This complaint is based on including but not limited to: whistleblower, Whistleblower retaliation, discrimination on the basis of race, ancestry, national origin, disability, medical or healthcare-related conditions, FMLA, FMLA retaliation, Reasonable accomodations, reasonable accommodation retaliation , and the exercise of rights under federal and state law among many other things without limitations. Complainant makes no admissions and expressly reserves all rights. This document does not constitute a waiver of any claims, causes of action, or legal theories. Complainant reserves the right to amend, supplement, modify, clarify, or withdraw any part of this filing as more evidence or circumstances arise.

Supplemental Submission of Evidence & Evidentiary Exhibit_37.1-48s inking and identifying Consortium Group and other potential respondents – Whistleblower Retaliation Complaint.

Evidence & Evidentiary exhibits below is relevant for motive, intent, knowledge, patterns of human behavior and without limitations, as to specifically (identity) -- identifying and connecting particular consortium members, in a role as potential additional Respondents for the investigation beyond merely Bennett Novitch as the sole Respondent responsible for this misconduct.

Incorporated by reference, as if fully set forth herein, are all materials that have been delivered to UCLA, including but not limited to those sent by certified mail, email correspondence, and any supplemental submissions previously acknowledged or referenced in related communications or responses related to the common scheme without limitations for knowledge, intent, motive, and pattern of human behavior among other evidentiary and factual reasons without limits.

I, Harout Gulesserian, make no waivers or admissions and expressly reserve all rights, without limitation, to amend, revoke, modify, or supplement any and all provisions of this complaint, particularly as additional evidence is discovered or becomes available.

Harout K. Gulesserian
Date of Submission: May 5th, 2025
Supplemented: May 23, 2025

Supplemental Submission of Exhibit 37.1-s (Part 2): Links to Consortium Group – Whistleblower Retaliation Complaint exhibits

Submitted by:
Harout K. Gulesserian
Date of Submission: May 23, 2025

Transmitted via email and certified mail

This complaint is based on, but not limited to, the following causes of action and protected classes without limitations:

1. Whistleblower
2. Whistleblower Retaliation
3. Discrimination on the Basis of without limitations:
    - Race
    - Ancestry
    - National Origin
    - Physical Disability
    - Mental Disability
    - Genetic information
    - Medical or Healthcare-Related Conditions
    - FMLA (Family and Medical Leave Act) Rights
    - FMLA Retaliation
    - Whistleblower
    - Reasonable Healthcare Accommodations
    - Reasonable Healthcare Accommodation Retaliation
    - Wage and hour retaliation and discrimination

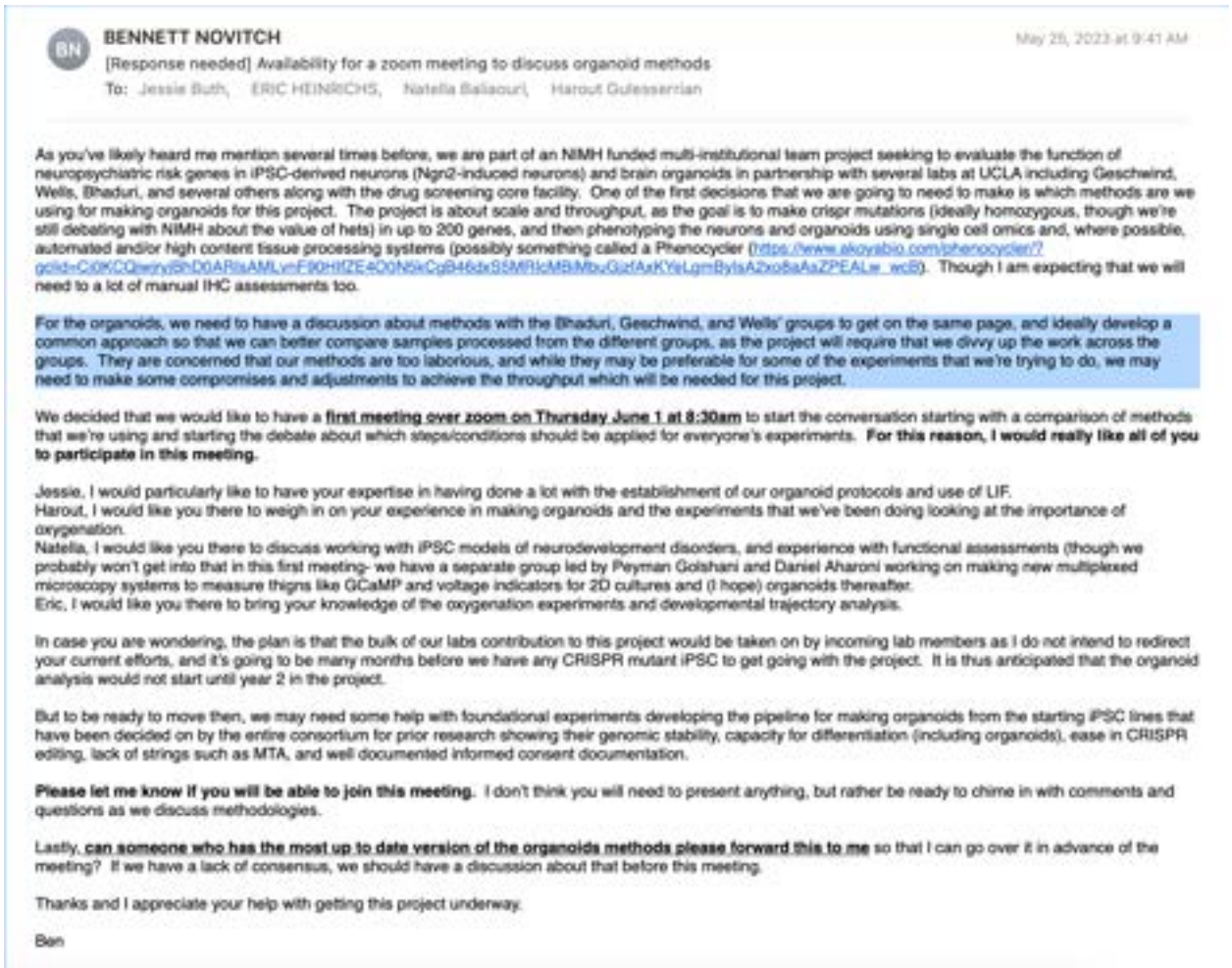
    + the discrimination, harassment, and retaliation thereof

4. The Exercise of Rights Under Federal and State Laws without limits
5. Any Other Protected Class or Claim as Stated in the Complaints or Relevant Legal Framework without limits

The complainant, Gulesserian, makes no admissions and expressly reserves all rights. This document does not constitute a waiver of any claims, causes of action, or legal theories. The complainant reserves the right to amend, supplement, modify, clarify, or withdraw any part of this filing as more evidence or circumstances arise.

Evidence & Evidentiary Exhibit 37.1

Original consortium-related email dated May 23, 2023, in which Dr. Bennett Novitch identifies key project members, including the organoid **consortium team** (Bhaduri, Geschwind, Wells). Dr. Novitch expressed concerns regarding the methodology and requested the most updated protocol for review prior to a scheduled meeting. Novitch goes on to state … " they are concerned our methods are too laborious…" (referencing "N.P." aka "Novitch Protocol" and NOT the serendipitous accidental novel Gulesserian Protocol because the serendipitous accidental Gulesserian Protocol was not yet invented (invented on 9/11/2023) at the time of this instant referenced email below). In the last paragraph Bennett Novitch goes on to state "can someone with the most up to date version of the organoids methods please forward this to me so that I can go over it in advance of the meeting."



BENNETT NOVITCH May 25, 2023 at 9:41 AM

[Response needed] Availability for a zoom meeting to discuss organoid methods

To: Jessie Buth, ERIC HEINRICHS, Natella Baiaouri, Harout Gulesserian

As you've likely heard me mention several times before, we are part of an NIMH funded multi-institutional team project seeking to evaluate the function of neuropsychiatric risk genes in iPSC-derived neurons (Ngn2-induced neurons) and brain organoids in partnership with several labs at UCLA including Geschwind, Wells, Bhaduri, and several others along with the drug screening core facility. One of the first decisions that we are going to need to make is which methods are we using for making organoids for this project. The project is about scale and throughput, as the goal is to make crispr mutations (ideally homozygous, though we're still debating with NIMH about the value of hets) in up to 200 genes, and then phenotyping the neurons and organoids using single cell omics and, where possible, automated and/or high content tissue processing systems (possibly something called a Phenocycler (https://www.akoyabio.com/phenocycler/?gclid=Cj0KCQjwqrvjBhD0ARIsAMLvnF90HfZE4O0N9xCgB46dx9SMRIcMBiMbuGizfAaKYeLgmBytsA2xo8aAaZPEALw_wcB). Though I am expecting that we will need to a lot of manual IHC assessments too.

For the organoids, we need to have a discussion about methods with the Bhaduri, Geschwind, and Wells' groups to get on the same page, and ideally develop a common approach so that we can better compare samples processed from the different groups, as the project will require that we divvy up the work across the groups. They are concerned that our methods are too laborious, and while they may be preferable for some of the experiments that we're trying to do, we may need to make some compromises and adjustments to achieve the throughput which will be needed for this project.

We decided that we would like to have a **first meeting over zoom on Thursday June 1 at 8:30am** to start the conversation starting with a comparison of methods that we're using and starting the debate about which steps/conditions should be applied for everyone's experiments. **For this reason, I would really like all of you to participate in this meeting.**

Jessie, I would particularly like to have your expertise in having done a lot with the establishment of our organoid protocols and use of LIF.
Harout, I would like you there to weigh in on your experience in making organoids and the experiments that we've been doing looking at the importance of oxygenation.
Natella, I would like you there to discuss working with iPSC models of neurodevelopment disorders, and experience with functional assessments (though we probably won't get into that in this first meeting- we have a separate group led by Peyman Golshani and Daniel Aharoni working on making new multiplexed microscopy systems to measure things like GCaMP and voltage indicators for 2D cultures and (I hope) organoids thereafter.
Eric, I would like you there to bring your knowledge of the oxygenation experiments and developmental trajectory analysis.

In case you are wondering, the plan is that the bulk of our labs contribution to this project would be taken on by incoming lab members as I do not intend to redirect your current efforts, and it's going to be many months before we have any CRISPR mutant iPSC to get going with the project. It is thus anticipated that the organoid analysis would not start until year 2 in the project.

But to be ready to move then, we may need some help with foundational experiments developing the pipeline for making organoids from the starting iPSC lines that have been decided on by the entire consortium for prior research showing their genomic stability, capacity for differentiation (including organoids), ease in CRISPR editing, lack of strings such as MTA, and well documented informed consent documentation.

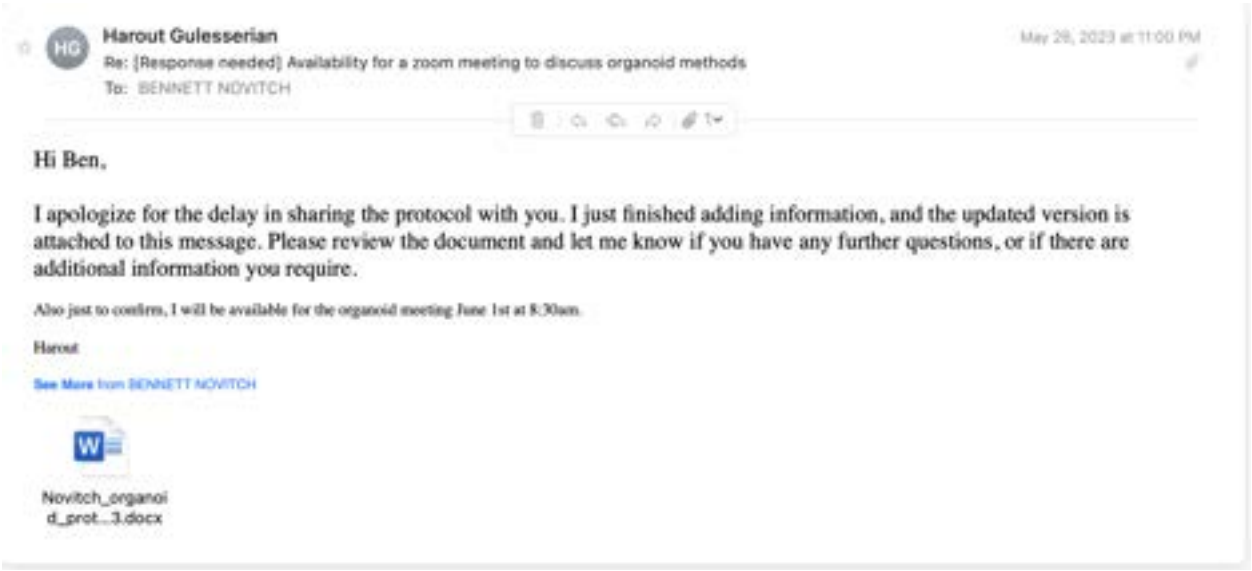
Please let me know if you will be able to join this meeting. I don't think you will need to present anything, but rather be ready to chime in with comments and questions as we discuss methodologies.

Lastly, **can someone who has the most up to date version of the organoids methods please forward this to me** so that I can go over it in advance of the meeting? If we have a lack of consensus, we should have a discussion about that before this meeting.

Thanks and I appreciate your help with getting this project underway.

Ben

Evidence & Evidentiary Exhibit 37.2 ***On May 26, 2023, Mr. Harout Gulesserian forwarded the current "too laborious" Novitch Protocol from Dr. Novitch's lab to Dr. Novitch himself. At that time, Gulesserian's own serendipitous novel accidental protocol had not yet been developed (See ACOP Manuscript 9/11/2023). The forwarded protocol differs from Mr. Gulesserian's later novel serendipitous accidental discovery (See ACOP manuscript(s) forwarded to UCLA TDG).***



Harout Gulesserian

May 26, 2023 at 11:00 PM

Re: [Response needed] Availability for a zoom meeting to discuss organoid methods

To: BENNETT NOVITCH

Hi Ben,

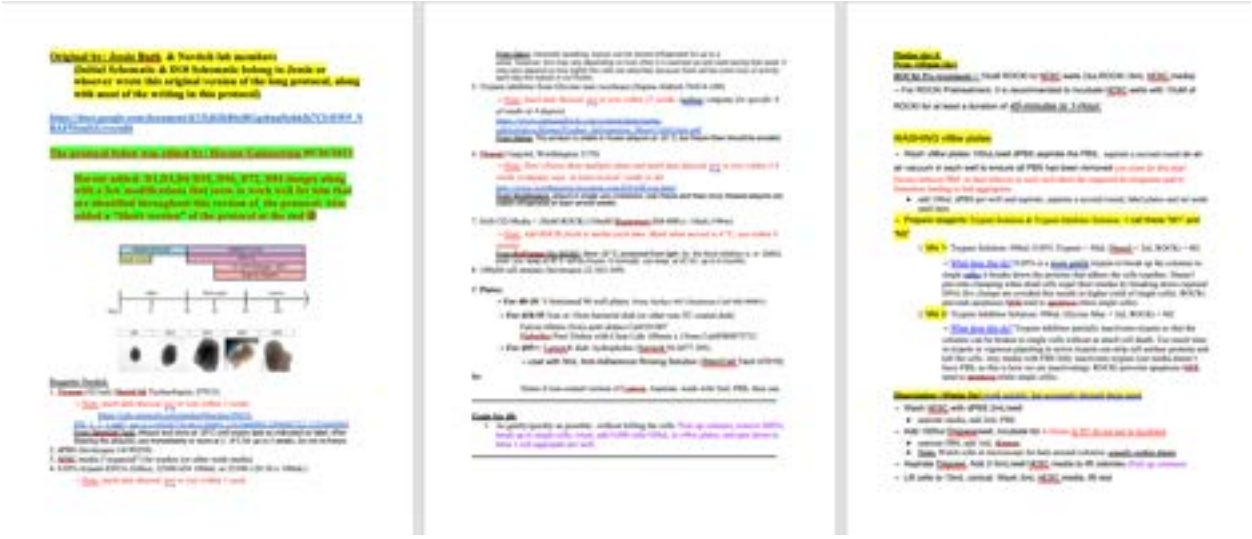
I apologize for the delay in sharing the protocol with you. I just finished adding information, and the updated version is attached to this message. Please review the document and let me know if you have any further questions, or if there are additional information you require.

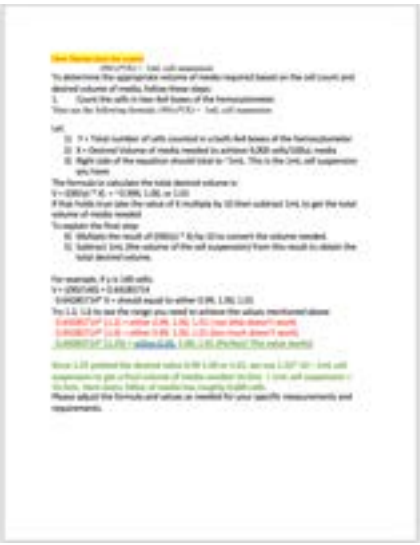
Also just to confirm, I will be available for the organoid meeting June 1st at 8:30am.

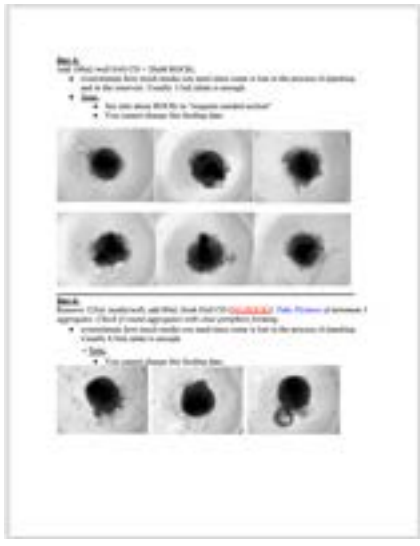
Harout

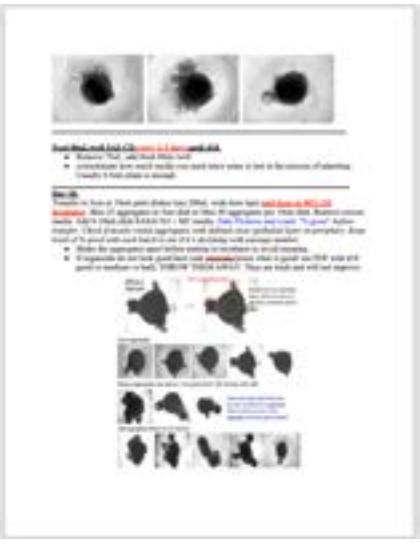
See More from BENNETT NOVITCH

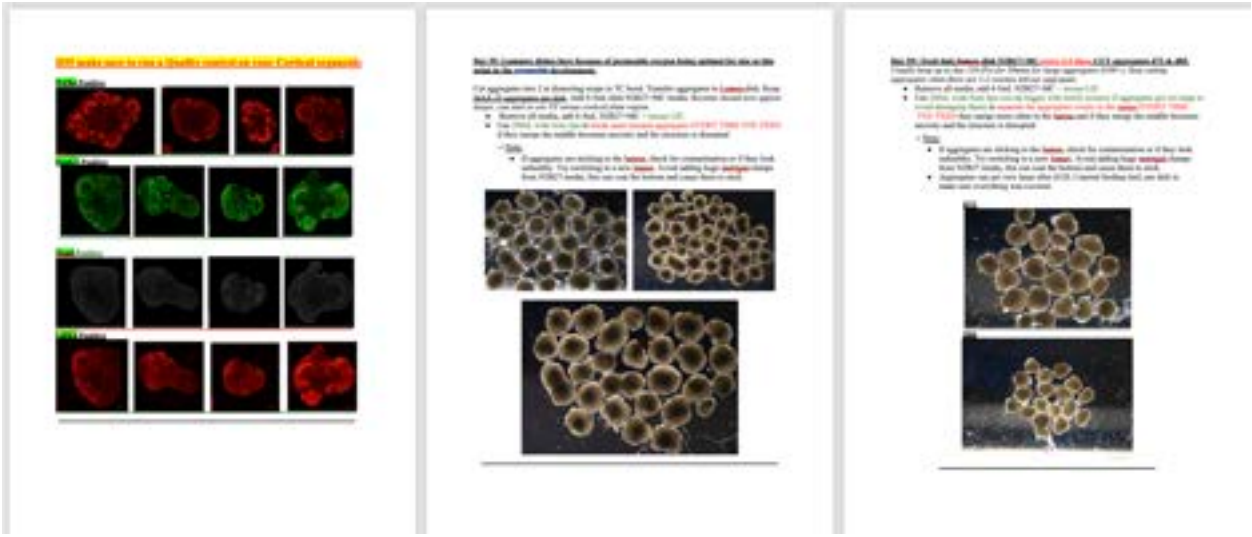
Novitch_organoid_prot...3.docx











Evidence & Evidentiary Exhibit 37.3 ***Dr. Bennett Novitch identifies Mr. Gulesserian as the first individual working on the relevant cell line in the lab. At this point basically, Gulesserian's protocol had not been invented/established yet. Why is this important, because if one looks at exhibit 37.2 uses Novitch old protocol (one NOT accidentally created or invented by Gulesserian until September 11, 2023) lacks Gulesserians discovery and procedures. This is confirmed by the email exhibit 37.1 where there is no Cendi Ling on that 37.1 email exhibit therefore tending to show that Cendi Ling was NOT a part of the Harout Protocol (See exhibit 37.1 37.38, 37.40, nor did Ling contribute to it what so ever).***

Novitch, Bennett
Re: We received KOLF2.1J cell line
To: Wojta, Kevin J., Martin, Jacqueline M., Cc: Harout Gulesserian
July 5, 2023 at 2:23 PM
Details

Siri found new contact info Bennett Novitch bnovitch@mednet.ucla.edu
add...

Hi Kevin and Jacqui,

I wanted to check in on how things are going with the KOLF2.1J iPSC line and when you project that you may be wanting to pass some off to us. I've cc'd in Harout Gulesserian, who will be the person in my lab who work first work with them.

Also, what are your iPSC growth/maintenance conditions? We probably should expand in our lab the same way for the first passage or two before trying our standard conditions.

Thanks.

Ben

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

Phone (office): 310-794-9339
Phone (lab): 310-825-7565
Fax: 310-825-2224
Email: bnovitch@ucla.edu
Web: http://novitchlab.com

Evidence & Evidentiary Exhibits 37.4 – 37.5

Documentation of consortium group meetings discussing culture protocols and conditions, with core contributors participating.

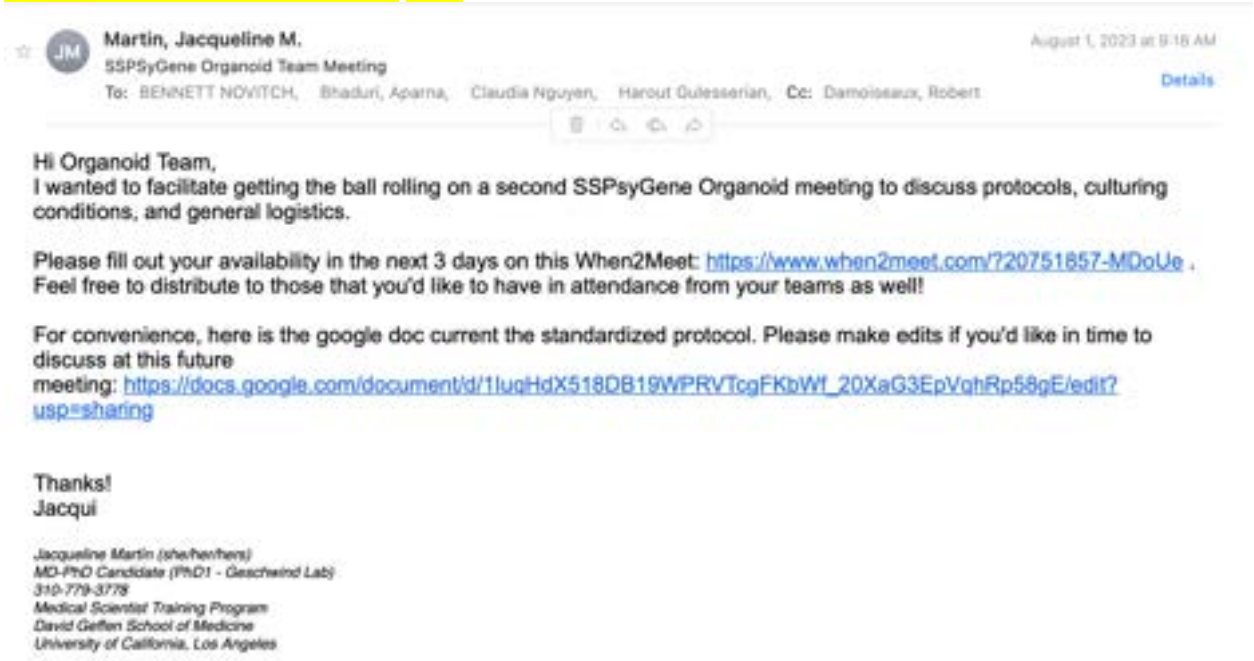
Martin, Jacqueline M.
SSPSyGene Organoid Meeting
To: BENNETT NOVITCH, Bhaduri, Aparna, mattli7@g.ucla.edu, Claudia Nguyen, Harout Gulesserian
August 3, 2023 at 4:41 PM

https://uclahs.zoom.us/j/4974629217

UCLA HEALTH SCIENCES IMPORTANT WARNING: This email (and any attachments) is only intended for the use of the person or entity to which it is addressed, and may contain information that is privileged and confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Unauthorized redisclosure or failure to maintain confidentiality may subject you to federal and state penalties. If you are not the intended recipient, please immediately notify us by return email, and delete this message from your computer.

Mail Attachment

Evidence & Evidentiary Exhibit 37.5



Martin, Jacqueline M.
SSPSyGene Organoid Team Meeting
To: BENNETT NOVITCH, Bhaduri, Aparna, Claudia Nguyen, Harout Gulesserian, Cc: Damoiseaux, Robert

August 1, 2023 at 9:16 AM
Details

Hi Organoid Team,
I wanted to facilitate getting the ball rolling on a second SSPsyGene Organoid meeting to discuss protocols, culturing conditions, and general logistics.

Please fill out your availability in the next 3 days on this When2Meet: https://www.when2meet.com/?20751857-MDoUe .
Feel free to distribute to those that you'd like to have in attendance from your teams as well!

For convenience, here is the google doc current the standardized protocol. Please make edits if you'd like in time to discuss at this future
meeting: https://docs.google.com/document/d/1IuqHdX518DB19WPRVTcgFKbWf_20XaG3EpVqhRp58gE/edit?usp=sharing

Thanks!
Jacqui

Jacqueline Martin (she/her/hers)
MD-PhD Candidate (PhD1 - Geschwind Lab)
310-779-3778
Medical Scientist Training Program
David Geffen School of Medicine
University of California, Los Angeles

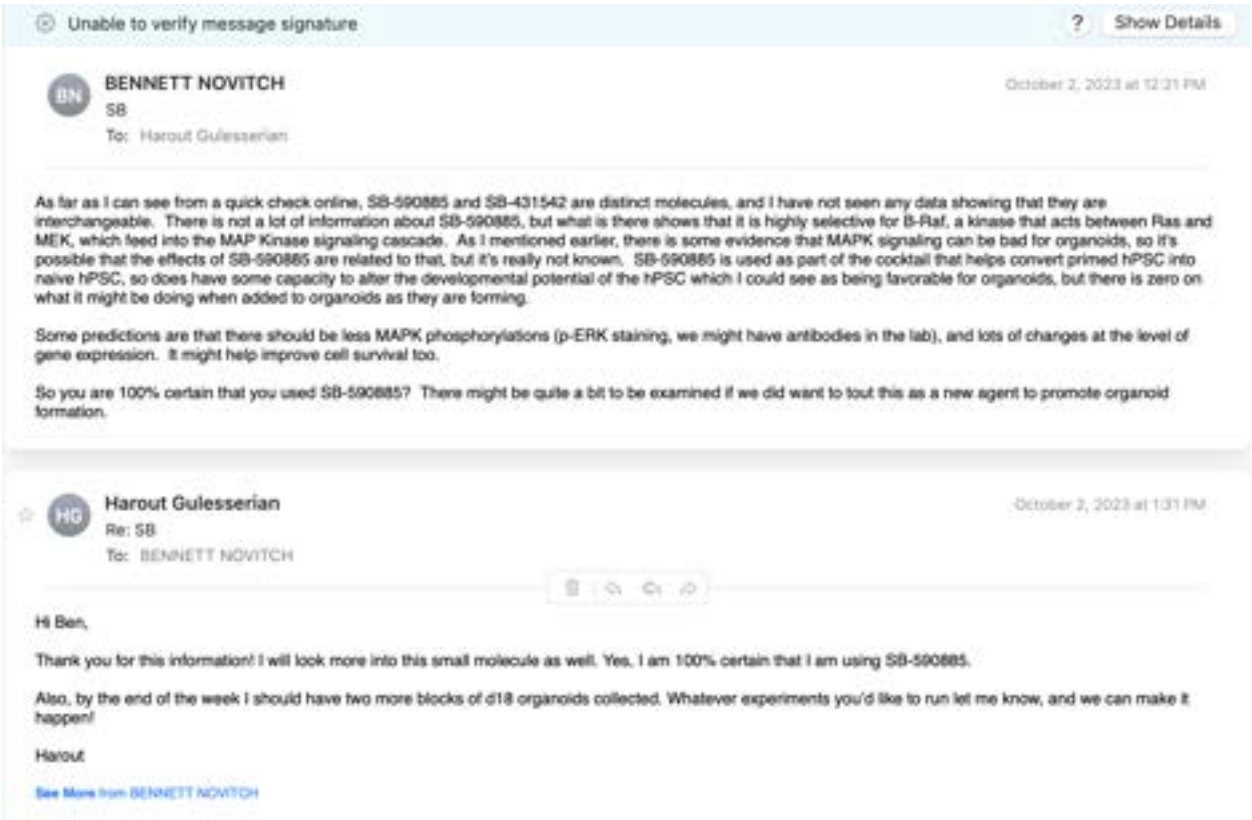
Evidence & Evidentiary Exhibit_37 6

Inventor/Creator Gulesserian establishes ACOP discovery by a laboratory accident and as such Gulesserian creates and invents a novel never before used or seen protocol on 9/11/2023 in the UCLA laboratory.

Evidence & Evidentiary Exhibit_37 7

Inventor/Creator Gulesserian Disclosed his accidental novel serendipitous discovery to Supervisor Bennett Novitch 9/29/2023

Evidence & Evidentiary Exhibit 37.8 ***Instead of following formal procedures, Dr. Novitch allegedly attempted to begin a false narrative with the full knowledge, intent and motive to misrepresent the accidental "mistake" serendipitous nature of the Gulesserian made USA discovery and subsequent novel new invention/creation as Novitch begins the planned false narrative to reframe the origin of the discovery and then further going on intentionally precluding any legally duty bound reporting as Novitch goes on to essentially intentionally thwart and ensure failure to disclose and report the new invention/patentable discovery to the university and its stakeholders (without limitation the Federal United States Government). Instead, rather Novitch in writing tries and goes forward on to falsify the origin of the novel discovery, which likely in part is owned by the US government .***



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BENNETT NOVITCH
SB
To: Harout Gulesserian
October 2, 2023 at 12:21 PM

As far as I can see from a quick check online, SB-590885 and SB-431542 are distinct molecules, and I have not seen any data showing that they are interchangeable. There is not a lot of information about SB-590885, but what is there shows that it is highly selective for B-Raf, a kinase that acts between Ras and MEK, which feed into the MAP Kinase signaling cascade. As I mentioned earlier, there is some evidence that MAPK signaling can be bad for organoids, so it's possible that the effects of SB-590885 are related to that, but it's really not known. SB-590885 is used as part of the cocktail that helps convert primed hPSC into naive hPSC, so does have some capacity to alter the developmental potential of the hPSC which I could see as being favorable for organoids, but there is zero on what it might be doing when added to organoids as they are forming.

Some predictions are that there should be less MAPK phosphorylations (p-ERK staining, we might have antibodies in the lab), and lots of changes at the level of gene expression. It might help improve cell survival too.

So you are 100% certain that you used SB-590885? There might be quite a bit to be examined if we did want to tout this as a new agent to promote organoid formation.

Harout Gulesserian
Re: SB
To: BENNETT NOVITCH
October 2, 2023 at 1:31 PM

Hi Ben,

Thank you for this information! I will look more into this small molecule as well. Yes, I am 100% certain that I am using SB-590885.

Also, by the end of the week I should have two more blocks of d18 organoids collected. Whatever experiments you'd like to run let me know, and we can make it happen!

Harout

See More from BENNETT NOVITCH

BENNETT NOVITCH

Re: SB

To: Harout Gulesserian

October 2, 2023 at 3:08 PM

Getting back to the idea about publishing the protocol, if this pans out, and the effects are reproducible and applicable to other cell lines, there will be a few things to assess if we wanted to publish. These include:

1. Are the effects of SB-590885 related to B-Raf signaling, or something else? This would entail testing other inhibitors of B-Raf, as well as downstream effectors of B-Raf including MEK (via MEK/ERK inhibitors like PD98059 and PD0325901), or maybe something upstream like FGF receptor inhibitors like PD-173074. There was a paper that came out in 2022 arguing that treatment of feeder-free hPSC with PD-173074 can allow feeder-free cells to make organoids (https://www.cell.com/iscience/pdf/S2589-0042(22)01412-2.pdf). But all of the prior experiments have focused on adding inhibitors to the undifferentiated hPSC, not during the organoid formation steps.

2. What effects are seen in organoids treated with nothing, SB-590885, and possibility other inhibitors (like SB-431542)? This would involve collecting organoids at different time points after drug additions (1 day, 3 days, 9 days, 18 days) for protein extracts and doing western blots for signs of different pathway activations (i..e pMEK1/2 as a readout of B-Raf activity, pERK1/2 for activation of MAPK signaling, pSMAD1/5/8 for BMP signaling, pSMAD2/3 for TGFbeta signaling, etc). We could also collect cells for RNA-Seq to identify downstream genes and molecular pathways hat are changing. Single cell-sea also possible but a much more expensive route.

I would not engage on 1 except to see about how SB-590885 compares to SB-431542, but for 2, you might want to think about collecting some organoids at different time points for both RNA and protein collection. One possibility might be to use a kit like this one: https://www.qiagen.com/us/products/discovery-and-translational-research/dna-rna-purification/multianalyte-and-virus/allprep-dnamaprotein-mini-kit which would allow collection of a common sample which can be fractionated into DNA, RNA, and protein for downstream analysis. I've never actually used this kit to know how well it works, but I presume it's not so different from the other methods that we use. This could also be done as parallel samples prepared for RNA collection as we normally do and protein either by adding some protein extraction buffer to the cells or snap freezing and storing at -80°C for later processing.

Probably we should wait until we see how well these methods reproduce, but happy to talk about laying out some of the analysis above.

The one factor I'm not yet sure of is how to introduce the use of SB-590885. Calling it a mistake does not add confidence, and it would be better to come up with some rationale based on other experiments like the idea that suppression of FGF-MEK signaling helps with organoids. This may take some crafting of a suitable narrative.

Evidence & Evidentiary Exhibit 37.9 ***Dr. Bennett Novitch attempted to compel Mr. Gulesserian to waive his inventor creator rights by distributing the protocol to other labs without reporting to the university TDG group, the Federal government, or any funding agencies resulting in violation(s) of research compliance and research misconduct laws without limitations.***

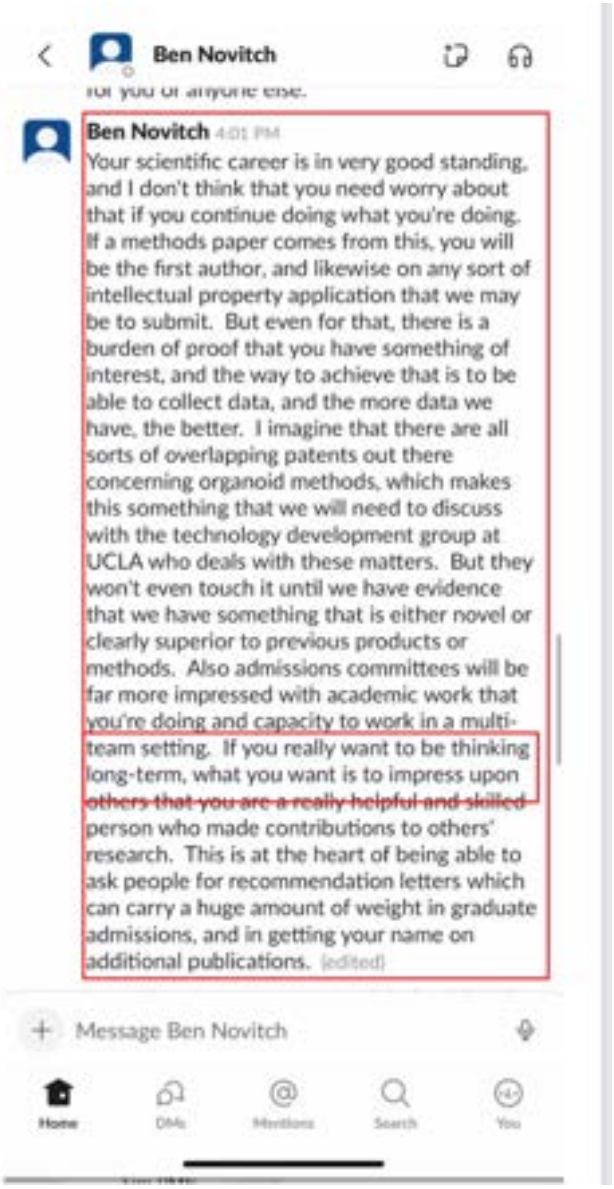
October 2023

On October 27, 2023, I was approached by Principal Investigator Supervisor Novitch via UCLA Slack. During this communication, Dr. Novitch sought to have me waive my rights by collaborating with another UCLA lab to replicate my work, circumventing the Technology Development Group (TDG) to safeguard University intellectual property. This approach appeared to be an attempt to compel me to share my research with other labs, undermining my rights as the inventor and effectively sidelining my contributions and going against University policy.

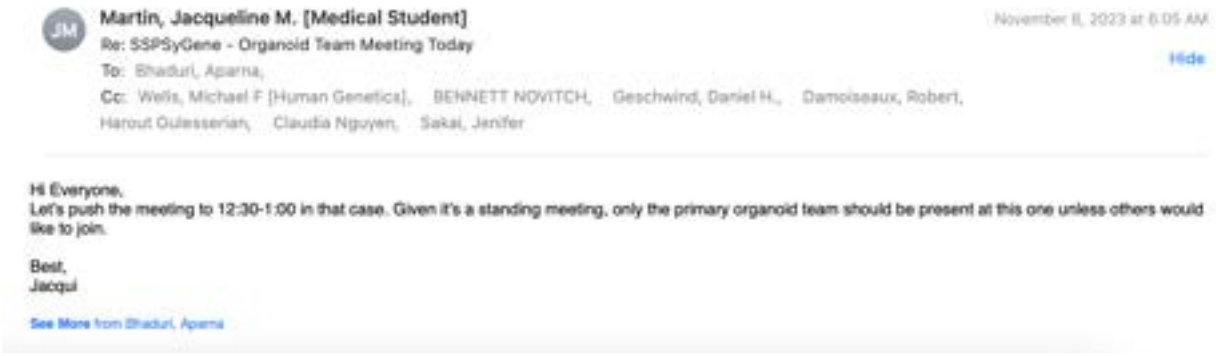
Furthermore, the lab proposed for collaboration was part of a consortium that, as subsequent evidence will demonstrate, had intentions to allow the National Institute of Mental Health (NIMH) to profit from my discovery rather than UCLA which was openly stated in a zoom meeting held with the consortium on February 26 2024.

Please note that **I was not opposed to collaborating** and sharing this discovery with the scientific community, provided that **proper protective measures** are taken to ensure UCLA receives its credits along with myself and to solidify its commercial viability and patentability. Supervisor Novitch has constructed a narrative that portrays me as intimidating, and obstructive, claiming that I withheld information and hindered the lab's progress to justify his failure to contact TDG. However, this situation could have been avoided if proper measures had been taken to secure the information and proper protection of UCLA property, and simply by following the law.

Evidence & Evidentiary Exhibit 37.10 ***Dr. Novitch verbally assured Mr. Gulesserian of rightful authorship and inventorship credit, contradicting his own statements and actions later on throughout the entire process.***



Evidence & Evidentiary Exhibit 37.11 ***The UCLA SSPsyGene Consortium member Jacqueline Martin acknowledged that Mr. Gulesserian would share his protocol, despite lacking intellectual property (IP) protection; this where the pressure to share the information with the consortium group begins (See key respondents named below).***



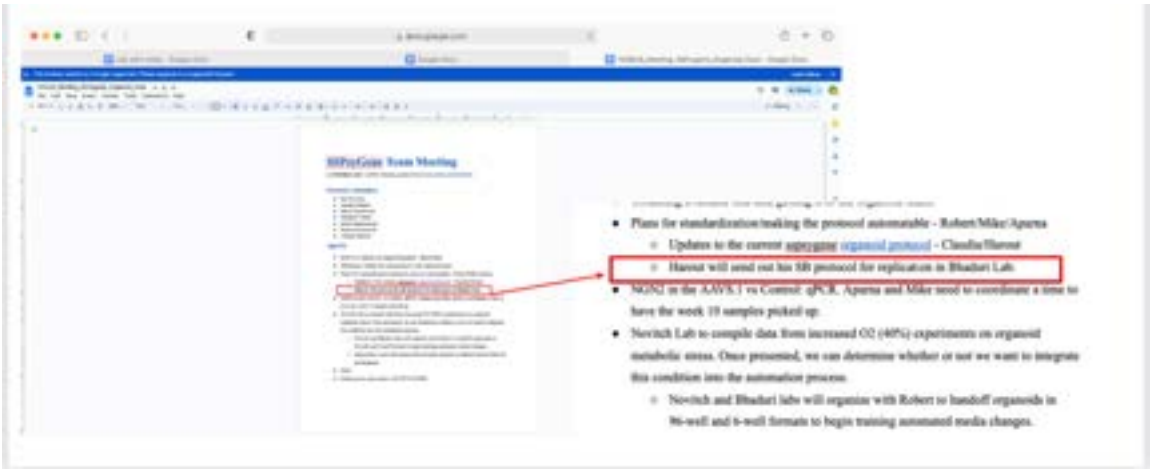
Martin, Jacqueline M. [Medical Student]
Re: SSPSyGene - Organoid Team Meeting Today
To: Bhaduri, Aparna,
Cc: Wells, Michael F [Human Genetics], BENNETT NOVITCH, Geschwind, Daniel H., Damoiseaux, Robert, Harout Gulesserian, Claudia Nguyen, Sakai, Jenifer

November 8, 2023 at 8:05 AM
Hide

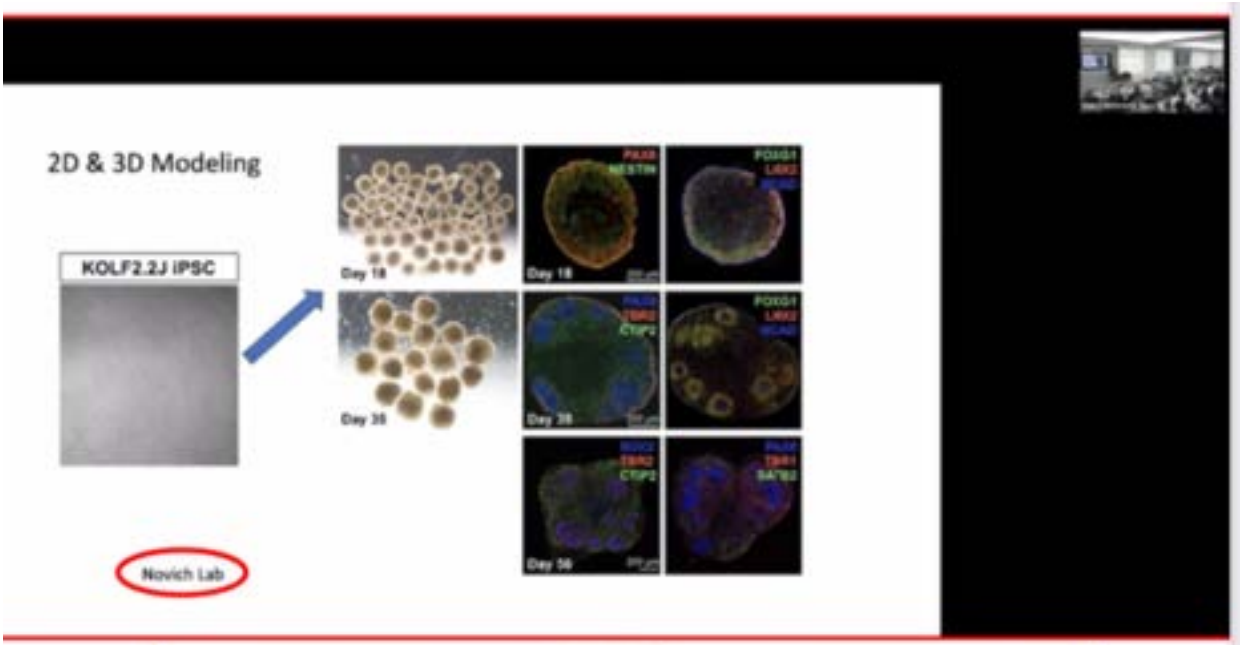
Hi Everyone,
Let's push the meeting to 12:30-1:00 in that case. Given it's a standing meeting, only the primary organoid team should be present at this one unless others would like to join.

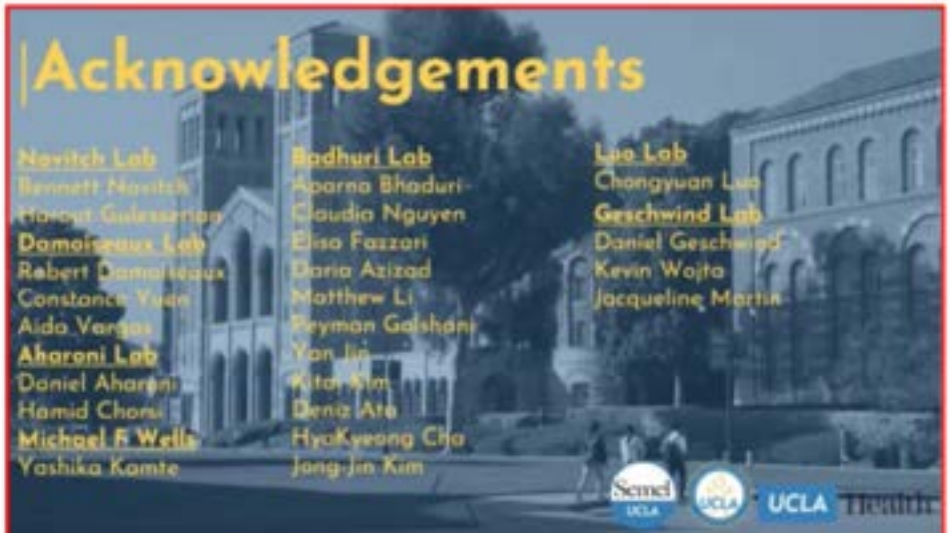
Best,
Jacqui

See More from Bhaduri, Aparna



Evidence & Evidentiary Exhibit 37.12 ***The discovery was presented at a National Institute of Mental Health (NIMH) consortium meeting with numerous institutions present without formal disclosure of the intellectual property which is unlawful. Intent knowledge motive and pattern of behavior start here of the consortium group and respondents (Novitch, Geschwind, Bhaduri, Wells, Damoiseaux and members of the consortium). There is video evidence of this exposure where the consortium group states they need funding (Aka Grants over IP protection).***


2D & 3D Modeling
KOLF2.2J iPSC
Novich Lab
Day 18
Day 35
Day 56


Acknowledgements
Novitch Lab
Bennett Novitch
Harout Galessanian
Damoiseaux Lab
Robert Damoiseaux
Constance Yuan
Aida Vargas
Aharoni Lab
Daniel Aharoni
Hamid Chorsi
Michael F Wells
Yashika Kamte
Badhuri Lab
Aparna Bhaduri
Claudia Nguyen
Elisa Fazzari
Dania Azizad
Matthew Li
Peyman Golshani
Yan Jin
Kitai Kim
Deniz Ata
HyoKyeong Cho
Jong-Jin Kim
Luo Lab
Chongyuan Luo
Geschwind Lab
Daniel Geschwind
Kevin Wojta
Jacqueline Martin
UCLA

Evidence & Evidentiary Exhibit 37.13

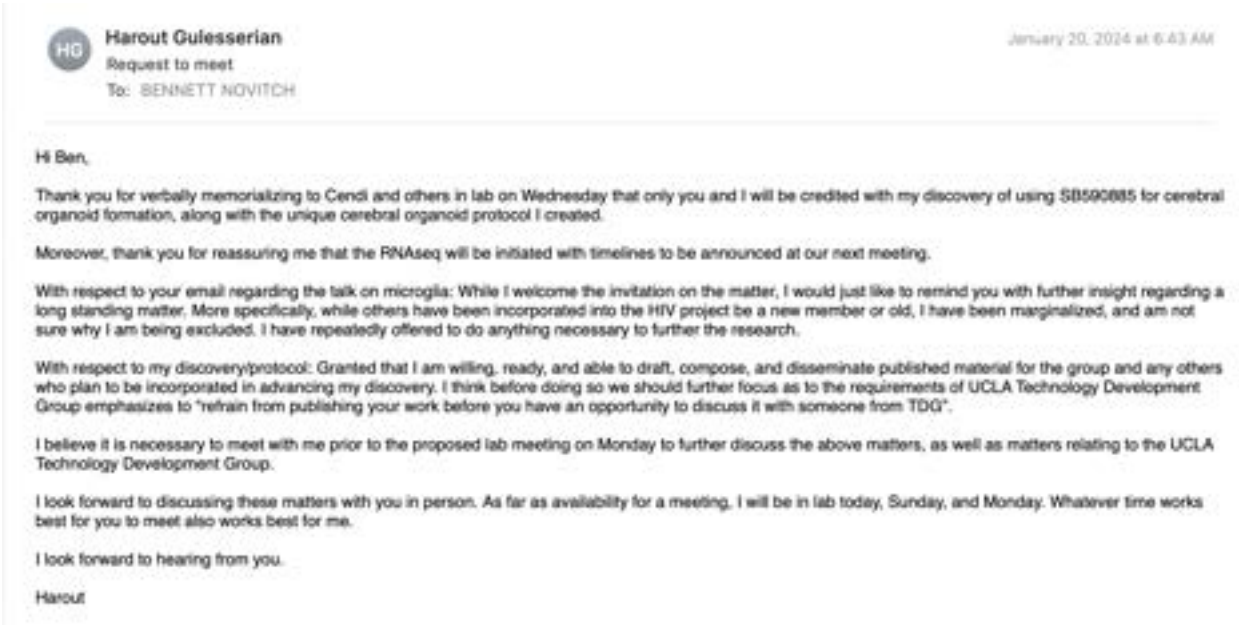
– Further interactions between Dr. Novitch and Mr. Gulesserian, where the former (Novitch) requested training(from Gulesserian) on Gulesserian's serendipitous novel accidental discovery and method, urging Gulesserian to disclose the invention through improper means going away from university channels or procedures and going directly against regents policy 5105. Because Novitch's goal was to take the Gulesserian novel accidental discovery as his own Novitch would tell Mr. Gulesserian during in person encounters that Gulesserian would need to teach Novitch the Gulesserian accidental serendipitous protocol with no intention to protect the IP.

Evidence & Evidentiary **Exhibit_37.14** **Mr. Gulesserian contacted the University to request guidance regarding his discovery. He reached out to Vice Chancellor Amir Naiberg and formally disclosed his manuscript to the Chief Intellectual Property Officer of UCLA's Technology Development Group (TDG), Charanjit Arora.**

#	Individuals/groups involved	Date	Description or Quote
	Harout Karnik Gulesserian **Hkg90@icloud.com**	**1/12/2024**	
	Amir Naiberg Associate Vice Chancellor, CEO & President UCLA Technology Development Group 10889 Wilshire Blvd. Suite 920 Los Angeles, CA 90095 Office (310) 794-0015 Email amir.naiberg@tdg.ucla.edu	**1/12/2024**	
	Harout Karnik Gulesserian **Hkg90@icloud.com**	**1/14/2024**	

Evidence & Evidentiary **Exhibit_37.15**

Mr. Gulesserian urged Dr. Bennett Novitch to take appropriate action by contacting UCLA's Technology Development Group (TDG) to formally disclose Mr. Gulesserian's discovery to the University, in accordance with institutional policies and intellectual property guidelines.



HG **Harout Gulesserian** January 20, 2024 at 6:43 AM
Request to meet
To: BENNETT NOVITCH

Hi Ben,

Thank you for verbally memorializing to Cendi and others in lab on Wednesday that only you and I will be credited with my discovery of using SB590885 for cerebral organoid formation, along with the unique cerebral organoid protocol I created.

Moreover, thank you for reassuring me that the RNAseq will be initiated with timelines to be announced at our next meeting.

With respect to your email regarding the talk on microglia: While I welcome the invitation on the matter, I would just like to remind you with further insight regarding a long standing matter. More specifically, while others have been incorporated into the HIV project be a new member or old, I have been marginalized, and am not sure why I am being excluded. I have repeatedly offered to do anything necessary to further the research.

With respect to my discovery/protocol: Granted that I am willing, ready, and able to draft, compose, and disseminate published material for the group and any others who plan to be incorporated in advancing my discovery. I think before doing so we should further focus as to the requirements of UCLA Technology Development Group emphasizes to "refrain from publishing your work before you have an opportunity to discuss it with someone from TDG".

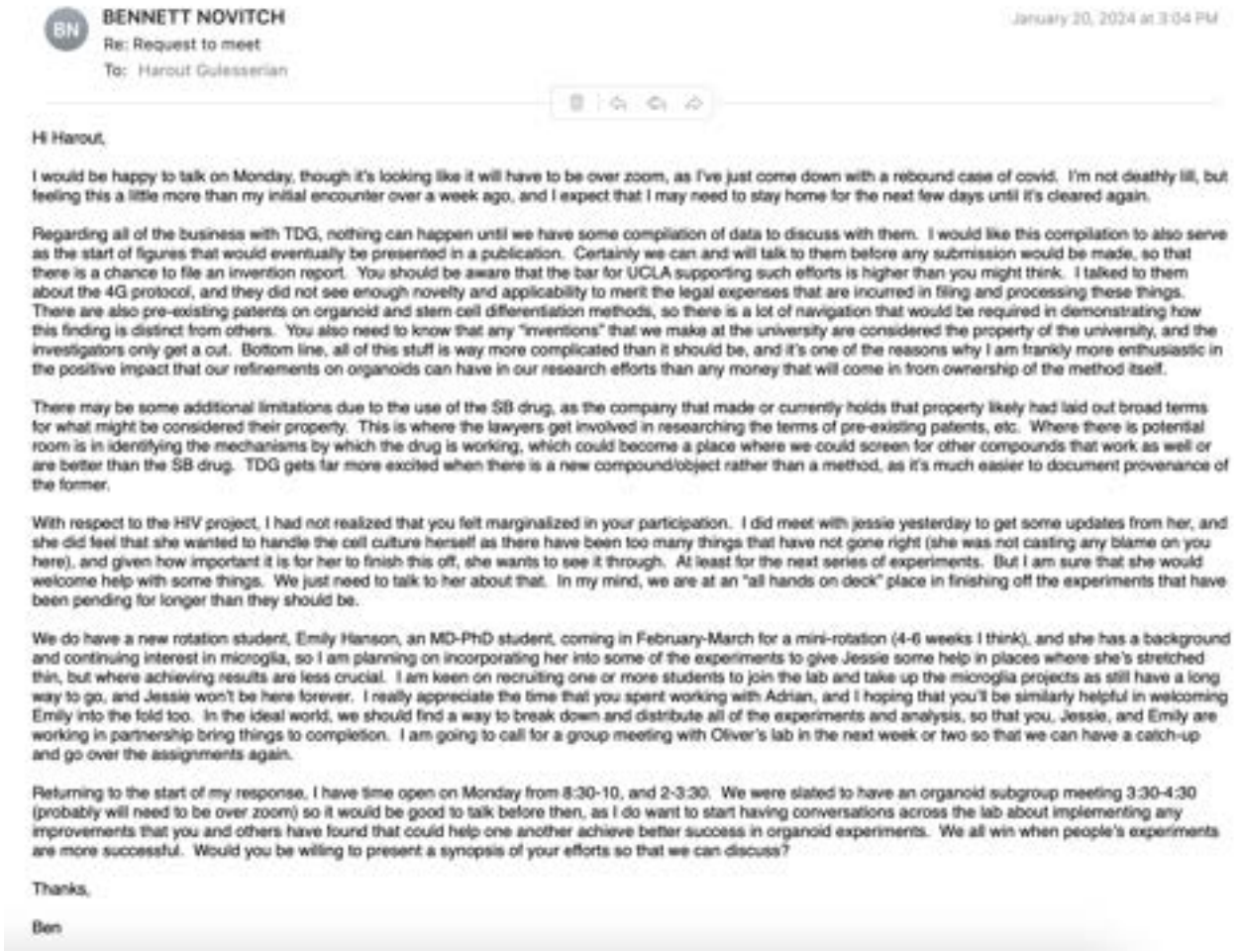
I believe it is necessary to meet with me prior to the proposed lab meeting on Monday to further discuss the above matters, as well as matters relating to the UCLA Technology Development Group.

I look forward to discussing these matters with you in person. As far as availability for a meeting, I will be in lab today, Sunday, and Monday. Whatever time works best for you to meet also works best for me.

I look forward to hearing from you.

Harout

Dr. Bennett Novitch declined to disclose the discovery to UCLA's Technology Development Group (TDG).



BENNETT NOVITCH

January 20, 2024 at 3:04 PM

Re: Request to meet

To: Harout Gulesserian

Hi Harout,

I would be happy to talk on Monday, though it's looking like it will have to be over zoom, as I've just come down with a rebound case of covid. I'm not deathly ill, but feeling this a little more than my initial encounter over a week ago, and I expect that I may need to stay home for the next few days until it's cleared again.

Regarding all of the business with TDG, nothing can happen until we have some compilation of data to discuss with them. I would like this compilation to also serve as the start of figures that would eventually be presented in a publication. Certainly we can and will talk to them before any submission would be made, so that there is a chance to file an invention report. You should be aware that the bar for UCLA supporting such efforts is higher than you might think. I talked to them about the 4G protocol, and they did not see enough novelty and applicability to merit the legal expenses that are incurred in filing and processing these things. There are also pre-existing patents on organoid and stem cell differentiation methods, so there is a lot of navigation that would be required in demonstrating how this finding is distinct from others. You also need to know that any "inventions" that we make at the university are considered the property of the university, and the investigators only get a cut. Bottom line, all of this stuff is way more complicated than it should be, and it's one of the reasons why I am frankly more enthusiastic in the positive impact that our refinements on organoids can have in our research efforts than any money that will come in from ownership of the method itself.

There may be some additional limitations due to the use of the SB drug, as the company that made or currently holds that property likely had laid out broad terms for what might be considered their property. This is where the lawyers get involved in researching the terms of pre-existing patents, etc. Where there is potential room is in identifying the mechanisms by which the drug is working, which could become a place where we could screen for other compounds that work as well or are better than the SB drug. TDG gets far more excited when there is a new compound/object rather than a method, as it's much easier to document provenance of the former.

With respect to the HIV project, I had not realized that you felt marginalized in your participation. I did meet with jessie yesterday to get some updates from her, and she did feel that she wanted to handle the cell culture herself as there have been too many things that have not gone right (she was not casting any blame on you here), and given how important it is for her to finish this off, she wants to see it through. At least for the next series of experiments. But I am sure that she would welcome help with some things. We just need to talk to her about that. In my mind, we are at an "all hands on deck" place in finishing off the experiments that have been pending for longer than they should be.

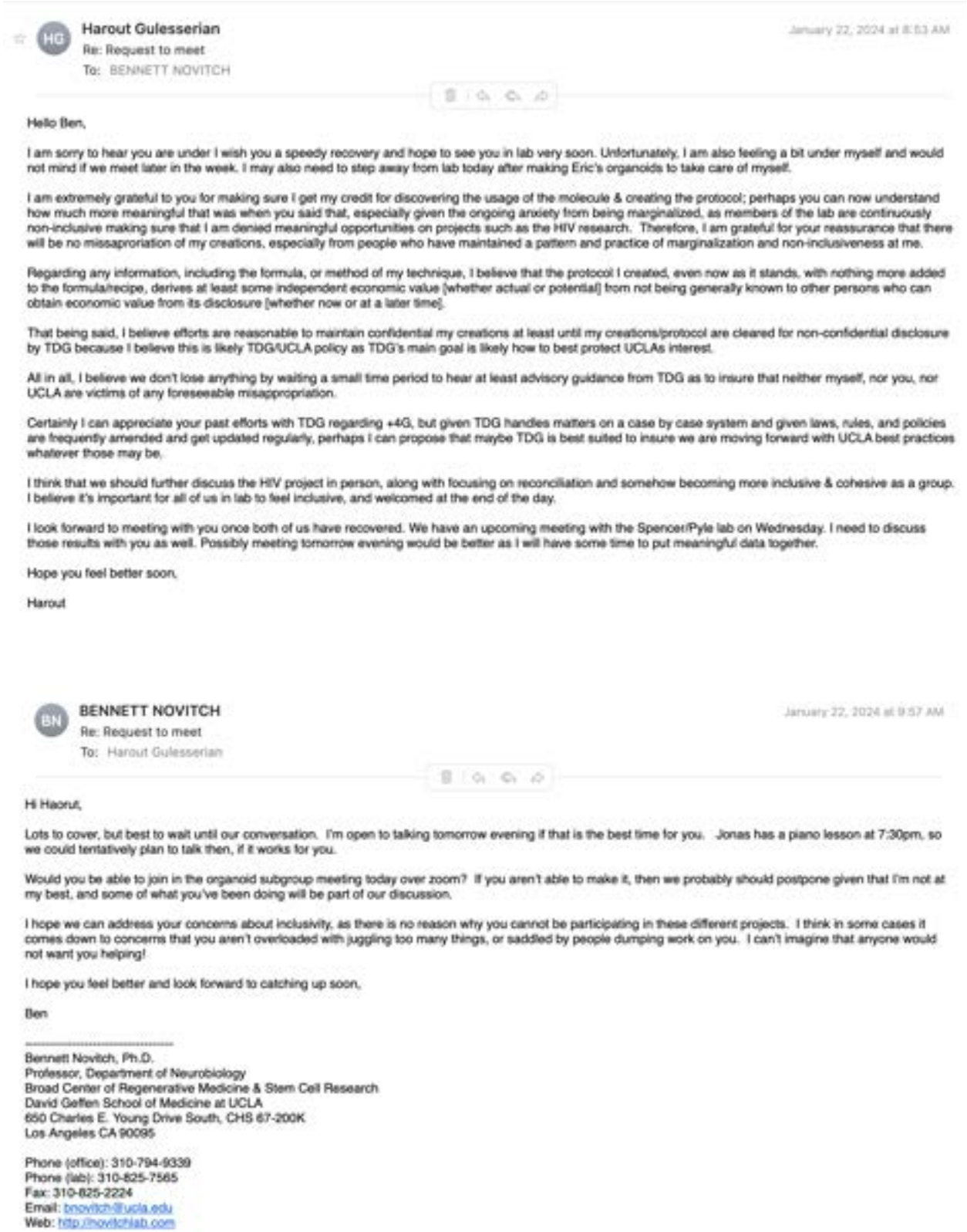
We do have a new rotation student, Emily Hanson, an MD-PhD student, coming in February-March for a mini-rotation (4-6 weeks I think), and she has a background and continuing interest in microglia, so I am planning on incorporating her into some of the experiments to give Jessie some help in places where she's stretched thin, but where achieving results are less crucial. I am keen on recruiting one or more students to join the lab and take up the microglia projects as still have a long way to go, and Jessie won't be here forever. I really appreciate the time that you spent working with Adrian, and I hoping that you'll be similarly helpful in welcoming Emily into the fold too. In the ideal world, we should find a way to break down and distribute all of the experiments and analysis, so that you, Jessie, and Emily are working in partnership bring things to completion. I am going to call for a group meeting with Oliver's lab in the next week or two so that we can have a catch-up and go over the assignments again.

Returning to the start of my response, I have time open on Monday from 8:30-10, and 2-3:30. We were slated to have an organoid subgroup meeting 3:30-4:30 (probably will need to be over zoom) so it would be good to talk before then, as I do want to start having conversations across the lab about implementing any improvements that you and others have found that could help one another achieve better success in organoid experiments. We all win when people's experiments are more successful. Would you be willing to present a synopsis of your efforts so that we can discuss?

Thanks,

Ben

While Gulesserian consistently pleaded for Dr. Novitch to follow the law.



Harout Gulesserian
Re: Request to meet
To: BENNETT NOVITCH
January 22, 2024 at 8:53 AM

Hello Ben,

I am sorry to hear you are under I wish you a speedy recovery and hope to see you in lab very soon. Unfortunately, I am also feeling a bit under myself and would not mind if we meet later in the week. I may also need to step away from lab today after making Eric's organoids to take care of myself.

I am extremely grateful to you for making sure I get my credit for discovering the usage of the molecule & creating the protocol; perhaps you can now understand how much more meaningful that was when you said that, especially given the ongoing anxiety from being marginalized, as members of the lab are continuously non-inclusive making sure that I am denied meaningful opportunities on projects such as the HIV research. Therefore, I am grateful for your reassurance that there will be no missaproriation of my creations, especially from people who have maintained a pattern and practice of marginalization and non-inclusiveness at me.

Regarding any information, including the formula, or method of my technique, I believe that the protocol I created, even now as it stands, with nothing more added to the formula/recipe, derives at least some independent economic value [whether actual or potential] from not being generally known to other persons who can obtain economic value from its disclosure [whether now or at a later time].

That being said, I believe efforts are reasonable to maintain confidential my creations at least until my creations/protocol are cleared for non-confidential disclosure by TDG because I believe this is likely TDG/UCLA policy as TDG's main goal is likely how to best protect UCLAs interest.

All in all, I believe we don't lose anything by waiting a small time period to hear at least advisory guidance from TDG as to insure that neither myself, nor you, nor UCLA are victims of any foreseeable misappropriation.

Certainly I can appreciate your past efforts with TDG regarding +4G, but given TDG handles matters on a case by case system and given laws, rules, and policies are frequently amended and get updated regularly, perhaps I can propose that maybe TDG is best suited to insure we are moving forward with UCLA best practices whatever those may be.

I think that we should further discuss the HIV project in person, along with focusing on reconciliation and somehow becoming more inclusive & cohesive as a group. I believe it's important for all of us in lab to feel inclusive, and welcomed at the end of the day.

I look forward to meeting with you once both of us have recovered. We have an upcoming meeting with the Spencer/Pyle lab on Wednesday. I need to discuss those results with you as well. Possibly meeting tomorrow evening would be better as I will have some time to put meaningful data together.

Hope you feel better soon,

Harout

BENNETT NOVITCH
Re: Request to meet
To: Harout Gulesserian
January 22, 2024 at 9:57 AM

Hi Haorut,

Lots to cover, but best to wait until our conversation. I'm open to talking tomorrow evening if that is the best time for you. Jonas has a piano lesson at 7:30pm, so we could tentatively plan to talk then, if it works for you.

Would you be able to join in the organoid subgroup meeting today over zoom? If you aren't able to make it, then we probably should postpone given that I'm not at my best, and some of what you've been doing will be part of our discussion.

I hope we can address your concerns about inclusivity, as there is no reason why you cannot be participating in these different projects. I think in some cases it comes down to concerns that you aren't overloaded with juggling too many things, or saddled by people dumping work on you. I can't imagine that anyone would not want you helping!

I hope you feel better and look forward to catching up soon,

Ben

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

Phone (office): 310-794-9339
Phone (lab): 310-825-7565
Fax: 310-825-2224
Email: bnovitch@ucla.edu
Web: http://novitchlab.com

Evidence & Evidentiary ***Exhibit_37.16*** ***Mr. Gulesserian formally placed the entire Novitch lab on notice regarding the relevant rules and policies as communicated to him by Charanjit Arora, Chief Intellectual Property Officer (CIPO) at UCLA's Technology Development Group (TDG). CIPO Arora was blind-copied on the communication, thereby establishing documented knowledge of these obligations for all lab members, including—but not limited to—Dr. Bennett Novitch.***

Harout Gulesserian January 30, 2024 at 5:00 PM
IP disclosure Hide
To: BENNETT NOVITCH,
Cc: Negien Shalmani, ERIC HEINRICHS, Sangmok Kim, Natella Baliaouri, Lauren Choi, Cendi Ling, Ivan Pavlovic, FU Ting, Jessie Buth, Erick Nedd, Maria L Caballero, Angel Emodi, diana Ibrahim, BENNETT NOVITCH,
Bcc: Charanjit Arora

Hi everyone,

Since my protocol was disclosed today for the first time @ the 2:00pm lab meeting. I wanted to reiterate some crucial information discussed during a recent meeting with UCLA's Technology Development Group.

TDG basically indicated that discussing my protocol outside of the lab may have implications for IP protection and the commercialization of my ideas. Internal discussions with lab members are considered confidential for IP purposes per UCLA's Technology Development Group.

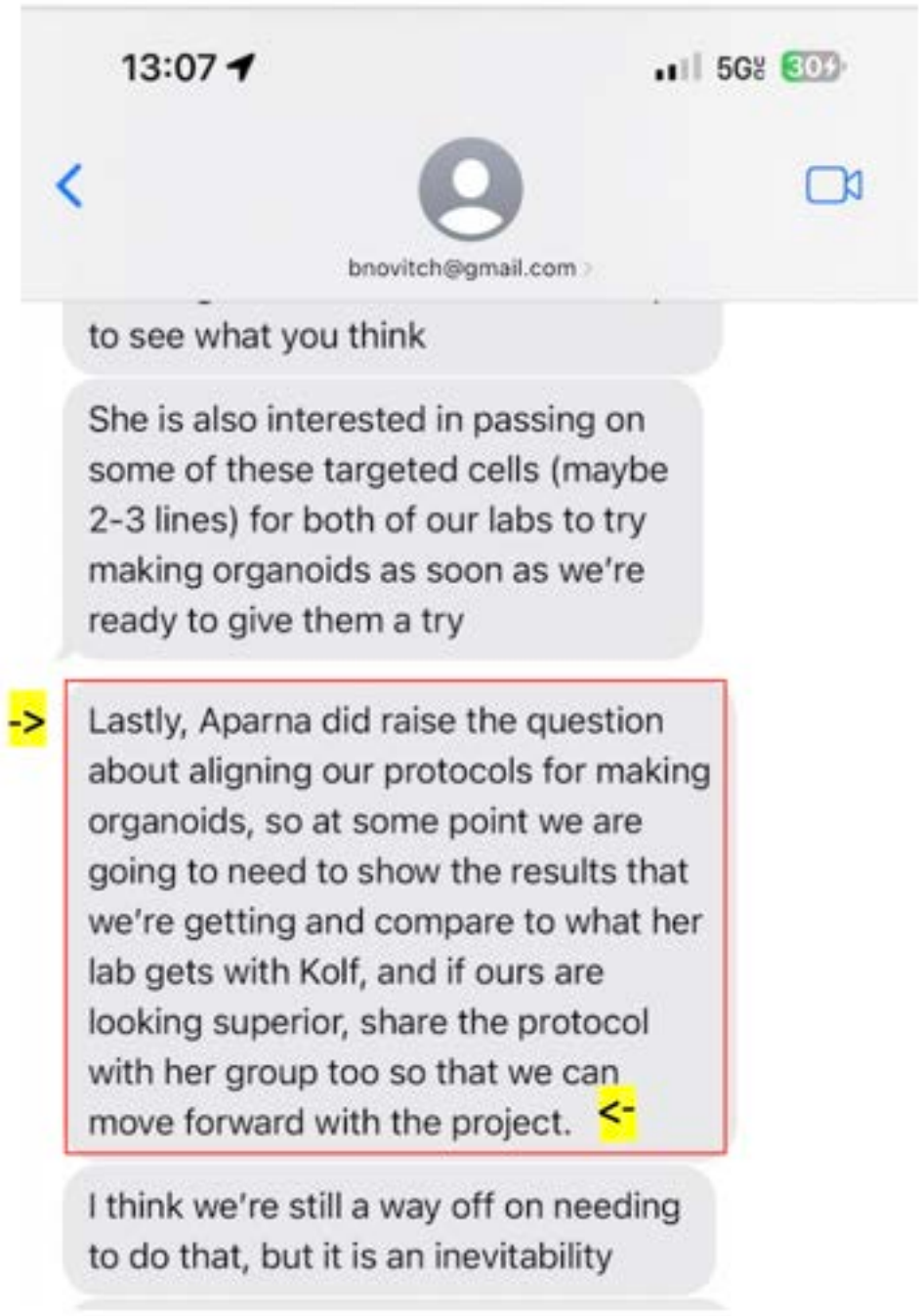
If any of you have plans to share my protocol in any capacity with external parties, including outside of the lab but within UCLA, please notify me & TGD immediately prior to doing so, as this is mandatory per TGD to take appropriate legal steps to safeguard my intellectual property.

Your prompt attention to this matter is highly appreciated, and your cooperation in maintaining the confidentiality of my research is vital.

Thank you for your understanding,

Harout

Evidence & Evidentiary ***Exhibit_37.17*** ***On February 5, 2024, Dr. Bennett Novitch emailed Mr. Gulesserian in an attempt to induce him to waive his rights to the invention by sharing the discovery with Dr. Aparna Bhaduri's lab. The communication appears to have been made with deliberate intent to bypass proper disclosure and intellectual property protections for the benefit of the inventor and the University collectively.***



Evidence & Evidentiary ***Exhibit_37.18*** ***Approximately 6–7 days prior, the group had been placed on notice regarding Mr. Gulesserian's intellectual property rights. A subsequent message from Natella Baliaouri , Novitch's graduate student indicated a potential threat of misappropriation, suggesting that the intent to exploit the discovery without proper authorization may have been a motive from the outset.***

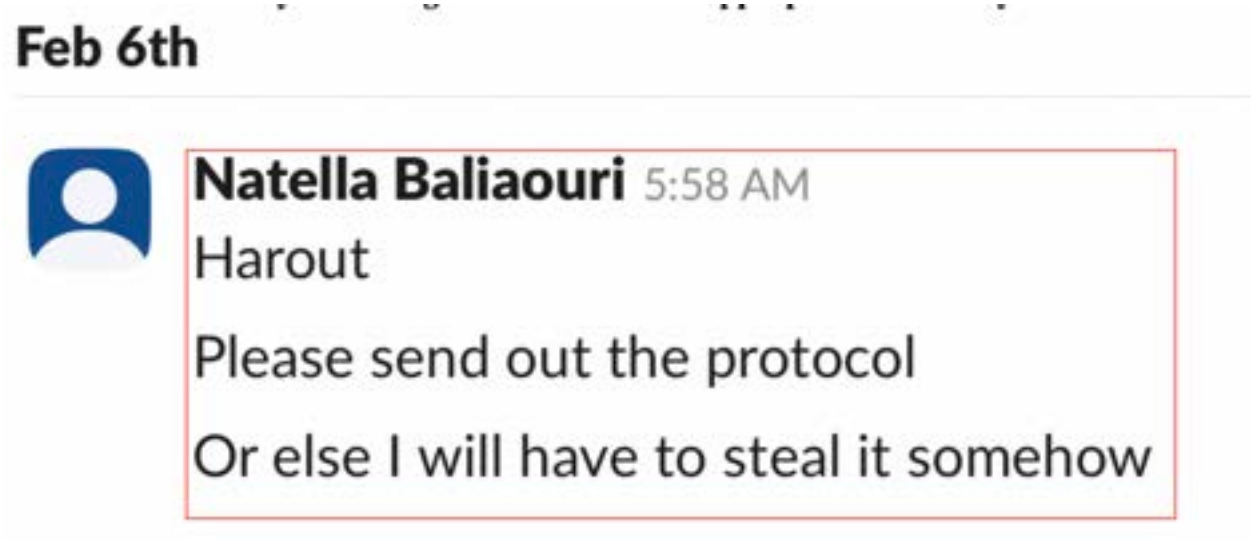
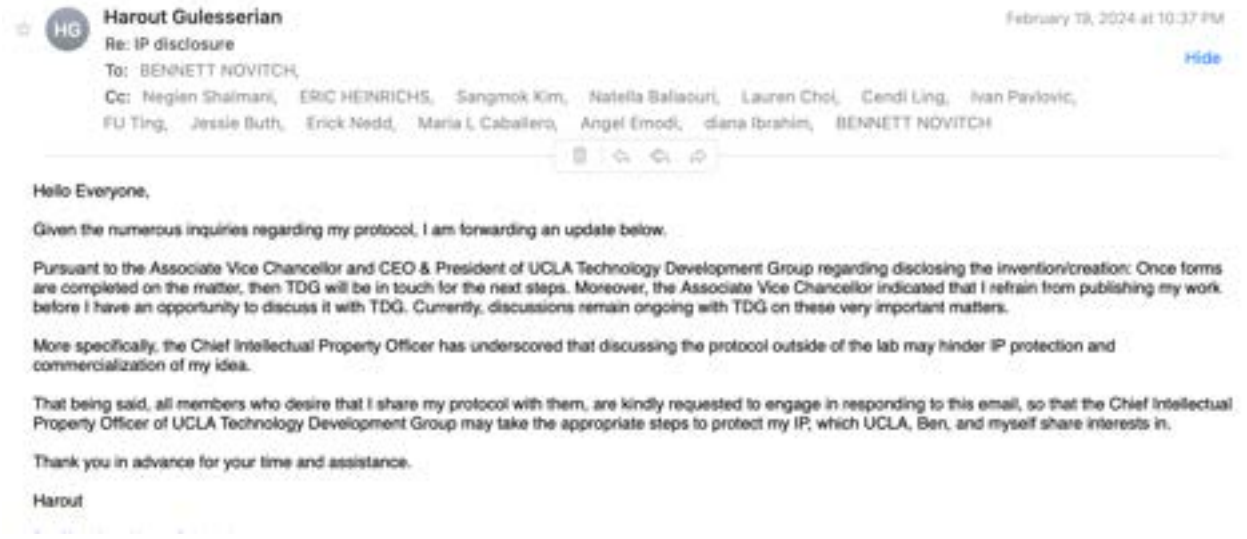


Exhibit_37.19 ***Once again, Mr. Gulesserian formally placed the entire lab on notice regarding the significant legal and ethical implications associated with the misappropriation of intellectual property.***



Mr. Gulesserian repeatedly urged Dr. Novitch to act in accordance with institutional policy and ethical standards; however, Dr. Novitch appeared to be motivated by other interests.

Harout Gulesserian
Re: IP disclosure
To: BENNETT NOVITCH

February 20, 2024 at 4:20 AM

Hello Ben,

Yes I am looking forward to our meeting as well. I also had some matters that I want to make sure are on our agenda for tomorrow as they still require a remedy; the ongoing non-inclusiveness against me which I believe, and hope we can ultimately resolve because you mentioned that you and the committee reached out to Jessie about making things more inclusive in the HIV project. I am most certainly looking forward to being apart of the team again, as I especially look forward to be given a meaningful opportunity to participate and promote rather than being denied and marginalised.

Second, I am a bit confused regarding any "holding back" which you referenced because I in fact disclosed my protocol to you and everyone in our lab meeting. I sent an email on 1/30/2024 to everyone in our lab about my disclosure, so I don't believe that there has been any "holding back" whatsoever.

Moreover, I am also trying to insure that UCLA's legal interest in this is protected and I believe the best practices to do this is by incorporating TDG, because this is precisely what was told to me to do by UCLA. So, I look forward to bringing to market and exploring further research of my accidental discovery and invention ASAP, and doing so using UCLA best practices under the guidance of Associate Vice Chancellor, Chief Intellectual Property Officer, & TDG as I am just following best practices for UCLA rules, policies, and procedures, along with State and Federal laws.

Please understand that in the past I attempted to reach out to you for many months regarding both my accidental discovery/invention of the protocol, but the fact remains you were extremely busy or unavailable for months to have a meeting with me.

Moreover, because it takes time and effort to recall and retrace my steps of my accidental discovery and invention, which you have been on notice of since last year and every step of the way. I sent an email which incorporated everyone in our lab regarding my efforts to disclose everything to UCLA and to not "hold back" any intellectual property which I accidentally discovered, invented and created, but at the same time for me to do so with the fastest speed possible so that UCLA can protect UCLA's very own legal interest in my accidental invention, discovery, and creation against any noticed misappropriation.

I don't believe my efforts to protect UCLAs best interest and legal interest in the intellectual property is "holding back" anything by using UCLA best practices to disclose and research my very important accidental discovery, invention and breakthrough, but in fact by incorporating the TDG office I believe that: #1 we are following UCLA policies and procedures and #2 I am in fact accelerating the process of disclosure to our lab and all other UCLA & related parties.

Looking forward to our meeting,

Harout

NATELLA VAHKTANGOVNA BALIAOURI
Re: IP disclosure
To: Harout Gulesserian, BENNETT NOVITCH

February 20, 2024 at 10:17 AM

Hello Harout and Ben,

I am interested in testing the protocol on my lines as it would help speed up organoid production. Thank you for all your help in lab!

Best,

Natella Baliaouri

See More from Harout Gulesserian

--
Natella Baliaouri
NSIDP Graduate Student
UCLA

CENDI LING
Re: IP disclosure
To: Harout Gulesserian, Cc: BENNETT NOVITCH

February 21, 2024 at 12:06 PM
Details

Hi Harout,

I would like to express my interest in gaining access to your protocol, and I believe it could greatly benefit our work.
Please let me know if anything is required from my end to proceed. Thank you!

Best,
Cendi

Evidence & Evidentiary ***Exhibit_37.20***

On February 23, 2024, Mr. Gulesserian informed Dr. Bennett Novitch that the intellectual property (IP) had been disclosed to UCLA's Technology Development Group (TDG). In response, Dr. Novitch became visibly agitated and acted in an overtly hostile manner toward Mr. Gulesserian. He subsequently followed up with an email in which he stated that he had contacts in Wisconsin and New York with whom he intended to share the discovery prior to any formal disclosure to TDG.

From: **BENNETT NOVITCH** <bnovitch@g.ucla.edu>
Date: Fri, Feb 23, 2024 at 11:56 PM
Subject: Following up
To: Harout Gulesserian <harout.gulesserian.507@my.csun.edu>

Hi Harout,

I wanted to follow up on our discussion this afternoon, as I fear that our conversation got overheated at times, for which I am very sorry. To recap some of our action items:

1. I am trying to arrange a time to speak with TDG, ideally on Monday, to discuss the steps that should be taken with filing an invention report. Please do not engage with them without including me on the conversation.

2. I would like you to please prepare a written form of your protocol that is suitable for distributing to our lab members who would like to give it a try. I would like to review this document before it's sent around, and send it coming from both of us with a clear statement that it must be treated as privileged information, and that it is not to be distributed to anyone outside our group for the time being. It actually might be better to arrange an in person meeting for the distribution so that we can add a more human element and offer an opportunity to discuss steps in the methods as well as show what one might expect it do, and what its limitations are (i.e. the point that you still need to test variables like IWR1E, etc).

3. I would like to finish reviewing the data that you have in hand to accompany the RNA samples that you've collected so that I can gauge what each sample is going to bring representing. If you have any qPCR from these samples, that would be particularly great to see as it might help give us some preview as to how some key genes might be changing. But it's okay if we don't have that, we can gauge by morphology alone and take the plunge.

4. I would like to get the samples submitted next week so that we can get this analysis underway. We will also need to recruit someone to do the bioinformatic processing. My inclination would be to ask Eric if he's willing to take it on, but Salena might also be willing to help. If necessary, we can turn to others outside our workgroup, but obviously it makes a lot of sense to keep it in house as much as we can.

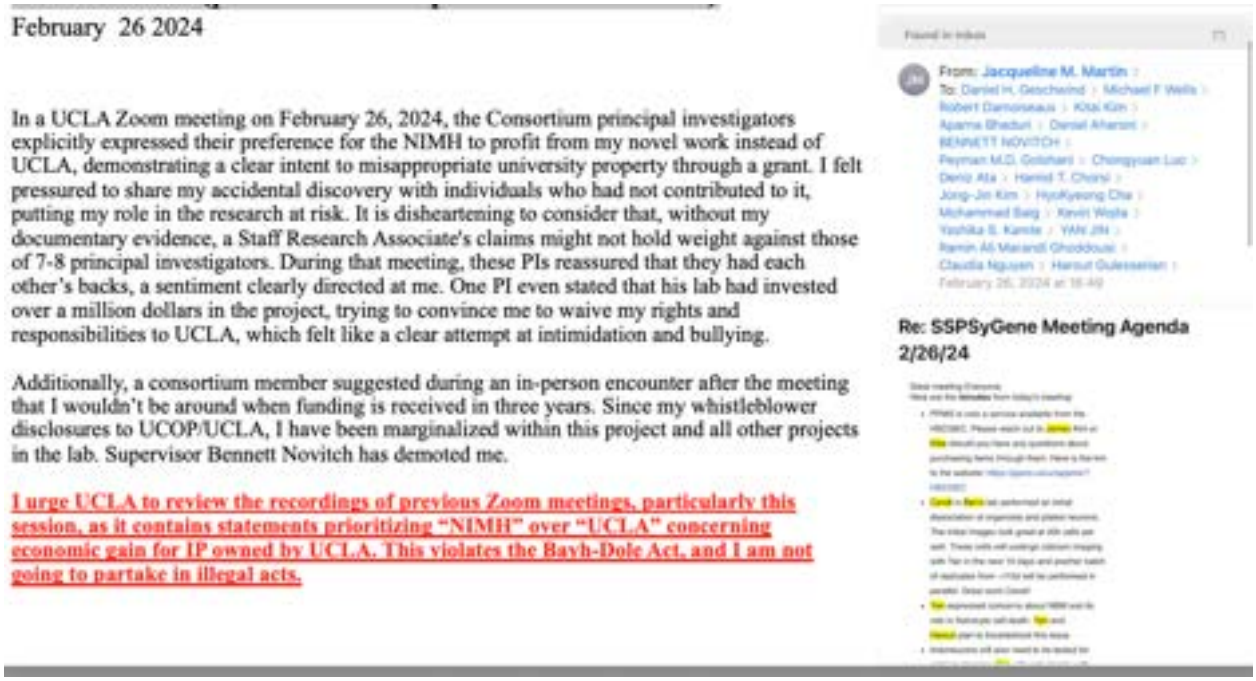
5. I would like to continue our discussion on the layout of figures which would be needed for both an invention report and for a publication. It looks right now like I may have some time free on Tuesday, Wednesday and Friday.

6. I am troubled by the message that you received, and I would like to find a way to confront the issues head on and not just sweep it under the rug. Would you be open to having a conversation with Natella and me so that we can clear the air? I know that these matters can be really uncomfortable, but what was sent (which I think may have been intended to be a joke- Natella's humor can lean to the dark), was unquestionably unprofessional and inappropriate, and it needs to be called out as such. They owe you an apology at the very least. I have done mediations in the past with others who were having conflicts, and it did seem to help to smooth things out in the end despite the initial awkwardness confronting the situation. Outside mediation is also possible.

7. Please take some time off from the lab- nobody should be working 7 days a week!

Ben

Evidence & Evidentiary ***Exhibit_37.21*** ***During a recorded Consortium Zoom meeting, participants made statements such as "NIMH over UCLA interest" and "We got each other's back," suggesting a coordinated effort to prioritize external interests over institutional obligations and to protect one another despite potential policy violations.***



February 26 2024

In a UCLA Zoom meeting on February 26, 2024, the Consortium principal investigators explicitly expressed their preference for the NIMH to profit from my novel work instead of UCLA, demonstrating a clear intent to misappropriate university property through a grant. I felt pressured to share my accidental discovery with individuals who had not contributed to it, putting my role in the research at risk. It is disheartening to consider that, without my documentary evidence, a Staff Research Associate's claims might not hold weight against those of 7-8 principal investigators. During that meeting, these PIs reassured that they had each other's backs, a sentiment clearly directed at me. One PI even stated that his lab had invested over a million dollars in the project, trying to convince me to waive my rights and responsibilities to UCLA, which felt like a clear attempt at intimidation and bullying.

Additionally, a consortium member suggested during an in-person encounter after the meeting that I wouldn't be around when funding is received in three years. Since my whistleblower disclosures to UCOP/UCLA, I have been marginalized within this project and all other projects in the lab. Supervisor Bennett Novitch has demoted me.

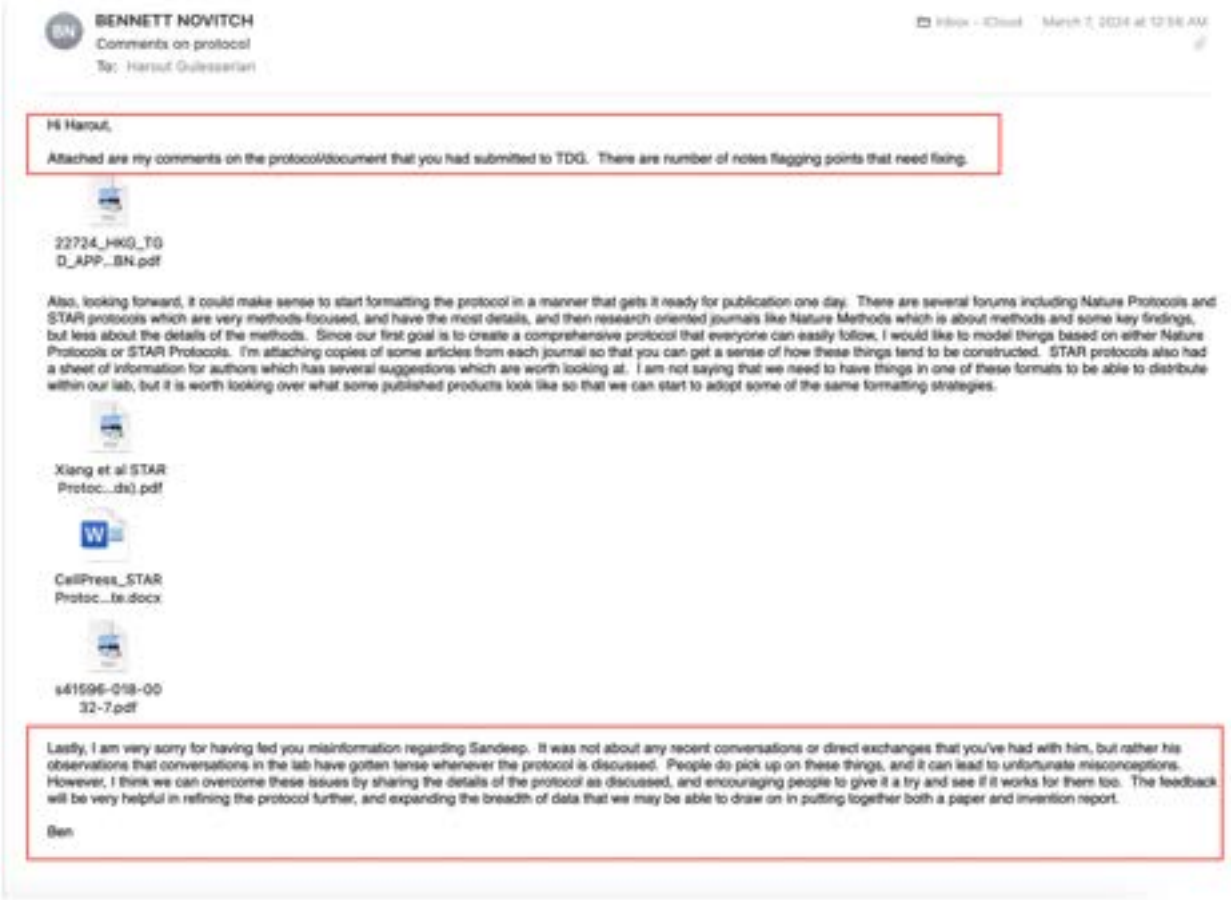
I urge UCLA to review the recordings of previous Zoom meetings, particularly this session, as it contains statements prioritizing "NIMH" over "UCLA" concerning economic gain for IP owned by UCLA. This violates the Bayh-Dole Act, and I am not going to partake in illegal acts.

From: Jacqueline M. Martin

Re: SSPSyGene Meeting Agenda 2/26/24

Evidence & Evidentiary ***Exhibit_37.22*** ***Mr. Gulesserian submitted his ACOP manuscript to UCLA's Technology Development Group (TDG) for intellectual property rights and patenting per university polict . A comparison with Exhibit_37.2 clearly demonstrates that the protocol detailed in the ACOP manuscript is distinct and substantively different from the earlier protocol forwarded by Dr. Novitch, thereby affirming the originality of Mr. Gulesserian's work.***

Evidence & Evidentiary ***Exhibit_37.23*** ***Dr. Bennett Novitch attached comments on Mr. Gulesserian's protocol—obtained from UCLA's Technology Development Group (TDG)—and subsequently disseminated the protocol without authorization. This action interfered with Mr. Gulesserian's ability to operate under Reagents Policy 5105 among others, potentially compromising his intellectual property rights and regulatory protections.***



BENNETT NOVITCH
Comments on protocol
To: Harout Gulesserian

Hi Harout,

Attached are my comments on the protocol/document that you had submitted to TDG. There are number of notes flagging points that need fixing.

22724_HKG_TGD_APP_BN.pdf

Also, looking forward, it could make sense to start formatting the protocol in a manner that gets it ready for publication one day. There are several forums including Nature Protocols and STAR protocols which are very methods-focused, and have the most details, and then research oriented journals like Nature Methods which is about methods and some key findings, but less about the details of the methods. Since our first goal is to create a comprehensive protocol that everyone can easily follow, I would like to model things based on either Nature Protocols or STAR Protocols. I'm attaching copies of some articles from each journal so that you can get a sense of how these things tend to be constructed. STAR protocols also had a sheet of information for authors which has several suggestions which are worth looking at. I am not saying that we need to have things in one of these formats to be able to distribute within our lab, but it is worth looking over what some published products look like so that we can start to adopt some of the same formatting strategies.

Xiang et al STAR Protoc...ds).pdf

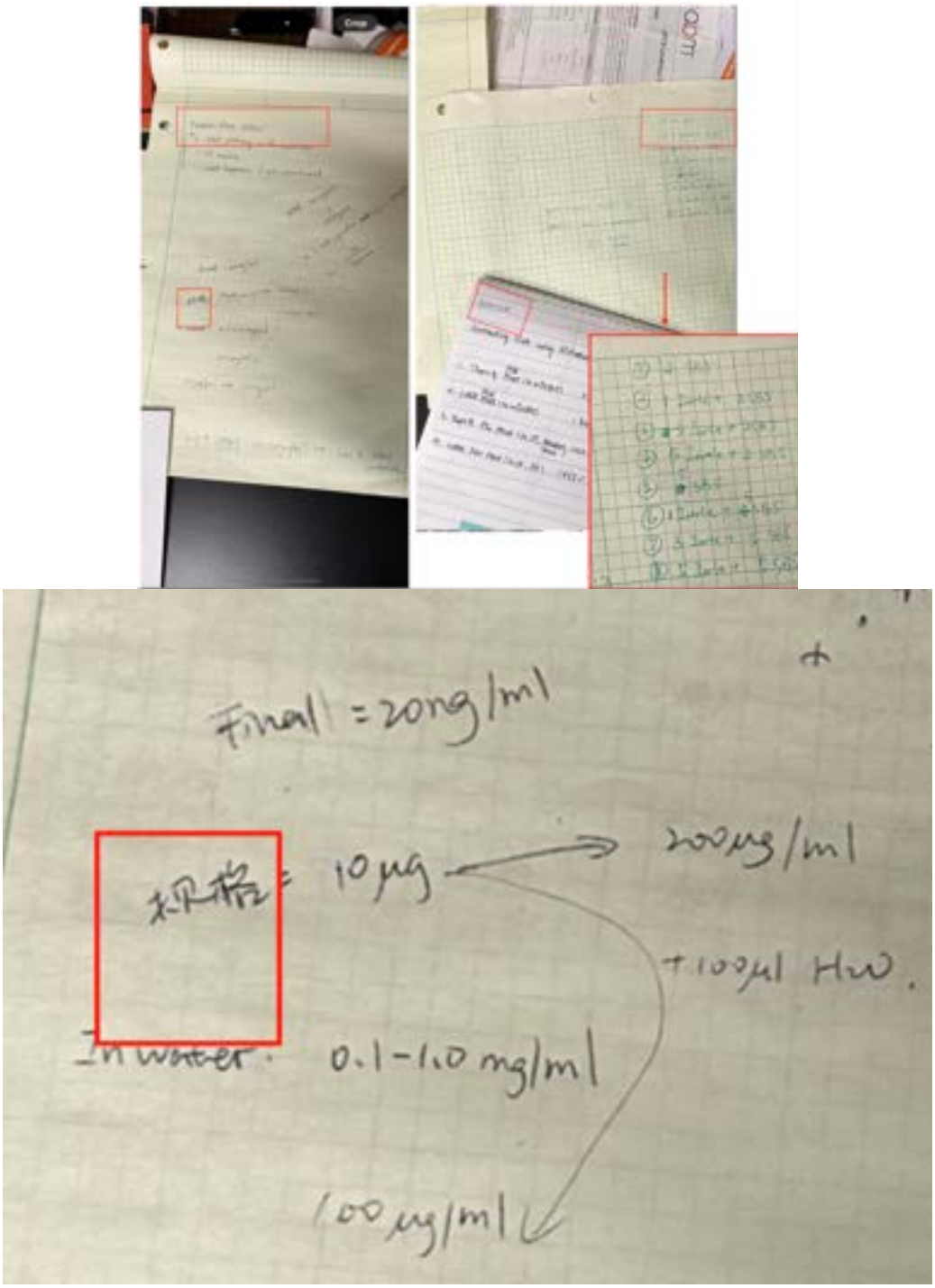
CellPress_STAR Protoc...te.docx

s41596-018-0032-7.pdf

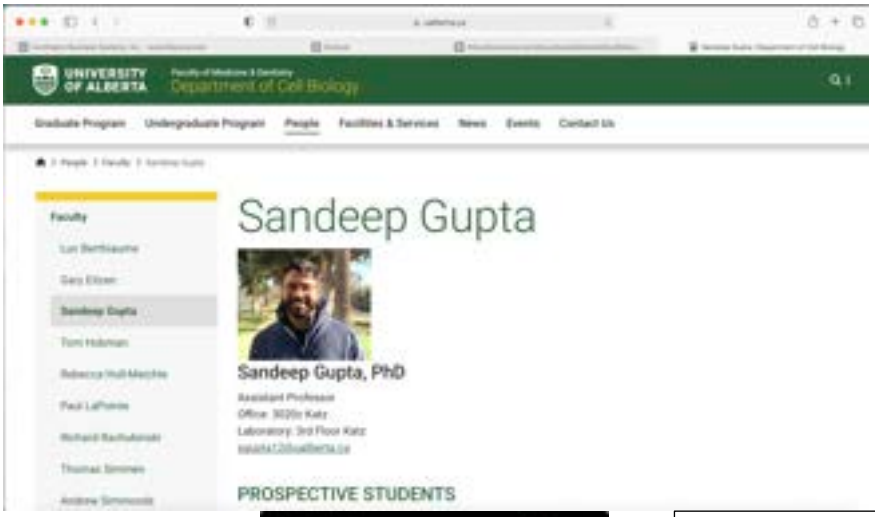
Lastly, I am very sorry for having fed you misinformation regarding Sandeep. It was not about any recent conversations or direct exchanges that you've had with him, but rather his observations that conversations in the lab have gotten tense whenever the protocol is discussed. People do pick up on these things, and it can lead to unfortunate misconceptions. However, I think we can overcome these issues by sharing the details of the protocol as discussed, and encouraging people to give it a try and see if it works for them too. The feedback will be very helpful in refining the protocol further, and expanding the breadth of data that we may be able to draw on in putting together both a paper and invention report.

Ben

Evidence & Evidentiary ***Exhibit_37.24*** ***In March 2024, Chinese writing was observed in the laboratory referencing aspects of Mr. Gulesserian's discovery. This raised concerns regarding the unauthorized documentation and potential external exposure of proprietary information.***



Evidence & Evidentiary **Exhibit 37.24** **continued International leaks of UCLA owned property**



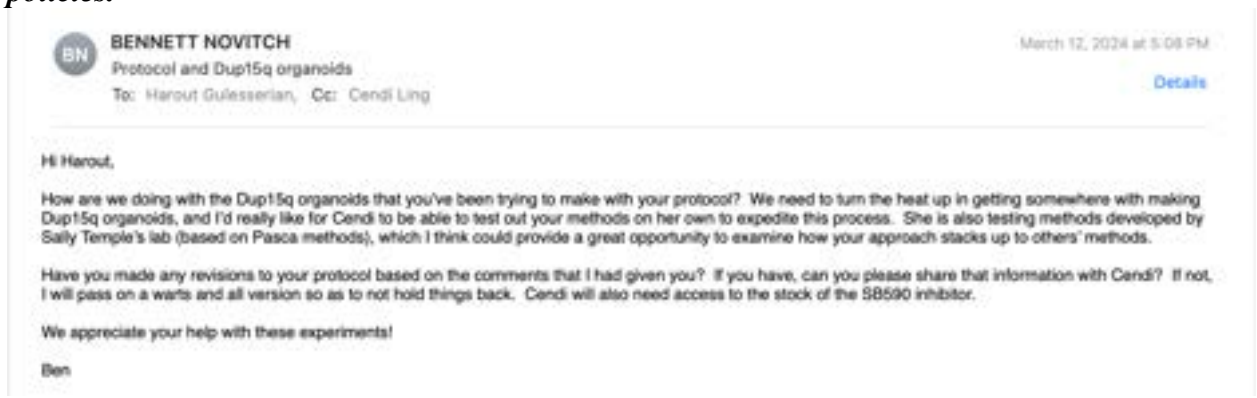
"Additionally, my lab is involved with developing regenerative medicine protocols for neural injuries such as stroke and spinal cord damage, generating specific neuron types for repairing damaged circuits. **Our approach involves collaboration with international partners to enhance treatment effectiveness and personalized therapies**."

1. **Gupta S***, Heinrich E*, **Novitch BG**, and **Butler SJ** (2024). Investigating the basis of lineage decisions and developmental trajectories in the dorsal spinal cord through pseudotime analyses. Development, * contributed equally.

https://apps.ualberta.ca/directory/person/sgupta12

https://www.ualberta.ca/en/cellbiology/people/faculty/sandeep-gupta.html

Evidence & Evidentiary ***Exhibit_37.25*** ***Dr. Bennett Novitch instructed Mr. Gulesserian to transfer all information related to his discovery to student Cendi Ling, implying that failure to do so would result in the forced waiver of Mr. Gulesserian's rights and potential misappropriation of the invention by other means. Mr. Gulesserian explicitly refused to waive his rights and instead continued to act in accordance with applicable laws and institutional policies.***



BN **BENNETT NOVITCH** March 12, 2024 at 5:08 PM

Protocol and Dup15q organoids Details

To: Harout Gulesserian, Cc: Cendi Ling

Hi Harout,

How are we doing with the Dup15q organoids that you've been trying to make with your protocol? We need to turn the heat up in getting somewhere with making Dup15q organoids, and I'd really like for Cendi to be able to test out your methods on her own to expedite this process. She is also testing methods developed by Sally Temple's lab (based on Pasca methods), which I think could provide a great opportunity to examine how your approach stacks up to others' methods.

Have you made any revisions to your protocol based on the comments that I had given you? If you have, can you please share that information with Cendi? If not, I will pass on a warts and all version so as to not hold things back. Cendi will also need access to the stock of the SB590 inhibitor.

We appreciate your help with these experiments!

Ben

From: **Harout Gulesserian** HKG90@icloud.com
Subject: Re: Protocol and Dup15q organoids
Date: March 18, 2024 at 3:42 AM
To: BENNETT NOVITCH bnovitch@g.ucla.edu

HG

Hi Ben,

First, let me thank you for the valuable info regarding starting to format the protocol in a manner that gets it ready for publication some day; I believe it's a great idea and I deeply appreciate all your valuable help. In fact, I can't wait to get that part of the project underway.

Second, I just would like to clarify that there seemingly is a distinction (with an imaginable difference) as to both form and substance regarding preparing and drafting the: (1) protocol documentation for academic publication as you brilliantly proposed; versus, (2) preparing the protocol documentation as to filing merely of a non-public skeletal "pre-patent" "provisional" application so as to comply with first-to-file rules with an early time-stamp and begin securing the intellectual property from intermeddling/misappropriation; and, then finally (3) as opposed to preparing the full blown rigorously scrutinized protocol documents with all the detailed data per your exact liking for drafting and prosecuting of the final "non-provisional" publicly published patent application and/or any other intellectual property interest protections that may exist under the Federal and State laws respectively.

Conceivably, in part because of UCLA best practices (I suspect these best practices are driven by the patent and intellectual property laws, whatever they may be, as I don't even purport to know anything about these laws, but TDG is extremely knowledgeable in this area and extremely helpful with wonderful guidance (see attached university links at the end of the email), it appears it is of ultimate legal importance to first quickly complete and conclude a minimum threshold skeletal filing option for the provisional/pre-patent intellectual property aspect of the project so as to essentially "race" towards the United States Patent Office (hereinafter "USPTO") time stamp from USPTO in an effort to protect the IP. Then, once this pre-patent time stamp is attained, subsequently the laws seemingly give us one year of time so as to comfortably gather all of the data you feel is needed, to do more deep dive research which may include (without limits) more people, including drafting any other documentation by others as you feel is of value as UCLA/TDG presumably will use a functionally more detailed substantive documentary form for the final non-provisional patent filing, as opposed to the primary provisional filing; thus, this two-step flexibility option invariably assists in securing the IP while encouraging our research supplemention throughout the year allowing even greater degrees of know how towards the subject matter underlying the goal of an ultimate final filing via a "non-provisional patent application" and perhaps contemporaneously publishing an academic publication via one or more of the "Nature Protocols" and "Star Protocols" which you proposed underscoring "Nature Methods."

This option effectively presents a win-win scenario which in part protects the IP while giving the flexibility to gather data and add additional publication value more fully.

On the flip side, if a provisional or "pre-patent" filing is NOT done, then this would likely constitute an act putting in very high risk and in extreme jeopardy: (a) my personal inventor credit, your inventor/PI credit, and UCLA's assigned interest before the USPTO respectively (evidently, this is not only a large foreseeable monetary value for UCLA and our lab, but also a perpetual academic value as to my career, our lab, and also particularly as to yourself as a world leading global PI on this subject matter because it is likely USPTO filings tend to be looked at favorably by both commercial enterprise and academia respectively).

Third, I know it's not a favorite topic of discussion, but given I remain exposed to nearly half a year of non-inclusive/discriminatory activities by lab members, sadly it is foreseeable that, if there is any malice by others towards me with intent towards precluding the filing of a pre-patent/provisional skeletal application of my discovery (or other acts thwarting TDGs ability to timely file a pre-patent/pre-release (such as potential willful infringement with anticipation to distribute an intellectual property work [such as my protocol] prepared for commercial distribution, by intentionally availing the trade secrets of my protocol to the public as opposed to only availing before the USPTO until a provisional filing can be had). Therefore, whether due to sabotage or sheer neglect by ongoing non-inclusive, discriminatory and/or retaliatory co-lab members, or otherwise, it becomes obvious that we cannot 100 percent exclude a risk of unlawful intermeddling/misappropriating, fraud or other intentional malfeasance to thwart a pre-patent filing; if for no other reason, that I essentially blew-the-whistle on discrimination and overt threats of intermeddling/misappropriation of my discovery/protocol/IP by co-lab member(s) to you.

Consequently, if any 3rd party intentionally or accidentally leaks my intellectual property (prior to a pre-patent skeletal barebones filing) to a nefarious 3rd party, then seemingly all proprietary discovered and learned details of the protocol and its specific intended commercial use would essentially become exposed (in 100% reproducible detail) to intermeddling third parties.

Sadly, as I told you numerous times in the past, I was put on notice (by folks even in our own lab) that individuals intend to misappropriate my discovery. Of course, subsequently after numerous verbal jabs by some folks in and about our lab, this whole madness ultimately culminated in brazen written notices to me of such intentions (which is sadly what it took for anyone to actually care about what I was saying for almost half a year).

Now, I hear you as you say all of the non-inclusiveness, discrimination, and intellectual property threats are basically just done as jokes and they are intended to be in jest. At some point perhaps I will be able to accept that this really was/is the case, but currently I cannot do so, and I understandably remain traumatized by the hostilities. The good news, however, (as I always try to be positive) is that luckily UCLA makes available a plethora of resources to help remedy exactly such types of violative matters, and despite the awkwardness I am truly trying to take affirmative efforts to get as much help to try find suitable remedies so as to be made whole again. In fact, again, I appreciate you reaching out with the ideas of helping the situation by proposing to do outside mediations. Going forward I need a little bit of time, but I am very willing to try your proposed outside mediations and I want to thank you for your offers to help. So perhaps we can also start planning or at least discussing how to ultimately get that moving as well.

That being said, it is axiomatic that UCLA, you, myself, and the lab would suffer immediate irreparable harm should someone decide to retaliate and simply take my discovery and allow a prior filing to outpace our pending filing. Imagine the foreseeable yet unneeded litigation this may trigger. On that note, and because of these seemingly bright line laws and rules, I humbly request that we make any and all edits necessary and keep whatever other requirements done in complete secrecy so as to at least allow TDG to file the pre-patent filing which seemingly resolves the First-to-File problem, and yet, that precisely would also allow us a greater comfort to circulate the protocol for greater testing and broader data with more people so that the protocol can subsequently be incorporated amongst all of the new future data and testing groups.

I submit giving the protocol to the others makes sense after TDG has filed and time stamped the bare bones minimum USPTO applications, as there is no guarantee that people who told me they will steal my product will not do so. I understand you are an honorable man and I appreciate you so much, and you have just as much to lose as I do, if one of the others even accidentally discloses the discovery to the wrong person(s).

Additionally, we can ask TDG if there are legal documents such as NDAs or other documents that would import further legal liability on any others should they accidentally or intentionally disclose my invention to 3rd party bad actors prior to at least TDG securing a bare bones USPTO time stamp filing. It may be wishful thinking, but I doubt either you or anyone else can provide UCLA and myself and yourself the written legal guarantees necessary to dampen the odds of such a bad foreseeable intermeddler scenario occurring. Keep in mind these are the same folks who make horrible jokes and ensure that I remain in a non-inclusive discriminatory hostile workplace, so my trust level in these folks remains very limited.

Please forgive me for being so worried, but I have suffered actual harms, threats, non-inclusive discrimination (as I am still not allowed to participate in the HIV project for example), hostile workspaces, retaliations, and yes maybe all of these things are intended as dark jokes, but what if being a devil's advocate, just what if, there was an ounce of truth behind these supposed "jokes." The fact of the matter is I was and remain harmed and I am trying to get better but it's not easy to do both at the same time, not to mention if something went wrong my harm would be disaster level harm. If TDG can outline in writing for us what is the minimum needed for a preliminary time stamped document that we can complete within the year, then this would be the safest method to share the protocol with third parties to do deep dive research and data. The worst-case scenario is that we are not happy with the data and the filing gets revoked and never becomes public. So, there is no downside to being safe and getting the bare bones time stamp filing going, with a year for us to build around the application and not be rushed.

This would also give me the time to try to get help, do mediation or whatever else and heal from all the negative issues discussed above.

Per UCLA's TDG Chief Intellectual Property Officer there is a request that we give them a list of all the "sponsor and MTA information" because they invariably need this information for processing the invention report (this was mentioned in our previous meeting) so as to begin the time sensitive pre-patent provisional time stamp filing so this can secure the IP so we can then more freely share the IP because the pre-patent provisional filing will serve as evidence in the right direction towards satisfying the legal requirements per the USPTO First-To-File rules. We can both reach out to TDG in writing, asking TDG to guide us towards securing and potentially patenting the discovery I made in your lab. I look forward to making great things in the Lab!

Thank you in advance for all your time and assistance on the above matters: all is DEEPLY APPRECIATED!

https://tdg.ucla.edu/ucla-researchers-innovators
https://tdg.ucla.edu/about/faq
https://tdg.ucla.edu/about/faq/ip-disclosure-ownership
https://tdg.ucla.edu/industry-investors/faq/patenting

Harout

> On Mar 12, 2024, at 5:08 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:
>
> Hi Harout,
>
> How are we doing with the Dup15q organoids that you've been trying to make with your protocol? We need to turn the heat up in getting somewhere with making Dup15q organoids, and I'd really like for Cendi to be able to test out your methods on her own to expedite this process. She is also testing methods developed by Sally Temple's lab (based on Pasca methods), which I think could provide a great opportunity to examine how your approach stacks up to others' methods.
>
> Have you made any revisions to your protocol based on the comments that I had given you? If you have, can you please share that information with Cendi? If not, I will pass on a warts and all version so as to not hold things back. Cendi will also need access to the stock of the SB590 inhibitor.
>
> We appreciate your help with these experiments!
>
> Ben

Evidence & Evidentiary ***Exhibit_37.26*** ***Dr. Bennett Novitch expressed his intent to pursue grant funding using the new protocol, acknowledging that the existing protocol in his lab was insufficient for producing large quantities of organoids, as noted by Graduate student. Baliaouri. In contrast, Mr. Gulesserian's protocol demonstrated high-throughput capacity and significantly higher output, underscoring its scientific and commercial value.***

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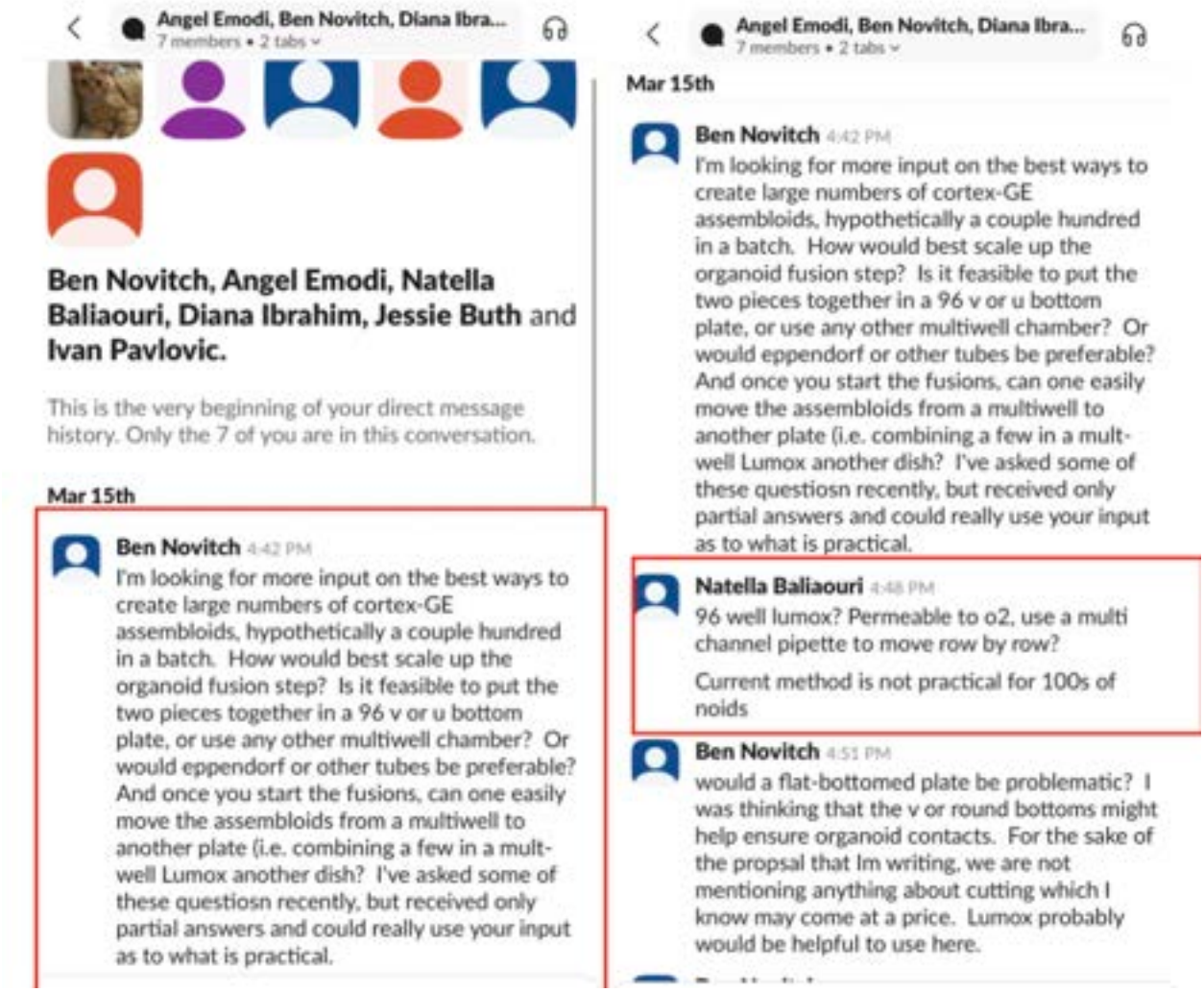
Slack



Evidence & Evidentiary Email 1

BENNETT NOVITCH

April 11, 2024 at 1:01 PM

Re: Recap

To: Harout Gulesserian

Hi Harout,

Just to let you know, I am under the gun to submit two NIH progress reports which are both due by Monday, so I am not going to be able to do any work on any of the IP stuff until that is all done. If you can send me what you have updated early-middle of next week, then we can pick up on fixing it up.

Ben

Evidence & Evidentiary Email 2

BENNETT NOVITCH

April 13, 2024 at 12:36 AM

Re: Delays

To: Natella Baliaouri, Cc: Harout Gulesserian

Details

I need to clear the air here, as I seem to be the initiator of this request from a conversation that I had with Ivan earlier today. He mentioned that he was unable to do many hippocampus recordings before he graduates since there have been problems with organoid formation broadly in the lab, likely related to the MEF issues. I commented to him that perhaps he could talk to Harout to see if some of the many organoids that he and Erick have been generated from the KOLF2.2J cell line could be spared and tested to see if they could be turned into hippocampus and GE, which to my knowledge still has not been formally tested. I was thinking of this as a potential win-win and perhaps give us a chance to start thinking about conducting some electrophysiological recordings which could be great for both validating the FF organoid protocol and advancing the goals of our SSPsyGene project.

I do not understand why we continue to be at this impasse with not sharing information within our lab: methods and materials to help one another openly and without conditions attached. It is counterproductive for everyone and breeds contempt. If someone in the lab is struggling or needs help- it should be provided, period.

Harout, this whole business about "the patent" is driving me nuts. A lot of work and contributions from people in the lab before you have gone into these methods, and I thus view our methods as the collective wisdom and property of the lab. Anyone working in our group should have access to that knowledge and the reagents needed. Please give the information that Natella, Cendi, and anyone else who is struggling with their organoid experiments need to see if what you've found works for you also works for them and their cells. It is imperative that we keep all of our projects moving forward as we have an obligation to our funding agencies to do the experiments that we said that we were going to do. By withholding information or providing it piecemeal, it is impeding other's progress and thus harms everyone. Funding for our Rett syndrome project has been fueling a lot of our research expenses and going towards people's salaries. If we do not fulfill our obligations and make steady progress, it puts everything at risk.

Rest assured, we will follow through with doing what is needed with submitting an invention report on these methods, but know that this is just a first step in the process of getting a patent, which is going to take more demonstration of utility, and the more examples we can generate, the better. The most tangible gains that we will likely see are potential boosts in everyone's experimental success, which could help people get their work done more efficiently, leading to more papers, better success in fellowship, job, and grad/med school applications, and enable us to get the research funding that we need to continue our research and pay for everyone's salaries. Importantly, these gains can be realized right now- not in a hypothetical future.

I would like to meet with both of you to discuss this further and make sure that we're all on the same page. Will Tuesday at 9am work for you?

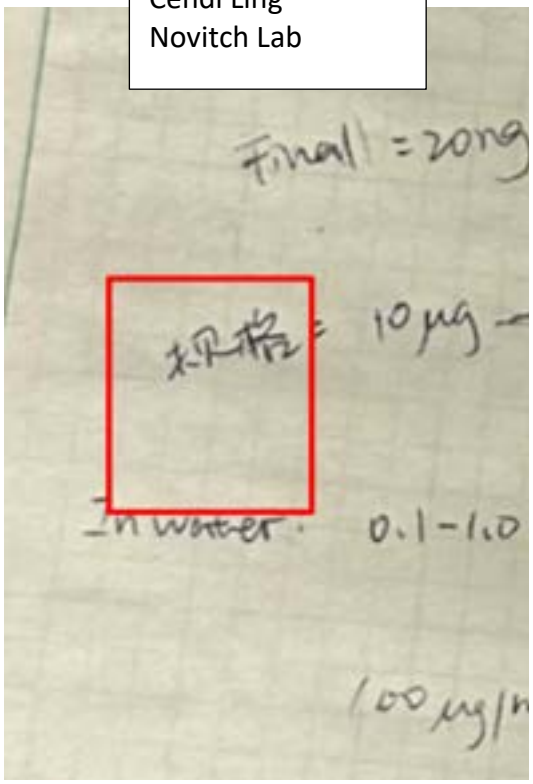
Ben

Evidence & Evidentiary

Exhibit_37.27 Misappropriation of trade secrets

03/26/2024
Chinese patent filed

03/10/2024
Cendi Ling
Novitch Lab



Evidence & Evidentiary **Exhibit_37.28**

Molecule is now sold out mysteriously by top vendors

3/26/2024 Item is sold out, no protection of IP by Novitch or attempts; Gulesserian alarm bells ringing 3/31/2024 Novitch does zero nothing

From: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Sent: Tuesday, March 26, 2024 10:50 AM
To: Phan, Minh D. <MDPhan@mednet.ucla.edu>
Cc: Gulesserian, Harout K. <HGulesserian@mednet.ucla.edu>; Ling, Cendi <CendiLing@mednet.ucla.edu>
Subject: Re: Bio-Techne RE: PO# 14300000051403 (Case #01879889)

It's sold by some other companies https://www.adooq.com/sb590885.html?gad_source=1, also from Sigma though the latter is not in stock.

Sent from my iPhone

> On Mar 26, 2024, at 11:48 AM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:
>
> Ugh. Is there any other vendor? Harout it would actually be worth testing other Braf inhibitors to see if the effects are specific to SB or recapitulated by other modulatory drugs
> Sent from my iPhone
>
> > On Mar 26, 2024, at 11:18 AM, Phan, Minh D. <MDPhan@mednet.ucla.edu> wrote:
> >
> > #2650/10

On Mar 31, 2024, at 10:44 PM, Gulesserian, Harout K. <HGulesserian@mednet.ucla.edu> wrote:

Hi Ben,

I wanted to bring to your attention that a few of the incubators in the TC seemingly have defective magnets. Apparently, now this is causing a buildup of moisture on the glass door if the magnet is not clicked in properly. As you can imagine, this is causing obstacles in the lab leading up to quandaries in the lane. If you want, I can try to facilitate with some help by contacting Bryan, and ascertain if Bryan and his affiliate can fix the problems or order new parts, if need be. Let me know.

Also, in an earlier email I had mentioned the desire to complete the RNA sequence. The main issue is that the core's sequencing application is asking for the funding information; regretfully, these are items that are not in my possession. If you would be so kind to please forward that information, then I can get that out of the way, as well.

Moreover, per your request to get a different BRAF inhibitor, here is just a thinking-out-loud thought: perhaps it's more cost efficient to wait for the above referenced RNA sequence data before we essentially blindly move towards a different modularity Rx or molecule. Essentially, this may very well be the case because the RNA sequence data may provide valuable insight as to which pathways would be inhibited (or promoted), which in turn, hypothetically further allows us to identify other categories of drugs that may work instead of just sticking with the SB BRAF inhibitor only. Also, in my view, alarm bells are ringing as we are seeing that the SB590885 drug is completely sold out with two top vendors. That being said, can we please process the previously referenced information (MTA & Sponsor Info) for TDG to complete the first-to-file pre-release provisional application with the USPTO (aka, United States Patent Office). Seemingly, filing the time-stamp sensitive provisional USPTO application ensures that proper inventor credit is had before the Federal government (timely application & prosecution in furtherance of patent protection) prior to any other third-party officious intermeddlers attempt to misappropriate via pilfered attempts to prevent TDG's timely filing of my instant protocol discovery, and thus opening foreseeable unneeded litigation floodgates, as well.

Furthermore, given Cendi was cc'd on the supplier email for the SB590885 drug, these issues are raising the specter of the imperative to get all the funding and MTA info over to TDG ASAP so TDG can immediately complete the pre-patent provisional USPTO application and thus seemingly secure the IP because time is legally of the essence. Consequently, our lab may not be equipped to protect the IP under the current operational status-quo; further making the case for the filing of the immediate provisional application which would basically give us the additional time needed to ensure our gathering of the requisite data exactly per your liking and comfort zone.

Consequently, until the RNA sequence data comes back, and until the provisional pre-patent application is completed with USPTO, the question remains: what safeguards to protect the IP are in place with our lab (and anyone else even remotely associated thereto); furthermore, presuming there are any safeguards (for the sake of argument), I am wondering how exactly these safeguards (if any) are in line with the first inventor to file (FITF) provision of the America Invents Act which profoundly transitioned the U.S. to a first-inventor-to-file system.

Please advise. Thank you so much and I hope you had a fantastic Spring Break!

Harout

On Apr 1, 2024, at 12:14 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Hi Harout,

I am working on time sensitive grant related matters today (they are due tomorrow so are eclipsing all else), and so do not have much bandwidth to discuss some of the things that you've raised below and in earlier emails. Let's plan on talking on Wednesday. I think that I should have a little time free around midday (11:30-1:30pm) and probably 4-5pm. If not then, Thursday 4-5pm would be the next time open. I will nevertheless repeat my wishes which is to submit an invention report only after I've seen proof that the methods can be reproduced by other's hands so that I know that it's the robustness of the drug and methods as you've composed them, and not just your personal magic which, while great, would be hard to commodity. I am hoping that you've been working with Cendi and others in the lab in giving the instructions and guidance so that we can get past this bottleneck. We also need complete replication with more cell lines to learn where the limitations are if the methods are not as universally great as has been touted. It's a win-win to get these replication studies done.

Did we find availability of the drug from other vendors? Products go in and out of stock all the time, so I would not read into anything there. I would nevertheless order some from wherever you can get it so that we're not without it so that we can continue testing and using it to move our research projects forward.

Regarding the incubator, please do contact Bryan and work with Keith in getting replacement parts as needed.

Thanks,

Ben

From: Gulesserian, Harout K. <HGulesserian@mednet.ucla.edu>
Sent: Tuesday, April 2, 2024 1:34 PM
To: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Subject: Re: Bio-Techne RE: PO# 1430000051403 (Case #01879889)

Hi Ben,

The intention of filing my protocol discovery with TDG was to comply with University Policy which is essentially designed to protect the IP interest under federal and state laws. Per TDG instructions, and essentially per Federal Law (which TDG explains very well to lay people like myself), filing a provisional application is imperative under Federal and International IP laws. In this instant case, the hold up to filing a provisional (not non-provisional, but provisional) time stamp under the Federal Laws is essentially failure to deliver to TDG what TDG expressly asked for: "The sponsor and MTA information are critical for processing the invention report," and thus, we were strong put on notice from TDG that the "pre-patent" provisional USPTO time stamp is nonpublic and lapses in one year with no public published material should the data prove not good, as you seem to overly be worried about, but what the provisional USPTO application shall do is further strengthen the ability to do more testing and gather more data while the IP is secured under the first inventor to file ("FITF") provision of the America Invents Act.

After discussions/dialogue with UCLA offices of Chief Intellectual Property Officer/ TDG/Associate Vice Chancellor it is evident that failing to file the provisional patent application and continuing to operate under these conditions is inconsistent with TDG instructions, University Policy, and Federal law because it exposes the IP to malfeasance and fails to safeguard IP interest as intended under the above rules. Moreover, due to such seemingly zero safeguards and an ongoing no University Policy operational scenario, I am again left with only the ability to speculate and surmise at admitted misappropriation/discriminatory lab member intentions, and as such expressly continue to reserve all my federal, state, and any other inventor/creator rights/remedies at law and in equity (if any), make zero waivers, irrespective of any action or inaction of any members of our lab or any other associates/affiliates or any others.

As far as your grant goes, I know that it's very important to you in terms of time sensitive matters, but so is the protecting the IP and it's been some time now since TDG addressed this for us and thus I am hoping my FF organoid protocol/use of SB590885 does not become subject to misappropriation/trade secret/exposure or otherwise used in any way by any 3rd party officious intermeddlers or any other until my inventor/creator interest is preserved under any and all state and federal laws. These matters are particularly important given there has been zero attempts at doing the proposed mediations to remedy the discriminatory/retaliatory/hostile/misappropriation admitted activities of all the usual lab member suspects, as I have objected and continue to object, to my protocol making it to the hands of Cendi/Natella and any others in the lab from my end until the IP inventor/creator credit is secured in line with the FITF under the America Invents Act.

This is why drafting and prosecuting the IP with the provisional time stamp shall further the end of sharing and seemingly circulating the IP for data gathering/testing purposes or otherwise making available the protocol with our UCLA lab members, other UCLA labs, or other Universities and researchers; this is why I object to any potential or existing orders or actions which fail to take the legally necessary and appropriate steps to preserve the confidentiality, drafting and prosecuting of the trade secrets/IP consistent with the requirements of UCLA policy, state, federal and all other applicable laws. In fact, the protocol/discovery was only shared with TDG and that's how you obtained the information as they were waiting for you to sign off on the application from my understanding.

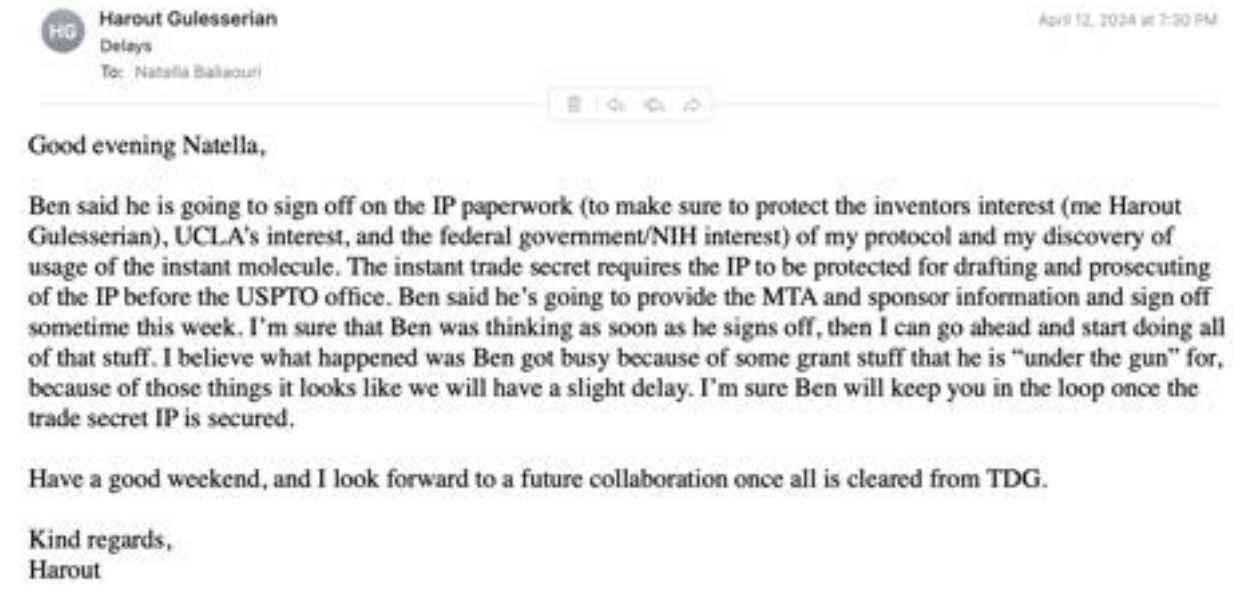
It's unfortunate to talk about these things but I have noted to you many times active discrimination/retaliation/hostile misappropriation issues from the not so above-board personnel which we have yet to do any remedial mediations or any other remedial matters as you so generously offered as help to assist and improve the continuous and systematic ongoing above referenced issues in lab.

Hopefully, you will find some time to devote to these very important matters and as always please forgive any lengthy emails but until matters in lab are remedied, I remain harmed, and I can only work hard and continue to ask for help; thank you in advance for your help and assistance, as I know you are busy and I very deeply appreciate your time.

Harout

Evidence & Evidentiary ***Exhibit_37.29*** ***On April 2, 2025, during an in-person meeting, Dr. Bennett Novitch stated that he would only approve the necessary paperwork if Mr. Gulesserian agreed to share his discovery with Dr. Aparna Bhaduri's lab (a member of the consortium group who had their protocol patented by TDG) prior to securing any intellectual property protection through UCLA's Technology Development Group (TDG). It was later revealed that Dr. Bhaduri had already submitted a protocol for patent consideration through TDG.***

Evidence & Evidentiary ***Exhibit_37.30*** ***Efforts by Mr. Gulesserian to disclose his intellectual property to the University for patent protection appeared to cause significant agitation to Dr. Novitch, as evidenced by an email he sent on April 13, 2025, at 12:56 AM. Additionally, Mr. Gulesserian's detailed email to Dr. Novitch on April 15, 2025, which outlines the full scope of the issues, should be reviewed in its entirety for context.***



Harout Gulesserian
Delays
To: Natella Baliaouri

Good evening Natella,

Ben said he is going to sign off on the IP paperwork (to make sure to protect the inventors interest (me Harout Gulesserian), UCLA's interest, and the federal government/NIH interest) of my protocol and my discovery of usage of the instant molecule. The instant trade secret requires the IP to be protected for drafting and prosecuting of the IP before the USPTO office. Ben said he's going to provide the MTA and sponsor information and sign off sometime this week. I'm sure that Ben was thinking as soon as he signs off, then I can go ahead and start doing all of that stuff. I believe what happened was Ben got busy because of some grant stuff that he is "under the gun" for, because of those things it looks like we will have a slight delay. I'm sure Ben will keep you in the loop once the trade secret IP is secured.

Have a good weekend, and I look forward to a future collaboration once all is cleared from TDG.

Kind regards,
Harout

NATELLA VAHKTANGOVNA BALIAOURI

April 12, 2024 at 7:49 PM

Re: Delays

To: Harout Gulesserian, Cc: BENNETT NOVITCH

Details

Hello Harout,

If this is in regards to my slack message, which I will copy here, I don't understand the reason for this email.

"Hey harout, can I have some of your d13 organoids to generate ge, cx and hippocampus to test their potential for different brain regions?
Ben mentioned you have a lot of ~d13 and we can help out with the more specific differentiation, and I'd be happy to teach you ifp and gcamp"

We would be taking organoids and using protocols unrelated to your work and developed in the Novitch lab previously. Additionally, if there are organoids at a good time point delaying it just sets everyone back as if this protocol has some issues with hippocampus generation, I won't find out in a timely manner and will likely end up using something else. Testing GE/HIP is past your IP and it would be good to know if it even works with alternative brain regions.

Furthermore, materials were wasted because you suggested preparing stem cells weeks ago and then refused to allow me to process them or to process them yourself. Because our stem cells do not grow well on FF, we wasted multiple vials upon your suggestion.

I do not understand the constant miscommunication regarding timing, the multiple instances of preparing materials for "a week from now", and the difference in how you've been treating myself from other lab members.

I have no desire to infringe on your discovery, I do not know how to make it more clear that I am offering assistance as I am literally the only person in lab with certain protocols and skills, ones that I am happy to share.

I hope your protocol is patented and published quickly, and would be happy to contribute or have Diana help out as she is on her way to being an excellent electrophysiologist herself.

All the best,

Natella

See More from Harout Gulesserian

BENNETT NOVITCH

April 13, 2024 at 12:36 AM

Re: Delays

To: Natella Baliaouri, Cc: Harout Gulesserian

Details

I need to clear the air here, as I seem to be the initiator of this request from a conversation that I had with Ivan earlier today. He mentioned that he was unable to do many hippocampus recordings before he graduates since there have been problems with organoid formation broadly in the lab, likely related to the MEF issues. I commented to him that perhaps he could talk to Harout to see if some of the many organoids that he and Erick have been generated from the KOLF2.2J cell line could be spared and tested to see if they could be turned into hippocampus and GE, which to my knowledge still has not been formally tested. I was thinking of this as a potential win-win and perhaps give us a chance to start thinking about conducting some electrophysiological recordings which could be great for both validating the FF organoid protocol and advancing the goals of our SSPsyGene project.

I do not understand why we continue to be at this impasse with not sharing information within our lab: methods and materials to help one another openly and without conditions attached. It is counterproductive for everyone and breeds contempt. If someone in the lab is struggling or needs help- it should be provided, period.

Harout, this whole business about "the patent" is driving me nuts. A lot of work and contributions from people in the lab before you have gone into these methods, and I thus view our methods as the collective wisdom and property of the lab. Anyone working in our group should have access to that knowledge and the reagents needed. Please give the information that Natella, Cendi, and anyone else who is struggling with their organoid experiments need to see if what you've found works for you also works for them and their cells. It is imperative that we keep all of our projects moving forward as we have an obligation to our funding agencies to do the experiments that we said that we were going to do. By withholding information or providing it piecemeal, it is impeding other's progress and thus harms everyone. Funding for our Rett syndrome project has been fueling a lot of our research expenses and going towards people's salaries. If we do not fulfill our obligations and make steady progress, it puts everything at risk.

Rest assured, we will follow through with doing what is needed with submitting an invention report on these methods, but know that this is just a first step in the process of getting a patent, which is going to take more demonstration of utility, and the more examples we can generate, the better. The most tangible gains that we will likely see are potential boosts in everyone's experimental success, which could help people get their work done more efficiently, leading to more papers, better success in fellowship, job, and grad/med school applications, and enable us to get the research funding that we need to continue our research and pay for everyone's salaries. Importantly, these gains can be realized right now- not in a hypothetical future.

I would like to meet with both of you to discuss this further and make sure that we're all on the same page. Will Tuesday at 9am work for you?

Ben

From: **Harout Gulesserian** HKG90@icloud.com
Subject: Re: Delays
Date: April 15, 2024 at 2:25 AM
To: BENNETT NOVITCH bnovitch@g.ucla.edu

Hi Ben,

Once again, I am objecting and reserving all rights and making no waivers, period. Furthermore, regarding your statements as to how you view "our methods as the collective wisdom and property of the lab" is seemingly irrelevant and insidious. Moreover, let me remind you that my discovery on 09/11/2023 was a complete accident. In as much as my accidental discovery (and my declaratory "creator"/"inventor credit under Federal law) is now all of a sudden being dubbed a collective lab effort according to you, arguably this defies federal, state, and university policy for many reasons, but also because you are not designated as the arbiter of law and fact with this particular decision-making process.

It is instead arguably TDG, UCLA patent counsel, CIPO, and the President who determine and opine these specific intellectual property decisions as to who is dubbed a "creator"/"inventor". Had the data been coming out unfavorable regarding my accidental scientific discovery, it would seemingly be used by you to my detriment. This accidental discovery by me is by no means a collective effort, rather an employee working 7 days a week while also progressing the work of multiple grad students for two years (one who essentially seldom showed up, and another who essentially rarely stepped foot in the TC for the last 1.5 years, nor was in lab working on Saturday/Sunday (while I was there Saturdays and Sundays for no extra pay feeding their respective batches and insuring their respective projects go forward) in an ongoing hostile work environment, as I remain subjected to consisting of discriminatory, non-inclusive, retaliatory, individuals further trying to misappropriate my invention of the FF protocol and my discovery of usage of SB590885. Let me remind you that I have put you on notice about these matters for some time now. I also accepted your proposed outside mediation which you made zero attempts to schedule or execute, thus remaining with zero attempts to remedy the described retaliatory hostile workplace.

Additionally, even before my discovery when I tried to mention the non-inclusive discrimination nothing was or has been done about it. Instead, I still remain to this day intentionally marginalized to ensure I do not have a meaningful opportunity to participate and promote regarding the HIV project. Whereas others who are similarly situated can claim that they are part of this collective effort in the HIV project, but I remain singled out, even to this day. I can't count how many numerous times I have given you notice regarding that in addition even after my discovery to the numerous subsequent retaliatory hostile attempts to misappropriate the intellectual property that I created/invented by accident.

Moreover, you continued/continue to foster this toxic environment since last year, as for months upon months you would dismiss my complaints as simply things in my head and do nothing regarding these very important matters. Things had to get so bad regarding the marginalization against me with discriminatory, retaliatory, and unspeakable hostilities, intentional words and/or acts that the situation had to get so bad for you to finally believe me, that some of the very same people who you allege is their "collective wisdom" which dubs them somehow miraculously as "creators" and "inventors" of my accidental discovery, and these are the very same people who notified me in writing that it is their intent to misappropriate my intellectual property interest regarding my discovery/ protocol. Furthermore, if this was a collective lab effort, then why were individuals sending messages of the like : " Harout, please send out the protocol or else I will have to steal it somehow" (please see imaged screenshot below).

Stealing something by definition means what is being stolen is someone else's property interest, neither the collective labs "creator"/"inventor" interest nor any other misappropriating lab members "creator"/"inventor" interest; by this admission in writing of attempted misappropriation of my "creator"/"inventor" by other lab members it is axiomatic that declaratory "creator"/"inventor" interest from my accidental discovery is exclusively mine and not the interest of other malicious lab members.

It is well known that whatever interest is had in intellectual property, such as that of my discovery, UCLA policy, along with state, and federal laws dictate what interest shall be had and by whom. From all of the communications with any and all University resources it is clear that I have some kind of declaratory interest dubbing me as a creator and/or inventor. To my knowledge all this time since my initial accidental discovery there are zero declarations by any of our lab members which are made under oath and punishable by penalty of perjury that assert they are "creators" or "inventors," let alone any draft manuscripts regarding the intellectual property discovery presented to TDG or any other UCLA authority asserting that there are other people besides me who share such interests.

These repeated attempts to force me to waive my rights to people who said openly they will try to "steal"/misappropriate my IP in exchange for any insinuations regarding my or any other staff pay checks, or me to otherwise be denied from securing my Federal Law interest as "inventor" and UCLA policy as "creator" certainly is not in line with UCLA policies, State or Federal law.

Again, I expressly object to any and all such malfeasance, I make zero waivers, and I reserve all rights and remedies. Let this be clear I shall not be bullied by admitted "steal" attempts and misappropriation attempts from other lab members who have gone so far as to notice me, you and by extension all of UCLA of this malicious intent in writing. What's mind boggling is I remain singled out, and the original ethnic/national origin/negative non-inclusive discriminatory intent which precluded me and still precludes me from meaningful opportunities to participate in the HIV project remains, as you are siding with these malicious intent actors and attempting to force me to waive my rights or otherwise you will essentially not provide the most basic required and necessary (in your exclusive possession) information to TDG. Maybe this discriminative ethnic/national origin/negative non-inclusive discriminatory intent which precluded me and still precludes me from meaningful opportunities to participate in HIV project likely stems and originates from you because that treatment is very similar to the treatment you are giving by intentionally precluding supplying the MTA and SPONSOR information to the patent office to initiate the patenting process. So, I think about the two things below:

1) Why are you not providing the information that you are supposed to provide as per UCLA policy to protect the intellectual property rights?

Evidence & Evidentiary ***Exhibit_37.30*** ***As of April 15, 2024 if not earlier, Mr. Mark Lucas had direct knowledge of the ongoing situation and, by siding with Dr. Bennett Novitch, became a complicit party to the matter. Mr. Lucas failed to act in accordance with university policy regarding the reporting and resolution of a hostile work environment, as well as violations of University rules, policies, and procedures.***

BENNETT NOVITCH

Re: Delays

To: Harout Gulesserian, Cc: Mark Lucas

April 15, 2024 at 9:56 AM

Details

Siri found new contact info: Bennett Novitch bnovitch@g.ucla.edu

add...

Hi Harout,

Your response has raised a number of concerning allegations. We will now need to have a discussion mediated by our departmental CAO Mark Lucas, who I have cc'd on this message, so that we can once and for all set the record straight as to what I am asking of you, and for you to air your concerns about me and the positions that I am taking.

I will reiterate once more and in very plain terms - what I am asking is for you to do is assist members of my laboratory in their experiments to best achieve the goals of our research. You are specifically paid from funds that we have received from NIH - funded by the American people - to support these research activities. As a staff research assistant, it is part of your job requirement to assist others. At this moment in time, people in the laboratory are encountering difficulties in achieving their goals, and your alternative cell culture methods could potentially help them overcome these bottlenecks. If you continue to refuse to help members of the laboratory in their research efforts, I will have no choice but to conclude that you no longer wish to do your job. This would sadden me greatly.

Please note that none of these concerns affect our previously discussed plans to pursue an invention report submission regarding your serendipitous finding about a small molecule that may improve brain organoid formation and development of a cell culture protocol (based on previous work from my laboratory) that maximizes its impact. You will get credit for your discovery, and I will continue to be enthusiastic about working with you on experiments to determine the mechanisms by which the molecule works. However it is essential to also assess whether the positive benefits of this molecule can be extended to improving problematic cell lines. This would be a major advance for the lab, reinforce the importance of your finding, and further our research productivity. Everyone would win in this scenario. It is inexplicable to me that you are continuing to be an obstructionist on this point and are endangering our previously good working relationship and raising tensions across lab members.

I would also like to clarify that our obligations are not to TDG and its leadership, it is to the NIH, the American taxpayer and patient needs. TDG's primary role is to provide a service to our University in helping us commercialize ideas and tangible property. The University does not mandate use of their services, and they have no authority over our research.

Mark Lucas is unfortunately out of town at a conference this week, so the earliest that we could have this mediated meeting will be Monday April 22. I would like to put forth a suggested time of 9:00 am if it works for Mark too. Please let me know if this time is acceptable.

Ben

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

Phone (office): 310-794-9339
Phone (lab): 310-825-7565
Fax: 310-825-2224
Email: bnovitch@ucla.edu
Web: http://novitchlab.com

BENNETT NOVITCH

Re: Delays

To: Harout Gulesserian

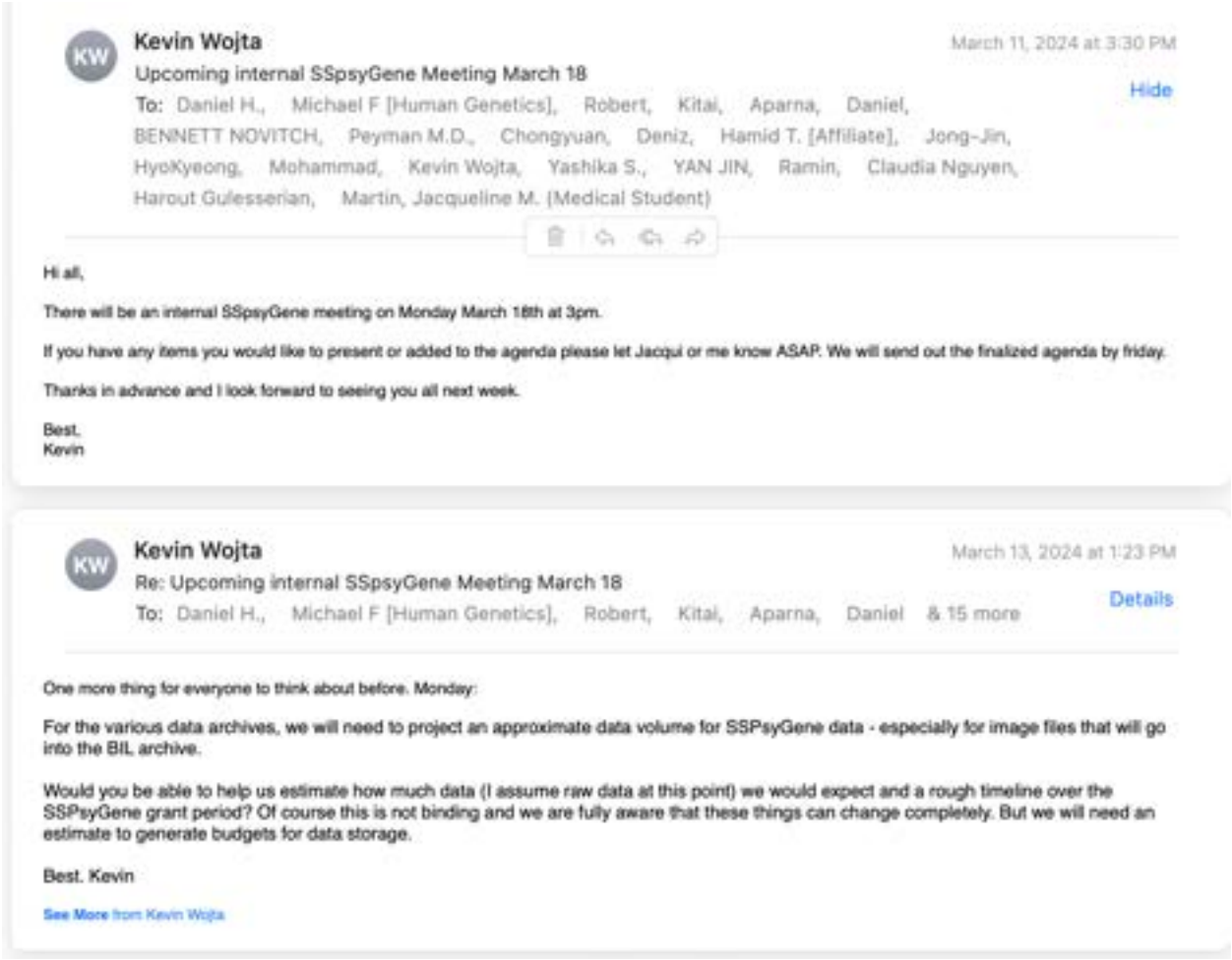
April 15, 2024 at 4:48 PM

Hi Harout,

Following up on this email from this morning, Mark Lucas is not going to be available until Monday April 22 at 10am. Can you meet with us at that time?

Ben

Evidence & Evidentiary ***Exhibit_37.33*** ***The entire consortium, Novitch lab, and Butler lab members were all aware of Mr. Gulesserian's discovery, and as such, all members had knowledge when Dr. Bennett Novitch improperly exposed the invention to the National Institute of Mental Health (NIMH) without reporting it to the appropriate stakeholders on or about November 15, 2023, (See NIMH video), including UCLA's Technology Development Group (TDG) and other relevant parties with interest. Right from the start Novitch had a motive to defraud the system for personal gains among other things.***



Kevin Wojta March 11, 2024 at 3:30 PM

Upcoming internal SSpsyGene Meeting March 18

Hide

To: Daniel H., Michael F [Human Genetics], Robert, Kitai, Aparna, Daniel, BENNETT NOVITCH, Peyman M.D., Chongyuan, Deniz, Hamid T. [Affiliate], Jong-Jin, HyoKyeong, Mohammad, Kevin Wojta, Yashika S., YAN JIN, Ramin, Claudia Nguyen, Harout Gulesserian, Martin, Jacqueline M. (Medical Student)

Hi all,

There will be an internal SSpsyGene meeting on Monday March 18th at 3pm.

If you have any items you would like to present or added to the agenda please let Jacqui or me know ASAP. We will send out the finalized agenda by friday.

Thanks in advance and I look forward to seeing you all next week.

Best,
Kevin

Kevin Wojta March 13, 2024 at 1:23 PM

Re: Upcoming internal SSpsyGene Meeting March 18

Details

To: Daniel H., Michael F [Human Genetics], Robert, Kitai, Aparna, Daniel & 15 more

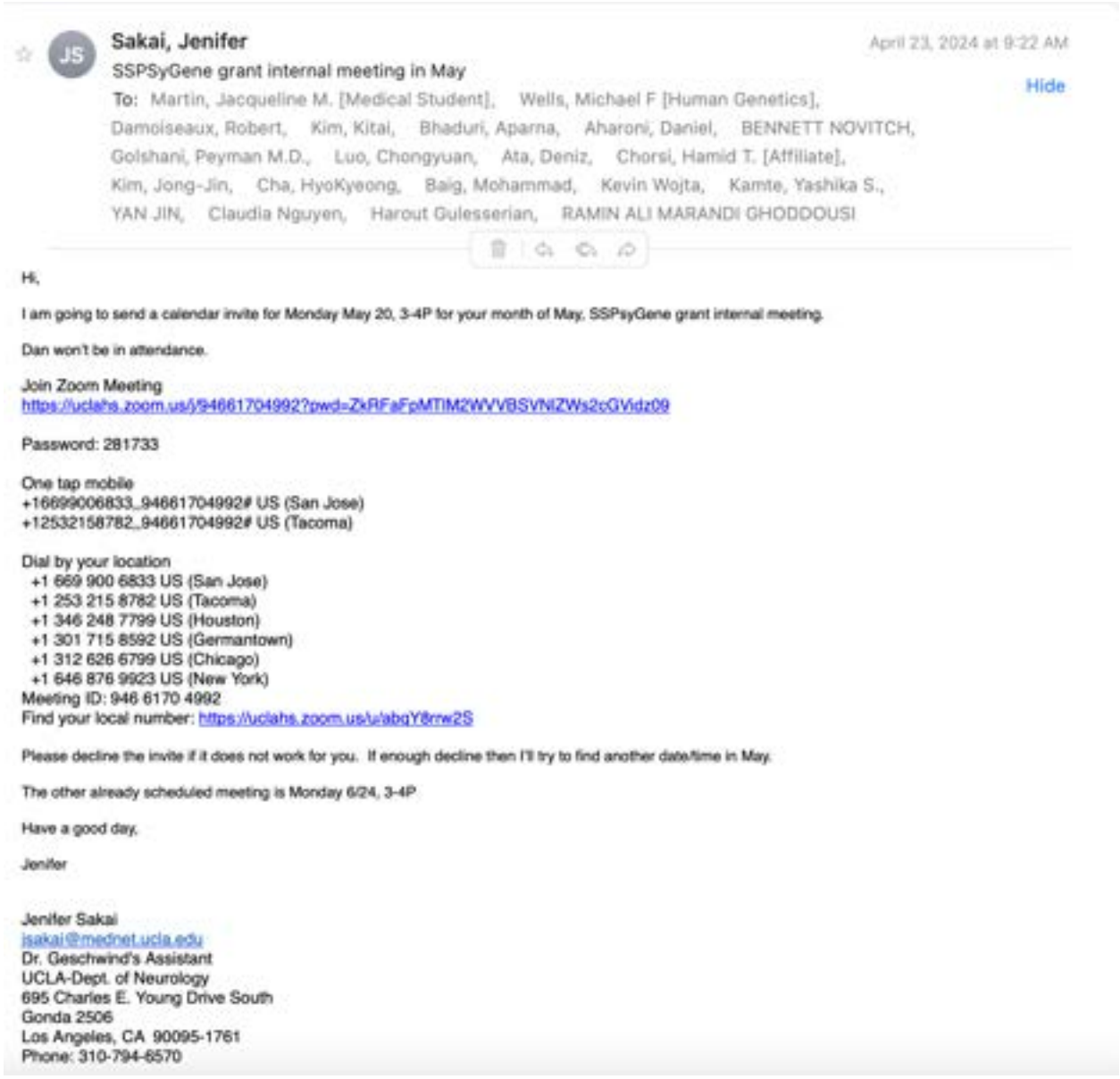
One more thing for everyone to think about before. Monday:

For the various data archives, we will need to project an approximate data volume for SSPsyGene data - especially for image files that will go into the BIL archive.

Would you be able to help us estimate how much data (I assume raw data at this point) we would expect and a rough timeline over the SSPsyGene grant period? Of course this is not binding and we are fully aware that these things can change completely. But we will need an estimate to generate budgets for data storage.

Best. Kevin

See More from Kevin Wojta



Sakai, Jenifer April 23, 2024 at 9:22 AM

SSPSyGene grant internal meeting in May

Hide

To: Martin, Jacqueline M. [Medical Student], Wells, Michael F [Human Genetics], Damoiseaux, Robert, Kim, Kitai, Bhaduri, Aparna, Aharoni, Daniel, BENNETT NOVITCH, Golshani, Peyman M.D., Luo, Chongyuan, Ata, Deniz, Chorsi, Hamid T. [Affiliate], Kim, Jong-Jin, Cha, HyoKyeong, Baig, Mohammad, Kevin Wojta, Kamte, Yashika S., YAN JIN, Claudia Nguyen, Harout Gulesserian, RAMIN ALI MARANDI GHODDOUSI

Hi,

I am going to send a calendar invite for Monday May 20, 3-4P for your month of May. SSPsyGene grant internal meeting.

Dan won't be in attendance.

Join Zoom Meeting
https://uclahs.zoom.us/j/94661704992?pwd=ZkRFaFpMTlM2WVVBSVNtZWs2cGVidz09

Password: 281733

One tap mobile
+16699006833,,94661704992# US (San Jose)
+12532158782,,94661704992# US (Tacoma)

Dial by your location
+1 669 900 6833 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
+1 301 715 8592 US (Germantown)
+1 312 626 6799 US (Chicago)
+1 646 876 9923 US (New York)
Meeting ID: 946 6170 4992
Find your local number: https://uclahs.zoom.us/u/abqY8rrw2S

Please decline the invite if it does not work for you. If enough decline then I'll try to find another date/time in May.

The other already scheduled meeting is Monday 6/24, 3-4P

Have a good day.

Jenifer

Jenifer Sakai
jsakai@mednet.ucla.edu
Dr. Geschwind's Assistant
UCLA-Dept. of Neurology
695 Charles E. Young Drive South
Gonda 2506
Los Angeles, CA 90095-1761
Phone: 310-794-6570

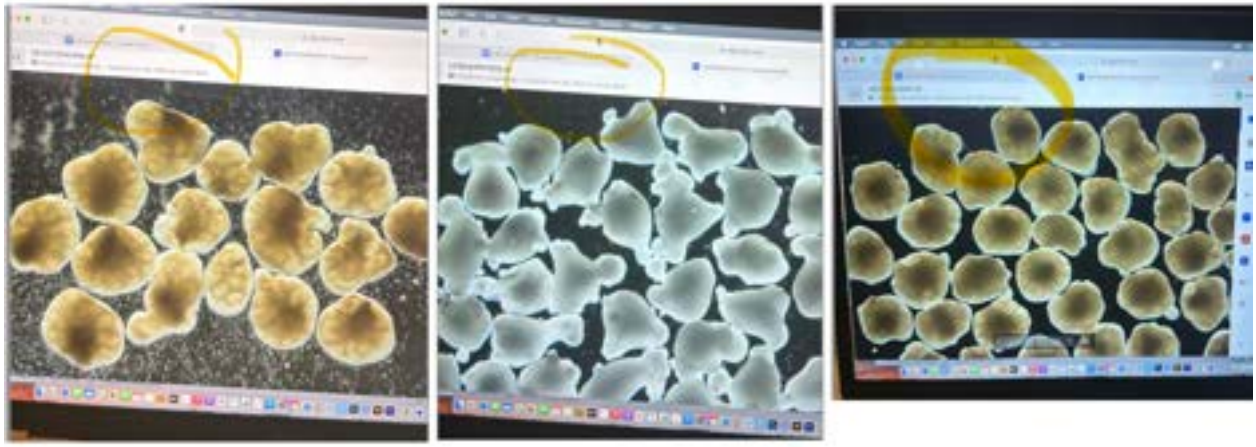
Join Zoom Meeting
https://uclahs.zoom.us/j/94661704992?pwd=ZkRFaFpMTlM2WVVBSVNlZWs2cGVidz09

Password: 281733

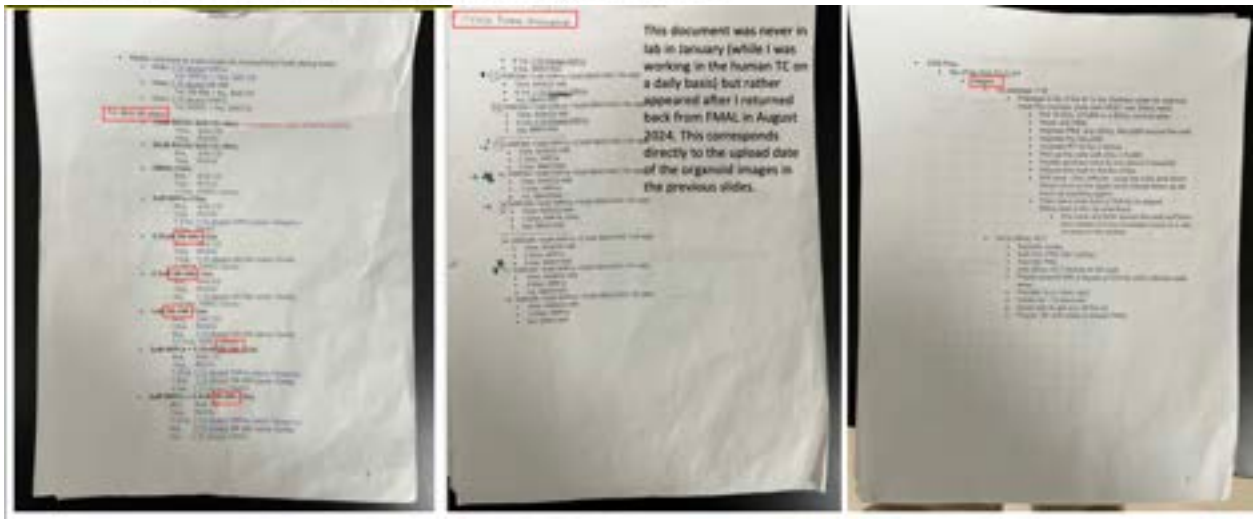
One tap mobile
+16699006833,,94661704992# US (San Jose)
+12532158782,,94661704992# US (Tacoma)

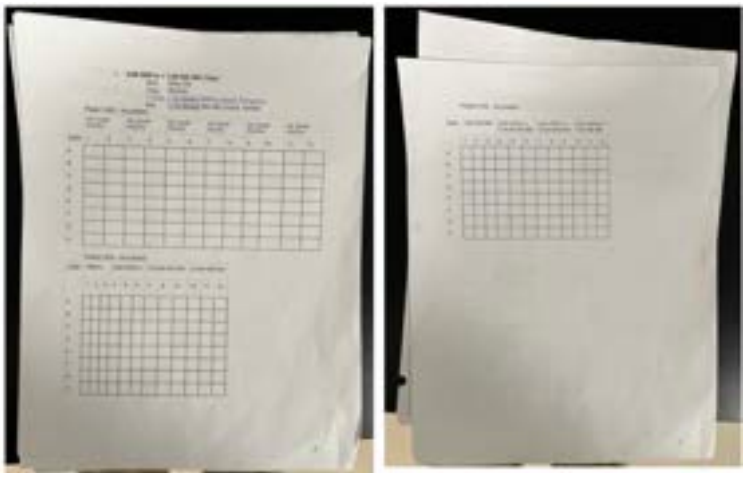
Dial by your location
+1 669 900 6833 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
+1 301 715 8592 US (Germantown)
+1 312 626 6799 US (Chicago)
+1 646 876 9923 US (New York)
Meeting ID: 946 6170 4992
Find your local number: https://uclahs.zoom.us/u/abqY8rrw2S

Evidence & Evidentiary ***Exhibit_37.34 : Attempts to remake Gulesserian's discovery while Gulesserian was out on FMLA***



There appear to be attempts to fabricate the origin of the discovery, as I had already established my Feeder-Free (FF) protocol back in September 2023. Recent uploads (June 30, 2024) made by graduate student Jessie Buth on her Box account demonstrate that this work was conducted AFTER my discovery, not before.





Evidence & Evidentiary ***Exhibit 37.35*** ***Gulesserian put the entire lab on notice including but not limited to Jessie Buth Bennett Novitch Cendi Ling Natella Baliaouri and all Novitch lab members***

Harout Gulesserian January 30, 2024 at 5:00 PM

IP disclosure Hide

To: BENNETT NOVITCH,

Cc: Negien Shalmani, ERIC HEINRICHS, Sangmok Kim, Natella Baliaouri, Lauren Choi, Cendi Ling, Ivan Pavlovic, FU Ting, Jessie Buth, Erick Nedd, Maria L Caballero, Angel Emodi, diana Ibrahim, BENNETT NOVITCH,

Bcc: Charanjit Arora

Hi everyone,

Since my protocol was disclosed today for the first time @ the 2:00pm lab meeting. I wanted to reiterate some crucial information discussed during a recent meeting with UCLA's Technology Development Group.

TDG basically indicated that discussing my protocol outside of the lab may have implications for IP protection and the commercialization of my ideas. Internal discussions with lab members are considered confidential for IP purposes per UCLA's Technology Development Group.

If any of you have plans to share my protocol in any capacity with external parties, including outside of the lab but within UCLA, please notify me & TGD immediately prior to doing so, as this is mandatory per TGD to take appropriate legal steps to safeguard my intellectual property.

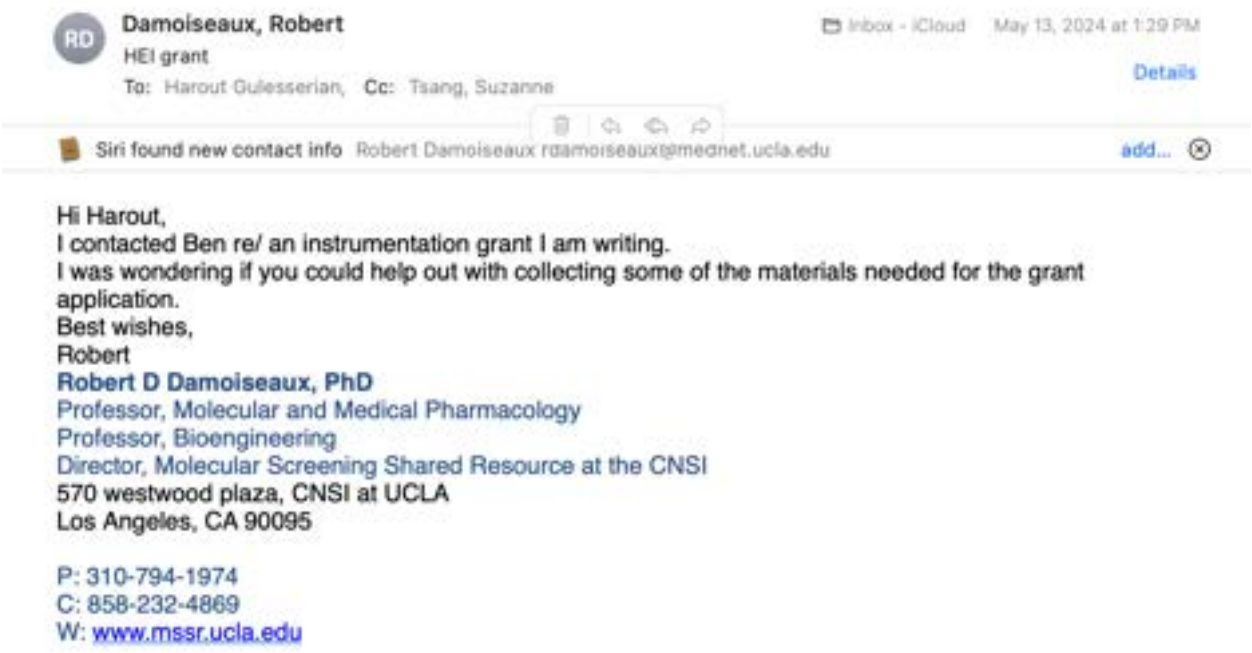
Your prompt attention to this matter is highly appreciated, and your cooperation in maintaining the confidentiality of my research is vital.

Thank you for your understanding,

Harout

Evidence & Evidentiary ***Exhibit_37.36***

The focus on securing grants superseded the protection of intellectual property, raising concerns about the interests of all stakeholders involved. This shift in priorities potentially compromised the rights and protections of those who made the discovery, undermining the proper protocol for IP protection.



Damoiseaux, Robert
Inbox - iCloud May 13, 2024 at 1:29 PM
HEI grant
To: Harout Gulesserian, Cc: Tsang, Suzanne
Details
Siri found new contact info Robert Damoiseaux rdamoiseaux@mednet.ucla.edu
add...

Hi Harout,
I contacted Ben re/ an instrumentation grant I am writing.
I was wondering if you could help out with collecting some of the materials needed for the grant application.
Best wishes,
Robert

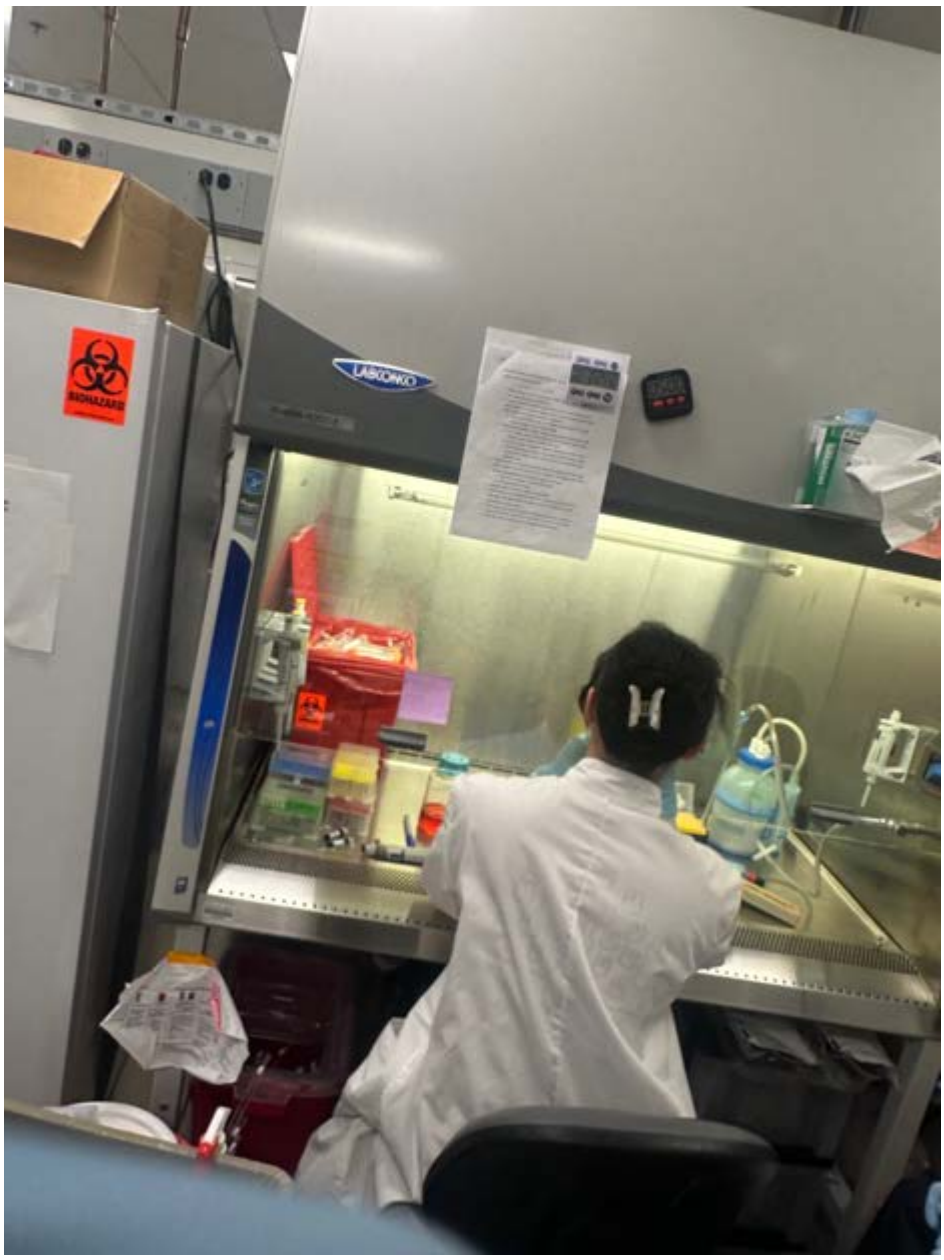
Robert D Damoiseaux, PhD
Professor, Molecular and Medical Pharmacology
Professor, Bioengineering
Director, Molecular Screening Shared Resource at the CNSI
570 westwood plaza, CNSI at UCLA
Los Angeles, CA 90095

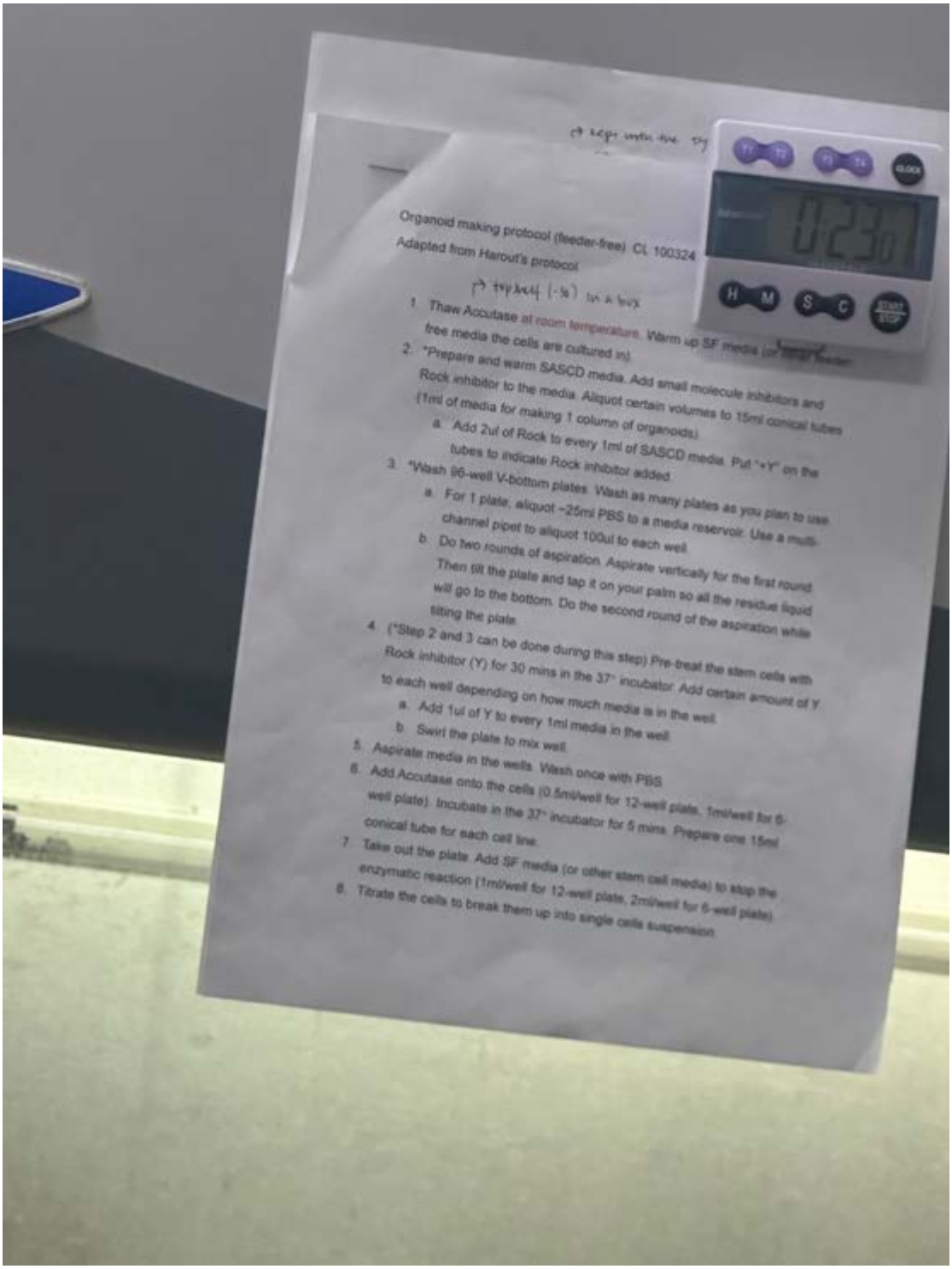
P: 310-794-1974
C: 858-232-4869
W: www.mssr.ucla.edu

Evidence & Evidentiary ***Exhibit_37.37***

Refer to the "Protected Disclosure Handbook" and the current formal complaint for additional details regarding the matter.

Evidence & Evidentiary ***Exhibit_37.38*** ***Cendi Ling, Bennett Novitch, , Natella Baliaouri, and their associates attempted to fabricate Mr. Gulesserian's discovery by concealing lab documents that had altered Gulesserian protocol without Gulesserian's knowledge. Mr. Gulesserian observed his name on a document he had never provided to Cendi Ling or any of her associates. Additionally, the document referenced a protocol he did not share with them but shared it with UCLA TDG. The individuals depicted include Charlene Guo Ling's partner (pictured), and Erick Nedd (not pictured) (Gulesserians former partner who was now on Lings team, (See exhibit below for further proof of fabrication), who was positioned to the right of Guo during this encounter.***



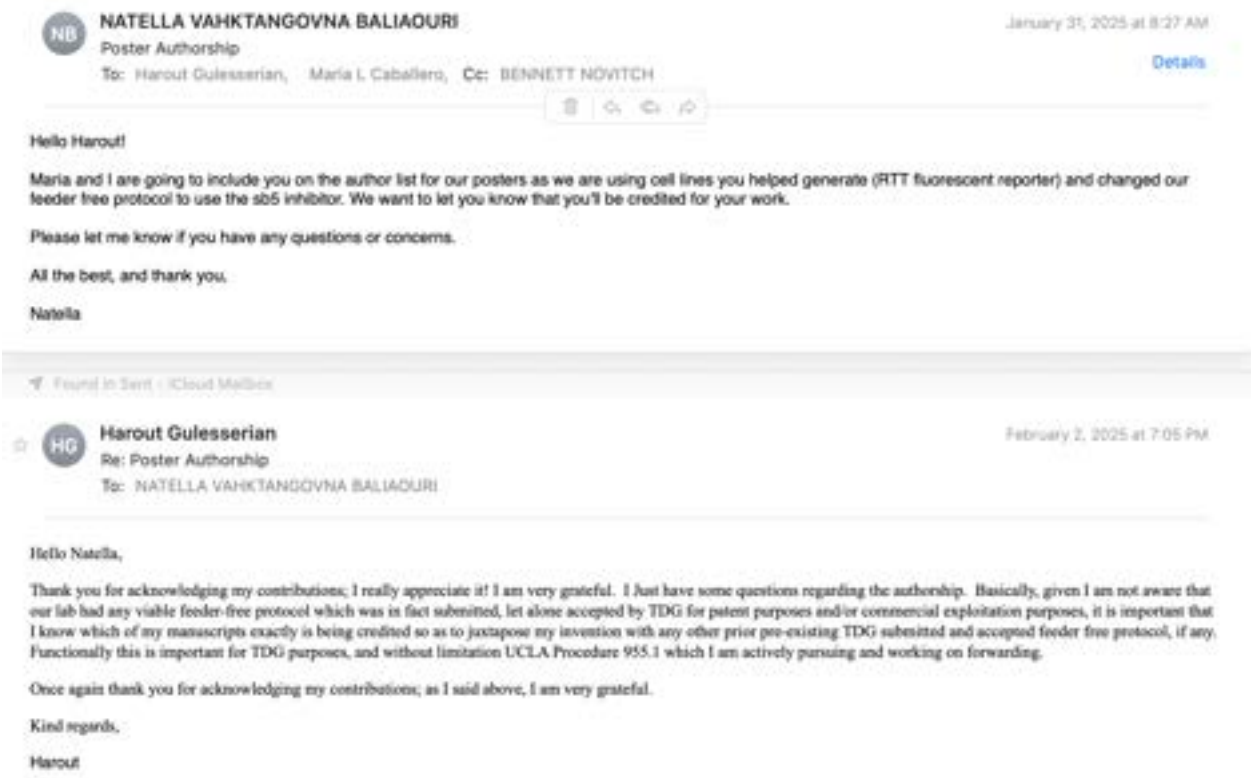


Organoid making protocol (feeder-free) CL 100324

Adapted from Harout's protocol

1. Thaw Accutase at room temperature. Warm up SF media (or other stem cell media the cells are cultured in).
2. *Prepare and warm SASCD media. Add small molecule inhibitors and Rock inhibitor to the media. Aliquot certain volumes to 15ml conical tubes (1ml of media for making 1 column of organoids).
   a. Add 2ul of Rock to every 1ml of SASCD media. Put "+Y" on the tubes to indicate Rock inhibitor added.
3. *Wash 96-well V-bottom plates. Wash as many plates as you plan to use.
   a. For 1 plate, aliquot ~25ml PBS to a media reservoir. Use a multi-channel pipet to aliquot 100ul to each well.
   b. Do two rounds of aspiration. Aspirate vertically for the first round. Then tilt the plate and tap it on your palm so all the residue liquid will go to the bottom. Do the second round of the aspiration while tilting the plate.
4. (*Step 2 and 3 can be done during this step) Pre-treat the stem cells with Rock inhibitor (Y) for 30 mins in the 37° incubator. Add certain amount of Y to each well depending on how much media is in the well.
   a. Add 1ul of Y to every 1ml media in the well.
   b. Swirl the plate to mix well.
5. Aspirate media in the wells. Wash once with PBS.
6. Add Accutase onto the cells (0.5ml/well for 12-well plate, 1ml/well for 6-well plate). Incubate in the 37° incubator for 5 mins. Prepare one 15ml conical tube for each cell line.
7. Take out the plate. Add SF media (or other stem cell media) to stop the enzymatic reaction (1ml/well for 12-well plate, 2ml/well for 6-well plate).
8. Titrate the cells to break them up into single cells suspension.

Evidence & Evidentiary ***Exhibit_37.39***: ***Baliaouri has now tried to identify Mr. Gulesserian as the creator and inventor, while both Bennett Novitch and Maria Caballero are copied on the email chain. Again something serendipitous and novel discovery by Gulesserian should have been patented due to its accidental nature among other things, and should have been reported to the government through iEdision among other outlets withing a 30-60 day timeframe not almost two years into the discovery.***



NATELLA VAHKTANGOVNA BALIAOURI
Poster Authorship
To: Harout Gulesserian, Maria L Caballero, Cc: BENNETT NOVITCH
January 31, 2025 at 8:27 AM
Details

Hello Harout!

Maria and I are going to include you on the author list for our posters as we are using cell lines you helped generate (RTT fluorescent reporter) and changed our feeder free protocol to use the sb5 inhibitor. We want to let you know that you'll be credited for your work.

Please let me know if you have any questions or concerns.

All the best, and thank you.

Natella

Found in Sent - iCloud Mailbox

Harout Gulesserian
Re: Poster Authorship
To: NATELLA VAHKTANGOVNA BALIAOURI
February 2, 2025 at 7:05 PM

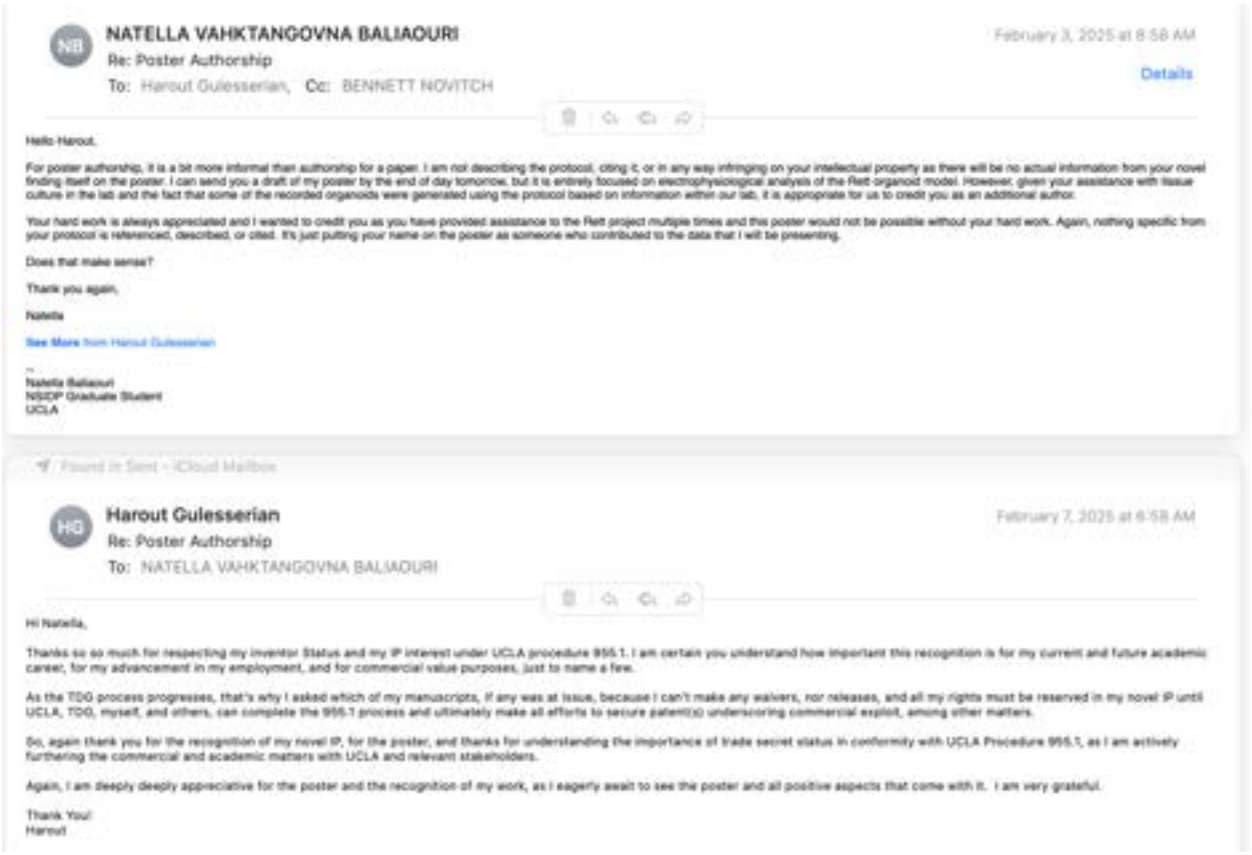
Hello Natella,

Thank you for acknowledging my contributions; I really appreciate it! I am very grateful. I just have some questions regarding the authorship. Basically, given I am not aware that our lab had any viable feeder-free protocol which was in fact submitted, let alone accepted by TDG for patent purposes and/or commercial exploitation purposes, it is important that I know which of my manuscripts exactly is being credited so as to juxtapose my invention with any other prior pre-existing TDG submitted and accepted feeder free protocol, if any. Functionally this is important for TDG purposes, and without limitation UCLA Procedure 955.1 which I am actively pursuing and working on forwarding.

Once again thank you for acknowledging my contributions; as I said above, I am very grateful.

Kind regards,

Harout



NATELLA VAHKTANGOVNA BALIAOURI

February 3, 2025 at 8:58 AM

Re: Poster Authorship

To: Harout Gulesserian, Cc: BENNETT NOVITCH

Details

Hello Harout,

For poster authorship, it is a bit more informal than authorship for a paper. I am not describing the protocol, citing it, or in any way infringing on your intellectual property as there will be no actual information from your novel finding itself on the poster. I can send you a draft of my poster by the end of day tomorrow, but it is entirely focused on electrophysiological analysis of the Rett organoid model. However, given your assistance with tissue culture in the lab and the fact that some of the recorded organoids were generated using the protocol based on information within our lab, it is appropriate for us to credit you as an additional author.

Your hard work is always appreciated and I wanted to credit you as you have provided assistance to the Rett project multiple times and this poster would not be possible without your hard work. Again, nothing specific from your protocol is referenced, described, or cited. It's just putting your name on the poster as someone who contributed to the data that I will be presenting.

Does that make sense?

Thank you again,

Natella

See More from Harout Gulesserian

--
Natella Baliaouri
NSIDP Graduate Student
UCLA

Found in Sent - iCloud Mailbox

Harout Gulesserian

February 7, 2025 at 6:58 AM

Re: Poster Authorship

To: NATELLA VAHKTANGOVNA BALIAOURI

Hi Natella,

Thanks so so much for respecting my inventor Status and my IP interest under UCLA procedure 955.1. I am certain you understand how important this recognition is for my current and future academic career, for my advancement in my employment, and for commercial value purposes, just to name a few.

As the TDG process progresses, that's why I asked which of my manuscripts, if any was at issue, because I can't make any waivers, nor releases, and all my rights must be reserved in my novel IP until UCLA, TDG, myself, and others, can complete the 955.1 process and ultimately make all efforts to secure patent(s) underscoring commercial exploit, among other matters.

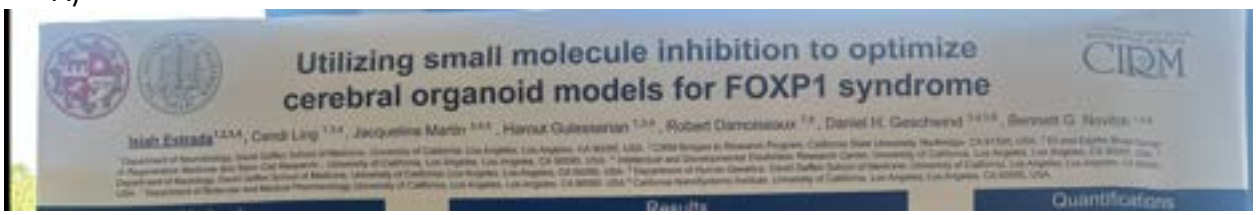
So, again thank you for the recognition of my novel IP, for the poster, and thanks for understanding the importance of trade secret status in conformity with UCLA Procedure 955.1, as I am actively furthering the commercial and academic matters with UCLA and relevant stakeholders.

Again, I am deeply deeply appreciative for the poster and the recognition of my work, as I eagerly await to see the poster and all positive aspects that come with it. I am very grateful.

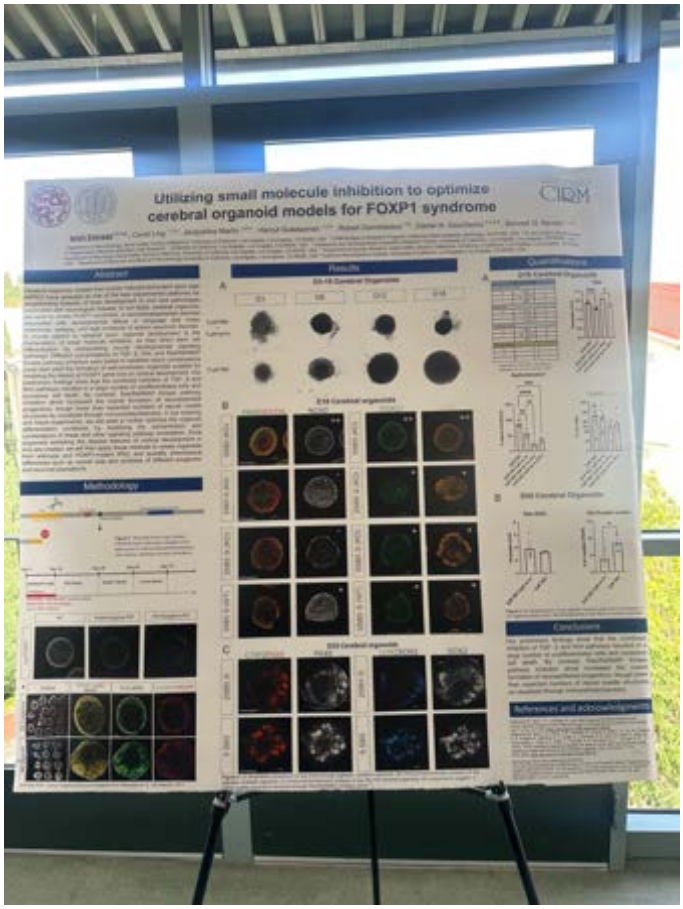
Thank You!
Harout

Evidence & Evidentiary ***Exhibit_37.40****: February 7, 2025 The IP is exposed to the public without proper protection thus completely foreclosing all of Gulesserian's opportunities per reagents policy 5105 and further elaborated on by provost Brown. Further this poster is somewhat what should be called a "jungle" as it essentially has cut and pieced various protocols from the lab with Gulesserians novel discovery trying to dilute or conceal the proper origins of the discovery. Furthermore, please view Bennett Novitch's interviews from 2022 where he states these organoid protocols are something like the wild wild west frontier gold rush etc. This poster somewhat identifies more respondents while other respondents are strategically concealed. For example the ones who got government grants or their protocol IP protected with TDG during the same time Gulesserian tried to do the same and was essentially denied by Novitch and the consortium collectively*.

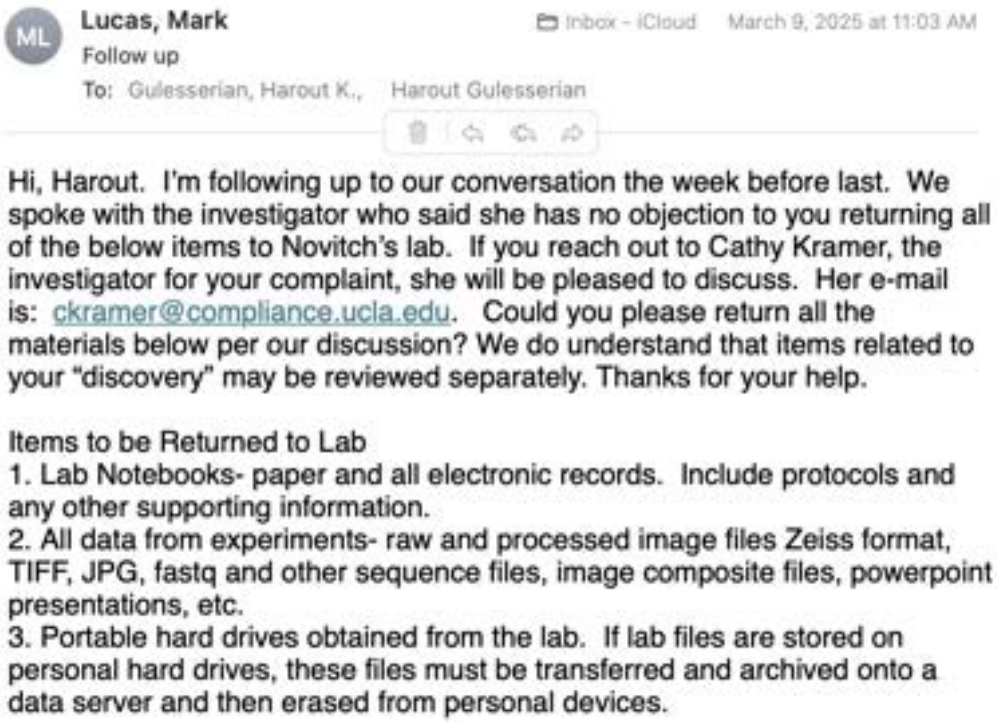
A)



B)



Evidence & Evidentiary ***Exhibit_37.44*** ***On February 24, 2025, Mr. Mark Lucas visited the new lab and began pressuring Mr. Gulesserian. During this encounter, Mr. Gulesserian reiterated the ongoing issues and detailed the numerous violations he had experienced throughout the process. Mr. Lucas subtly suggested that Mr. Gulesserian's future was in industry rather than academia, while simultaneously attempting to downplay the significance of Mr. Gulesserian's novel discovery. That encounter was later confirmed by Lucas himself when Lucas identified the investigator of the case and had shown his potential bias involvement in this situation.***



ML **Lucas, Mark** Inbox - iCloud March 9, 2025 at 11:03 AM

Follow up

To: Gulesserian, Harout K., Harout Gulesserian

Hi, Harout. I'm following up to our conversation the week before last. We spoke with the investigator who said she has no objection to you returning all of the below items to Novitch's lab. If you reach out to Cathy Kramer, the investigator for your complaint, she will be pleased to discuss. Her e-mail is: ckramer@compliance.ucla.edu. Could you please return all the materials below per our discussion? We do understand that items related to your "discovery" may be reviewed separately. Thanks for your help.

Items to be Returned to Lab

1. Lab Notebooks- paper and all electronic records. Include protocols and any other supporting information.
2. All data from experiments- raw and processed image files Zeiss format, TIFF, JPG, fastq and other sequence files, image composite files, powerpoint presentations, etc.
3. Portable hard drives obtained from the lab. If lab files are stored on personal hard drives, these files must be transferred and archived onto a data server and then erased from personal devices.

WIPING out of the DATA and Server by Selectively Transferring and deleting other files

Exhibit 37.45 SERVER and DATA WIPEOUT + External Hard drives

BENNETT NOVITCH October 17, 2024 at 3:51 PM

DGSOM Data Server

To: Natella Baliaouri, Jessie Buth, Maria Caballero, Angel Emodi, Isaiah Estrada, Harout Gulesserian, Hide
Charlene Guo, diana Ibrahim, Sangmok Kim, Cendi Ling, Erick Nedd, FU Ting,
Cc: Keith Phan, Samantha Butler

As mentioned in lab meeting, we need to move files off from the LSM 800 computer, but I'd like people to do the same for the Apotome and LSM 700 systems, if you have been using these.

The preferred storage sites are the data servers that have been provided to us by the med school. Access to these servers is restricted to those with mednet accounts as you will need to login to access the folders. If you have an account, you can use the login instructions below on computers that are hard-wired into the mednet system (i.e. ethernet connected in the lab), on the UCLA HealthSecure Wifi network, or if you've remotely connected to the mednet network via VPN. If you need help with VPN, that's a conversation unto itself, so just ask me and I will help you get that set up.

Assuming that you are able to login with the attached instructions, I have set up some individual folders for people in the lab members folder. Those of you who have mednet access shoudl be able to open the folder with your name, but most likely not other people's folders. The exception are that I had tried to set up for the newest members of the lab who I'm guessing don't already have mednet accounts. These folders seem to be open to everyone, so I need to get those settings fixed.

What DGIT has requested is that we use the \\nbio-fs01.ad.medctr.ucla.edu\Novitch site for regular file usage, but for longer-term storage, they would like us to move the data to a different server (dgit-qumulo.ad.medctr.ucla.edu\neurobiologyarchive). The issue with that server is that only I and they have read/write privileges, for the rest it would be read only. I think what this means is that if you have old files, please put them in an to be archived folder, and I can transfer them to the archive server.

Please give this a try and let me know if things work or don't work.

If you need to get a mednet account, please let me know and I will set you with with Mark Lucas or others in the neurobiology office as I think there is some procedure for getting an account.

Lastly, I will give everyone a week to please clear off your files from the LSM 800 computer, and on Friday Oct 25, Keith and I will start to transfer files onto the archive server and once that process is complete, delete off the data files on the computer. Thereafter, I will move to do the same for the Apotome microscope, and eventually the LSM 700.

Novitch Lab
Data S...uctions

BN **BENNETT NOVITCH**

Inbox - iCloud October 17, 2024 at 4:13 PM

Data Management Tips

To: Natella Ballaouri, Jessie Buth, Samantha Butler, Maria Caballero, Angel Emodi, Isaiah Estrada, Hide
Salena Gallardo, Harout Gulesserian, Charlene Guo, Sandeep Gupta, diana Ibrahim, Sangmok Kim,
Cendi Ling, Yesica Mercado-Ayon, Erick Nedd, Keith Phan, Soizic Riche, Cristian Rodriguez,
Negien Shalmani, FU Ting, ANTONELLA DEL TORO, Marie Payne

2

Following up on some thigns that I mentioned in lab meeting, I was a participant in a refresher course on Research Misconduct and Data Management for graduate students and postdocs, and liked some of the ideas and exercise materials that the instructor had created to make points about how to organize data files in a sensible manner. Please have a look at these documents and think about ways that you could co-opt some of their suggestions for your own data collection and filing.

We should have a more extensive discussion about this topic at some point in the future to see if we could come up with a standardized format that works for most people so that we can move towards having more consistency in the ways we collect and store our data files, composite figures, and written documents. I'd also love to have a discussion on the use of electronic notebooks to see if we could establish a common standard for current and future lab members.

Ben

Info from Resear...l.docx

Module 4 Exercis...s.docx

BENNETT NOVITCH
June 30, 2023 at 3:16 PM

UCLA Med Data Storage Instructions

To: Natella Baliaouri, Jessie Buth, Harout Gulesserrian, ERIC HEINRICHS, Sangmok Kim, Cendi Ling Hide

Siri found new contact info Bennett Novitch bnovitch@g.ucla.edu add...

Hi Everyone,

I managed to work things out with the digital technology (DGIT) team to re-vamp our data server space. The deal is that we have two data servers. One is for "short-intermediate" term storage and more limited in space (currently about 4 TB for our workgroup), and then a second "Data Archive" space which is more readily expandable to meet our storage needs. Both are HIPPA compliant, password protected, and backed up onto a secondary server.

The limitations are that:
1. Access requires you are logged into the Mednet network via local ethernet, VPN, or being connected to the UCLA HealthSecure Wifi.
2. That you have a Mednet account. Thus, this storage is not available to our Bridges students nor undergraduate students unless we can figure out ways to get them mednet accounts. This may be possible, but I have not tried to do this thus far.

Here are the instructions for how to access both servers. Note that the short-intermediate-term storage is set up so that we have some common folders that everyone has read-write-edit access for, as well as some individual folders that I've assigned for your personal use (note that I and DGIT can access these- so don't put anything you wouldn't want us to see here).

I've created a microscope backup folder on the short-intermediate term server, but as the files age or storage space gets filled, these will ultimately be transferred to the data archive storage server. We have this set so that everyone will have read/download/execute only access so that files can't be accidentally removed or changed.

Please have a look and see if you can access these files, and if you find that your storage needs are not met, please let me know and I can see what we can do to get more space, or we can be more aggressive about transferring files to the archive space more quickly.

Ben

Novitch Lab
Data S...s.docx

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

BENNETT NOVITCH
July 14, 2023 at 10:56 AM

Re: UCLA Med Data Storage Instructions

To: Natella Baliaouri, Jessie Buth, Harout Gulesserian, ERIC HEINRICHS, Sangmok Kim, Cendi Ling, Hide

Cc: Soizic Riche, KEN YAMAUCHI, Keith Phan

Hi Everyone,

Soizic will be beginning the removal of the confocal files that have been transferred onto the UCLA DGIT data clouds today. Please see the instructions in my previous email for how to access the transferred data files. Novitch lab members, I created individual folders for you to use. Soizic and Keith, Samantha will need to set this up under your names. I can ask DGIT if they can grant access to the long-term server as we've set that up with read/download access for everyone.

I hope this helps free space on the LSM 800.

Soizic, should we start to do the same for the LSM 700?

Ben

See More from BENNETT NOVITCH

Soizic Riche July 14, 2023 at 11:09 AM

Re: UCLA Med Data Storage Instructions

To: BENNETT NOVITCH, Cc: Natella Baliaouri, Jessie Buth, Harout Gulesserian & 5 more Details

Hi Ben,

For the LSM700 we need to check with Sandy and Yesica as they are the main users.
But it will be always good to remove previous member files if they are any.

Soizic

See More from BENNETT NOVITCH

> ----------

See More from BENNETT NOVITCH

Keith Phan July 14, 2023 at 11:14 AM

Re: UCLA Med Data Storage Instructions

To: BENNETT NOVITCH, Cc: Natella Baliaouri, Jessie Buth, Harout Gulesserian & 5 more Details

our 8TB harddrive will be delivered sometime next week for the lsm800. is it necessary to delete filtes?

See More from BENNETT NOVITCH

> ----------

See More from BENNETT NOVITCH

BENNETT NOVITCH July 14, 2023 at 12:05 PM

Re: UCLA Med Data Storage Instructions

To: Keith Phan, Cc: Natella Baliaouri, Jessie Buth, Harout Gulesserian, ERIC HEINRICHS & 4 more Details

I think we can for sure delete former lab member files as we have those backed up.

See More from Keith Phan

BENNETT NOVITCH July 14, 2023 at 12:23 PM

Re: UCLA Med Data Storage Instructions

To: Keith Phan, Natella Baliaouri, Jessie Buth, Harout Gulesserian, ERIC HEINRICHS & 4 more Details

Hi Everyone,

Eric pointed out that I had made a typo in the Mac instructions for how to access the short-term/individual user folder server. The correct link to is is smb://nbio-fs01.ad.medctr.ucla.edu/Novitch

I've updated the word document accordingly.

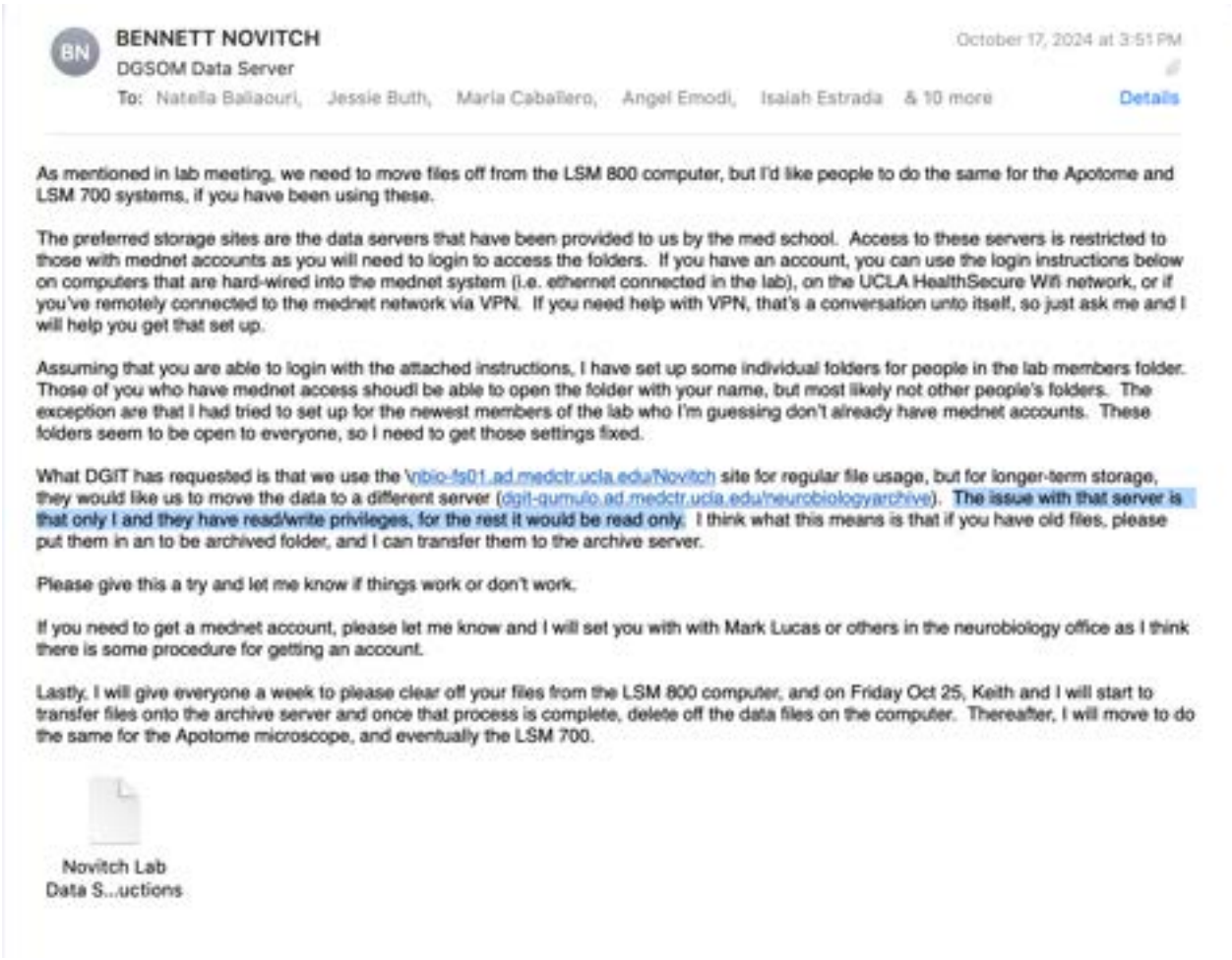
Thanks for catching this error!

Ben

Novitch Lab Data S...d.docx

See More from BENNETT NOVITCH

"They" refers to one of Bennett Novitch's graduate student



BENNETT NOVITCH
DGSOM Data Server
October 17, 2024 at 3:51 PM
To: Natella Baliaouri, Jessie Buth, Maria Caballero, Angel Emodi, Isaiah Estrada & 10 more Details

As mentioned in lab meeting, we need to move files off from the LSM 800 computer, but I'd like people to do the same for the Apotome and LSM 700 systems, if you have been using these.

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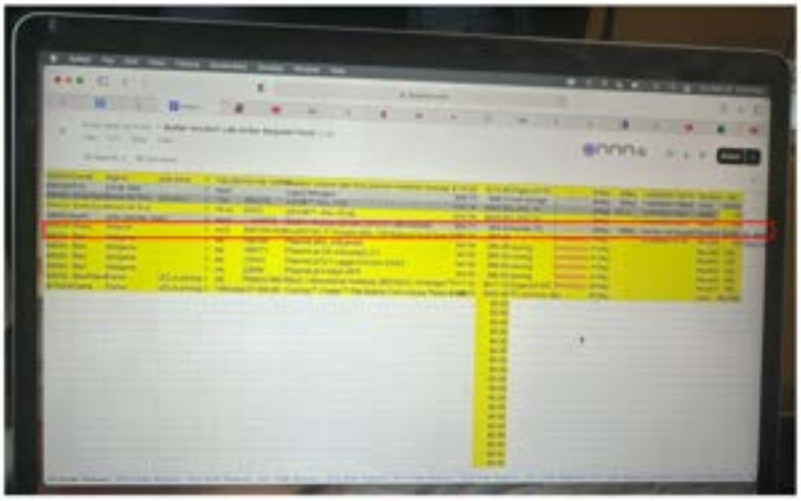
Novitch Lab
Data S...uctions

Exhibit 37.46 **External hard drives at the same time of wiping out of computers in the lab**



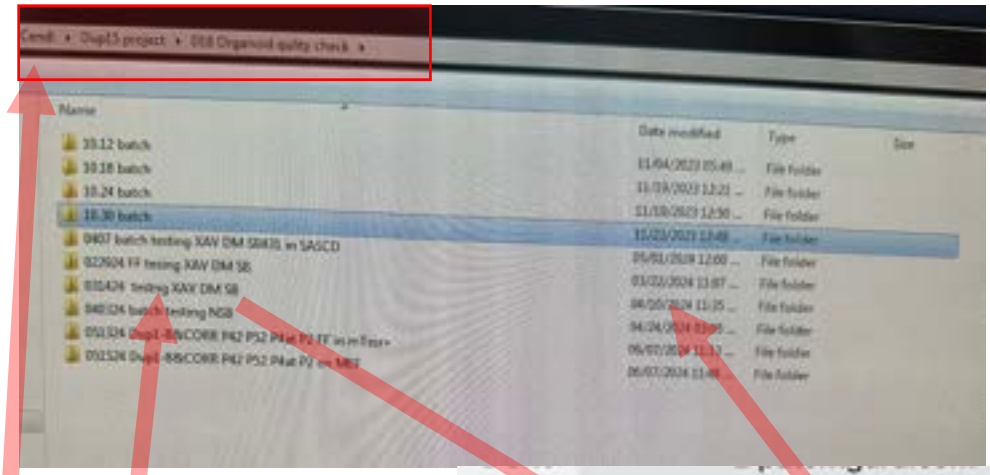
Portable hard drives are being ordered and now are a common practice in this lab to have and to transfer data

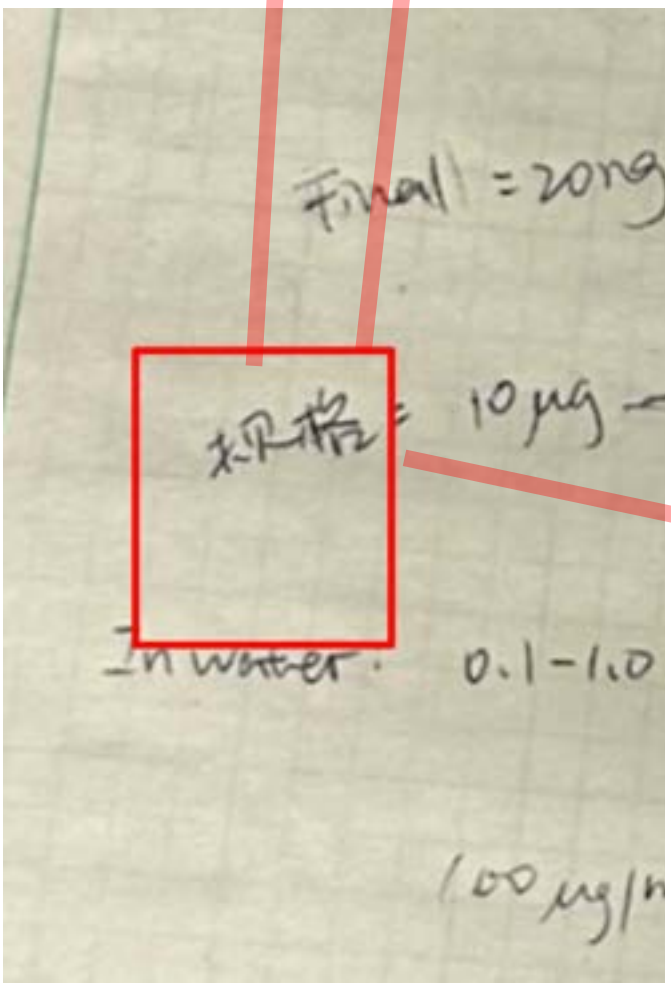
****See next slide**

Evidence A (New evidence provided to UCLA)

There is evidence that external hard drives are being ordered in the lab and/or used as a common practice, despite the availability of a UCLA Box account. This account allows for secure, direct uploads of images to the cloud, mitigating the risks associated with storing data on unprotected servers. The decision to utilize external hard drives raises concerns regarding compliance with data protection policies and could suggest potential data fabrication or mismanagement.

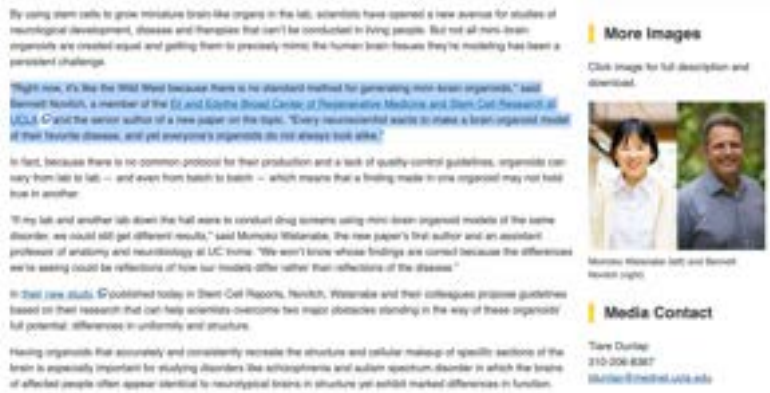
Evidence & Evidentiary **Exhibit 37.47** Casual links between Chinese patent filing and UCLA/ U.S Government owned trade secret misappropriation of Gulesserian's Serendipitous discovery at the same time servers were wiped out unnecessarily and external hard drives were purchased.



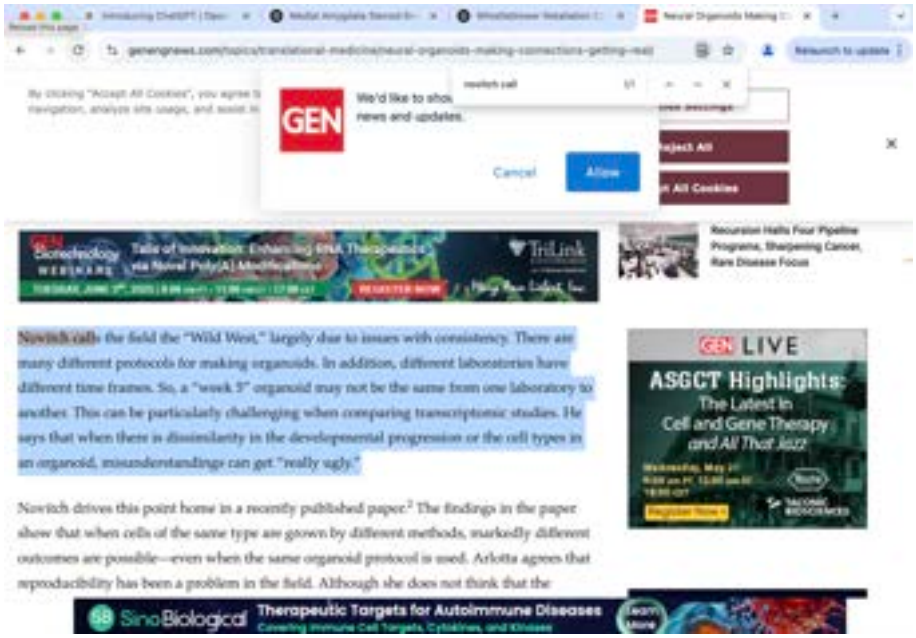


Evidence & Evidentiary Exhibit 37.48 Proof that the Novitch lab and the Novitch lab collaborators or graduates from the Novitch lab used the Mouse embryonic fibroblast protocol and not the serendipitous accidental Gulesserian made protocol (See Exhibit 37.22).

A) Novitch lab uses different materials (See exhibit 37.2) feeder dependent
B) Gulesserian's protocol uses different novel accidental materials feeder independent
C) Therefore, the two protocols are not the same! (See exhibit 37.2 v 37.22 then see 37.40)



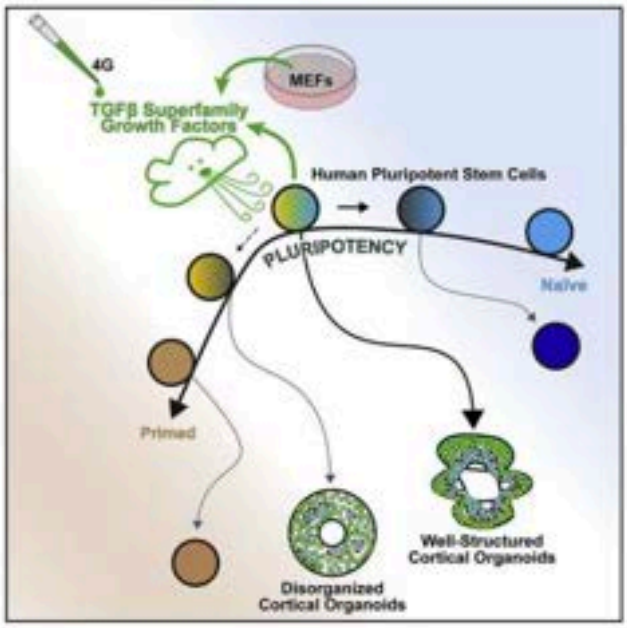
https://www.genengnews.com/topics/translational-medicine/neural-organoids-making-connections-getting-real/


GEN
Cancel
Allow
Recursion Halts Four Pipeline Programs, Sharpening Cancer, Rare Disease Focus
Novitch calls the field the "Wild West," largely due to issues with consistency. There are many different protocols for making organoids. In addition, different laboratories have different time frames. So, a "week 5" organoid may not be the same from one laboratory to another. This can be particularly challenging when comparing transcriptomic studies. He says that when there is dissimilarity in the developmental progression or the cell types in an organoid, misunderstandings can get "really ugly."
Novitch drives this point home in a recently published paper.[2] The findings in the paper show that when cells of the same type are grown by different methods, markedly different outcomes are possible—even when the same organoid protocol is used. Arlotta agrees that reproducibility has been a problem in the field. Although she does not think that the
GEN LIVE
ASGCT Highlights:
The Latest in Cell and Gene Therapy and All That Jazz
SinoBiological
Therapeutic Targets for Autoimmune Diseases

SEPTEMBER 29, 2022

Making lab-grown brain organoids 'brainier'

by Tiare Dunlap, University of California, Los Angeles

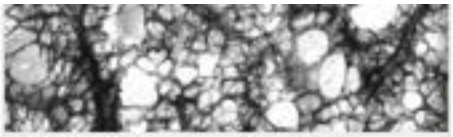


Graphical abstract. Credit: *Stem Cell Reports* (2022). DOI: 10.1016/j.stemcr.2022.08.013

By using stem cells to grow miniature brain-like organs in the lab, scientists have opened a new avenue for studies of neurological development, disease and therapies that can't be conducted in living people. But not all mini–brain organoids are created equal and getting them to precisely mimic the human brain tissues they're modeling has been a persistent challenge.

"Right now, it's like the Wild West because there is no standard method for generating mini–brain organoids," said Bennett Novitch, a member of the Eli and Edythe Broad Center of Regenerative Medicine and Stem Cell Research at UCLA and the senior author of a new paper on the topic. "Every neuroscientist wants to make a brain organoid model of their favorite disease, and yet everyone's organoids do not always look alike."

In fact, because there is no common protocol for their production and a lack of quality-control guidelines, organoids can vary from lab to lab—and even from batch to batch—which means that a finding made in one organoid may not hold true in another.



a member of the Eli and Edythe Broad Center of Regenerative Medicine and Stem Cell Research at UCLA and the senior author of a new paper on the topic. "Every neuroscientist wants to make a brain organoid model of their favorite disease, and yet everyone's organoids do not always look alike."

In fact, because there is no common protocol for their production and a lack of quality-control guidelines, organoids can vary from lab to lab—and even from batch to batch—which means that a finding made in one organoid may not hold true in another.

"If my lab and another lab down the hall were to conduct drug screens using mini–brain organoid models of the same disorder, we could still get different results," said Momoko Watanabe, the new paper's first author and an assistant professor of anatomy and neurobiology at UC Irvine. "We won't know whose findings are correct because the differences we're seeing could be reflections of how our models differ rather than reflections of the disease."

In their new study, published today in *Stem Cell Reports*, Novitch, Watanabe and their colleagues propose guidelines based on their research that can help scientists overcome two major obstacles standing in the way of these organoids' full potential: differences in uniformity and structure.

Having organoids that accurately and consistently recreate the structure and cellular makeup of specific sections of the brain is especially important for studying disorders like schizophrenia and autism spectrum disorder in which the brains of affected people often appear identical to neurotypical brains in structure yet exhibit marked differences in function.

"We'll never be able to identify the subtle differences in brain structure and function —things that are relevant for patients with neurological disorders—if our organoids have the wrong balance of cell types or grossly irregular structure," said Novitch, who is also director of the UCLA Brain Research Institute's Integrated Center for Neural Repair.

Creating the best organoids: A question of maturity

To produce mini–brain organoids, which can range from 1 to 5 millimeters in diameter, scientists first take human skin or blood cells and reprogram them to become induced pluripotent stem cells—cells that can differentiate into any cell type in the body. They then direct these iPS cells to create neural stem cells, which can produce most cell types found in the brain. As the neural stem cells are forming, they can be coaxed to aggregate into 3D organoids. Simple enough. But why do some organoids better resemble the human brain than others?

To answer this question, the team collaborated with pluripotency experts Kathrin Plath and Amander Clark from the UCLA Broad Stem Cell Research Center. They discovered that the developmental maturity of the stem cells from which an organoid is grown influences its quality, much as the freshness of ingredients influences the quality of a culinary dish.

"In human embryonic development, the nervous system is one of the first structures to form, so it makes sense that stem cells that are early in development are best at producing brain organoids," said Watanabe, who is also a member of the UCI Sue & Bill Gross Stem Cell Research Center.

The researchers then found that the best way to keep human stem cells in an early developmental state suitable for organoid formation was to grow them in a dish with mouse skin cells, referred to as fibroblast feeders, since these provide essential chemical signals and structural support that helps stem cells expand and preserve their immaturity over time.

Unfortunately, they also discovered that using mouse cells could make organoids less suitable for the development of cellular therapies to replace diseased or damaged neural tissues. Further, these feeder-supported methods are more laborious than the stem cell growth methods many labs commonly use.

Unfortunately, they also discovered that using mouse cells could make organoids less suitable for the development of cellular therapies to replace diseased or damaged neural tissues. Further, these feeder-supported methods are more laborious than the stem cell growth methods many labs commonly use.

The team next turned to RNA sequencing and computational analysis in an attempt to pinpoint genetic differences between stem cells that produce good organoids and those that don't. This enabled them to identify four molecules—all belonging to the transforming growth factor beta superfamily of molecules—that were responsible for keeping stem cells in a less-developed state.

Adding these four molecules to stem cells growing in a dish kept them in an immature state and enabled these cells to produce high-quality, well-structured organoids.

"We found a way to have our cake and eat it, too," Novitch said. "We have taken mouse cells out of the equation while retaining some of their benefits for organoid formation, bringing us closer to our goals of studying and developing treatments for complex neurological diseases."

More information: Momoko Watanabe et al, TGFβ superfamily signaling regulates the state of human stem cell pluripotency and capacity to create well-structured telencephalic organoids, *Stem Cell Reports* (2022). DOI: 10.1016/j.stemcr.2022.08.013

Journal information: Stem Cell Reports

https://phys.org/news/2022-09-lab-grown-brain-organoids-brainier.html#google_vignette

The material being shown below is from the Novitch protocol (See exhibit 37.2), the serendipitous Accidental Gulesserian protocol had not been established yet (Please see exhibits 37.1 and 37.2 then compare with exhibit 37.22 Gulesserian's discovery (Note: Please ask Gulesserian to walk you through this exhibit if it is not clear)

Neuro Zoom (2/28/2022) – Tingting Wang (Georgetown University) and Bennett Novitch (UCLA)

Neuro Zoom
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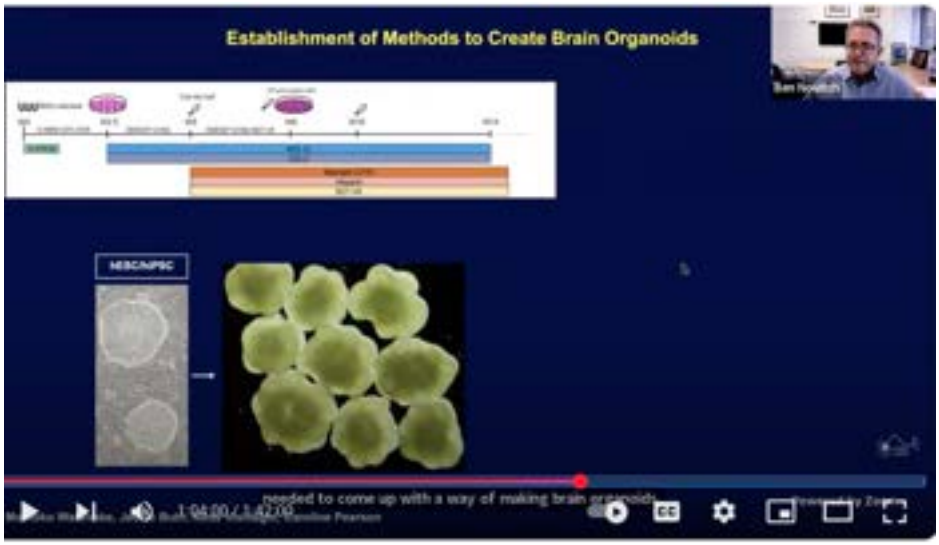
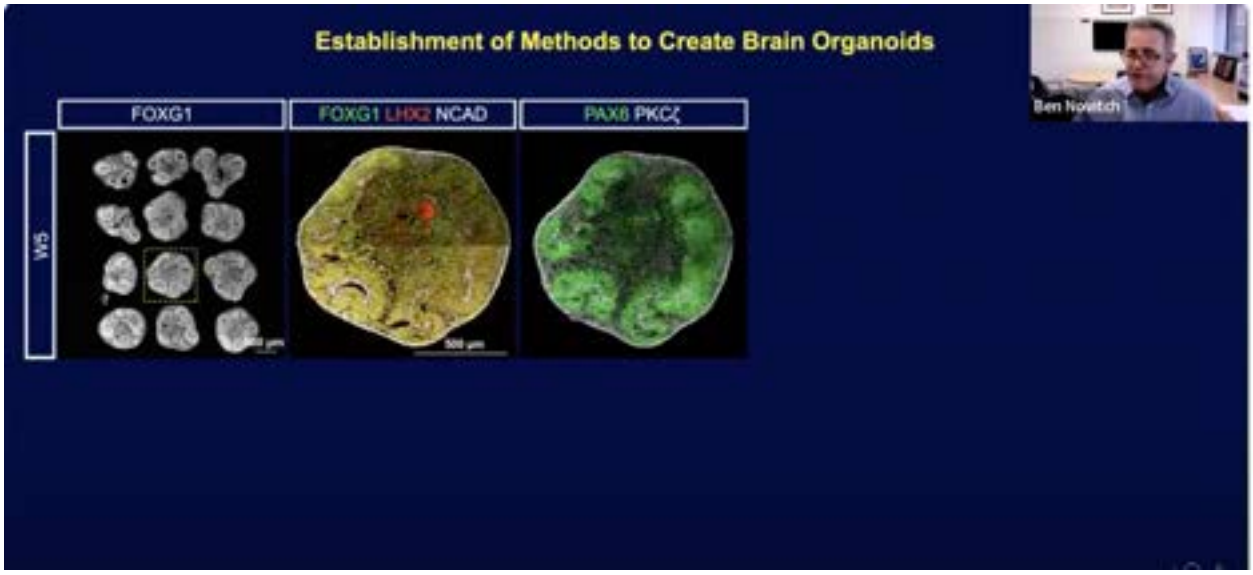
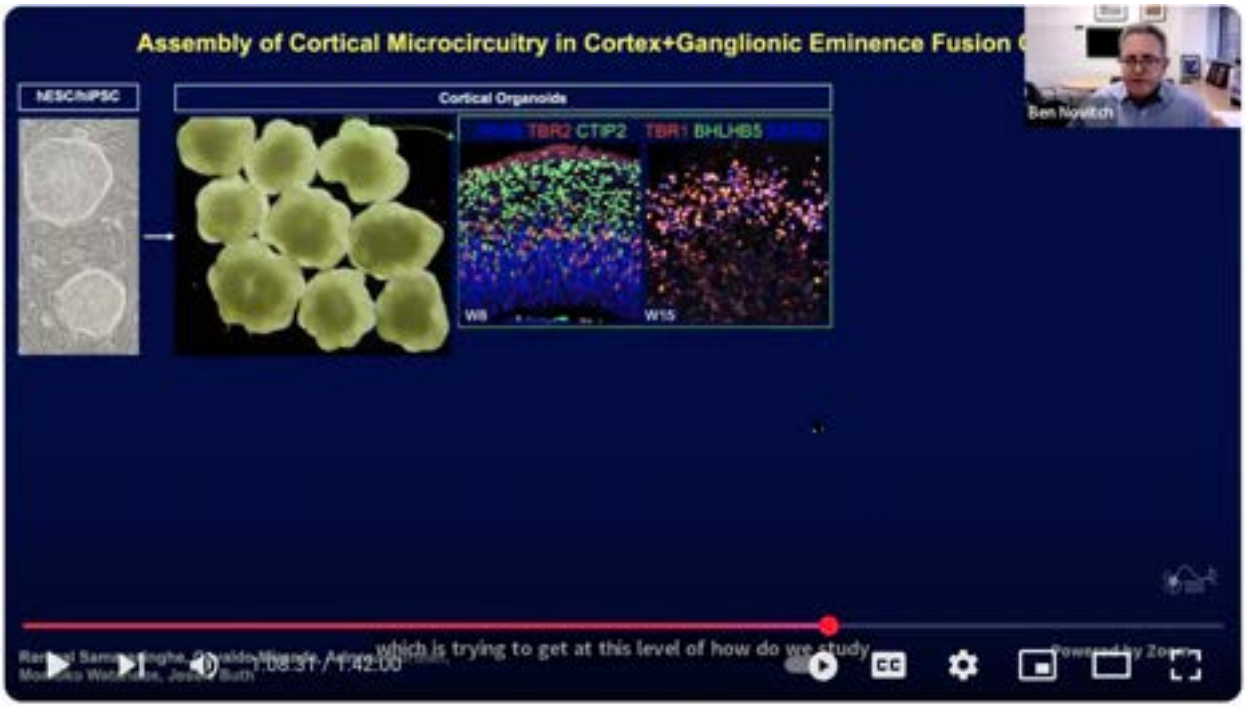
300 views Streamed 3 years ago
Glial epigenetic signaling in synapse stabilization and Modeling neural network function and dysfunction using human brain organoids ...more



The material being shown below is from the Novitch protocol (See exhibit 37.2), the serendipitous Accidental Gulesserian protocol had not been established yet (Please see exhibits 37.1 and 37.2 then compare with exhibit 37.22 Gulesserian's discovery (Note: Please ask Gulesserian to walk you through this exhibit if it is not clear)





Neuro Zoom (2/28/2022) – Tingting Wang (Georgetown University) and Bennett Novitch (UCLA)

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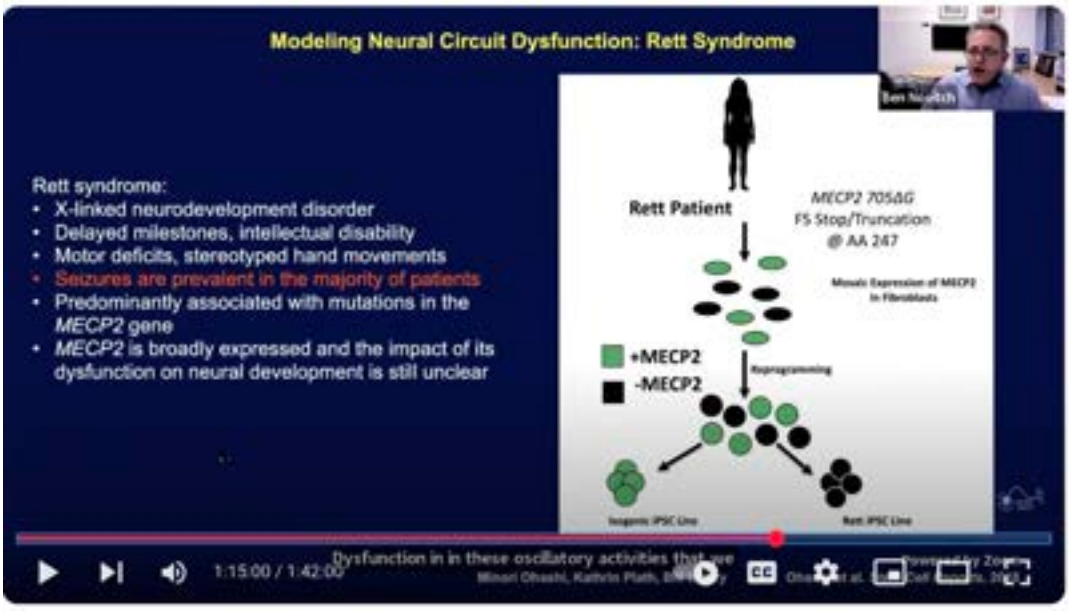

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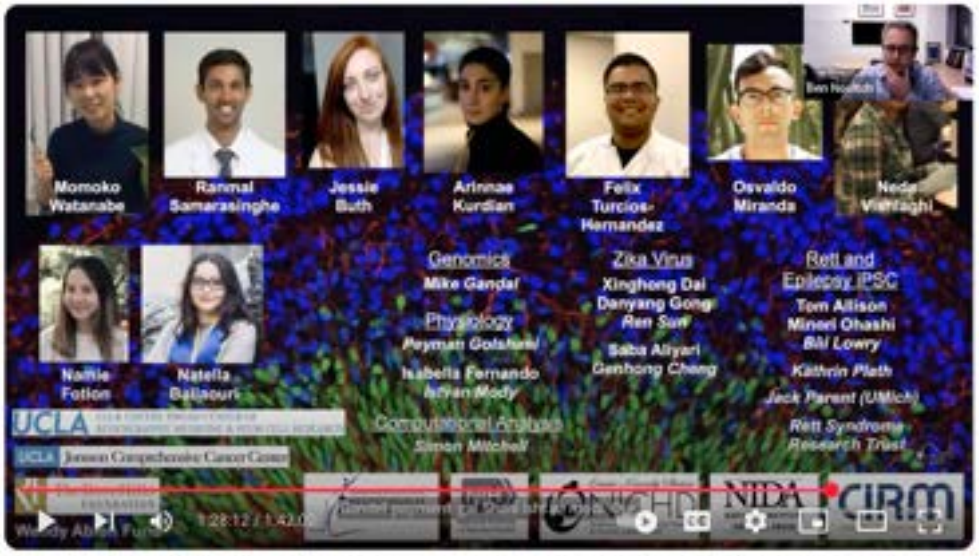

Neuro Zoom (2/28/2022) – Tingting Wang (Georgetown University) and Bennett Novitch (UCLA)

https://www.youtube.com/watch?v=RD-Q89m4n30

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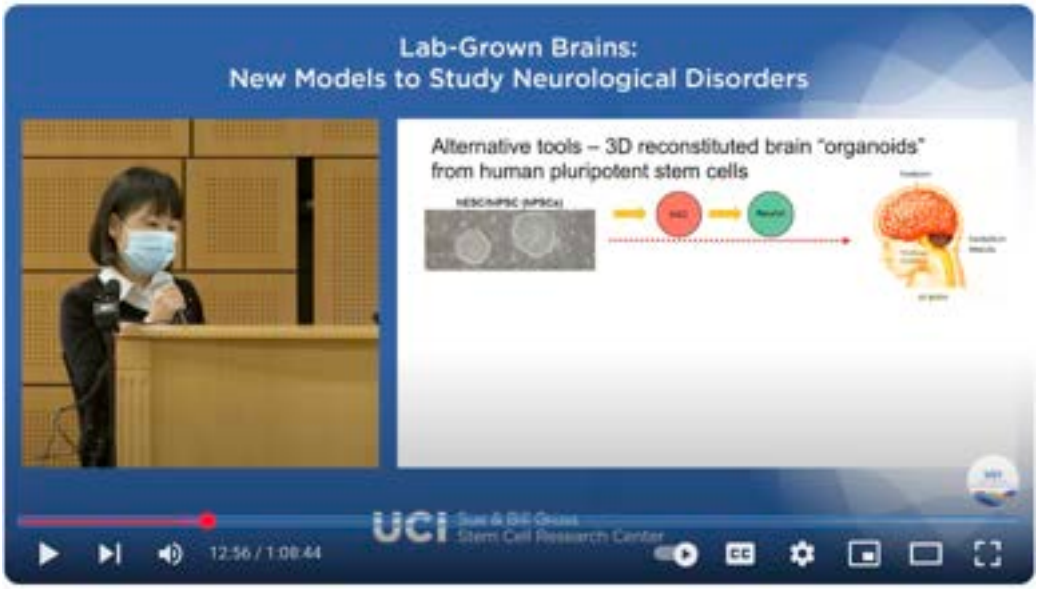
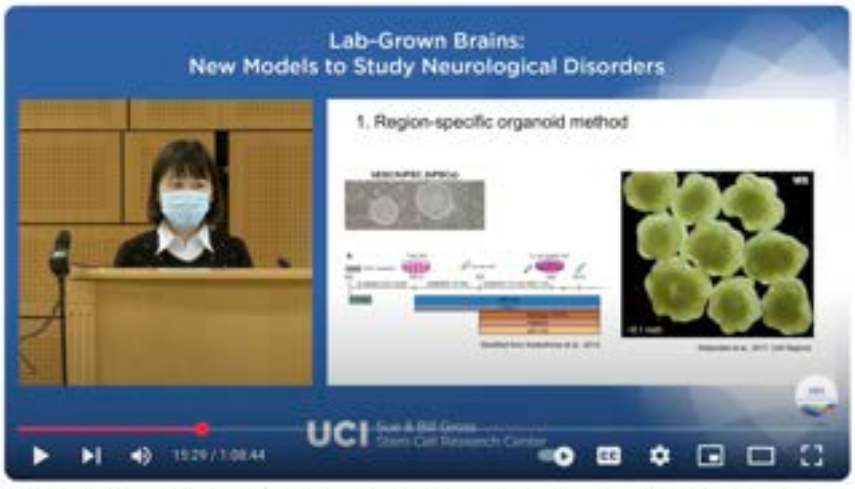
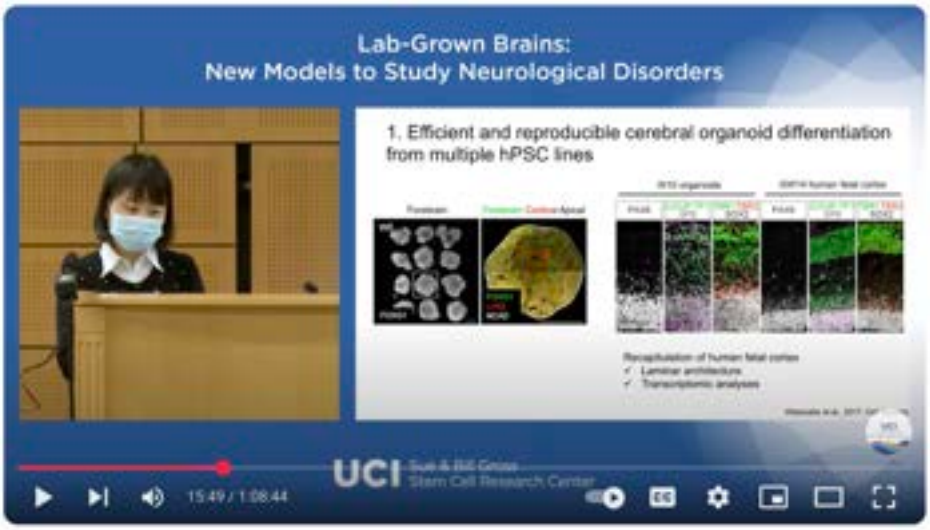


Lab-Grown Brains: New Models to Study Neurological Disorders - Momoko Watanabe & Claire Henchcliffe



Lab-Grown Brains: New Models to Study Neurological Disorders - Momoko Watanabe & Claire Henchcliffe



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https://www.youtube.com/watch?v=-b8ocd05ZHk

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Human Brain Organoids: A Novel Tool for Unlocking the Potential and Promise of Stem Cells

Human Brain Organoids: A Novel Tool for Unlocking the Potential and Promise of Stem Cells

https://www.youtube.com/watch?v=iU6yDcmbKM8

When comparing the exhibits above to Exhibit 37.2, it becomes clear that the "accidental Gulesserian serendipitous protocol" did not exist in the Novitch lab prior to Gulesserian's discovery (see Exhibit 37.22). The steps outlined in the protocols differ, with the former using mouse embryonic fibroblasts, and the materials are not the same. Just as there are multiple ways to make a chocolate cake, there are also various methods for creating organoids—feeder-dependent (see Exhibit 37.2, former protocol) versus feeder-independent (Gulesserian's accidental, serendipitous novel discovery, Exhibit 37.22).

In my view, if a chef invents a new way to make chocolate cake, they deserve recognition, credit, and all the honors that come with it. Similarly, the same principle should apply to those who innovate in the field of organoid development. It's important to honor genuine discoveries rather than misrepresenting the true narrative of the discovery (see Exhibit 37.8) by disguising an accidental discovery as an intentional one. This attempt to mislead the audience is evident in Exhibit 37.40, where the poster has pieced together various former protocols and falsely presented them as part of the Gulesserian novel accidental serendipitous protocol.

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