Diana R. Williams \* IN THE

131Calvin Hill Court \*

Baltimore, Maryland 21222 \* CIRCUIT COURT

Plaintiff \*

v. \* FOR

Hameedullah Virk, et al. \*

Defendants \* BALTIMORE CITY

\* Case No. 24-C-17-004535

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

**MOTION FOR SUBSTITUTION TO HAVE A SPECIAL JUDGE TO DETERMINE IF THE MATERIAL FACTS BELOW SUBSTANTIATE THAT JUDGE FLETCHER-HILL AND JUDGE KAREN FRIEDMAN NEED TO BE REFERRED FOR IMPEACHMENT BY GOVERNOR HOGAN, SANCTIONED BY THE JUDICIAL COMMISSION, DISQUALIFIED FROM PRESIDING OVER THE PLAINTIFF’S CIVIL CASE, AND BE REFERRED FOR INVESTIGATION BY A SPECIAL PROSECUTOR RELEVANT TO ALLEGATIONS OF CRIMINAL ACTS, JUDICIAL MISCONDUCT, AND OBSTRUCTION OF JUSTICE, MOTION TO HAVE ALL ORDERS BY JUDGE FLETCHER-HILL AND JUDGE KAREN FRIEDMAN DISMISSED, AND A MOTION TO HAVE THE SPECIAL JUDGE FOR A SUBSTITUTION AND/OR JUDGE ALFRED NANCE FOR A SUBSTITUTION TO CONSIDER GRANTING ALL OF**

**THE PLAINTIFF’S MOTIONS**

I, Diana R. Williams, the Plaintiff who is being represented Pro Se, hereby, requests that the Plaintiff’s Motion For Substitution To Have A Special Judge To Determine If The Material Facts Below Substantiate That Judge Fletcher-Hill And Judge Karen Friedman Need To Be Referred For Impeachment By Governor Hogan, Sanctioned By The Judicial Commission, Disqualified From Presiding Over The Plaintiff’s Civil Case, And Be Referred For Investigation By A Special Prosecutor Relevant to Allegations Of Criminal, Judicial Misconduct, And Obstruction Of Justice, Motion To Have All Orders By Judge Fletcher-Hill And Judge Karen Friedman Dismissed, And A Motion To Have The Special Judge For A Substitution And/or Judge Alfred Nance For A Substitution To Consider Granting All Of The Plaintiff’s Motions (hereinafter “1st Motions”) be granted based on the grounds and authorities cited below:

1. **CR 59 (a)(4) cites that newly discovered evidence, material for the party making the application that could not have reasonably discovered and produced earlier are grounds for granting the Plaintiff’s Motions. The newly discovered evidence, material for the Plaintiff, being represented Pro Se and making the application which could not have reasonably been discovered and produced earlier by the Plaintiff is that Judge Fletcher-Hill and Judge Karen Friedman have acted corruptly and criminally by violating U.S. Code, Title 18, Part 1, Chapter 73** **§ 1505.** Under the definition of U.S. Code, Title18, Part1, Chapter 73 § 1505, a judge obstructs justice when he/she acts corruptly, or by threats or force, or by any threatening letter or communication influences, obstructs, or impedes or endeavors to influence, obstruct, or impede the due and proper administration of the law under which any pending proceeding is being had before any department or agency of the United States. Obstruction can include crimes committed by judges, prosecutors, attorney generals, and elected officials in general. It is misfeasance, malfeasance or nonfeasance in the conduct of the office. Maryland judges may be removed by the governor upon the address of the general assembly with the concurrence of two thirds of the members of each house, may be impeached by a majority of the House of Delegates and convicted by two thirds of the senate, and judges may be removed by the Court of Appeals on the recommendation of the Commission on Judicial Disabilities. On 4-27-18, the Plaintiff mailed a copy of her 1st Motions and her 4-27-18 Complaint of criminal charges, judicial misconduct, and obstruction of justice to Governor Hogan and others, and a copy of her 1st Motions and another 4-27-18 Complaint of criminal charges, misconduct, and obstruction of justice to the Commission On Judicial Disabilities of Maryland, and will soon post these complaints on her website, [www.dianarwilliams.com](http://www.dianarwilliams.com). All of the Plaintiff’s complaints include a request that a Special Prosecutor be assigned to investigate the allegations in the complaints to determine if Judge Fletcher-Hill and Judge Karen Friedman need to be impeached, disbarred, and criminal charged.

In his Orders docketed on 4-19-18, 4-5-18, and/or in his Orders docketed 4-2-18, Judge Fletcher-Hill not only intentionally cited the false and misleading statements in asserting that the Plaintiff did not support her motions for Substitution with factual causes, but Judge Fletcher-Hill, also, concealed the Plaintiff’s factual causes and never revealed that the Plaintiff had a right to motion the court for Substitution with or without a cause. The Plaintiff cited multiple causes in her pleadings for Substitution. In making misleading statements and withholding and concealing relevant material fact in his Orders, Judge Fletcher-Hill acted corruptly in obstructing or perverting justice and, thereby, committed the federal crime as stipulated in U.S. Code, Title 18, Part 1, Chapter 73 § 1505. Also, Judge Karen Friedman perverted justice and act corruptly and, thus, committed the federal crime, namely, U.S. Code, Title 18, Part 1, Chapter 73 § 1505. In Judge Karen Friedman’s denial of the Plaintiff’s Motion for Substitution, as well in all of her denials of the Plaintiff’s motions, Judge Karen Friedman failed to cite one ground or legal authority upon which she substantiated her denials; she simply cited motion “denied”. Like Judge Fletcher-Hill, Judge Karen Friedman knew that the Plaintiff had a right for Substitution with or without a cause. Judge Fletcher-Hill and Judge Karen Friedman know that they were infringing upon U.S. Code, Title 18, Part 1, Chapter 73 § 1505 in denying the Plaintiff’s Motions for Substitutions because these Officers of the Court know that, legally, the Plaintiff should have been granted her Motions for Substitution which cited factual causes since the **right of substitution** is a statutory right of all parties except the state, since the right of substitution with cause does not have a limitation on the number of times it may be called for, and since the Plaintiff can exercise her right of substitution until she finds a neutral judge. Further, Judge Fletcher-Hill and Judge Karen Friedman know that, legally, they were violating U.S. Code, Title 18, Part 1, Chapter 73 § 1505 because, as Officers of the Court, they knew that the Plaintiff’s motions for substitution, legally, should have been granted since the Plaintiff questioned Plaintiff stated in her Motions for Substitution that she questioned the impartiality of Judge Fletcher-Hill and Judge Karen Friedman presiding over her civil case due to their appointment as judges for the Eighth Circuit in Baltimore City by Martin O’Malley (hereinafter “O’Malley”) who is alleged in the Plaintiff’s Civil Complaint to have intentionally committed misconduct and potentially criminal acts which contributed to the Plaintiff’s emotional distress, which is part of the Plaintiff’s claim and damages in her civil case, and that O’Malley will be called to testify during the Plaintiff’s civil proceeding. Also, the Plaintiff assert that Judge Fletcher-Hill and Judge Karen Friedman knew that, because of their special and personal relationship with O’Malley who appointed them to such an elite and privileged position as judges, a reasonable-minded person like the Plaintiff would view their presiding over her civil case as an actual conflict of interest and, thereby, legal grounds for motioning Judge Fletcher-Hill and Judge Karen Friedman to recuse themselves and that Judge Fletcher-Hill and Judge Karen Friedman should have recused themselves without the Plaintiff having to file a motion for Substitution and/or Disqualification. Still too, in her Motions for Substitution, the Plaintiff declares that Judge Fletcher-Hill and Judge Karen Friedman are cognizant of the material fact that, under Federal Statute, 28 U.S.C. § 455, recusal of a judge is appropriate where "a reasonable person”, knowing all the facts, would conclude that the judge's impartiality might reasonably be questioned and requires judges to recuse sua sponte where appropriate. Moreover, as cited in the Plaintiff’s Motions for Substitution, since O’Malley, who is an attorney, will be called to testify in the Plaintiff’s civil case, has a relationship with Judge Fletcher-Hill and Judge Karen Friedman, and is being alleged to have intentionally committed misconduct and potentially criminal acts, the Plaintiff questioned the ability of Judge Fletcher-Hill and Judge Karen Friedman to be unbiased because of their friendly relationship with O’Malley and that such a relationship with O’Malley is viewed by the Plaintiff as an actual conflict of interest and/or an actual impropriety if Judge Fletcher-Hill and Judge Karen Friedman remained presiding over the Plaintiff’s civil case. Judge Fletcher-Hill and Judge Karen Friedman, being experts in the law, also, know that Canon 1 stipulates that a judge shall uphold and promote the independence, integrity, and impartiality of the judiciary, and shall avoid impropriety and the appearance of impropriety, that Canon 2 cites that a judge shall perform the duties of judicial office impartially, competently, and diligently, and that Canon 3 states that a judge shall disqualify himself/herself in a proceeding in which his/her impartiality might reasonably be questioned. Also, the American Bar Association's (hereinafter ABA) Model Code of Judicial Conduct prescribes disqualification for judges who encounter allegations of a conflict of interest in a motion to disqualify. Therefore, Judge Fletcher-Hill and Judge Karen Friedman knowingly and willingly perverted justice and were corrupt and, thereby, breached U.S. Code, Title 18, Part 1, Chapter 73 § 1505 because they violated Federal Statute, 28 U.S.C. &455, Canons 1, 2, and 3 and infringed upon the Plaintiff’s 7th and 14th Amendment Rights by failing to disqualify and/or recuse himself from presiding over the Plaintiff’s civil case; and, further, these two Officers of the Court were corrupt, perverted justice, and, again, infringed upon U.S. Code, Title 18, Part 1, Chapter 73 § 1505 because they have committed judicial misconduct as a result of failing to disqualify themselves from presiding over the Plaintiff’s Civil Complaint but chose to violate Federal Statute, 28 U.S.C. § 455 and Canons 1, 2, and 3, and obstruct justice by breaching Federal Statute, 28 U.S.C. &455 and Canons 1, 2, and 3, which prevents the Plaintiff from exercising her 7th and 14th Amendment Rights as stipulated in the Constitution of the U.S.Also, Judge Fletcher-Hill and Judge Karen Friedman know that they were perverting justice, being corrupt, and, again, breaching U.S. Code, Title 18, Part 1, Chapter 73 § 1505 because these experts in the law are cognizant of the obvious conflict of interest and bias in deciding to take it upon themselves to be the judge to determine whether he/she should remove himself/ herself from presiding over the Plaintiff’s civil case, although the Plaintiff requested in her Motions for Disqualifications and Substitution for these two judges and that another judge determine whether Judge Fletcher-Hill and Judge Karen Friedman should be disqualified from presiding over her civil case. Further, both judges know that a Substitution for cause can be for any bias a judge may have in the case, such as an association with a party, and that a substitution with cause may be moved for at any time after a party realizes a bias exists. In each of her Motions for Substitution, the Plaintiff filed timely and cites multiple causes as to why she believes that Judge Fletcher-Hill and Judge Karen Friedman would be bias as presiding judges over her civil case. Thus, the Plaintiff details in her Motion For Judicial Disqualification Of Judge Fletcher-Hill, Motion, Motion Sanction Judge Fletcher-Hill, Motion To Have Judge Nance For A Substitution, Motion To Disqualify The Judges Listed Below, and Motion To Dismiss Judge Fletcher-Hill’s Orders to Deny The Plaintiff’s Motion For Judicial Disqualification Of Judge Karen Friedman, Motion For Sanctions Against Judge Karen Friedman For Committing Judicial Misconduct, Motion For Clarification, Motion For Another Substitution, Motion To Dismiss Judge Karen Friedman’s Orders, And To Have Another Judge Consider The Plaintiff’s Motions For Reconsideration, For a New Trial By Jury, To Enter A New Judgment Because Of Additional Evidence, And Granting Of The Plaintiff’s Motion To Amend the Punitive Damage In the Plaintiff’s Civil Complaints (hereinafter “2nd Motions) other factual causes as why she believes that Judge Fletcher-Hill would be bias in presiding over her civil case. And, had the Plaintiff known prior to her filing her 2nd Motions that Judge Fletcher-Hill was appointed in 2009 as an Associate judge in the Eighth Circuit of Baltimore City by O’Malley, and, thus, have a special relationship with O’Malley who is alleged in the Plaintiff’s Civil Complaint to have intentionally committed misconduct, potentially criminal acts, and will be called to testify, the Plaintiff would have included this material fact in her 2nd Motions as one of the reasons she questions the impartiality of Judge Fletcher-Hill presiding over her civil case. Judge Fletcher-Hill and Judge Karen Friedman never informed the parties that they were appointed to such an elite position as an Associate judge by O’Malley, and therefore, had a unique relationship with O’Malley that would cause the Plaintiff to be suspicious of them being able to be impartial in any aspect of this civil proceeding. However, the following material facts that are cited in the Plaintiff’s 2nd Motions are certainly sufficient to justify why the Plaintiff questions the impartiality of Judge Fletcher-Hill’s presiding over her civil case and why there would be an actual conflict of interest and/or an appearance of an conflict of interest and/or an actual impropriety and/or an appearance of an impropriety if he remained presiding over the Plaintiff’s civil case; these factual causes are cited in the Plaintiff’s 2nd Motions as follows: **1.**  In her appeals of Judge Fletcher-Hill’s 2015 decision to grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint of Constructive Fraud (hereinafter “2014 Civil Complaint”), the Plaintiff asserts that Judge Fletcher-Hill breached her 14th Amendment right, violated Federal Law, 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint which, amongst other things, exposed the material fact that O’Malley and the 6 Defendants intentionally committed misconduct and potentially criminal acts by deliberately exposing our children to lead-tainted drinking water and/or lead-based paint hazards since at 1993, and have yet to test or compensate all the children that have been exposed to this potentially fatal toxic. **2.** Judge Fletcher-Hill, the presiding judge over the Plaintiff ‘s 2014 Civil Complaint, knew that, amongst other things, the Plaintiff stated that O’Malley and the Defendants, 5 of whom are state agencies in Maryland which O’Malley, when he was the Governor of Maryland, exercised executive power over, namely, the Maryland State Board of Education, the Department of Labor, Licensing, and Regulation of Maryland, the Maryland State Board of Education, the Board of Education of Baltimore County, and the Maryland State Education Association intentionally committed misconduct and potential criminal acts. **3.** Judge Fletcher-Hill, along with Judge Julie Rubin, Judge Michel Pierson, Judge Edward Hargadon, Judge Videtta Brown, Judge Lawrence Fletcher-Hill, Judge Yolanda Tanner, Judge Shannon Avery, and Judge Sylvester Cox is named as one of the approximate 35 judges who is being alleged by the Plaintiff to have intentionally committed judicial misconduct and obstructed justice in order to cover up the fact that O’Malley, the former Governor of Maryland, the former Mayor of Baltimore City, the former member of the Baltimore City Council who was, also, one of the 2016 Candidates for President is alleged by the Plaintiff to have committed deliberate misconduct and potentially criminal acts, and the Plaintiff has requested that the President and Congress appoint a Special Prosecutor to investigate her substantiated allegations of judicial misconduct and obstruction of justice against Judge Fletcher-Hill, Judge Karen Friedman, the other judges listed above, and, also, to investigate the allegation of deliberate misconduct and possibly crimes against O’Malley and other government officials. **4.** The Plaintiff pleads that, since she questions the impartiality of Judge Fletcher-Hill presiding over her civil case, Judge A. Nance be assigned to preside over her civil case because the Plaintiff cites that, thus far, Judge Nance’s integrity in ruling according to the Rule of Law and without the respect of persons or taking gifts are not in question by the Plaintiff, and the Plaintiff doesn’t believe that Judge A. Nance could identify her in a line-up although Judge A. Nance has ruled on one of the Plaintiff’s civil cases over a decade ago and received a signed copy of the Plaintiff’s Documentary at a public event at or around 2013 or 2014. **5.** The Plaintiff alleges that Judge Fletcher-Hill’s 2015 unlawful denial of her Motions and Responses in order to unlawfully grant the Defendants’ motions to dismiss her 2014 Civil Complaint is similar to Judge Karen Friedman’s unlawful denial of her Motions and Responses in order to unlawfully grant the Defendants’ motions to dismiss her 2017 Civil Complaint in that, in both Civil Complaints, Judge Fletcher-Hill and Judge Karen Friedman violated federal laws and/or statutes, including the Plaintiff’s 7th and 14th Amendment Rights, in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s Civil Complaints and, thereby, preventing the Plaintiff from having her civil cases heard before a jury of her peers which would expose, amongst other things, the material facts that O’Malley and other government officials intentionally committed misconduct and potentially criminal acts. **6**. The Plaintiff declares that, unless transparency is prevalent, her 2017 Civil Complaint will continue to follow the same illegal and unlawful acts committed by Judge Fletcher-Hill and other Officers of the Court in her 2014 Civil Complaint. **7.** In the Plaintiff’s May 2015 Motion for Reconsideration or a New Trial to the In Banc judges from the Circuit Court (Exhibit 32 on website), the Plaintiff details and substantiates how Judge Fletcher-Hill breached her 14th Amendment right and violated Federal Law, 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause in order to unlawfully grant the Defendants’ motions to dismiss her 2014 Civil Complaint. **8.** The Plaintiff pleads to Hon. President Trump and Hon. Chuck Grassley, and the public that in her 3-9-18 Official Complaint of Judicial Misconduct and Obstruction of Justice by Judge Karen Friedman that **“….unless transparency is prevalent, her 2017 Civil Complaint will continue to follow the same illegal and unlawful acts by the Officers of the Court as her 2014 Civil Complaint. Ms. Williams asserts that the Defendants’ motions to dismiss her 2014 Civil Complaint [Civil Complaint of Constructive Fraud] were upheld by Judge Fletcher-Hill, although Judge Fletcher-Hill knew that the evidence substantiated the fact that the Defendants’ grounds for dismissal not only breached Ms. Williams’ 14th Amendment right but, also, violated 2 other federal laws, namely, Federal Law, 42 U.S.C & 1983 and Federal Law 42 U.S.C & 1985…..even though the evidence before these appellant Officers of the Court proved that the Federal Supremacy Clause of the U.S., Federal Law, 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and Ms. Williams’ 14th Amendment right had been infringed upon by Judge Fletcher-Hill’s unlawful granting of the Defendants’ motion to dismiss Ms. Williams’ 2014 Civil Complaint. ……” ….“Therefore, all public information relevant to Ms. Williams’ 2017 Civil Complaint ….that led up to her 2006, 2015, and 2016 Petitions to the Supreme Court will be able to be viewed by the public on Ms. Williams’ website.”…. 9.** The Plaintiff alleges that, in her 2015 Motion for Reconsideration to the In Banc judges in the Circuit Court (which is Exhibit 32 on the Plaintiff’s website, www.dianarwilliams.com), in her 2015 Writ to the Court of Appeals of Maryland (Exhibit 11 on website), and/or in her 2016 Petition to the Supreme Court (Exhibit 7 on website), she provided the irrefutable evidence to support the fact that Judge Fletcher-Hill infringed upon Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, the Federal Supremacy Clause of the U.S., and her 14th Amendment Right by unlawfully granting the Defendants’ motions to dismiss her 2014 Civil complaint in order to cover up the relevant and material facts that O’Malley and other government officials intentionally committed misconduct and possibly criminal activities. **10.** The Plaintiff alleges that, of all of her appeals that led up to her filing 3 Petitions to the Supreme Court in 2006, 2015, and 2016, it is her 2016 Petition to the Supreme Court that would have taken the Justice of the Supreme Court less than 10 minutes to read in order to determine that the Court of Appeals of Maryland deliberately committed perjury which caused the issues raised in the Plaintiff’s appeal to the Court of Appeals of Maryland never to be addressed or resolved by this court, which includes the assertion that the In Banc judges committed perjury, breached the Plaintiff’s 14th Amendment Right and infringed upon Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause to cover up the material fact that Judge Fletcher-Hill violated the Plaintiff’s 14th Amendment Right and breached Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint, which would have revealed the relevant and material facts that O’Malley and other government officials intentionally committed misconduct and possibly criminal activities. **11.** Thedeliberate perjury by the Court of Appeals of Maryland, which caused the issues raised in the Plaintiff’s 2015 Writ to the Court of Appeals of Maryland never to be addressed or resolved, is that the evidence support the allegation that the Court of Appeals of Maryland lied under oath in their Order dated 9-21-15 by citing that the Plaintiff’s Writ to their court was denied because it was filed late, and the Court of Appeals of Maryland deliberately lied under oath after refusing to correct their lie after being referenced to the two exhibits in their record which, undeniably, support the fact that YES, the Court of Appeals of Maryland committed perjury. **12.** The Plaintiff asserts that the Justices of the Supreme Court, excluding Justice Gorsuch who was not yet appointed as one of the Justices to the Supreme Court, were obligated by Rule 10 in the manual of the Supreme Court to exercise their supervisory power and take corrective actions against the Court of Appeals of Maryland because intentional perjury is not the accepted and usual judicial proceedings by any court. **13.** In order to determine that the first 5 exhibits on the Plaintiff’s website, which accompanied her 2016 Petition to the Supreme Court, and which the 8 Justices of the Supreme Court could have read in less than 10 minutes in order to determine that the Court of Appeals of Maryland deliberately committed perjury, it’s essential to know that Maryland Rule 7-104 allows 30 days to file an appeal to the Court of Appeals, with the first day starting on the day that the last judgment of the Circuit Court is filed in the record by the clerk. The first exhibit, which is on Plaintiff’s website as Exhibit 1, is copy of the document that gives the date of the In Banc judges’ last judgment, which was their denial on July 6, 2015 of the Plaintiff Motion for Reconsideration and a New Trial. The next exhibit which is on the Plaintiff’s website as Exhibit 2 is a copy of the docket receipt from the clerk of the Court of Appeals which gives the date that the Plaintiff’s 2015 Petition for a Writ to the Court of Appeals was filed in the record of this court, namely, on August 3, 2015. The third exhibit which is on the Plaintiff’s website as Exhibit 3 is a copy of the Court of Appeals’ Order dated 9-21-15 which declares that the Plaintiff’s Writ was denied because it was filed late to the Court of Appeals of Maryland. The fourth exhibit which is on the Plaintiff’s website as Exhibit 4 is a copy of her Motion for Reconsideration to the Court of Appeals of Maryland which asserts that, amongst other things, the evidence in the record of this court, namely, Exhibits 1 and 2, support the fact that the Plaintiff’s Writ was filed in the Court of Appeals of Maryland prior to the 30-day expiration.  The fifth exhibit which is on the Plaintiff’s website as Exhibit 5 is the second denial of her Writ by the Court of Appeals of Maryland. Consequently, the second denial by the Court of Appeals of Maryland is indicative of the fact that this court refused to correct their prejudicial error, even after receiving the Plaintiff’s Motion for Reconsideration which references Exhibits 1 and 2 in their record to prove that her Writ was filed on time. **14.** The Plaintiff asserts that the evidence that accompanied her 2016 Petition to the Supreme Court includes a copy of the Plaintiff’s addendum to her 7-14-14 initial complaint against 13 Officers of the Court to Attorney General Loretta Lynch from the Department of Justice (hereinafter (“DOJ”), which substantiate that the Justices of the Supreme Court knew that she had filed a complaint against Judge Fletcher-Hill on 9-22-15 to the DOJ requesting an investigation by Attorney Lynch of the allegations that Judge Fletcher-Hill, along with the judges listed above, obstructed justice by committing, nonfeasance, misfeasance, malfeasance, and violating her 14th Amendment right. **15.** The Plaintiff declares that the evidence in the courts and/or on her website, substantiates that the Supreme Court deliberately committed judicial misconduct and obstructed justice in 2016 by failing to uphold, protect, and defend her 14th Amendment Right and Rule 10 in the manual of the Supreme Court as a result of failing to take corrective actions against the intentional prejudicial error of perjury by Court of Appeals Maryland, who deliberately committed perjury in stating that the Plaintiff’s 2015 Writ was filed late to their court and, thereby, avoided addressing and resolving the issues raised in the Plaintiff’s Writ to the Court of Appeals, which includes the issue that the In Banc judges in the Circuit Court committed perjury, breached the Plaintiff’s 14th Amendment Right and infringed upon Federal Law, 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause to cover up the material fact that Judge Fletcher-Hill violated the Plaintiff’s 14th Amendment Right and breached Federal Law, 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint, which would have revealed the relevant and material facts that O’Malley and other government officials intentionally committed misconduct and possibly criminal activities. **16**. The Plaintiff asserts that, because of the alleged intentional judicial misconduct by the Courts and/or deliberate misconduct by O’Malley and other government officials, all of her civil litigations were unlawfully dismissed and, thus, she has yet to receive justice for the 21 years of injustices and emotional distress she has endured, and that she continues to endure emotional distress as she considers the possible negative health effects of thousands of children in Maryland public schools that have been exposed to lead poisoning since 1993 by O’Malley and by other government officials, who are responsible for the health and safety of children in public schools, but have intentionally exposed our children to lead-tainted drinking water and/or lead-based paint hazards and have yet to test or compensate all the children that have been exposed to this potentially fatal toxic.

In his Orders docketed on 4-2-18, Judge Fletcher-Hill not only intentionally cited false statements in asserting that the Plaintiff did not support her motions for substitution with factual causes for having Judge Karen Friedman be recused from presiding over the Plaintiff’s civil case, but, again, Judge Fletcher-Hill chose to continue to violate U.S. Code, Title 18, Part 1, Chapter 73 § 1505 by making false and misleading statements by failing to disclose in his Orders that the Plaintiff had a right to motion the court for Substitution with or without a cause, that the Plaintiff asserted numerous causes for her motioning the recusal of Judge Karen Friedman, and that Judge Karen Friedman’s refusal to recuse herself from presiding over the Plaintiff’s civil case was illegal, corrupt, an obstruction of justice and, thereby, a federal crime as declared in U.S. Code, Title 18, Part 1, Chapter 73 § 1505. Moreover, Judge Fletcher-Hill knew that by making false statements and misleading statements in his Orders by failing to disclose the causes cited in the Plaintiff’s motions and responses for questioning the impartiality of Judge Karen Fletcher, and by denying the Plaintiff’s motion for Substitution of Judge Karen Friedman, he could conceal the material fact that he, too, was appointed to the privileged position as an Associate judge to the Eighth Circuit by O’Malley, and needed to disqualify himself from presiding over the Plaintiff’s civil case as well. Thus, contrary to Judge Fletcher-Hill citing in his Orders that the Plaintiff stated no factual causes for motioning the recusal of Judge Karen Friedman as the presiding judge, the Plaintiff asserts many causes as to why she believes that Judge Karen Friedman would be impartial in presiding over her civil complaint in her 2-1-18 Motions For Substitution, To Dismiss Judge Friedman’s Orders, and To Have Another Judge Consider the Plaintiff’s Motions For Reconsideration, For a New Trial By Jury, To Enter a New Judgement Because of Additional Evidence, and Granting Of The Plaintiff’s Motion to Amend the Punitive damage in The Plaintiff’s Civil Complaints (hereinafter “3rd Motions”), in her 2-15-18 Response to Defendants’ Response to Plaintiff’s ‘ Response to Plaintiff’s Motions For Substitution, To Dismiss Judge Friedman’s Orders, and to have Another Judge Consider the Plaintiff’s Motions For Reconsideration For a New Trial, to Enter a New Judgment Because of Additional Evidence, and Granting of the Plaintiff’s Motion to Amend the Punitive Damage in the Plaintiff’s Civil Complaints (hereinafter “Plaintiff’s Response to Defendants’ Response”), and/or in her 3-9-18 Motion For Judicial Disqualification of Judge Karen Friedman, Motion for Sanctions against Judge Karen Friedman For Committing Judicial Misconduct, Motion for Clarification, Motion for Another Substitution, Motion to Dismiss Judge Karen Friedman’s Orders’ and to Have Another Judge Consider the Plaintiff’s Motions for Reconsideration, For a New Trial By Jury, To Enter a New Judgment Because of Additional Evidence, and Granting of the Plaintiff’s Motion to Amend the Punitive Damage in the Plaintiff’s Civil Complaints (hereinafter “4th Motions”). Consequently, in her 3rd Motions, in the Plaintiff’s Response to Defendants’ Response, and/or in her 4th Motions, the Plaintiff details the factual causes as to why she questions Judge Karen Friedman’s impartiality in presiding over her civil case, including stating that she questioned the impartiality of Judge Karen Friedman presiding over her civil case due to her close friendship with O’Malley, her friend who will be called to testify and whose being alleged to have committed misconduct and possibly crimes being alleged in the Plaintiff’s civil case and, thus, states the other factual causes as follows: **1.** The Plaintiff asserts that Judge Karen Friedman knows that the material facts cited in her 3rd Motions and in her response to Defendants’ Response prove, indisputably, that, legally, Judge Karen Friedman should have recused herself from presiding over the Plaintiff’s civil case and that the Defendants’ response to the Plaintiff’s 3rd Motions was erroneous, not in good faith, and have no legal grounds or authorities. **2.** Because Judge Karen Friedman didn’t cite a single ground or authority for denying the Plaintiff’s 3rd Motions and the Plaintiff’s response to Defendants’ Response, nor did she cite any legal ground or authority for denying any of the Plaintiff’s motions or responses, the Plaintiff questions Judge Karen Friedman’s impartiality as the presiding judge who has a special relationship with O’Malley who is alleged to have committed misconduct and potentially criminal acts, and demands clarity as to why the Circuit Court allows Judge Karen Friedman to deny the Plaintiff’s Motions without ever citing at least one legal grounds and authority for her denials, **3.** Judge Karen Friedman violated Federal Statute, 28 U.S.C. &455 and Canons 1, 2, and 3 by failing to disqualify and/or recuse herself from the Plaintiff’s civil case as motioned by the Plaintiff in her 3rd Motions. **4.** Judge Karen Friedman never informed the parties that she needed to recuse herself from presiding over the Plaintiff’s civil case or get permission from both parties to continue presiding due to the material fact that she was appointed in 2014 to an elite and privileged status as one of the judges to the Maryland Eighth Circuit Baltimore City by O’Malley who is being alleged in the Plaintiff’s civil case to have intentionally committed misconduct and potentially criminal actions as a member of the City Council of Baltimore City, as Mayor of Baltimore City, and/or as Governor of Maryland. **5.** O’Malley is alleged to be one of the government officials whose deliberate misconduct and possibly criminal activities contributed to Plaintiff’s emotional distress, which is part of the Plaintiff’s claim and damages in her Civil Complaint. **6.** O’Malley will, also, be called as a witness during the trial as asserted in the Plaintiff’s 2nd and 3rd Motions. **7.** The Plaintiff asserts in her Civil Complaint and/or in her other documents in the record of this court that she reiterated in these documents some of the facts cited in the Plaintiff’s 5-6-16 complaint and email addendums to the President and Congress germane to the allegations of intentional misconduct and possibly crimes by O’Malley and other government officials because these facts are essential in explaining how the deliberate misconduct and potential criminal actions by O’Malley and other government officials contributed to the Plaintiff’s emotional distress, which is part of the claim and damages in the Plaintiff’s Civil Complaint. **8.** Since the public schools in Baltimore City are owned by the members of the City Council of Baltimore City and the Mayor, O’Malley who served as a member of the City Council and as Mayor for 8 years, was one of the owners of the schools in Baltimore City during the Plaintiff’s whistleblowing relevant to exposure to lead poisoning in the schools in Baltimore City. **9.** O’Malley and other government officials deliberately exposed our children to lead poisoning in Maryland schools since at least 1993. **10.** O’Malley and other government officials that are responsible for the health and safety of our children in public schools have yet to test all of our children that may have been exposed to lead poisoning using the special X-Ray machine to determine the cumulative amount of lead in the bones because the blood lead testing will not reveal the lead in the blood after about 45 days, but lead stays in the bones for nearly 30 years. **11.** O’Malley and the other government officials have a duty and obligation to compensate the children that were injured by being deliberately exposed to such a possibly deadly poison. **12.**  When the Plaintiff began whistleblowing by publicly lead-based paint hazards and/or lead-contaminated drinking water in the public schools in Baltimore City in 1996, O’Malley, who was one of the 2016 democratic candidates for President, was a member of the City Council. **13.** The Plaintiff has been exposing lead-tainted drinking water in Baltimore County Public Schools since around 2003. **14.** During the Plaintiff’s whistleblowing relevant to O’Malley and other government officials deliberately exposing our children to lead poisoning and having yet to test or compensate all the children that have been exposed to this potentially deadly poison, O’Malley became Governor of Maryland was now was the Chief Executive Officer who had the authority to appoint judges to the Court of Appeals of Maryland and appointed members to the Maryland State Board of Education, one of the state agencies in Maryland who is one of the Defendants in the Plaintiff’s 2014 Civil Complaint of Constructive Fraud (hereinafter “2014 Civil Complaint”) which was unlawfully dismissed and which would revealed the evidence to support the fact the In Banc judges from the Circuit Court violated federal laws including the Plaintiff’s 14th Amendment right granting the Defendants motion to dismissing the Plaintiff’s 2014 Civil Complaint and that O’Malley and other government officials intentionally exposed our children to lead-tainted drinking water and/or lead-based paint hazards since at 1993 and have yet to test or compensate all the children that have been exposed to this potentially fatal toxic. **15.** As Governor, O’Malley, also, executed authority over 4 other government agencies that are, too, Defendants in the Plaintiff’s 2014 Civil Complaint and whose appeal of the In Banc judges’ dismissal of her complaint to the Court of Appeals was denied premised solely on the intentional perjury by the Court of Appeals which will be discussed in more detail shortly. The 4 other state agencies with whom O’Malley had executive power and are Defendants in the Plaintiff’s 2015 Civil Complaint are the Department of Labor, Licensing, and Regulation of Maryland, the Board of Education of Baltimore County, and the Maryland State Education Association. **16.** In all 3 of the Plaintiff’s civil litigations that culminated in her 2006, 2015, and 2016 Petitions to the Supreme Court, amongst other things, the issue of O’Malley, the other owners of these public schools in Baltimore City, and other government officials being negligent and liable for deliberately exposing our leaders of tomorrow to lead poisoning. **17.** The Plaintiff’s Documentary, Thanks, Praise, Honor, and Glory to the TRIUNE GOD For Leading and Guidance in Documenting Lead Poisoning in the Public Schools and the Obstructions of Justice in Order to Conceal the Indisputable Truths , footnotes the evidence in record of the Supreme Court, the Courts of Appeals, and the lower courts to substantiate the fact that, included in the Plaintiff’s whistleblowing was the evidence to support the fact that, amongst other things, the Plaintiff had provided the evidence in her Administrative hearing to substantiate that three public schools in Baltimore City exposed children to lead-based paint hazards, one school had lead-tainted drinking water, and that O’Malley and the other owners of the public schools in Baltimore City have known about the lead-tainted drinking water in at least 20 of the public schools in Baltimore since 1993 and, thus, knowingly and willingly exposed our children to lead poisoning, have yet to test all of the children who were exposed to lead poisoning, and have yet to compensate any of the children for injuries resulting from being exposed to such potentially fatal hazard. **18.** The Plaintiff declares that, as she continued her crusade of whistleblowing, she sent many letters to O’Malley and other government officials expressing, amongst other things, her desire to end lead poisoning in the public schools, the need as required by the law for the owners of public schools and other government agencies that are responsible for the health and safety of our children in public schools to test all of our children that may have been exposed to lead poisoning in the public schools using the special X-Ray machine to determine the cumulative amount of lead in the bones, and the obligation as, again, mandated by the law, that O’Malley and the government officials that are responsible for the health and safety of children in schools to compensate the students that were injured by this possibly deadly poison. **19.** The Plaintiff has been a Mathematics teacher for over 35 years who has, too, been accredited for over 20 years by the Maryland Department of the Environment as an Inspector Technician, and Clearance Examiner, a Lead Abatement Contractor and, thus, under the Code of Maryland Regulation (COMAR), namely, COMAR 26.16.01.18(B)(1)(e), a Lead Expert. **20.** The Plaintiff cites in her 2016 Civil Complaint that, in her 5-6-16 complaint of misconduct and/or in her email addendums to the President and Congress, she has requested that their investigation O’Malley and other government officials that are responsible for the health and safety of children in schools. The Plaintiff further asserts that she believes that the evidence will prove that O’Malley, who was one of the owners of the lead hazardous schools as a former member of the City Council and Mayor of Baltimore City, and, thereby, is liable for exposing our children to lead poisoning, abused his power as a member of the City Council, the Mayor, and/or Governor of Maryland to negatively impacted the Plaintiff’s Administrative and Civil Complaints in the Circuit Court of Baltimore City, in the Courts of Appeal, and in the Supreme Court. **21.** O’Malley appointed members to the Maryland State Board of Education, one of the state government agencies who, again, is one of the 6 Defendants in the Plaintiff’s 2015 Civil Complaint as well as one of the Defendants in the Plaintiff’s judicial proceedings which culminated in the Plaintiff’s appeals to the Court of Appeals which ultimately led to the Plaintiff’s 2006, 2015, and 2016 Petitions to the Supreme Court. The Court of Appeals, whose judges are appointed by the Governor of which O’Malley was for 8 years, and the Supreme Court denied all of the Plaintiff’s appeals and/or Petitions, all which provided the evidence support the fact that the Court of Appeals and the Supreme Court, amongst other things, not only violated the Plaintiff’s 14th Amendment right but breached Canons 1, 2, and 3, and that the Supreme Court failed to enforce Rule 10 in the manual of the Supreme Court. **22.** The Plaintiff asserts in her Civil Complaints and Motions that, because of the alleged intentional judicial misconduct and/or the deliberate misconduct by O’Malley and other government officials, all of her civil litigations were unlawfully dismissed and thus she has yet to receive justice for the 21 years of injustices and emotional distress she has endured and continues to endure. Further, the Plaintiff alleges that her heart bleeds more daily and her emotional distress is incurable as she considers the possibly thousands of children that have been exposed to lead poisoning in Maryland schools since 1993 by O’Malley and by other government officials who are responsible for the health and safety of children in public schools but have intentionally exposed our children to lead-tainted drinking water and/or lead-based paint hazards since at 1993 and have yet to test or compensate all the children that have been exposed to this potentially fatal toxic

Judge Fletcher-Hill further breached U.S. Code, Title 18, Part 1, Chapter 73 § 1505 by sending the Plaintiff threatening communication in his Orders docketed 4-19-18 and 4-6-18, and, thus, again, obstructing and impeding the due and proper administration of the law in this civil proceeding. Contrary to Judge Fletcher-Hill’s threatening Orders which insinuate that the Plaintiff’s Motions are frivolous and groundless, such statements are erroneous due to the fact that each one of the Plaintiff’s Motions and Responses are essential in providing relevant and material facts which substantiate how and why Judge Fletcher-Hill and Judge Karen Friedman infringed upon U.S. Code, Title 18, Part 1, Chapter 73 § 1505, underFederal law, 28 U.S.C & 363, Judge Fletcher-Hill and Judge Karen Friedman committed judicial misconduct and obstructed justice as a result of failing to disqualify themselves from presiding over the Plaintiff’s 2nd Motions but choosing to infringe upon Federal Statute, 28 U.S.C. § 455 and Canons 1, 2, and 3, and obstruct justice by violating Federal Statute, 28 U.S.C. &455 and Canons 1, 2, and 3, preventing the Plaintiff from exercising her 7th and 14th Amendment Rights as stipulated in the Constitution of the U.S. in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s Civil Complaint, which, amongst other things, exposes the relevant and material facts O’Malley’s deliberate misconduct and possibly criminal acts contributed to the Plaintiff’s emotional distress which is part of the damages asserted the Plaintiff’s Civil Complaint. And, although Judge Fletcher-Hill cited similar threatening statements in his Order in 2015 which granted motions to dismiss the Plaintiff’s Civil Complaint of Constructive Fraud against the Defendants, 5 of whom O’Malley exercised executive power over when he was the Governor of Maryland, the Plaintiff still filed her appeals with substantial evidence to prove that Judge Fletcher-Hill’s 2015 decision to grant the Defendants’ motions, breached her 14th Amendment right, violated Federal Law, 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause as a means to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint which, amongst other things, exposed the material fact that O’Malley and the 6 Defendants intentionally committed misconduct and potentially criminal acts by deliberately exposing our children to lead-tainted drinking water and/or lead-based paint hazards since at 1993, and have yet to test or compensate all the children that have been exposed to this potentially fatal toxic. Moreover, the Plaintiff alleges that, of all of her appeals that led up to her filing 3 Petitions to the Supreme Court in 2006, 2015, and 2016, it is her 2016 Petition to the Supreme Court that would have taken the Justice of the Supreme Court less than 10 minutes to read in order to determine that the Court of Appeals of Maryland deliberately committed perjury which caused the issues raised in the Plaintiff’s appeal to the Court of Appeals of Maryland never to be addressed or resolved by this court, which includes the assertion that the In Banc judges committed perjury, breached the Plaintiff’s 14th Amendment Right and infringed upon Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause to cover up the material fact that Judge Fletcher-Hill violated the Plaintiff’s 14th Amendment Right and breached Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint, which would have revealed the relevant and material facts that O’Malley and other government officials intentionally committed misconduct and possibly criminal activities. Thus, the Plaintiff is still waiting for the President and Congress to address and resolve the issue of Judge Fletcher-Hill and the other judges committing such horrific judicial misconduct and obstruction of justice by infringing upon Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and the Federal Supremacy Clause in order to unlawfully grant the Defendants’ motions to dismiss the Plaintiff’s 2014 Civil Complaint, which would have revealed the relevant and material facts that O’Malley and other government officials intentionally committed misconduct and possibly criminal activities.Also, because Judge Fletcher-Hill has written a similar threatening communication in his 2015 Order and the Plaintiff, being coerced, again, to be represented Pro Se didn’t know the federal laws that reveal criminal activities by Judge Fletcher’s actions during this time, and because the statute of limitation has not expired for criminal referral of Judge Fletcher-Hill violating U.S. Code, Title 18, Part 1, Chapter 73 § 1505, the Plaintiff is requesting that the Special Judge Substitution and/or Alfred will take these material facts into consideration as well. Moreover, antithetical to Judge Fletcher-Hill’s threatening penalties in his communication docketed on 4-19-18 and 4-6-18 because of the Plaintiff’s numerous Motions and Responses, it’s due to the material facts cited in the Plaintiff’s Motions and Responses that that Plaintiff is able to reveal an appearance of a conspiracy on the part of Judge Fletcher-Hill and Judge Karen Friedman to pervert justice in that a reasonable mind would question how is it that both of these Officers of the Court: **1.** acted corruptly and criminally by violating the same federal crime, namely, U.S. Code, Title 18, Part 1, Chapter 73 § 1505. **2.** committed the same judicial misconduct as a result of failing to disqualify themselves from presiding over the Plaintiff’s Civil Complaint. **3.** chose to breach the same Federal Statute, 28 U.S.C. § 455 and same Canons, namely, Canons 1, 2, and 3, **4.** obstructed justice in the same manner, namely, by infringing upon Federal Statute, 28 U.S.C. &455 and Canons 1, 2, and 3**. 5.** prevented the Plaintiff from exercising the same Amendment Rights, namely, the Plaintiff’s 7th and 14th Amendment Rights as stipulated in the Constitution of the U.S. **6.** failed to inform the parties in the Plaintiff’s civil case that both of them were appointed to the special position of judge by O’Malley and, thus, they both had a relationship with O’Malley which would be viewed by the Plaintiff as a conflict of interest if they remained as presiding judges. **7**. chose to be the judge to determine if he/she should have disqualified himself/herself as the presiding judges despite the Plaintiff motioning that another judge determine the disqualifications.

**Conclusion**

Thus, in conclusion, the Plaintiff is requesting that this Honorable Court grant all of the Plaintiff’s 1st Motions.

Respectively Submitted

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Diana R. Williams, Pro Se

131 Calvin Hill Court

Baltimore, Maryland 21222

410-288-6123

**Certificate of Service**

I HEREBY CERTIFY that on this 27th day of April 2018 a copy of the Motion For Substitution To Have A Special Judge To Determine If The Material Facts Below Substantiate That Judge Fletcher-Hill And Judge Karen Friedman Need To Be Referred For Impeachment By Governor Hogan, Sanctioned By The Judicial Commission, Disqualified From Presiding Over The Plaintiff’s Civil Case, And Be Referred For Investigation By A Special Prosecutor Relevant to Allegations Of Criminal, Judicial Misconduct, And Obstruction Of Justice, Motion To Have All Orders By Judge Fletcher-Hill And Judge Karen Friedman Dismissed, And A Motion To Have The Special Judge For A Substitution And/or Judge Alfred Nance For A Substitution To Consider Granting All Of The Plaintiff’s Motions were mailed, postage paid to: Larry H. Kirsch, Esquire, 402 Long Trail Terrace, Rockville, Maryland 20850.

Cc: Hon. Judge Lance, Hon. Gov. L. Hogan, Judicial Commission

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Diana R. Williams, Pro Se