

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

Case Nos.: B341119 (consolidated with B345361)

Los Angeles County Superior Court No.: 20STCV37498

ALKIVIADES DAVID, et al.,  
Defendants and Appellants,

v.

JANE DOE,  
Plaintiff and Respondent.

APPELLANT'S SUPPLEMENTAL APPLICATION TO AUGMENT THE RECORD  
AND NOTICE OF MATERIAL FACTS AND RELATED EVIDENCE

Date: April 3, 2026

Appellant Alkiviades David respectfully submits this Supplemental Application to augment the record pursuant to California Rules of Court, rule 8.155, and Code of Civil Procedure section 909.

I. CLARIFICATION OF IDENTITY IN EXISTING RECORD

The Rizzo Text Messages refer to "mk" as a material witness. Appellant clarifies that "mk" refers to Mahim Khan.

II. MATERIAL WITNESS – CARL DAWSON

Carl Dawson was identified and available prior to trial but not presented due to breakdown in representation.

III. DOCUMENTED TRAUMATIC BRAIN INJURY (TBI)

Supported by:

- Dr. Eric Wexler (May 6, 2023)

- Dr. George Karampoutakis (Nov 2, 2023)

IV. ADA COMMUNICATIONS

Emails show counsel had knowledge and ADA discussions with Angelina Dettamanti.

V. BREAKDOWN IN REPRESENTATION

Emails evidence failure to present key material.

VI. PREJUDICE

Record omitted key witness, disability, and ADA context.

VII. LEGAL BASIS

CRC 8.155 and CCP 909.

VIII. RELIEF REQUESTED

Appellant requests augmentation and consideration of materials.

STATEMENT OF TRUTH

I declare under penalty of perjury this is true.

/s/ Alkiviades David

Appellant, In Propria Persona (Disabled)

Dated: April 3, 2026