

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 MASTER CONSOLIDATED SUPPLEMENTAL SUBMISSION

(Motion to Augment Record Under Rule 8.155 | Dawson Evidence as Completion of Existing Record | Record Integrity | Request for Continued Stay)

Date: 2 April 2026

I. INTRODUCTION

This submission is filed in support of the appeal and invokes this Court's authority under California Rules of Court, rule 8.155 and Code of Civil Procedure § 909.

The appeal turns on one decisive issue:

A witness identified contemporaneously in materials already before this Court — Carl Dawson — was never heard at trial. His sworn testimony directly contradicts the central allegation. The jury therefore decided the case on a materially incomplete record.

II. CONTEMPORANEOUS RECORD ALREADY BEFORE THIS COURT

The Mary Rizzo Text Messages (Exhibit: RIZZO TEXTS) identify:

"mk, Carl, and Chasity" as witnesses "they need."

III. CENTRAL EVIDENCE: CARL DAWSON

Carl Dawson has provided:

Affidavit of Carl Dawson

Recorded Deposition Testimony (YouTube link included in filing)

Dawson states that:

- the relationship was consensual
- no rape occurred
- pressure from lawyers influenced narrative

IV. STRUCTURAL FAILURE OF THE TRIAL RECORD

Dawson was identified, available, and exculpatory — yet not called.

V. DISABILITY AND ACCESS TO JUSTICE

Appellant suffers from documented TBI impacting ability to manage litigation and ensure proper witness presentation.

VI. RELIEF SOUGHT

- Augmentation of the record
- Admission of Dawson evidence
- Recognition of incomplete record
- Continuation of stay

STATEMENT OF TRUTH

I believe that the facts stated in this submission are true.

/s/ Alkiviades David

Date: 2 April 2026