



SWISSX LEGAL

Alkiviades Andrew David · Litigant in Person
SwissX Island, St. John's, Antigua and Barbuda

20 September 2026

The Honourable Helen Zukin

Presiding Justice, Division Four

Court of Appeal of the State of California, Second Appellate District

300 South Spring Street, Los Angeles, California 90013

By email to the Access / ADA Coordinator (2DCA.ADA@jud.ca.gov) for lodging and circulation to Division Four chambers, the Clerk, and the Administrative Presiding Justice; contemporaneous copy to counsel for Jane Doe.

Re: Jane Doe v. Alkiviades David, LASC 20STCV37498; B341119 / B345361 · Zirpel v. Alki
David Productions, Inc., 93 Cal.App.5th 563 · Khan v David, KB-2025-001991

Dear Presiding Justice Zukin:

You preside over Jane Doe. That file was penned by Thomas V. Girardi. On 1 October 2020 the LASC docket in 20STCV37498 updated him as attorney of record, organisation Girardi & Keese. Gary A. Dordick now prosecutes it. Jonathan Hay is represented by Dordick. Girardi is defendant [7] on Williams J's 6 May 2026 order in ANUHCv2025/0149. The 1 November 2025 service schedule identifies Jane Doe as Marguerita Nichols and records that Girardi previously represented her. Girardi was disbarred in 2022, convicted of wire fraud in 2024, and sentenced to 87 months. This is a notice and a request for recusal or disclosure. It is not a substitute brief.

1. Recusal and disclosure — feature

I ask Presiding Justice Zukin to recuse from Jane Doe, or to disclose any connection with Girardi, Girardi Keese, Dordick Law, Gloria Allred, Glaser Weil or Fred D. Heather. I do not have a public appointment tying Your Honour to Girardi. What I do have is this.

Your Honour wrote Zirpel against ADP on the employment frame Glaser Weil put in front of this Division. Jane Doe — a Girardi file now in Dordick's hands — is the next case in that method. Hon. Christopher K. Lui tried Jane Doe. His father, Hon. Elwood G. Lui, is Administrative Presiding Justice of this Court. That father-son fact is on Justice Lui's official Second District biography. Khan v. David was affirmed in Division Two — the father's division — on 27 May 2022. That affirmance is now live English process: Khan v David, KB-2025-001991. I signed the N244 stay on 19 September 2026. Jane Doe tried by the son; the Khan title that funds King's Bench affirmed in the father's division; Zirpel written by the justice who now has Jane Doe. A reasonable person in my position fears the frame is locked. If the connection is nil, a one-line disclosure ends it. I copy Hon. Audra M. Mori, Hon. Armen Tamzarian, Hon. Audrey B. Collins if still assigned, and Hon. Elwood G. Lui via the Clerk. Judges are not personally served.

2. The Jane Doe record is not whole — Dawson

On 2 April 2026 I filed in B341119 / B345361 an Appellant's Master Consolidated Supplemental Submission under Rule 8.155 and Code of Civil Procedure section 909. Mary Rizzo's texts, already on

the appellate record, identify “mk, Carl, and Chasity” as witnesses “they need.” Carl Dawson — former Head of Marketing at FilmOn and employer of Mahim Khan — was a willing and available witness. He was never heard at trial. His affidavit and recorded testimony state that Margarita Nichols admitted the relationship was consensual, confirmed she was not raped, and described pressure from lawyers to pursue a different narrative. Shoefield and Calendar, in that same submission, show no support for the allegation. Trial counsel Fred Heather and Robert Shapiro did not call Dawson. Glaser Weil buried the file Cecilia Preciado needed after trial. A jury cannot safely stand on a record that omitted the witness the other side’s own texts named. This letter does not decide the 8.155 motion. It tells this Division the file in front of you is the file that motion already called incomplete.

3. What Zirpel decided — and what counsel left off the page

Justice Zukin, writing for Division Four, Currey, P.J., and Collins, J., concurring, decided whistleblower status. 93 Cal.App.5th 563 affirms Labor Code sections 1102.5 and 232.5 and the punitive award. It does not decide inventorship, ownership, licence or infringement of the hologram system Zirpel was installing (Pepper’s Ghost / Musion / Hologram USA; U.S. Patents 5,865,519 and 7,883,212). I have sued Glaser Weil, including Zirpel. They do not speak for me. I say this Division was lied to about Zirpel as an allegation against counsel of record: the published opinion accurately reflects the file they served; that file left title off the page. 93 Cal.App.5th 563 is not property title and not Harmonia title.

4. Khan is before King’s Bench on the same method

Mahim Khan is a live English claimant in KB-2025-001991 on the Division Two affirmance of 27 May 2022 (Hon. Michelle Williams Court below; Heather / Glaser Weil for me; Allred, Maroko & Goldberg for Khan). Gary Shoefield and Yelena Calendar state Justice Elwood Lui took their statements wrongfully: they never appeared, and they were not supportive. Ellyn S. Garofalo’s declaration of 15 September 2020 on that appeal, and her letter, show the case was maligned at threshold — witness integrity, signature integrity, whether the appeal was even in a state to be decided. A figure of “\$43 million” was a mistake. It is deleted.

5. Niko and Tino

My minor sons Niko and Tino are the grandchildren for whom Harmonia Sub-Trust D was built on the death of Andrew A. David in October 2000. I was Protector. I say I was wrongfully removed. Enforcement against me cannot run as if their remainder were spare change. That is why this notice cannot wait until after argument.

6. Disability

I am a severely disabled litigant in person. Dr Flavian Costin Naclad, CPR Part 35, 18 July 2026 (examination 13 July 2026): TBI with structural frontal changes; adjustments required; capacity to conduct KB-2025-001991 not displaced; not a protected party. The report does not determine any allegation. I ask for clear directions and no assumption that speed is consent. I will lodge Naclad, the 19 September AD1 bundle, Huzaineh’s Statement of Truth of 9 July 2025, Lieberman’s 30 August 2023 letter, and the 2 April 2026 Dawson submission on request.

7. Already on other dockets — cited, not tried here

Dallas E.D. Tex. 4:23-cv-00435-SDJ-BD (Hay; deaths of Aaron Cain McKnight and Mark J. Lieberman; Lieberman letter 30 August 2023 recording a 2 February 2023 confidence of a federal criminal investigation of the California RICO defendants). S.D.N.Y. No. 1:25-mc-00098-JMF, In re Guryeva-Motlokhov, Hon. Jesse M. Furman: I am the pro se interested party; Prime Minister Gaston Alphonso Browne is intervenor; Boies Schiller for the applicant; CLOSED 4 June 2025; Second Circuit March 2026 upheld the quash. CID Antigua 22 April 2026 and Met Police 01/7434911/25 — Asot Michael, allegation of relatedness only. Williams J, 6 May 2026, ANUHCv2025/0149 [33]–[34], [38]. Matthew Huzaineh,

Cal. Bar 326242, Statement of Truth 9 July 2025, then silent. Thirty-five and more witnesses ready if a court of trial asks. Barry Rothman named Girardi / Allred / Boies / Geragos / Pellicano to me; that is my account. Danny Kapon Sr., Ruben Valdez, Anthony Pellicano, Desiree Perez and Sean Combs sit on the Dallas Sinaloa-lane theory, not for trial here.

Five purposes. First: Glaser Weil and Heather do not speak for me. Second: 93 Cal.App.5th 563 is Labor Code, not title. Third: decide Jane Doe on its own record, or recuse. I do not ask this Division to recall Zirpel, grant the King's Bench stay, or sit over Judge Jordan. Fourth: lodge this letter in B341119 / B345361 and, as courtesy, in B317334, 20STCV37498 and BC684618. Fifth: Niko and Tino are minors. Time is the point.

Please lodge this letter and circulate it to Division Four chambers.

Respectfully submitted,

A handwritten signature in cursive script that reads "Alkiviades A. David". The signature is written in dark ink and is underlined with a single horizontal stroke.

Alkiviades Andrew David

Litigant in Person · Defendant-Appellant, B341119 / B345361

KB-2025-001991 · E.D. Tex. 4:23-cv-00435-SDJ-BD · S.D.N.Y. 1:25-mc-00098-JMF

Ambassador-at-Large for the Green Economy of Antigua and Barbuda

Service

To: 2DCA.ADA@jud.ca.gov — Access / ADA Coordinator, 300 South Spring Street, Room 2217, Los Angeles, CA 90013, Tel. (213) 830-7000 — with request to lodge and circulate to chambers of Hon. Helen Zukin, P.J.; Hon. Audra M. Mori; Hon. Armen Tamzarian; Hon. Audrey B. Collins if assigned; and Hon. Elwood G. Lui, APJ; and to the Clerk, 2nd Floor, North Tower. Judges are not personally served. Cc: Gary@dordicklaw.com; DZMeservice@dordicklaw.com; brittney@dordicklaw.com; esb@lb-lawyers.com. Courtesy: Clerk, LASC 20STCV37498 and BC684618.

Notice and recusal request only. Not a substitute brief. Allegations are not findings. Deleted: any \$43 million wire.