

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: KB-2025-001991
Appeal No: CA-2025-002562

BETWEEN:

ALKIVIADES DAVID
Appellant / Applicant / Litigant in Person

— and —

MAHIM KHAN & OTHERS
Respondents

**APPELLANT'S FINAL CONSOLIDATED
SUPPLEMENTAL NOTE**

(Glaser Weil file control, the Chastity Jones / Mary Rizzo / MK contradiction, the Carl Dawson omission, and the unsafe enforcement of an incomplete record)

This filing is advanced on a strictly procedural basis only. Its purpose is narrower and immediate: to show that the record underlying the California judgments was materially incomplete; that Glaser Weil, principally through Fred Heather, had or knew of contradictory witness material, medical / disability material, and support pathways that were not properly deployed; and that later Chora-led enforcement proceeded off that incomplete foundation.

The Applicant's central submission is that this was not an ordinary litigation path followed by ordinary enforcement. It was a path marked by contradictory witness formation, counsel-side omission, buried files, and downstream coercive collection activity. On that basis, coercive enforcement is unsafe unless and until the omitted-evidence problem is squarely addressed.

1. How Fred Heather entered and became central

The Applicant says that Fred Heather was introduced to him directly by Dani Peretz and the Applicant's sister Alexia, through the representation that Louis Freeh had recommended Fred Heather. The relevance of that evidence is structural: on the Applicant's case, Fred Heather did not arrive as independent outside counsel encountered at arm's length. He entered through an already connected family and legal channel, and was then placed at the centre of the Applicant's most sensitive litigation and evidentiary pathways.

The Applicant further says that Fred Heather became operationally central during the Mahim Khan trial itself, at the point when the proceedings had already become procedurally distorted.

2. The Mahim Khan trial was already structurally unsafe

On the Applicant's case, the Mahim Khan proceedings before Hon. Michelle W. Court were already unsafe by the time Fred Heather entered the operative picture. The Applicant says he had gone apoplectic when the court refused to receive or properly act on the Garofalo false-signature evidence. The uploaded materials identify the Mahim Khan proceedings as having been before Hon. Michelle W. Court, Dept. 74, and the later State Bar / writ materials say that Ellyn Garofalo's signature page was removed from one agreed version and attached to another, altered version without her knowledge or authorization, with exhibits added and removed before filing.

The Applicant does not ask this Court to make a final finding of judicial misconduct on this application. The relevance is narrower. By the Applicant's case, the Mahim Khan trial was already marked by a false-signature / doctored-filing / witness-exclusion problem before Glaser Weil ever claimed to have restored order.

3. Patricia Glaser put Fred Heather at the centre

"we feel very strongly that Fred Heather is the right person to argue on your behalf ... Please work with Fred Heather to resolve any further questions about this email."

"Fred was absolutely the right person to appear."

The Applicant's Gmail record contains two emails from Patricia Glaser that matter. In the first, Patty wrote that the firm was pursuing trial misconduct and apparently false declarations in the Jones case, and then stated that the firm felt "very strongly" that Fred Heather was the right person to argue on the Applicant's behalf. She then directed the Applicant to work with Fred Heather on further questions.

In the second, she repeated the point and wrote that "Fred was absolutely the right person to appear." These emails matter because they show that Glaser Weil itself affirmatively placed Fred Heather at the centre of the Jones appellate pathway.

4. The centrepiece: Chastity Jones, Mary Rizzo, and MK

"All I need is Chasity and MK."

"MK to say he touched her boobs ... Chasity to say she was a witness to the headstand thing."

"They told me I need mk, Carl, and Chastity."

The clearest buried-evidence lane in the entire record is the Chastity Jones / Mary Rizzo / MK lane. The record contains a signed declaration from Chastity Jones stating that, after Elizabeth Taylor was terminated, Taylor repeatedly contacted Jones and tried to persuade her to say that she had witnessed harassment by the Applicant in order to "make her case bigger," when Jones says she had witnessed no such thing.

That declaration is independently reinforced by the Mary Rizzo / Chastity Jones text materials, which attribute to Taylor statements that all she needed was "Chasity and MK," that "MK" would say the Applicant touched her breasts, that Chastity would say she witnessed the headstand incident, and that "they told me I need mk, Carl, and Chastity." For clarity, the Applicant states that "MK" in those texts refers to Mahim Khan.

The same material attributes to Jones and Rizzo statements that are flatly inconsistent with the later plaintiff-side narrative. This is not collateral impeachment. It goes to the formation of the allegations themselves.

5. The contradiction was already live in the trial-era record

This contradiction was not invented later. The deposition record shows direct questioning about whether Chastity Jones had signed a declaration stating that she did not witness sexual harassment at the office. The same broader record also reflects hostile examination around Mary Rizzo and the obtaining of statements.

So by the time the litigation matured, the existence of a Jones denial pathway and a Rizzo contradiction pathway was already real. It should have been central. On the Applicant's case, it was instead buried, fragmented, or not squarely advanced.

6. Carl Dawson: known to Fred. useful to Fred. not used

Fred Heather iMessage: "Carl is being terrific in helping us on Jane Doe."

The Carl Dawson omission is the cleanest omitted-witness point in the record. The Rizzo / Taylor texts identify Carl as one of the people "needed." The later evidentiary summaries and appellate drafts repeatedly say that Carl Dawson was a known, material witness whose evidence contradicted the core allegation. The Gmail record reflects a later written confirmation from Dawson that he reviewed a draft affidavit and was satisfied it accurately reflected his prior statements.

Most importantly, the Applicant has a direct Fred Heather message stating: "Carl is being terrific in helping us on Jane Doe." That message proves that Fred knew Carl, regarded Carl as useful and credible, and knew that Carl was active in the live case architecture.

On the Applicant's case, despite that, Carl Dawson was not properly deployed in the Mahim Khan pathway, even though his evidence materially contradicted the core allegation. The narrower procedural point is therefore simple: Glaser Weil did not merely fail to discover evidence. It failed to deploy known evidence.

7. The Shoefield / Calendar pathways were also in the later evidence package

The Applicant does not presently overstate the Gmail record. He has not re-located a live Fred Heather email expressly admitting that Gary Shoefield or Yelena Calendar were deliberately kept out of the Mahim Khan appeal.

However, the Applicant's later Gmail filing bundles repeatedly include by exact filename DECLARATION OF GARY SHOEFIELD.pdf and ACD-02_Calendar_Affidavit_July2025.pdf.pdf, and the Applicant's later filing text treats them as rebuttal or corrective evidentiary materials within the Mahim Khan forged-signature / record-integrity pathway. The Calendar pathway is additionally significant because the earlier record shows that Elena / Yelena Calendar was an HR investigator in the underlying workplace setting.

8. The files were not whole: Glaser Weil held them and they had to be pulled back out

The file-burial problem is also documented. The Applicant's formal demand to Fred Heather / Veronica / Dana demanded that "AFFIDAVITS in my supports - ANY AND ALL" be pulled from Glaser Weil files and from Dana Cole's files. That is direct contemporaneous proof that the Applicant was asserting that support affidavits existed and were sitting in counsel-held files.

The later Beast-file material then states that 42 boxes of evidence and litigation records were recovered from Fred Heather's office and reviewed by the Applicant and Barbara Burke. Barbara Burke is therefore not peripheral. She is a fact witness to the proposition that the evidentiary record was not merely incomplete in theory but literally buried in stored materials controlled by prior counsel and only later recovered with effort.

9. The medical / ADA material was also known to Fred

The same omission problem appears in the medical / disability lane. The uploaded email "Treatment Report fr Dr. Wexler" shows Dana Cole sending the report and copying Fred Heather. The uploaded Greek medical letter then expressly addresses itself to the Applicant's lawyers, including Mr Fred Heather in California, and states that Fred Heather is authorised to submit the material to the judge in the pending case.

So the medical / capacity / accommodation evidence was not unknown. It was expressly routed to Fred Heather for litigation use. The combined point is serious: Glaser Weil held both the contradictory witness pathways and the medical / ADA pathways, yet the record still went forward as though it were whole.

10. Chora is the downstream enforcement arm of the same structural failure

Once the contradictory record was not properly advanced, the same case structure matured into Joseph Chora enforcement. The uploaded materials describe Chora as an "enforcer" in the wider judgment-collection structure and specifically tie together the Taylor/Jones, Jane Doe/Nichols, Khan, and Chora matters.

The Malibu materials show what that looked like in practice. Nissrine Qrib states that on 1 June 2023, approximately ten deputies came to the Malibu residence, that Joseph Chora was present and directing the seizure, and that electronics including an iPad, two laptops, and the security-system DVR were taken. She further states that the iPad later tracked to 425 Colorado Blvd., Glendale, rather than to sheriff storage, and that she was informed and believed Chora personally possessed it.

The separate Chora complaint alleges trespass, conversion, invasion of privacy, seizure of electronic storage devices, removal of the DVR, and misstatements concerning Vader, the Applicant's service animal, to gain tactical advantage against a disabled litigant.

The chronology visible on the Applicant's case is therefore: (1) witness recruitment / contradiction at source; (2) Glaser Weil non-deployment of contradictory and medical evidence; (3) buried files later pulled back out; and (4) Chora-led coercive enforcement off that incomplete foundation.

11. Witness availability

- Barbara Burke, as a fact witness to the burial and later recovery of evidence and emails from the Fred Heather / Glaser Weil file chain;
- Carl Dawson, as a contradictory witness known to Fred Heather and not properly deployed;
- Angelina Dettamanti, on the ADA / accommodation pathway;
- Nissrine Qrib, on the Malibu seizure, caller-ID / CCTV continuity, and Chora-directed enforcement events;
- Ronald Gottschalk, as reflected in the filed affidavit / offer-of-proof materials, on the wider Girardi / Allred / Bloom / Chora judicial-influence environment.

The Applicant's point is not that this Court must hear all of those witnesses now. It is that the case should not be treated as resting on a safely complete record when so many known witness pathways point the other way.

12. The Court does not need to decide the whole world

The Applicant recognises that the wider background includes many more names, disputes, and business harms. For present purposes, the Court does not need to decide every part of that wider picture.

It is enough that the material already before the Court shows: a contemporaneous Jones / Rizzo / MK contradiction problem; a contemporaneously identified and known contradictory witness in Carl Dawson, expressly praised by Fred Heather as helpful; Patricia Glaser placing Fred Heather at the centre of the Jones appeal; later file burial / retrieval evidence involving Glaser Weil, the Applicant's demands, and Barbara Burke; known medical / ADA material expressly routed to Fred Heather; and a downstream Chora enforcement phase targeting electronics, surveillance, and disability vulnerabilities.

That is sufficient to show that the record cannot safely be treated as ordinary or complete.

13. Relief sought

In those circumstances, the Applicant respectfully asks the Court to: (1) take formal note that the underlying California record was materially incomplete; (2) treat with caution any enforcement step that assumes that record was stable and reliable; (3) preserve all relevant files, witness materials, counsel-held correspondence, medical / ADA records, and electronic evidence; (4) maintain or continue the stay / protective case-management position unless and until the omitted-evidence problem has been properly addressed; and (5) grant such further directions as are just.

14. Conclusion

This case did not move from a clean trial record to clean enforcement. It moved from a witness-formation problem, to counsel-side omission of contradictory and medical evidence, to buried files, to later Chora-led coercive enforcement.

On the material before this Court, Glaser Weil's role is central to the omission problem and Chora is the downstream enforcement arm of that same structural failure. The result is a record that is unsafe for coercive enforcement without further scrutiny.

Statement of Truth

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

/s/ Alkiviades David

Appellant / Applicant / Litigant in Person

Schedule of Exhibits Included in this PDF

Exhibit	Description / source
A	fred_carl_exhibit.png — applicant-supplied screenshot recreation of Fred Heather iMessage confirming Carl Dawson was “terrific in helping us on Jane Doe.”
B	chastity-sign.jpeg — signed Chastity Jones declaration page stating Elizabeth Taylor asked her to testify falsely to “make her case bigger.”
C	Patricia Glaser Gmail excerpts — 2 Nov 2021 and 10 Nov 2021 emails placing Fred Heather at the centre of the Jones appeal.
D	ANNEX B David v. LA Superior Court et al. (1).pdf — key text-message extracts concerning Chastity, MK, and Carl.
E	EXHIBIT H - A D MEDICAL NOTE_021123 - final-1 (1).pdf — medical note addressed to Greek counsel and Fred Heather for California judicial use.
F	AD-67-EXHIBIT AD v. JOSEPH CHORA COMPLAINT 2-1.pdf — downstream enforcement allegations concerning iPad, DVR, Glendale tracking, and Vader.

The filing body above is the operative note. The following exhibits are included for immediate visual and documentary assistance.

EXHIBIT A

Fred Heather iMessage confirming Carl Dawson was known and helpful

EXHIBIT A

Applicant-supplied iMessage screenshot recreation

Fred Heather

Relevant contemporaneous message confirming Carl Dawson was known and helpful

You and Dana milked me to the end

Nov 22, 2023 at 4:03 PM

Carl is being terrific in helping us on Jane Doe

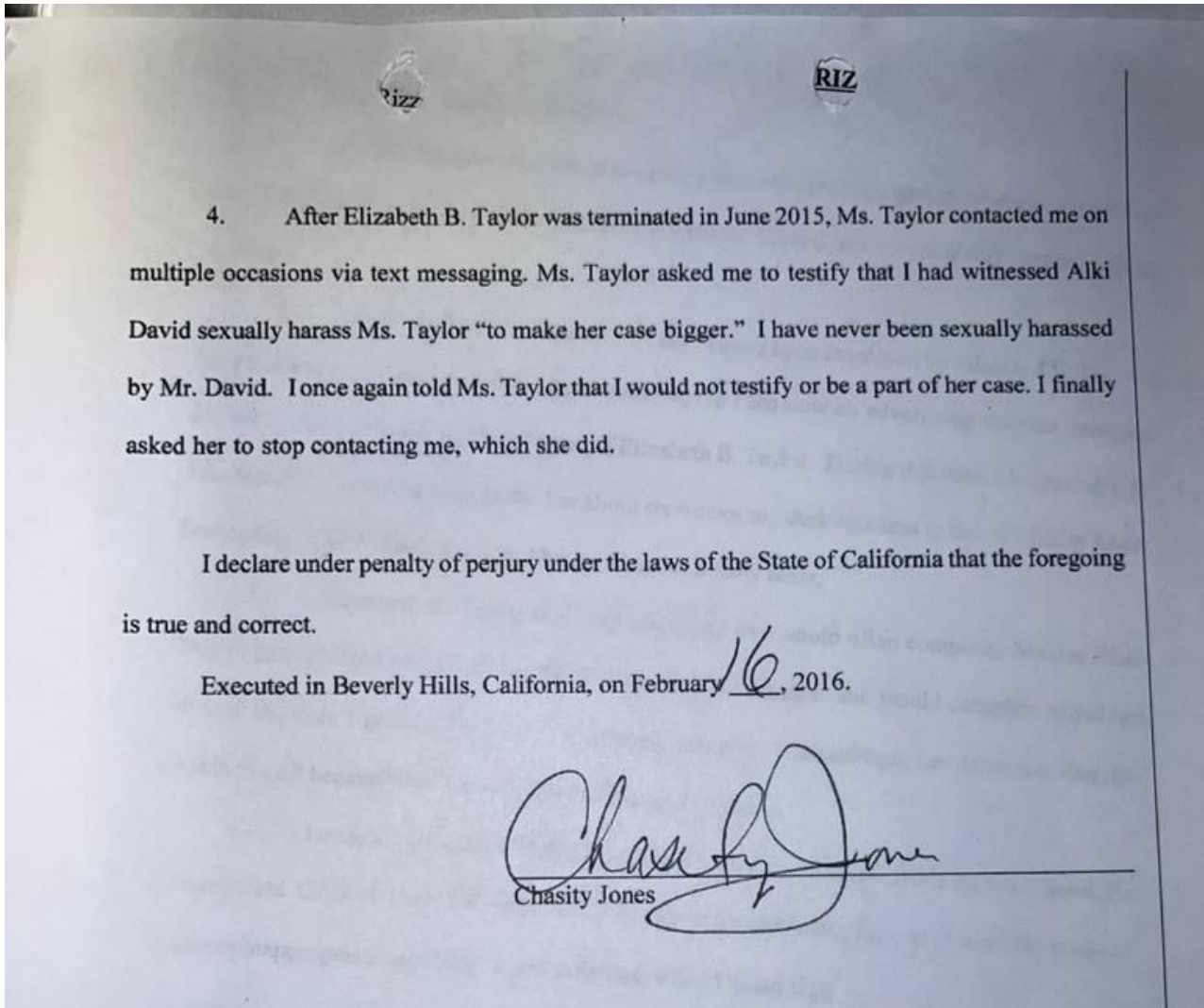
Key message: "Carl is being terrific in helping us on Jane Doe."

Use asserted in filing: Fred Heather's own message confirms that Carl Dawson was known to him, considered useful, and active in the live case architecture.

Prepared for filing bundle in KB-2025-001991 / CA-2025-002562

EXHIBIT B

Chastity Jones declaration page (image file: chasity-sign.jpeg)



Key line visible on the image: Elizabeth B. Taylor asked Chastity Jones to testify that she had witnessed harassment in order "to make her case bigger."

EXHIBIT C

Patricia Glaser Gmail excerpts (2 Nov 2021 and 10 Nov 2021)

“we feel very strongly that Fred Heather is the right person to argue on your behalf ... Please work with Fred Heather to resolve any further questions about this email.”

“Fred was absolutely the right person to appear.”

These emails matter because Glaser Weil itself placed Fred Heather at the centre of the Jones appellate pathway.

EXHIBIT D

ANNEX B text-message extracts concerning Chastity, MK, and Carl

"All I need is Chasity and MK."

"MK to say he touched her boobs ... Chasity to say she was a witness to the headstand thing."

"They told me I need mk, Carl, and Chastity."

For the Applicant's purposes in this filing, "MK" is asserted to refer to Mahim Khan. The significance of the extracts is that they show attempted witness construction and identify Carl contemporaneously as a witness "needed."

EXHIBIT E

Medical note routed to Fred Heather for California judicial use

"The current note is provided for Judicial use."

"the medical opinion ... is addressed to ... your lawyer in Greece Mr. Themistoklis Sofos and your lawyer in California, USA, Mr Fred Heather, with the sole purpose of being submitted during your pending trial in California ... Mr. Fred Heather is only allowed to submit our medical opinion to the Judge of your pending case."

This exhibit is included to show that the medical / capacity pathway was expressly routed to Fred Heather and was not unknown to the Glaser Weil lane.

EXHIBIT F

Joseph Chora downstream enforcement extracts

Complaint extract: on or about 1 June 2023 Chora took possession of an Apple iPad / Airtag device.

Complaint extract: the DVR was removed without being properly inventoried and was allegedly targeted for conversion.

Complaint extract: Chora allegedly misstated essential facts regarding Vader, the Applicant's ADA service dog, to have the animal removed from the proceeding.

These extracts are included not to determine the whole Chora dispute here, but to show the downstream enforcement phase that followed the allegedly incomplete record.