

IN THE MATTER
THE PETITION OF
DIANA R. WILLIAMS

* IN THE
*
* CIRCUIT COURT
*
* FOR
*
* BALTIMORE CITY
*
* Case No. 24-C-17-004535

CIVIL DIVISION

2022 APR -7 AM 11:47

**3rd MOTION FOR DISQUALIFICATION FOR "FRAUD UPON THE COURT" UNDER FEDERAL STATUE 28
U.S.C & 455(A) AGAINST THE PANEL OF IN BANC JUDGES, MOTION FOR ALL ORDERS BY THE
PANEL OF IN BANC JUDGES, BY JUDGE MICHEL PIERSON, BY JUDGE FLETCHER-HILL, AND
BY JUDGE KAREN FRIEDMAN BE DEEMED VOID AS A MATTER OF LAW UNDER
FEDERAL STATUE 28 U.S.C & 455(A), MOTION FOR RECONSIDERATION,
AND 3RD MOTION FOR A HEARING ON THE MOTIONS**

I, Diana R. Williams, the Petitioner who is being represented Pro Se, hereby, requests that the Petitioner's 3rd Motion For Disqualification For "Fraud Upon The Court" Under Federal Statute 28 U.S.C. & 455(a) Against The Panel of In Banc Judges, Motion for All Orders By The Panel Of In Banc Judges, By Judge Michel Pierson, By Judge Fletcher-Hill, and By Judge Karen Friedman Be Deemed Void As A Matter Of Law Under Federal Statute 28, U.S.C. & 455(a), Motion For Reconsideration, And 3rd Motion For A Hearing On The Motions 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 been reasonably discovered and produced earlier are grounds for granting the Petitioner's Motions. The newly discovered evidence, material for the Petitioner, who is being represented Pro Se and making the application, which could not have reasonably been discovered and produced earlier by the Petitioner is that, for the 2nd time the panel of In Banc judges, namely, Chair Judge Carrion, Judge Phinn, and Judge Rubin have repetitiously and intentionally breached Federal Statute 28, U.S.C. & 455(a) and, thus, for the 2nd time have committed "Fraud upon the Court." Also, the

previously presiding judges over the Petitioner's Civil litigation , namely, Judge Michel Pierson, Judge Fletcher-Hill, and Judge Karen Friedman have, too, repeatedly and deliberately violated Federal Statute 28, U.S.C. & 455(a) and, thus, have on several occasions committed "Fraud upon the Court."

Federal Statute 28, U.S.C. & 455(a) cites that any justice, judge, or magistrate judge of the United States shall disqualify himself/herself in any proceeding in which his/her impartiality might reasonably be questioned. Section 455(a) of the Judicial Code, 28 U.S.C. §455(a), which is applicable for all judges in all states, holds that, if there is even an appearance in impartiality, then the judges must recuse themselves voluntarily, and a party does not have to file a Motion for Disqualification because the judges are required by this federal law to recuse themselves in any proceeding in which their impartiality might reasonably be questioned. Judges do not have discretion not to disqualify themselves, and by law, judges are bound to follow the law." Taylor v. O'Grady, 888 F.2d 1189 (7th Cir. 1989). Recusal is based on the MAXIM that judges are charged with a duty of impartiality in administering justice.

Courts have repeatedly held that positive proof of the partiality of a judge is not a requirement, only the appearance of partiality as in the case of Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847, 108 S.Ct. 2194 (1988). In such a case, the Court has decided that "what matters is not the reality of bias or prejudice but its appearance); United States v. Balistreri, 779 F.2d 1191 (7th Cir. 1985)." Furthermore, the Courts have affirmed that Section 455(a) of the Judicial Code, 28 U.S.C. "is directed against the appearance of partiality, whether or not the judge is actually biased," and that "Section 455(a) of the Judicial Code, 28 U.S.C. §455(a), is not intended to protect litigants from actual bias in their judge but rather to promote public confidence in the impartiality of the judicial process." The Supreme Court has ruled and reaffirmed the principle that "justice must satisfy the appearance of justice", Levine v. United States, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing Offutt v. United States, 348 U.S. 11, 14, 75 S.Ct. 11, 13 (1954). In 1994, the U.S. Supreme Court held that disqualification of a judge is mandatory if an objective observer would entertain reasonable questions about the judge's impartiality (Liteky v. U.S., 114 S.Ct. 1147, 1162 (1994). The Court has, also, affirmed that, should a judge not disqualify himself/herself as required by law, then the judge has given another example of his/her "appearance of partiality" which could potentially further disqualify the judge. Further, the Courts have determined that, should another judge not accept the disqualification of the judge, then the second judge has evidenced an "appearance of partiality" and has possibly disqualified himself/herself. Moreover, the Courts have affirmed that, if a judge issue any Order after he/she has been disqualified by law, then that judge has acted in the judge's personal capacity and not in the judge's judicial capacity and has, further, violated his/her oath of office.

Also, the 7th Circuit Court of Appeals has determined that, if a judge is disqualified according to Section 455(a) of the Judicial Code, 28 U.S.C. §455(a) but fail to recuse himself/herself, then that judge is acting in the judge's "personal capacity" and not in the judge's "judicial capacity" and has, thus, committed "Fraud upon the Court". In the case of Bulloch v. United States, 763 F.2d 1115, 1121 (10th

Cir. 1985), the court stated "Fraud upon the Court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury. ... It is where the court or a member is corrupted or influenced or influence is attempted or where the judge has not performed his judicial function --- thus where the impartial functions of the court have been directly corrupted." Still too, this Court has determined that, when a judge acts in his/her personal capacity and not in his/her judicial capacity, it causes the court to be directly corrupted and further "embrace that species of fraud which does, or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication." *Kenner v. C.I.R.*, 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, 60.23. The 7th Circuit, also, stated that "a decision produced by fraud upon the court is not in essence a decision at all, and never becomes final." Further, the 7th Circuit has determined that "Fraud upon the Court" immediately removes jurisdiction from that Court as well as vitiates (makes ineffective - invalidates) every decision or Order from that point on. Moreover, the Supreme Court has decided that, should a judge issue any Order after he/she has been disqualified by law, and if the party has been denied of any of his / her property, then the judge could be engaging in the federal crime of "interference with interstate commerce" because the judge is, again, acting in the judge's personal capacity due to being disqualified and not in the judge's judicial capacity. Further, Federal Statute 28 U.S.C. & 455(a) asserts that, if proper grounds for recusal exist and the judge is aware of the grounds but still refuse to recuse himself/herself, then there may be penalties levied against the judge for not recusing himself/herself. Courts have repeatedly ruled that judges have no immunity for their criminal acts.

Still too, the Courts have ruled that, should a judge who has been disqualified by law fail to recuse himself/herself, then the judge is in violation of the Due Process Clause of the U.S. Constitution (*United States v. Sciuto*, 521 F.2d 842, 845 (7th Cir. 1996)). The Due Process clauses of the United States Constitution require judges to recuse themselves from cases in two situations, namely, where the judge has a financial interest in the case's outcome and where there is otherwise a strong possibility that the judge's decision will be biased. In the United States constitutional law, a Due Process Clause is found in both the Fifth and Fourteenth Amendments to the United States Constitution. The Constitution uses the phrase in the 5th and 14th Amendments, declaring that the government shall not deprive anyone of life, liberty, or property, without due process of law. The 5th Amendment protects people from actions of the federal government, and the 14th protects them from actions by state and local government. Moreover, the Supreme Court has, also, held that, if a judge wars against the Constitution in breaching the Due Process Clause of the U.S Constitution or if he/she acts without jurisdiction, then that judge has engaged in treason to the Constitution. And, if a judge acts after he has been automatically disqualified by law, then he is acting without jurisdiction, and that suggest that he is then engaging in criminal acts of treason, may be engaging in extortion and/or in interference with interstate commerce. Since both treason and the interference with interstate commerce are criminal acts, no judge has immunity to engage in such acts. There is no statute of limitations on fraud.

As a believer in JESUS CHRIST as her LORD and personal SAVIOR, the Petitioner believes that our great Country is founded on Judean-Christian principles, which means that our laws are patterned after the

Commandments and Laws in the WORD OF GOD. Thus, in terms of judges being impartial in their ruling, the WORD OF GOD states in Exodus 32:11, "And the LORD spake into Moses face to face as a man speaketh unto his friend" and Moses informed the judges of Israel of GOD'S law and employed the judges over the various tribes in Israel in Judges 6:16-17, saying, "And, I charged your judges at that time, saying. Hear the causes between your brethren, and judge righteously between every man and his brother, and the stranger that is with him. Ye shall not respect persons in judgment: but ye shall hear the small as well as the great: ye shall not be afraid of the face of man: for the judgement is GOD'S: and, the cause that is too hard for you, bring it unto me, and I will hear it." Moreover, also, in the WORD OF GOD, namely, Jeremiah 9:23-25, it states "Thus, saith the LORD, Let not the wise man glory in his wisdom, neither let the mighty man glory in his might, let not the rich man glory in his riches.: But, let him that glorieth, glory in this. That he understandeth and knoweth ME, that I am the LORD which exercises loving-kindness, judgement, and righteousness in the earth: for in these things I delight, saith the LORD. Behold the days come saith the **LORD** that I will punish all them which are circumcised with the uncircumcised."

STATEMENT OF MATERIAL FACTS

In terms of responding to the Petitioner's 2-13-20 and 2-19-20 Motions in a timely manner, the evidence of the 3-30-22 date of the Findings and Orders by the panel of In Banc judges, which respond to the Petitioner's 2-13-20 and 2-19-20 Motions, substantiate that the panel of In Banc judges took over 2 years to respond to the Petitioner's Motions. The evidence on the Circuit Court's website substantiate that the last Motion filed by the Defendant was on 2-13-20 and that the Petitioner's 2-13-20 Motions were filed, also, on 2-13-20. Although the same "filed date" is entered on the Circuit Court's website for the Defendant's Motion and the Petitioner's Motions, the "entry date" for the Defendant's Motion is 2-13-20, but the Petitioner's "entry date" for her 2-13-20 Motions is 2-14-20. Moreover, the panel of In Banc judges entered their Findings and Orders responding to the Defendant's 2-13-20 Motion on 2-13-20, but responded to the Petitioner's 2-13-20 Motions on 3-30-22. According to the manager, the panel of In Banc judges received the Petitioner's file containing her 2-13-20 and 2-19-20 Motions on 3-11-20 and had the Petitioner's file return to the clerk on 6-11-20 without having rendered their Findings and Orders. Moreover, the panel of In Banc judges responded to Petitioner's 16-page Motions dated 2-13-20 and her 20-page Motions dated 2-19-20 in their less than two-page Findings and Orders dated 3-30-22, and only after the Petitioner informed the manager that she had yet to receive a response from the panel of In Banc judges from her 2-13-20 and 2-19-20 Motions and the manager returned the file containing the Petitioner's Motions back to the panel of In Banc judges on 3-28-22. The 3-30-22 Findings and Orders by the panel of In Banc judges were entered into the record on 3-31-22.

The facts and/or lack thereof of facts cited in the 3-30-22 Findings and Orders by the panel of In Banc judges substantiate that these Officers failed to disclose, consider, and resolve all of the material facts and legal arguments in the Petitioner's 2-13-20 and 2-19-20 Motions. For instance, the panel failed to disclose, consider, and resolve the legal arguments and material facts in the Petitioner's 2-13-20 Motions in regard to the Petitioner's right granted her by the Maryland Constitution to have an oral

hearing before the panel of In Banc judges renders their decision to deny on 2-6-20 the Petitioner's Notice of Petition for an In Banc Review and, thus, amongst other material facts and legal arguments, the Petitioner's 2-13-20 Motions asserts that "The Maryland Constitution cites that, upon the decision or determination of any point, or question, by the Court, it shall be competent to the party, against whom the ruling or decision is made, upon motion, to have the point, or question reserved for the consideration of the three Judges of the Circuit, who shall constitute a court in banc for such purpose. Moreover, when review by a court in banc is permitted by the Maryland Constitution, the Petitioner may have a judgment or determination of any point or question reviewed by a court in banc by filing a notice for in banc review. Issues are reserved for in banc review by making an objection in the manner set forth in Rules 2-517 and 2-520. Again, the Court of Appeals set out the details of in banc practice in rule 2-551 of the Maryland Rules of Civil Procedure. A "hearing," as opposed to an argument, is automatically scheduled, but may be waived by consent of all parties. Since the Petitioner did not waive her right to a hearing, the consent by all parties to waive the hearing was not given. Thus, according Article IV, §22 of the Maryland Constitution, the Petitioner had a right to a hearing before the In Banc panel once she was granted her Petition for Review on 1-24-20 before the panel of judges and then the panel of judges may decide at the hearing to dismiss the Petitioner's Petition for In Banc Review and Memorandum in Support of an In Banc Review. The Petitioner has yet to have a hearing before the panel of In Banc judges as required by Article IV, §22 of the Maryland Constitution, instead of the panel of In Banc judges deciding on 2-6-20 to unlawfully dismiss the Petitioner's Petition for an In Banc Review. Furthermore, Article IV, §22 of the Maryland Constitution requires the banc panel to file a brief statement of the reasons for the decision or shall dictate the reasons into the record. The evidence of the facts and/or lack thereof in their 2-6-20 Findings and Decision and Order of the panel of In Banc judges which are response to the Petitioner's Questions presented for Review in her Memorandum in Support of an In Banc Review reveal that Judge Carrión, Judge Melissa Phinn, Judge Julie R. Rubin were deliberately negligent in their responsibility as Officers of the Court, to uphold the requirements of citing a statement of the reasons for their decision and, therefore: a.) failed in their obligation as Officers of the Court and as asserted in the procedures for an In Banc Review to cite a single material fact in the Petitioner's 27-page Memorandum in Support of an In Banc Review dated 1-14-20, which has very relevant and material facts to support her legal arguments for granting her Petition for an In Banc Review. b.) failed in their obligation as Officers of the Court and as asserted in the procedures for an In Banc Review cite a single legal argument from the Petitioner's 7-page Memorandum in Support of an In Banc Review dated 1-14-20 or a single material fact as supported by the evidence, statute, or law which even refute the material facts cited in the Petitioner's Motions to support her legal arguments for granting her Memorandum in Support of an In Banc Review. c.) in their Findings and Decisions and Orders suppress, alter, tamper with and/or conceal the material facts, laws, and statutes as supported by the evidence that substantiate the Petitioner's legal arguments in her Memorandum in Support of an In Banc Review to grant her Petition for an In Banc Review and refute the panel of In Banc judges 2-6-20 Findings and Decision and Order and Judge Michel Pierson's 1-2-20 Findings and Decision and Order that the legal arguments in the Petitioner's 1-14-20 Memorandum in Support of an In Banc and in her 8-22-19 Motions are "frivolous". d.) failed in their obligation as Officers of the Court and as asserted in the procedures for an In Banc Review to disclose, consider, and resolve a single Question

Presented for Review in the Petitioner's Memorandum in Support of an In Banc s that would substantiate the Petitioner's legal arguments for granting her Petition for an In Banc Review. e.) failed in their obligation as Officers of the Court and as asserted in the procedures for an In Banc Review to cite any law/s, statutes, or material facts as supported by the evidence in the record that justify Judge Michel Pierson lawfully "DENYING" the Petitioner's 8-22-19 Motions or cite any material fact as supported by the evidence and laws to substantiate their initially granting the Petitioner's Petition for an In Banc Review to dismissing the Petitioner's Petition for an In Banc Review, but simply justified their dismissal of the Petitioner's Petition for an In Banc Review by stating, verbatim, all of the unsubstantiated facts as cited in Judge Michel Pierson's 1-2-20 Finding and Decision and Order, namely, that the "Plaintiff has filed a motioned entitled "Motions for 'Substitution'...." (Paper No. 31). Plaintiff continues to file repetitive and/or frivolous pleadings because prior rulings are not to her liking. According, it is this 2nd day of January, 2020. ORDERED that the motion be and it hereby is DENIED, and further ORDERED that the Clerk shall not accept any further filings in this action other than an Order of Appeal accompanied by the filing fee, and further ORDERED the Clerk shall close this case. f.) without any explanation, refuse to recuse themselves as the presiding panel of In Banc judges, although the Petitioner in her 1-29-20 Motions, which includes a Motion for Disqualification and Substitution of the panel of In Banc judges as the presiding judges over the Petitioner's In Banc hearing provided just causes for their being disqualified from presiding over her In Banc hearing. g.) committing the prejudicial error of perjury in insinuating in their 2-6-20 Findings and Decisions and Orders that the Petitioner has no merit to her 1-14-20 Memorandum in Support of an In Banc Review which they without any evidence or law to support their claim that the Petitioner's Memorandum in Support of an In Banc Review is frivolous and that the Petitioner filed her Petition for an In Banc Review because she resented the "liking" of the 1-2-20 Findings and Decision and Order by Judge Michel Pierson or the Findings and Decisions and Orders of Judge Fletcher-Hill, and Judge Karen Friedman."...

Moreover, the evidence of the facts and/or lack of facts cited in the 3-30-22 Findings and Orders of the panel of In Banc judges and the evidence of the Petitioner's "Headings" in her 2-19-20 Motions as well as the material facts in the body of these Motions support the material facts that the panel of In Banc judges failed to disclose, verbatim, the "Headings" in the Petitioner's 2-19-20 Motions and/or failed to disclose, consider, and resolve all of the material facts and legal arguments in the Headings of the Petitioner's Motions dated 2-19-20 and the material facts and legal arguments as detailed in the body of her 2-19-20 Motions. As evidenced by Exhibit 80 on her website, the Petitioner's 2-19-20 Motions, are entitled "MOTION FOR A HEARING ON THE PANEL OF IN BANC JUDGES' 2-6-20 ORDER TO DENY THE PETITIONER'S MOTION FOR AN IMMEDIATE "SUBSTITUTION" AND DISQUALIFICATION OF THE PANEL OF IN BANC JUDGES, MOTION FOR "SUBSTITUTION" IN BANC PANEL OF JUDGES TO PRESIDE OVER THE HEARING BECAUSE THE PRESIDING IN BANC PANEL OF JUDGES ARE ONE OF THE JUDGES IN THE PETITIONER'S 2-17-20 OFFICIAL COMPLAINT TO THE FBI, HON. PRESIDENT TRUMP, HON. GOV. HOGAN, CONGRESS, AND OTHER GOVERNMENT AGENCIES WHO ARE BEING ALLEGED TO HAVE INTENTIONALLY AND REPEATEDLY COMMITTED THE FEDERAL CRIMES OF MISFEASANCE, MALFEASANCE, AND NONFEASANCE UNDER US CODE, TITLE 18, PART 1, CHAPTER 73 & 1505, TO HAVE DELIBERATELY AND REPEATEDLY COMMITTED THE FEDERAL CRIMES OF BREACHING THE PETITIONER'S

6TH, 7TH, AND 14TH AMENDMENTS RIGHTS AND OTHER FEDERAL STATUTES, LAWS, AND CANONS UNDER 18 USC 242, TO HAVE DELIBERATELY AND REPEATEDLY TAMPERED WITH EVIDENCE UNDER U.S. CODE TITLE 18 PART 1 CHAPTER 73 & 1512, HAVE CONCEALED, REMOVED, AND/OR MUTILATED EVIDENCE UNDER 18 U.S. CODE § 2071, AND, IN DECIDING THE PETITIONER'S 1-14-20 PETITION FOR AN IN BANC REVIEW, HER 1-14-20 MEMORANDUM IN SUPPORT OF AN IN BANC REVIEW, AND IN HER 1-29-20 MOTIONS, WHICH INCLUDES THE PETITIONER'S MOTION FOR SUBSTITUTION AND DISQUALIFICATION OF THE PANEL OF IN BANC JUDGES, TO HAVE REPEATEDLY, DELIBERATELY, EXCESSIVELY, AND EGREGIOUSLY: 1.) ABUSED THEIR POWER. 2.) DISPLAYED TOTAL CONTEMPT FOR THE RULE OF LAW. 3.) COMMITTED THE FEDERAL CRIMES OF MISFEASANCE, MALFEASANCE, AND NONFEASANCE IN THE CONDUCT OF THE OFFICE UNDER US CODE, TITLE 18, PART 1, CHAPTER 73 & 1505. 4.) COMMITTED THE FEDERAL CRIMES OF DEPRIVING THE PETITIONER OF HER 6TH, 7TH, AND 14TH AMENDMENTS RIGHTS, AND BY VIOLATING OTHER FEDERAL STATUTES, LAWS, AND CANONS UNDER 18 USC 242. 5.) TAMPERED WITH EVIDENCE UNDER U.S. CODE TITLE 18 PART 1 CHAPTER 73 & 1512. 6.) CONCEALED, REMOVED, AND/OR MUTILATED EVIDENCE UNDER 18 U.S. CODE § 2071. MOTION TO HAVE THE "SUBSTITUTION" PANEL OF IN BANC JUDGES APPOINTED BY HON. GOV. HOGAN TO PRESIDE OVER THE PETITIONER'S MOTIONS, AND MOTION TO HAVE THE "SUBSTITUTION" PANEL OF IN BANC JUDGES TO RECONSIDER THE PETITIONER'S PETITION FOR AN IN BANC REVIEW AND ALL OF THE PETITIONER'S MOTIONS."

Moreover, as cited in the Petitioner's 2-19-20 Motions, although the Petitioner filed her Notice for an In Banc Petition and her Memorandum in Support for An In Banc Review (hereinafter "Memorandum") on the same day, namely, on 1-14-20, and as evidenced by the stamped date on these documents from the clerk's office, there is no evidence of a "filed date" or "entry date" of the Petitioner's 1-14-20 Memorandum in the record on the Circuit Court's website or in the facts cited in any of the Findings and Orders by the panel of In Banc judges. In fact, in her 2-19-20 Motions, amongst other material facts, the Petitioner asserts that the evidence of the Findings and Orders by the panel of In Banc judges (Exhibits 73, 75, and 93 on the Petitioner's website) substantiate that these Officers of the Court failed to disclose the material fact that the Petitioner filed her Memorandum along with her Notice for an In Banc Review on 1-14-20. As evidenced by the Exhibits 71 and 72 on the Petitioner's website, the Petitioner's 1-page Notice of an In Banc Review and her 28-page Memorandum was stamped by the clerk on 1-14-20 and the copies, including the original copies, should be filed in the record of the Circuit Court.

As asserted in the Petitioner's 2-19-20 Motions, which include a Motion for Disqualifications, as cited in her other Motions, as stated in her Official Complaints, and/or as declared in her Addendums to her Official Complaints, the former Governor of Maryland, Martin O'Malley, (hereinafter "Martin O'Malley") appointed Judge Barbera to the elite position as the new Chief Judge of the Court of Appeals of Maryland in 2013. Martin O'Malley and/or Chief Judge Barbera appointed the panel of In Banc judges who are presently presiding over the Petitioner's Civil litigation and, also, appointed the 3 judges who formerly presided over the Petitioner's present Civil litigation to the privileged position of Administrative judges. Moreover, the Petitioner asserts in her Motions, which include Motions for disqualification that there is evidence of the public acknowledgement of the close relationship amongst Chief Judge Barbera, the panel of In Banc judges, Judge Michel Pierson, Judge Fletcher-Hill, and/or Judge Karen Friedman.

Also, as asserted in the Petitioner's Motions, which includes Motions for Disqualifications, as cited in her Official Complaints, and/or as proclaimed in her Addendums to her Official Complaints, the Petitioner questions the impartiality of the panel of In Banc judges or the former presiding judges, being appointed to such a privileged position as Administrative judges, to fully disclose, consider, and resolve all the material facts and legal arguments which are vital material facts in her present Civil litigation, which includes the relevant and material fact that Martin O'Malley and Chief Judge Barbera are being alleged to have committed federal crimes and/or misconduct.

As cited in the Petitioner's Motions, which includes Motions for Disqualifications, as declared in her Official Complaints, and/or as asserted in her Addendums to her Official Complaints, the Petitioner's questions the impartiality of the panel of In Banc judges or the previous presiding judges in disclosing, considering, and resolving all the material facts and legal arguments which are very material facts in her present Civil litigation, namely, the allegations that: **1.)** our children who attended Baltimore City Public Schools have been exposed, for decades, to lead-tainted drinking water and/or lead-based hazards by the owners of these public schools, namely, Mayors of Baltimore City since at least 1993, namely, Kurt Schmoke, **Martin O'Malley**, Sheila Dixon, Stephanie Rawlings, Catherine Pugh, Jack Young, and the present Mayor of Baltimore City, Brandon Scott; also, the evidence support the material fact that the other owners of the public schools have intentionally and repetitiously exposed our children to lead hazards, namely, every member of the City Council who was a member of the City Council between 1993 until the present. **2.)** Kurt Schmoke was the Mayor of Baltimore City and **Martin O'Malley was a member of the City Council** when the Petitioner initially started whistleblowing about the lead hazards in the schools in 1996. **3.)** during the Petitioner's continued whistleblowing, **Martin O'Malley became Mayor of Baltimore City in 1999 and held this office for 8 years, and he became Governor of Maryland in 2007 and held this position, also, for 8 years.** **4.)** Kurt Schmoke, **Martin O'Malley** Sheila Dixon, Stephanie Rawlings, Catherine Pugh, Jack Young, and the present Mayor of Baltimore City, Brandon Scott, as well as all of the members of the City Council who were members between 1993 until the present, and/or other government officials, are being alleged to have: **a.)** deliberately and repetitiously exposed our children to lead poisoning in Maryland schools since at least 1993 and that the evidence in the records of the lower and appellant courts, and in the Supreme Court, and/or by the evidence in the Petitioner's highly footnoted Documentary. **b.)** have yet to fulfill their duty and obligation 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. Lead stays in the bones for nearly 30 years. Lead is a poison, and when it becomes hazardous, it can possibly kill you. **c.)** failed in their duty and obligation to evaluate and compensate all of the children that were exposed to such potentially deadly poison.

Also, as asserted in the Petitioner's Motions, which includes Motions for Disqualifications, as cited in her Official Complaints, and/or as proclaimed in her Addendums to her Official Complaints, the Petitioner's questions the impartiality of the panel of In Banc judges or the former presiding judges in disclosing, considering, and resolving other material facts and legal arguments which are vital material facts in her present Civil, which, also, include the allegations that, due to the alleged 2015 prejudicial error of perjury by Chief Judge Barbera, the issues raised in the Petitioner's 2015 Writ to the Court of

Appeals have yet to be disclosed, considered, and resolved, namely, that, in 2014, the In Banc judges from Baltimore City Circuit Court committed perjury, breached my 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, one of the judges which, also, presided over my present Civil litigation, violated the Petitioner'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 my 2014 Civil Complaint, which would have revealed the relevant and material facts that Martin O'Malley is being alleged to have committed misconduct in office and possibly criminal activities. Moreover, the Petitioner asserts in her Civil Complaint, in her Motions for Disqualification, in her Official Complaint and/or Addendums against Chief Judge Barbera that the first 5 Exhibits on her website will substantiate, unequivocally, the allegation that Chief Judge Barbera committed, deliberately, in 2015 the prejudicial error of perjury.

The Findings and Orders by the panel of In Banc judges can be viewed on the Petitioner's website as Exhibits, 73, 75, and 93. The Findings and Orders by Judge Michel Pierson can be viewed on the Petitioner's website as Exhibits 59, 63, 66, and 70. The Findings and Orders by Judge Fletcher-Hill can be viewed on the Petitioner's website as Exhibits 50, 51, 52, and 67. The Findings and Orders of Judge Karen Friedman can be viewed on the Petitioner's website as Exhibits 47, 48, and 49.

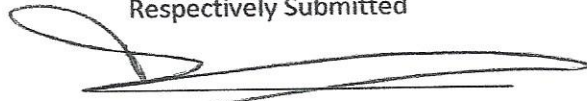
The evidence of the Petitioner's repeated filed Motions for disqualification and/or substitution of the panel of In Banc judges (Exhibit 74 and 80 on Petitioner's website) support the material fact that the Petitioner has, on several occasions, made pleadings for recusal of the present presiding In Banc judges over her Civil litigation, namely, Judge Carrión, Judge Melissa Phinn, and Judge R. Rubin. Moreover, the Petitioner's, Motions, which include Motions for Disqualification, her Official Complaint and/or Addendums to the Petitioner's Official Complaint against the present presiding panel of In Banc judges can be viewed from Exhibits 71, 72, 73, 74, 75, 77, 78, 80, 81, and/or 94 on her website. The Petitioner's Motions, which include Motions for Disqualification and/or Substitution, her Official Complaint, and/or the Petitioner's Addendums to her Official Complaint against Judge Karen Friedman can be viewed from the numbered exhibits on the Petitioner's website, namely, Exhibits 33, 34, 35, 37, 38, 41, 42, 43, 44, 45, 49, 54, 55, 56, 71, 72, 77, and/or Exhibit 81. The Petitioner's Motions, which include Motions for Disqualifications and/or Substitutions, her Official Complaint, and/or Addendums to the Petitioner's Official Complaint against Judge Fletcher-Hill can be viewed from Exhibits 36, 41, 42, 43, 44, 45, 46, 47, 50, 51, 52, 54, 55, 56, 57, 58, 71, 72, 77, and/or Exhibit 81. The Petitioner's Motions, which include Motions for Disqualifications and/or Substitutions, her Official Complaint, and/or Addendums to her Official Complaint against Judge Michel Pierson, can be viewed from Exhibits 59, 61, 62, 64, 65, 67, 68, 69, 71, 72, 77, and/or Exhibit 81 on her website. Moreover, Exhibits 43, 45, 54, 56, 77, and 81 on the Petitioner's website are her Official Complaint, and/or the Petitioner's Addendums to her Official Complaint against Chief Judge Barbera.

CONCLUSION

Thus, in conclusion, the Petitioner is requesting that the panel of In Banc Review Judges grant the Petitioner's Motions.

Cc: Hon. President Trump, Hon. Military tribunal, Public

Respectively Submitted



Diana R. Williams, Pro Se

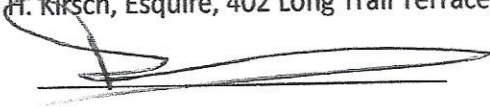
131 Calvin Hill Court

Baltimore, Maryland 21222

410-868-6013

Certificate of Service

I HEREBY CERTIFY that on this 7th day of April 2022, a copy of the foregoing Petitioner's 3rd Motion For Disqualification For "Fraud Upon The Court" Under Federal Statute 28 U.S.C. & 455(a) Against The Panel of In Banc Judges, Motion for All Orders By The Panel Of In Banc Judges, By Judge Michel Pierson, By Judge Fletcher-Hill, and By Judge Karen Friedman Be Deemed Void As A Matter Of Law Under Federal Statute 28, U.S.C. & 455(a), Motion For Reconsideration, And 3rd Motion For A Hearing On The Motions was mailed, postage paid to: Larry H. Kirsch, Esquire, 402 Long Trail Terrace, Rockville, Maryland 20850.



Diana R. Williams, Pro Se

REQUEST FOR A HEARING

Petitioner is requesting a hearing on her Motions.