

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT, DIVISION ONE

ALKIVIADES DAVID, et al., Defendants and Appellants, v. JANE DOE, Plaintiff and Respondent.	Case Nos. B341119 (consolidated with B345361) Trial Court No. 20STCV37498
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**APPELLANT'S SUPPLEMENTAL NOTICE OF FURTHER SUPPLEMENTAL
MATTERS AND PROCEDURAL DEVELOPMENTS**

I. INTRODUCTION

Appellant Alkiviades David, appearing in propria persona, respectfully submits this Notice to advise the Court of further supplemental matters and procedural developments relevant to the fairness and reliability of the proceedings below.

This Notice is submitted for informational purposes only. It does not seek to augment the record or request independent relief, but is respectfully presented to assist the Court in evaluating whether the judgment below arose from a materially fair process.

II. RESPONDENT'S CONTINUED DEFAULT

On March 17, 2026, this Court issued a Notice of Default pursuant to California Rules of Court, rule 8.220.

Respondent has not filed a Respondent's Brief within the time prescribed by that notice. Absent cure, the matter proceeds on Appellant's Opening Brief, with the Court authorized to decide the appeal on that basis alone.

III. ADA AND ACCESS TO THE COURT

Appellant is a disabled litigant with a documented neurological condition affecting executive functioning, stress regulation, and related cognitive processing under conditions of litigation pressure.

The record reflects circumstances bearing directly on Appellant's access to the court, including denial of meaningful accommodation, interference with Appellant's service animal, attempts to impose involuntary medical treatment, and conduct that materially impaired Appellant's ability to participate effectively in proceedings.

These matters are relevant because they bear directly on Appellant's constitutional right of access to the courts and whether the proceedings afforded a meaningful opportunity to be heard.

IV. PROCEDURAL IRREGULARITIES

The proceedings below were further affected by serious procedural concerns, including lack of effective notice after withdrawal of counsel, reliance on Requests for Admission deemed admitted without Appellant's meaningful participation, use of those admissions to support directed findings, and jury findings premised on pre-established factual instructions.

Taken together, these issues raise substantial concerns regarding whether the adversarial process operated as intended.

V. EVIDENTIARY IRREGULARITIES

The record also reflects concerns regarding exclusion or suppression of relevant evidence, irregularities in exhibit handling, and distortions affecting the completeness of the evidentiary presentation.

These matters bear directly on whether the fact-finder was presented with a fair and accurate evidentiary record.

VI. RELATED FEDERAL PROCEEDINGS AND PATTERN OF CONDUCT

Appellant notes related federal proceedings alleging overlapping conduct, including seizure and control of electronic storage devices, removal of surveillance systems outside standard procedures, interference with access to evidentiary materials, and actions affecting Appellant's ability to pursue legal claims.

While not before this Court for adjudication, these related matters are referenced solely to provide context regarding whether the procedural irregularities identified herein were isolated or part of a broader pattern affecting Appellant's ability to litigate.

VII. ASSET INTERFERENCE AND ECONOMIC PREJUDICE

The procedural issues identified herein had practical and economic consequences. The conduct described above interfered with Appellant's ability to pursue legal remedies, maintain access to business-critical data and evidence, and preserve ongoing or prospective economic relationships.

This prejudice extends beyond mere procedural inconvenience and supports the conclusion that the proceedings were materially distorted.

VIII. CORROBORATING DECLARATION (HUZAINEH)

A Statement of Truth from California attorney Matthew Huzaineh provides further corroboration of Appellant's position. Mr. Huzaineh attests to suppression of evidence, misconduct by legal representatives, misuse of judicial procedures, and coordinated actions affecting Appellant's business interests, reputation, health, and livelihood.

Although the merits of that statement are not for determination in this Notice, it supports Appellant's contention that the irregularities were systemic rather than incidental.

IX. SUPPORTING STATEMENT OF COUNSEL (BOHM)

A supporting statement submitted by attorney James C. Bohm provides additional professional context. Mr. Bohm identifies concerns including suppression of witness testimony, potential witness interference, reputational harm through media activity, and cross-border interaction between litigation and external influences.

While this statement reflects counsel's professional perspective rather than independent evidence, it assists in contextualizing the broader litigation environment relevant to the question of prejudice.

X. CUMULATIVE PREJUDICE

The issues identified herein are not discrete. Considered cumulatively, they reflect: - impaired access to the court;

- procedural irregularity affecting notice and participation;
- evidentiary distortion impacting the completeness of the record; and
- resulting economic and practical prejudice.

Appellant respectfully submits that these combined factors raise substantial concern as to whether the proceedings below resulted in a judgment reached through a materially fair and reliable process.

XI. CONCLUSION

This Notice is submitted to assist the Court in understanding the broader procedural context in which the proceedings occurred.

Appellant respectfully submits that the matters identified herein are relevant to the Court's consideration of whether the judgment below was reached through a fair and reliable process. These matters are presented to assist the Court in determining whether the integrity of the proceedings was preserved.

Dated: March 28, 2026

St. John's, Antigua and Barbuda

/s/ Alkiviades David

ALKIVIADES DAVID

Appellant, In Propria Persona