

APPENDIX A

Pre-Purchase Lies	Claim Made	Evidence Untrue
A Review Team, Board, or others at WPM will review inventor ideas.	PX 1, ¶ 4; PX 2, ¶ 3; PX 3, ¶ 3; PX 4, ¶ 4; PX 5, ¶ 3; PX 7, ¶ 4; PX 8, ¶ 2; PX 10, ¶ 3; PX 12, ¶ 5; PX 13, ¶ 7; PX 14, ¶ 3; PX 16, ¶¶ 6, 8; PX 17, ¶ 9; PX 23, ¶ 3; PX 30, ¶ 21; PX 53, Att. B, p. 3709, 3713, 3717, 3718, 3720, 3721, 3725, 3730; PX 36, ¶ 4; PX 49, ¶ 10.	There is no Review Team. PX 43, ¶ 9; PX 44, ¶¶ 6, 8; Receiver's Report ¶ 26.
WPM rejects a large portion of ideas.	PX 53, Att. B, p. 3711, 3713, 3720, 3725; PX 3, ¶3; PX 4, ¶4; PX 30, ¶ 20, PX 43, ¶9.	WPM does not reject a large portion of ideas. PX 44, ¶ 8.
WPM has been in business since 2012.	PX 53, Att. J, p. 4726 (website page from April 2014)	WPM has been in business since 2014. PX 30, ¶ 64; D.E. 32-1, ¶ 2 (Declaration of Scott Cooper)
WPM client products are sold in Walmart, Target, Lowes, HSN, The Home Depot, Walgreens, Best Buy, Sears, QVC, Toys R Us, Petco, SkyMall	PX 53, Att. J, p. 4726	WPM's client's products are not sold in brick and mortar stores. PX 27, ¶ 13; PX 52; PX 51.
The Invention Team Advisory Board participated in an advisory role at WPM.	PX 53, Att. F, p. 3822-3823; PX 27, Att. A-D, p. 2259-2293; PX 32, ¶ 6, PX 33, ¶ 5.	Some Advisory Board members did not advise the company and were not asked to review inventions. PX 48, PX 41, PX 50.

Pre-Purchase Lies	Claim Made	Evidence Untrue
<p>Certain WPM inventors are “success stories.”</p>	<p>PX 3, ¶¶ 6-7; PX 4, ¶ 2; PX 5, ¶ 4; PX 7, ¶ 3; PX 8, ¶ 4; PX 10 ¶¶ 2, 7; PX 11, ¶ 2, 9; PX 12, ¶ 3; PX 13, ¶ 5; PX 15, ¶ 5; PX 16, ¶ 4; PX 17, ¶ 6; PX 32, ¶ 5; PX 27, ¶¶ 14-37.</p>	<p>Many inventors listed as “success stories” did not receive a patent, bring their product to market, or realize financial gain as a result of working with World Patent Marketing. PX 5 ¶¶ , 26, 42, 51, 60-61; PX 7, ¶¶ 10, 36, 38, 39-40, 43; PX 9, ¶¶ 44, 76, 78, 84-86; PX 10, ¶¶ 27, 30; PX 19, Att. B, p. 2111-12; PX 31, ¶ 31; PX 38, ¶ 24-27.</p>
<p>World Patent Marketing partnered with “the man behind the \$500 million Snuggie” and “the team that grows \$500 million on 30 million Snuggies since 2009.”</p>	<p>PX 30, ¶ 60(b).</p>	<p>Allstar Marketing Group, which is behind the marketing or development of the Snuggie, has no business relationship with World Patent Marketing. PX 28, ¶¶ 3-6.</p>
<p>The History Channel did a special episode on WPM.</p>	<p>PX 3, Att. D, p. 186; PX 9, ¶¶ 38, 48-49; PX 11, Att. E, p. 1150; PX 25, ¶ 9, Att. B, pp. 2153-2167. The email contains a link stating: “Click Here To Watch World Patent Marketing On The History Channel.” A WPM sales agent told the FTC’s investigator that the History Channel did a “whole segment” on WPM and invited him to watch the video. PX 30, ¶ 15.</p>	<p>The History Channel ran an ad for World Patent Marketing once for which A&E Television Networks was paid \$17,170. PX 18, ¶¶ 2-5.</p>
<p>Consumers can pay a one-time fee for global patent protection.</p>	<p>PX 1, ¶¶ 6-7; PX 2, ¶ 7; PX 4, ¶ 9; PX 9, ¶ 14; PX 16, ¶¶ 15-16, 22; PX 17, ¶ 16-18; PX 32, ¶ 10; PX 33, ¶ 10; PX 38, ¶ 7; PX 49, ¶¶ 13-16.</p>	<p>PX 20, ¶¶ 14-17. There is a Patent Cooperation Treaty (“PCT”) application (this patent application is part of Defendants’ “global package”), which allows the filer to file one application as a placeholder for separate applications in each PCT signatory country. However, inventors then have thirty months to request and pay for a patent in each country. PX 20, ¶ 16.</p>

Pre-Purchase Lies	Claim Made	Evidence Untrue
<p>Once consumers have purchased their patent package, they will never need to pay another fee.</p>	<p>PX 1, Att. B, p. 87; PX 2, ¶ 7; PX 5, ¶ 6; PX 6, ¶ 6; PX 11, ¶11; PX 7, ¶ 6; PX 8, ¶ 23; PX 10, ¶ 11; PX 14, ¶ 6; PX 16, ¶ 16; PX 17, ¶¶ 18, 23; PX 53, Attachment B, p. 3738. WPM’s contract also states, in capital letters: “The inventor will not be held responsible for any additional expenses incurred or assessed by World Patent Marketing, other than those defined within the scope of this agreement.” <i>See, e.g.</i>, PX 1, Att. B, p. 87; PX 12, Att. D, p. 1246.</p>	<p>Sometimes inventors are asked for additional fees after they pay for their patent packages. PX 1, ¶ 20; PX 5 ¶ 18, PX 11 ¶ 23, PX 8 ¶ 23, PX 10 ¶ 18, PX 14 ¶ 14-15, PX 16 ¶ 22, PX 17 ¶ 27.</p>
<p>Particular products created by WPM inventors are now on the market or in use by members of the general public.</p>	<p>PX 27, Att. K, pp. 2432-2447, Atts. O-Q, pp. 2494-2548, Atts. S-T, pp 2553-2614, Atts V-Z, pp. 2641-2712; PX 4, ¶ 35, Att. F, p. 452-454; PX 7, ¶ 40 (<i>see</i> PX 3, Att. D, pp. 183-186 for press release); PX 8, ¶ 15, Att. D, pp. 830-832; PX 10, ¶ 30, Att. D, p. 1060; PX 13 ¶ 25, Att. I, pp. 1480-1481; PX 16, ¶ 35.</p>	<p>Many of these products are not on the market or in use by the general public. PX 1-8; PX 10-17; PX 23; PX 31-36; PX 39-40; PX 49; PX 4, ¶ 35; PX 8, ¶ 15; PX 13, ¶ 25; PX 16, ¶ 35.</p>