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

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 **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 JUDGMENT BECAUSE OF**

  **ADDITIONAL EVIDENCE, AND GRANTING OF THE PLANTIFF’S**

  **MOTION TO AMEND THE PUNITIVE** **DAMAGE IN THE**

 **PLAINTIFF’S CIVILCOMPLAINTS**

 I, Diana R. Williams, the Plaintiff who is being represented Pro Se, hereby requests that the 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 “Motions”) based on the grounds and authorities cited below:

**1a. 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**. As a result of the Plaintiff being forced to be represented Pro Se due to severe financial hardship and inability to, yet, find an attorney who will represent her Pro Bono, or even on a contingency basis, the Plaintiff lacks the full knowledge and competence as an attorney who would have been able to discover and produce the new evidence earlier. The newly discovered evidence, material for the Plaintiff making the application which could not have reasonably been discovered and produced by the Plaintiff being represented Pro Se is that Judge Karen C. Friedman (hereinafter “Judge Friedman”) should have recused herself from the Plaintiff’s Civil Case due to a conflict of interest and/or the appearance of a conflict of interest and/or being impartial and/or having the appearance of impartiality and, thereby, breaching Canons 1 and 2 in the Judicial Code of Conduct for Judges. 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. And, Canon 2 cites that a judge shall perform the duties of judicial office impartially, competently, and diligently. Judge Friedman was one of the judges appointed in 2014 to Maryland Eighth Circuit Baltimore City by the Former Governor of Maryland, Martin O’Malley (hereinafter “O’Malley”)who is being alleged in the Plaintiff’s Civil Complaint and in the Plaintiff’s Motions for Motions for Reconsideration, 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 “Plaintiff’s Motions”) as one of the Government Officials whose misconduct has caused the Plaintiff emotional distress. Also, as asserted in the Plaintiff’s Civil Complaints and the Plaintiff’s Motions, the Plaintiff endures tremendous emotional distress as a result of being a Whistleblower who substantiated in the Plaintiff’s Documentary and in the Appeals and/or Petitions to the Supreme Court, the Courts of Appeals, and the Lower Court that O’Malley is one of the Government Officials who as former Mayor of Baltimore City and, thus, one of the former owners of the lead hazardous schools in Baltimore City, who knowingly and willingly exposed our children to lead poisoning, have yet to test all of our children whom he and other Government officials have caused to be exposed to lead poisoning using the special X-Ray machine to measure the amount of lead in the bones (because blood lead testing is only reliable for about 45 days after initial exposure) and/or have yet to compensate our children for their injuries from being exposed to this potentially fatal hazard.Still too**,** as stated in the Plaintiff’s Civil Complaint and in the Plaintiff’s Motions, the Plaintiff has requested in her 5-6-16 Official Complaint of judicial misconduct and/or email addendums that the President and Congress include in their investigation of misconduct O’Malley and other local and state Government officials in Maryland. Furthermore, O’Malley will be one of the witnesses called to testify in the Plaintiff’s Civil Complaint. The Plaintiff has a right to request a new trial due to the fact that Judge Friedman should have recused herself because of the conflict of interest and/or the appearance of conflict of interest and/or being impartial and/or having the appearance of being impartial and, thus, breaching Canons 1 and 2, the Plaintiff can request a new trial. Moreover, any Judge who has a personal conflict of interest in the case may only stay on the case and not recuse herself only if all the parties and the judge understand the conflict, but agree the judge should stay on anyway.

**Argument**

 This Honorable Court should grant the Plaintiff’s Motions since CR 59 (a) (4) asserts that newly discovered evidence as asserted in paragraph 1, material for the Plaintiff whose making the application are grounds for granting reconsideration of judgment by the Court and since the Plaintiff who has been forced to be represented Pro Se and, thereby, would not be expected to have reasonably discovered and produced earlier the newly discovered evidence, but has been able to timely file the newly discovered evidence in her Motion. Further, the Plaintiff’s Motions should be granted since Judge Friedman did not recuse herself from the civil case, although she knew that there was a conflict of interest and and/or the appearance of a conflict of interest and/or being impartial and/or an appearance of impartiality and, thus, violating Canons 1 and 2 due to her being privileged to be appointed as one of Maryland’s judges for the Eighth Circuit Baltimore City in 2014 by O’Malley , one of the Government Officials who are alleged in the Plaintiff’s Civil Complaint to cause the Plaintiff’s tremendous emotional distress because the Plaintiff continues to Whistleblowing germane to the assertion that O’Malley and other state and local Government Officials knowingly and willingly exposed our children to lead poisoning, have yet to test all of our children whom he and other Government officials have caused to be exposed to lead poisoning using the special X-Ray machine to measure the amount of lead in the bones (because blood lead testing is only reliable for about 45 days after initial exposure) and/or have yet to compensate our children for their injuries from being exposed to this potentially fatal hazard**.** Moreover**,** , a reasonable mind would find it difficult to believe that Judge Friedman would not have voluntarily recused herself due to the conflict of interest and/or appearance of a conflict of interest and/or the appearance of being impartial due to these serious allegations against O’Malley who appointed Judge Friedman to the privileged position of judge to Maryland Eight Circuit Baltimore City in 2014.

**Conclusion**

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

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 Diana R. Williams, Pro Se

 **Certificate of Service**

 I HEREBY CERTIFY that on this 1st day of February, 2018 a copy of the foregoing 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 were mailed, postage paid to: Larry H. Kirsch, Esquire, 402 Long Trail Terrace, Rockville, Maryland 20850.

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 Diana R. Williams, Pro Se