

Order is governed by Md. Rule §2-535.

Plaintiff's Motion was filed 23 days after this Court's July 23, 2018 ruling and a review of this

(1) Response to Motion

COME NOW Defendants Hamedullah Virk ("Virk") and Tichi Property, LLC ("Defendant Tichi Property") [Defendant Virk and Defendant Tichi Property may hereinafter collectively be referred as the "Defendants"] by and through their undersigned counsel and file Defendants' Response and Renewed Motion for Sanctions and in support thereof, state as follows:

DEFENDANTS' (1) RESPONSE TO PLAINTIFF'S MOTION FOR SUBSTITUTION TO HAVE A JUDGE APPOINTED BY GOVERNOR HOGAN TO DETERMINE IF THE MATERIAL FACTS CITED BELOW SUBSTANTIATE THAT JUDGE FLETCHER-HILL HAS REPEATEDLY BREACHED U.S. CODE, TITLE 18, PART 1, CHAPTER 73 AND 1505 AND THAT THERE IS NO EVIDENCE OR REASONABLE INFERENCE FROM THE EVIDENCE TO JUSTIFY JUDGE FLETCHER HILL'S 7-26-18 DECISIONS AND ORDERS BECAUSE JUDGE FLETCHER-HILL'S DECISIONS ARE CONTRARY TO THE LAW, MOTION FOR CLARIFICATION, MOTION TO DETERMINE IF THE MATERIAL FACTS CITED BELOW SUBSTANTIATE THAT JUDGE FLETCHER-HILL AND JUDGE KAREN FRIEDMAN NEED TO BE REFERRED FOR IMPEACHMENT AND DISBARMENT 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 OBSTRUCTING JUSTICE UNDER U.S. CODE, TITLE 18, PART 1, CHAPTER 73 AND 1505, MOTION TO HAVE ALL ORDER BY JUDGE FLETCHER-HILL AND JUDGE KAREN FRIEDMAN DISMISSED, AND A MOTION TO HAVE THE SPECIAL JUDGE FOR SUBSTITUTION AND/OR JUDGE ALFRED NANCE FOR A SUBSTITUTION TO CONSIDER AND (II) RENEWED MOTION FOR SANCTIONS

Case No. 24-C-17-004535

IN THE CIRCUIT COURT
FOR BALTIMORE CITY

DIANA R. WILLIAMS
Plaintiff,
vs.
HAMEEDULLAH VIRK, et al.

Defendants.

Defendants oppose any revision of this Court's July 26, 2018 order. While Plaintiff asserts the existence of the factors that could allow this Court to revise the order under Md. Rule §2-535, the mere assertion without any facts does not constitute sufficient grounds for revision of a prior order. In fact, Plaintiff has done nothing more than repeat, albeit in different form, arguments previously rejected by this Court.

To the extent that Plaintiff's Motion seeks to revise any prior order entered by this Court denying her prior Motions, Plaintiff's time for seeking revision of the prior orders has passed and therefore this Court can afford her no relief.

As further support, Defendants incorporate by reference all arguments made in prior Responses filed in this matter.

For the reasons set forth herein, Plaintiff's current Motion should be denied.

(II) Renewed Motion for Sanctions

On March 26, 2018, Defendants' filed a Motion for Sanctions (Paper No. 14). By Order dated April 11, 2018 and entered on April 19, 2018, this Court denied Defendants' Motion **without**

prejudice, stating:

the Court warns Plaintiff Williams that she is subject to the requirement that any filing with this Court must be supported by a substantial basis and that she may be sanctioned if she persists in filing motions or other papers without substantial justification. If her conduct continues, the Court will consider sanctions for new papers filed without substantial justification and will reconsider sanctions for her past filings.

Despite the Court's admonishment, Plaintiff has continued to file motions without

substantial justification, as evidenced by the filing denied by this Court on July 26, 2018 and the

most recent Motion now pending before the Court.

While Defendants did not believe it necessary to respond to Plaintiff's prior Motion because the relief sought was directed more toward the judiciary, Defendants did decide to respond to this instant Motion that seeks revision of the July 26, 2018 and to renew their request for sanctions. Accordingly, Defendants renew their request for sanctions and based upon the record in this action request that this Court sanction Plaintiff as follows:

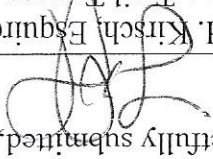
1. Award Defendants attorney's fees and costs in the amount of \$456.00 as requested in Defendants' Motion filed on March 26, 2018 (Paper No. 14);
2. Award Defendants additional attorney's fees and costs in the amount of \$368.50 for the review of Plaintiff's Motion for Reconsideration, preparation and filing of this Response¹;
3. Enter an Order that Defendants will not be required to respond to any new Motions² or other pleadings filed by Plaintiff in this action unless Defendants in their discretion decide to respond; and
4. For such other and further relief this Court deems to reasonable and appropriate based upon the record.

WHEREFORE, for the reasons set forth herein, Defendants request that Plaintiff's Motion be denied and that this Court enter sanctions against Plaintiff for her continued filing of unjustified Motions.

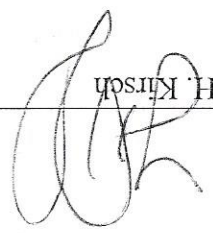
¹ Copies of legal bills supporting the request are attached hereto as Exhibit "A" and incorporated herein by reference.

I HEREBY CERTIFY that on this 23rd day of August 2018, a photocopy of the foregoing was mailed first class, postage prepaid to Plaintiff, Diana R. Williams, 131 Calvin Hill Court, Baltimore, Maryland 21222.

CERTIFICATE OF SERVICE

Respectfully submitted,


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