believe to be the normal, customary, and reasonable rate for experts in this area of the law.

35. 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).

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

37. 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.

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

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

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

40. We have been retained as experts to review and form an opinion about whether or not the documents produced by LVNV have been altered, destroyed, concealed, or otherwise modified to impair their value as evidence.

41. It is our understanding that the documents that we reviewed included documents that were produced by LVNV.

42. The documents that we reviewed include the following (including all attached

exhibits to those documents):

- a. LVNV's Complaint (with exhibits), filed 2024-Mar-04.
- b. Barnes Notice of Appearance, filed 2024-Mar-30.
- c. Answer, Affirmative Defenses, and Counterclaims, filed 2024-Mar-30.
- d. Salmon's Motion on Standing (and proposed order), filed 2024-Mar-30.
- e. Salmon Notice of Submission of discovery, filed 2024-Mar-30.
- f. Municipal Court LVNV filing receipts, 2024-Apr-01.
- g. Magistrate's finding for transfer, 2024-Apr-09.
- h. Jury Demand, filed 2024-May-21.
- i. Barnes Affidavit in support of default judgment, executed 2024-Jul-09.
- j. Defendant's Disclosure of Expert Under Ohio R. Civ. P. 26(B)(7), filed 2024-Jul-09.
- k. Defendant's Initial Disclosures, filed 2024-Jul-09.
- l. Defendant's Motion for Default Judgment, filed 2024-Jul-09.
- m. Plaintiff's Motion for Leave to Plead to Defendant's Counterclaim, filed 2024-Aug-06.
- n. Plaintiff's Motion for Extension of Time to Respond to Defendant's First Set of Discovery, filed 2024-Aug-08.
- o. Plaintiff's More Definite Statement (including all exhibits), 2024-Aug-08.
- p. Defendant's Opposition to Plaintiff's Motion for Leave to Plead to Counterclaim, filed 2024-Aug-09.
- q. Defendant's Partial Opposition to Plaintiff's Motion for Extension of Time, filed 2024-Aug-09.

r. Plaintiff's Opposition to Defendant's Motion for Default Judgment, filed 2024-Aug-12.

s. Plaintiff's Reply to Counterclaim, served 2024-Aug-20.

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

44. 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.

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

45. Based on our respective education, experience, and training, we 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.

46. For example, we were the ones that uncovered that LVNV had modified or tampered with electronic files in another case (*LVNV Funding, LLC v. Eric Wiseman*, Case Number 2024CV000841 (Franklin County Court of Common Pleas (hereinafter, "LVNV Sister Case"))).

47. We have applied the same rigorous methodology and the same rigorous analysis in this case as we did for the LVNV Sister Case.

48. The particular education, training, and experience that is pertinent to our document analysis is our background in electrical engineering and our experience with computers, from which we were 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.

49. Additional education, training, and experience as patent attorneys reinforce our knowledge of the different word-processing, spreadsheet, and other document types.

50. With this salient technological background in mind, our 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; **(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.

51. 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

52. Based on our education, experience, and training, we are qualified to provide expert testimony about what is necessary to show a complete and unbroken chain of title.

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

54. Specifically, we first determine whether or not the documentation is complete.

55. Thereafter, we determine whether or not the chain of title is unbroken.

56. Our 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.

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

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

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

60. Our 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.

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

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

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

Specific Methodology with Reference to This Report

64. In crafting this Report, we independently reviewed the documents first before consulting with each other.

65. After our respective review of the documents and filings, we consulted each other on the opinions that we formed.

66. As part of our consultation, we questioned each other's opinions and challenged each other's findings so that both of us could be confident in stating our final opinions.

67. In other words, we took an academic process (similar to a peer-review process) that we believed would produce an objective and reasonable opinion.

68. Consequently, this Report reflects what we would consider to be an intellectually honest and objective assessment of the documents, as well as our reasoned explanations for our opinions.

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

69. By way of background for our expert opinion relating to electronic data files or computer files, we 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.

70. 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).

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

72. Thus, a CSV file stores tabular data (numbers and text) in plain text, where each

line of the file typically represents one data record.

73. 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.

74. When a spreadsheet (such as Microsoft® Excel®) is printed, either to paper or to a PDF file, the user is provided with an option to "freeze" the top row (or heading row) so that the headings are preserved on each of the printed pages.

75. If "freeze top row" is not applied, then the headings will only appear on the first page.

76. With all of this background and methodology explained, our opinions (all of which we can state with at least a reasonable degree of certainty) are as follows.

Substance of Report Under Ohio Civ. R. 26(B)(7)(c): First Opinion - The Printout Attached to Plaintiff's More Definite Statement Shows That It Has Been Deliberately Altered, Destroyed, Concealed, or Otherwise Tampered with to Include Only Twenty-One (21) Lines with Defendant's Entry Being on the Eleventh Line (Line 11)

77. Our first (1st) opinion is that the printout attached to Plaintiff's More Definite Statement, dated 2024-Aug-08 (hereinafter, "Manufactured Printout") comprises made-for-litigation documents that was fabricated, manufactured, or otherwise generated, either manually (by a person) or automatically (by a computer program or formula or script).

78. The portion of the Manufactured Printout that appears to be in a spreadsheet format (with a total of ten (10) pages) begins on line 1400 (circled for clarity) and ends on line 1420 (also circled for clarity), for a total of twenty-one (21) lines, as shown here:

FileName	LineNumber	loan_id	loan_amount	first_name	last_name	social_security_number
April 2023 Resurgent Final Sale File_20230425	1400	[Redacted]8190	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1401	[Redacted]8533	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1402	[Redacted]7929	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1403	[Redacted]9797	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1404	[Redacted]0290	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1405	[Redacted]7110	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1406	[Redacted]1012	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1407	[Redacted]2426	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1408	[Redacted]6586	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1409	[Redacted]4785	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1410	[Redacted]	12000	DAVE	SALMON	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1411	[Redacted]4864	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1412	[Redacted]5410	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1413	[Redacted]5383	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1414	[Redacted]5349	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1415	[Redacted]5938	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1416	[Redacted]8037	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1417	[Redacted]2707	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1418	[Redacted]5053	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1419	[Redacted]5051	[Redacted]	[Redacted]	[Redacted]	[Redacted]
April 2023 Resurgent Final Sale File_20230425	1420	[Redacted]5151	[Redacted]	[Redacted]	[Redacted]	[Redacted]

79. The top row has headings, such as "FileName" and "LineNumber," which demonstrates that "freeze top row" was applied, thereby preserving the heading row for each printed page.

80. Additionally, when a spreadsheet (such as Microsoft® Excel®) is printed to either paper or PDF format, all of the rows are printed sequentially, starting with row "1" and ending with the last row on the spreadsheet.

81. If a single page is too small to contain all of the rows, then a printout of a spreadsheet will continue from page-to-page with each subsequent page starting with a row number that succeeds the last row number of the prior page.

82. Thus, for example, if there are thirty (30) rows printed per page, then the first (1st) page will span rows 1 through 30 (inclusive of rows 1 and 30), the second (2nd) page will span rows 31 through 60 (inclusive of rows 31 and 60), the third (3rd) page will span rows 61 through 90 (inclusive of rows 61 and 90), and so on, until all of the rows in the spreadsheet are printed.

83. Of course, it is possible for the very last page of the document may have fewer rows than the prior pages because the total number of entries in a spreadsheet may not be a clean

multiple of the number of rows on each page.

84. Thus, if twenty-one (21) lines are printed on a single page (as it appears to be the case for the Manufactured Printout), then the first page would have rows 1 through 21 (inclusive of rows 1 and 21), the second page would have rows 22 through 42 (inclusive of rows 22 and 42), the third page would have rows 43 through 63 (inclusive of rows 43 and 63), and so on.

85. Ultimately, for a 21 lines-per-page printing, the 67th page would begin on line 1387 and end on line 1407, while the 68th page would begin on line 1408 and end on line 1428.

86. The following mathematical calculation shows why the 67th page would begin on line 1387:

$(66 \text{ pages} \times 21 \text{ lines-per-page}) + 1 \text{ line (for the beginning of the next page)} = \text{line 1387.}$

87. In other words, in the absence of any altering, destroying, concealing, removing, or otherwise tampering, a printout of a spreadsheet with 21 lines-per-page cannot have a page that begins with line 1400.

88. Instead, a 21-lines-per-page printout would have a page that begins at line 1387 and ends at line 1407 (inclusive of line 1387 and line 1407) or a page that begins at line 1408 and ends at line 1428 (inclusive of line 1408 and line 1428).

89. However, LVNV's Manufactured Printout with twenty-one (21) lines begins at line 1400 and ends at line 1420.

90. There is no reasonable explanation for why LVNV's Manufactured Printout begins at line 1400.

91. Ultimately, our conclusion (based on education, training, and experience), which we can state with at least a reasonable degree of certainty, is that the Manufactured Printout is a document that has been altered, destroyed (to some level), concealed (to some level), or

otherwise tampered with in such a way that it has impaired the Manufactured Printout's value or availability as evidence.

92. That altering, destroying, concealing, or otherwise tampering with the Manufactured Printout was done either manually or by a computer program that was specifically designed to print twenty-one (21) lines per page to make it appear as if it was a portion of a larger total printout.

93. We have observed this same type of altering, destroying, concealing, or otherwise tampering with evidence in other LVNV cases.

94. If LVNV provides an unmodified electronic copy of the original electronic or computer file, with metadata intact, then we are confident that we can demonstrate why it is highly unlikely (if not impossible) to print LVNV's Manufactured Printout as produced, unless there has been some altering, destroying, concealing, removing, or otherwise tampering with the Manufactured Printout.

Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Second Opinion - The Manufactured Printout Is Not a Redacted Version of an Original Spreadsheet But, Rather, a Spreadsheet in Which Specific Cells Have Been Deliberately Altered, Either Manually or Through a Computer Program That Was Specifically Designed to Alter Information Within Cells

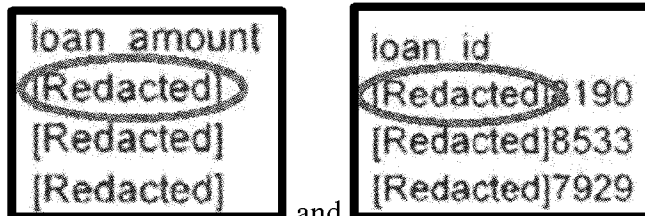
95. Our second (2nd) opinion is that the Manufactured Printout has been deliberately altered, either manually or through a computer program that was designed to alter information within a cell.

96. We arrive at this conclusion because there are inconsistencies within the document that cannot be reasonably explained.

97. For example, there are at least two (2) different types of redactions.

98. Examples of these different types of redactions are shown here (circled for

clarity):



99. The first type of alleged redaction is an entire cell being replaced by a text string that recites "[Redacted]" (as shown above on the left).

100. The second type of alleged redaction is part of the cell reciting "[Redacted]" followed by a four (4) digit number (e.g., "[Redacted]8533") (as shown above on the right).

101. We find it peculiar (and not reasonably explainable) that there are inconsistent types of redactions in a single document.

102. Having used spreadsheets for several decades, and being familiar with how spreadsheets operate based on our experience, education, and training, we are not aware of any provision or formula (for example, native to Microsoft® Excel®) that redacts a cell by replacing its contents with "[Redacted]" (whether completely or partially).

103. In other words, we are not aware of any redaction features that display a cell as "[Redacted]" unless the cell has been specifically populated with a text entry of "[Redacted]."

104. We are aware of only one (1) way in which a cell can be displayed with "[Redacted]" in the cell, which is by inserting the text "[Redacted]" in the cell (whether completely or partially).

105. Based on our experience, education, and training, all of the cells with entries that show "[Redacted]" were either manually populated with "[Redacted]" or a computer program (or a formula or a script) was used to populate those cells with "[Redacted]."

106. Thus, our second (2nd) opinion is that the Manufactured Printout is a spreadsheet

in which information in specific cells have been deliberately altered, destroyed, concealed, removed, or otherwise tampered with to have different formats for the same data types.

107. That deliberate alteration, destruction, concealment, removal, or otherwise tampering of the contents of certain cells was done either manually or through a computer program that was specifically designed to alter the information within those particular cells.

108. If LVNV provides an unmodified electronic copy, with metadata intact, then we are confident that the underlying data will demonstrate altering, destroying, concealing, removing, or otherwise tampering of the Manufactured Printout.

Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Third Opinion - The "Data Tape" Named "April 2023 Resurgent Final Sale File_20230425.xlsx" Referenced in "Schedule 1 to the Bill of Sale Dated April 26, 2023" Cannot Be the "Receivable File dated April 19, 2023" Referenced in the "Transfer and Assignment"

109. Our third (3rd) opinion is that the "Data Tape named April 2023 Resurgent Final Sale File_20230425.xlsx" referenced in "Schedule 1 to the Bill of Sale Dated April 26, 2023" cannot be the "Exhibit A, in the Receivable File dated April 19, 2023" referenced in the alleged "Transfer and Assignment" document.

110. The basis of our opinion is that the "April 26, 2023" is a different date than "April 19, 2023."

111. Here, the alleged "Bill of Sale and Assignment" shows:

EXHIBIT A

BILL OF SALE AND ASSIGNMENT

For value received and pursuant to the terms and conditions of the Purchase and Sale Agreement dated as of this 27th day of June, 2019, Avant, LLC, on behalf of the entities listed in Schedule 1 attached hereto (collectively, "Seller"), hereby assigns effective as of April 26, 2023 and all of Seller's rights, title and interest in and to those certain charged-off loans and/or related participation interests and all related receivables, judgments or evidences of debt described in Schedule 1 attached hereto and made part hereof for all purposes to RESURGENT ACQUISITIONS LLC ("Purchaser").

AVANT, LLC,
as Servicer and attorney-in-fact

By:  _____

Date: 04-26-2023

Title: Chief Operating Officer

112. The alleged "Schedule 1" shows:

SCHEDULE I TO THE BILL OF SALE DATED April 26, 2023

The Accounts included in this Schedule are sold by or on behalf of the following Sellers, as indicated in the Data Tape referenced below:

AVANT II, LLC
AVANT LOANS FUNDING UNDERLYING TRUST 2021-REV1
AVANT LOANS FUNDING UNDERLYING TRUST 2022-REV1
AVANT OF LOUISIANA, LLC
AVANT OF NEVADA, LLC
AVANT OF NEW JERSEY, LLC
AVANT OF OREGON, LLC
AVANT WAREHOUSE TRUST I
NBSF 2018-2, SERIES 2019-1
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2020-3
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2021-2
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2021-3
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2021-4
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2022-1
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2022-2
PAGAYA AI DEBT SELECTION GRANTOR TRUST 2022-3
PAGAYA FUNDING TRUST II

The Data Tape named "April 2023 Resurgent Final Sale File_20230425.xlsx" provided to the Buyer on or about April 25, 2023, is hereby included by reference.

113. The alleged "Transfer and Assignment" shows:

Transfer and Assignment

Resurgent Acquisitions LLC ("RALLC"), without recourse, to the extent permitted by applicable law, hereby transfers, sells, assigns, conveys, grants and delivers to LVNV Funding LLC ("LVNV") all of its right, title and interest in and to the receivables and other assets (the "Assets") identified on Exhibit A, in the Receivable File dated April 19, 2023 delivered by Avant II, LLC, Avant Loans Funding Underlying Trust 2021-REV1, Avant Loans Funding Underlying Trust 2022-REV1, Avant of Louisiana, LLC, Avant of Nevada, LLC, Avant of New Jersey, LLC, Avant of Oregon, LLC, Avant Warehouse Trust I, NBSF 2018-2, Series 2019-1, Pagaya AI Debt Selection Grantor Trust 2020-3, Pagaya AI Debt Selection Grantor Trust 2021-2, Pagaya AI Debt Selection Grantor Trust 2021-3, Pagaya AI Debt Selection Grantor Trust 2021-4, Pagaya AI Debt Selection Grantor Trust 2022-1, Pagaya AI Debt Selection Grantor Trust 2022-2, Pagaya AI Debt Selection Grantor Trust 2022-3, Pagaya Funding Trust II on April 26, 2023 for purchase by RALLC on April 26, 2023. The transfer of the Assets included electronically stored business records.

114. The alleged "Exhibit A" shows:

Exhibit A

Receivables File
04.26.23 April 2023 Resurgent Final Sale File_20230425

Transfer Group	Portfolio	Transfer Batch
910080	41675	N/A

115. Ultimately, the alleged transfers reference two (2) separate transfer documents, each with its own date (namely, a first document dated 2023-Apr-19 and a second document dated 2023-Apr-25).

116. The same document cannot have two (2) different dates.

117. Consequently, our third (3rd) opinion is that there must be two (2) separate electronic files (one dated 2023-Apr-19 and another dated 2023-Apr-25).

Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Fourth Opinion - The Chain of Title Is Broken Because "Avant, LLC" Is a Different Entity Than "Avant II, LLC," "Avant Loans Funding Underlying Trust 2021-Rev1," Avant Loans Funding Underlying Trust 2022-Rev1," "Avant of Louisiana, LLC," "Avant of Nevada, LLC," "Avant of New Jersey, LLC," "Avant of Oregon, LLC," or "Avant Warehouse Trust I."

118. Our fourth (4th) opinion is that the chain of title is broken because there is no document that evidences any transfer from either Avant, LLC or WebBank.

119. The documents attached to LVNV's Complaint include an alleged "Loan Agreement and Promissory Note":

Loan Agreement and Promissory Note

120. According to the alleged "Loan Agreement and Promissory Note," the "Lender/Creditor" is "WebBank" (as shown here):

WebBank, an FDIC-insured, state-chartered industrial bank headquartered in Salt Lake City, Utah, identified above as Lender/Creditor ("WebBank") is the lender of this loan ("Loan"). In this Loan Agreement and Promissory Note ("Note" or "Agreement"), the words "you," "your"

121. That same "Loan Agreement and Promissory Note" alleges that the loan will be serviced by "Avant, LLC" (as shown here):

into Your Bank Account as defined below and \$0.00 of the Amount Financed is paid with respect to your existing loan serviced by Avant, LLC ("Avant") and (b) you promise to pay to us (i) the Principal Loan Amount of \$12000.00; (ii) simple interest, which accrues daily on the

122. To be clear, the alleged "Loan Agreement and Promissory Note" expressly identifies "Avant, LLC" (not any other entity with "Avant" in its name), as shown here:

Avant, LLC

Avant, LLC, PO Box 9183380, Chicago, Illinois

123. Consequently, the only entities that have any right to take any action under the

alleged "Loan Agreement and Promissory Note" are either WebBank or Avant, LLC.

124. On its face, the alleged "Bill of Sale and Assignment" states that "Avant, LLC" is acting "on behalf of the entities listed in Schedule 1."

125. The alleged "Schedule 1" does not list "Avant, LLC" itself or WebBank, but instead lists seventeen (17) other legal entities (none of which are either Avant, LLC or WebBank).

126. To be clear, the alleged "Schedule 1" recites a number of other entities that include "Avant" in the name, but not the actual "Avant, LLC" entity and none which appear to be a Chicago, Illinois, entity:

AVANT II, LLC
AVANT LOANS FUNDING UNDERLYING TRUST 2021-REV1
AVANT LOANS FUNDING UNDERLYING TRUST 2022-REV1
AVANT OF LOUISIANA, LLC
AVANT OF NEVADA, LLC
AVANT OF NEW JERSEY, LLC
AVANT OF OREGON, LLC
AVANT WAREHOUSE TRUST I

127. Similarly, "Avant, LLC" itself is not mentioned in the alleged "Transfer and Assignment":

Resurgent Acquisitions LLC ("RALLC"), without recourse, to the extent permitted by applicable law, hereby transfers, sells, assigns, conveys, grants and delivers to LVNV Funding LLC ("LVNV") all of its right, title and interest in and to the receivables and other assets (the "Assets") identified on Exhibit A, in the Receivable File dated April 19, 2023 delivered by Avant II, LLC, Avant Loans Funding Underlying Trust 2021-REV1, Avant Loans Funding Underlying Trust 2022-REV1, Avant of Louisiana, LLC, Avant of Nevada, LLC, Avant of New Jersey, LLC, Avant of Oregon, LLC, Avant Warehouse Trust I, NBSF 2018-2, Series 2019-1, Pagaya AI Debt Selection Grantor Trust 2020-3, Pagaya AI Debt Selection Grantor Trust 2021-2, Pagaya AI Debt Selection Grantor Trust 2021-3, Pagaya AI Debt Selection Grantor Trust 2021-4, Pagaya AI Debt Selection Grantor Trust 2022-1, Pagaya AI Debt Selection Grantor Trust 2022-2, Pagaya AI Debt Selection Grantor Trust 2022-3, Pagaya Funding Trust II on April 26, 2023 for purchase by RALLC on April 26, 2023. The transfer of the Assets included electronically stored business records.

128. Rather, the alleged "Transfer and Assignment" recites the same entities in the alleged "Schedule 1" that had "Avant" in their names (but not "Avant, LLC" itself).

129. Thus, the alleged "Transfer and Assignment" does not transfer any assets that have any relation to either WebBank or "Avant, LLC."

130. In other words, "Avant, LLC" is not a party to the alleged "Bill of Sale and Assignment."

131. Similarly, "Avant, LLC" is not a party to the alleged "Transfer and Assignment."

132. Ultimately, there are no documents that evidence any transfers at all from either WebBank or "Avant, LLC."

Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Fifth Opinion - The Alleged "Bill of Sale and Assignment" Is Incomplete Because It is an Exhibit and Begins on Page 19 (With None of Pages 1 Through 18 Being Provided)

133. Our fifth (5th) opinion is that the alleged "Bill of Sale and Assignment" is incomplete because it is an exhibit (presumably to another primary document) and there appear to be eighteen (18) pages missing from the document.

134. Here, the alleged "Bill of Sale and Assignment" is designated as "Exhibit A" (as shown here and circled for clarity):



135. An exhibit (especially in a legal document) is attached to a primary document.

136. There is no primary document (for which the "Bill of Sale and Assignment" was an "Exhibit") in the record.

137. Next, at the bottom of the alleged "Bill of Sale and Assignment" appears a page

number 19 (the entire page is shown here and the page number at the bottom is circled for clarity):

EXHIBIT A

BILL OF SALE AND ASSIGNMENT

For value received and pursuant to the terms and conditions of the Purchase and Sale Agreement dated as of this 27th day of June, 2019, Avant, LLC, on behalf of the entities listed in Schedule I attached hereto (collectively, "Seller"), hereby assigns effective as of April 26, 2023 and all of Seller's rights, title and interest in and to those certain charged-off loans and/or related participation interests and all related receivables, judgments or evidences of debt described in Schedule I attached hereto and made part hereof for all purposes to RESURGENT ACQUISITIONS LLC ("Purchaser").

AVANT, LLC,
as Servicee and attorney-in-fact

By: [Signature]

Date: 04-26-2023

Title: Chief Operating Officer

19

138. Page 19 necessarily follows after eighteen (18) previous pages.

139. None of those previous eighteen (18) pages exist in the record.

140. Because neither the primary document (for the exhibit) nor the prior 18 pages (preceding the 19th page) are in the record, the alleged "Bill of Sale and Assignment" is incomplete.

141. Consequently, the chain of title is incomplete.

Substance of Report Under Ohio Civ. R. 26(B)(7)(c): Sixth Opinion - The Chain of Title Is Incomplete Because There Is an Alleged "Purchase and Sale Agreement Dated as of This 27th Day of June, 2019" That Is Missing from the Record

142. Our sixth (6th) opinion is that the chain of title is incomplete because there is an alleged "Purchase and Sale Agreement dated as of this 27th day of June, 2019," which expressly referenced in the alleged "Bill of Sale and Assignment" but missing from the record.

143. The significance of the "Purchase and Sale Agreement" is that the "Bill of Sale and Assignment" is executed "pursuant to the terms and conditions of the Purchase and Sale Agreement" (as shown here and underlined for clarity):

For value received and pursuant to the terms and conditions of the Purchase and Sale Agreement dated as of this 27th day of June, 2019, Avant, LLC, on behalf of the entities listed in Schedule I attached hereto (collectively, "Seller"), hereby assigns effective as of April 26, 2023 and all of Seller's rights, title and interest in and to those certain charged-off loans and/or related participation interests and all related receivables, judgments or evidences of debt described in Schedule I attached hereto and made part hereof for all purposes to RESURGENT ACQUISITIONS LLC ("Purchaser").

144. Because the alleged "Bill of Sale and Assignment" is subject "to the terms and conditions of the Purchase and Sale Agreement dated as of this 27th of June, 2019," the terms and conditions of that "Purchase and Sale Agreement" are necessarily a part of the alleged "Bill of Sale and Assignment."

145. There is no "Purchase and Sale Agreement" in the record, thereby making the documentation for the chain of title incomplete.

Concluding Remarks

146. If original, unmodified electronic documents are provided for review, then we can provide a more accurate assessment of how, precisely, the documents were created, stored, transferred, or otherwise manipulated over time.

147. Even in the absence of the original, electronic files, we can (at least reasonably) conclude that one (1) or more documents are fabricated, manufactured, altered, or subjected to tampering.

148. In other words, although the production of the original, electronic files may show how the documents were fabricated, manufactured, altered, or subjected to tampering, what those original, electronic files will not be able to explain are the inconsistencies that we note herein (which cannot be reasonably explained based on how computers work).

149. Consequently, it is our opinion (based on our education, training, and experience) that the statements by LVNV that it owns an alleged debt is based on fabricated documents, modified documents, and missing documents, all of which constitute false and misleading statements.

150. Additionally, we conclude that the chain of title is both broken and incomplete based on at least the following: **(a)** the missing "Purchase and Sale Agreement"; **(b)** the missing eighteen (18) pages that preceded the 19th page on which the "Bill of Sale and Assignment" was attached as an "Exhibit A"; and **(c)** an entire missing link from "Avant, LLC" (which does not appear to be the same legal entity as any of the other entities with "Avant" in its name).

151. We 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 DECLARANT SAYETH NAUGHT.

[SIGNATURE AND OATH TO FOLLOW]

Executed on 2025-JAN-14, in Dayton, Ohio.



Sam Han

(for: (a) joint portions; and (b) portions that are labeled as pertaining to Sam Han)

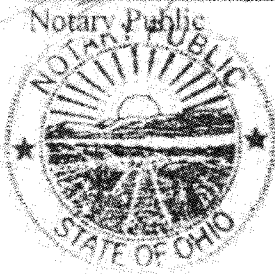
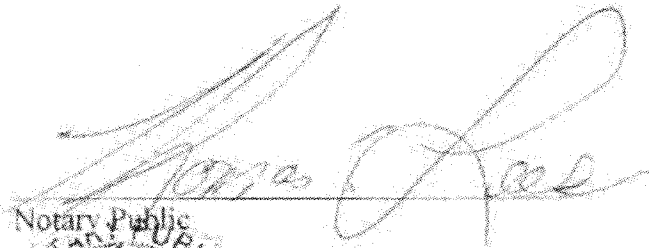


Brian Sullivan

(for: (a) joint portions; and (b) portions that are labeled as pertaining to Brian Sullivan)

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

Sworn to and subscribed in my presence this 14th day of January, 2025.



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.

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)

McChure, Qualey & Rodack, LLP, Atlanta, GA

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

-
- Appeals

Of Counsel *Thomas, Kayden, Horstemeyer, & Risley, LLP, Atlanta, GA*
(2010 - 2011)

- Patent
 - Applications
 - Responses to Office Action
 - Appeals

Adjunct Professor of Law *Indiana Institute of Technology, Fort Wayne, IN*
(2015)

- 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 *The University of Dayton, School of Law, Dayton, OH*
(2008 - 2012)

- 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 *Furukawa Electric North America, Inc. ("FENA"), Norcross, GA*
(2007 - 2008)

- 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

-
- 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

-
- 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

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- 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

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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

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)
- *Chatman 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: Prophesying 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 ^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 $p\text{O}_2$ 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.

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*

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- *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

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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

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)

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

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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