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DIINELE DINAALI
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PLAINTIFF IN PRO PER

DISTRICT COURT
CLARK COUNTY, NEVADA

DIINELE DINAALI, an individual,
Plaintiff,

vs.

SHEIN DISTRIBUTION CORPORATION, a
Delaware corporation;
BROWNSTEIN HYATT FARBER SCHRECK,
LLP, a Washington Corporation;
CHRIS XU, an individual;
YINAN ZHU, an individual;
NORMAN BROWNSTEIN, an individual;
RICHARD BENSON, an individual;
ERIC D WALTHER, an individual;
MADYSIN B BATHKE, an individual;
DOES 1-20;
ROE CORPORATIONS 1-10, inclusive;
Defendants.

Case No.: A-25-915392-C
Dept.: 26
[Honorable Gloria Sturman]

**STATEMENT OF DISQUALIFICATION OF HON.
JUDGE GLORIA STURMAN**

1 **TO THIS HONORABLE COURT, DEFENDANTS AND ATOORNEYS OF RECORD:**

2 Plaintiff DIINELE DINAALI (“Plaintiff”), appearing in pro per, respectfully submits this
3 Statement of Disqualification for Cause pursuant to NRS 1.235 and related authority, and moves this
4 Court to disqualify the Honorable Judge from further involvement in the above-captioned matter
5 for the following reasons:

6 **A- GROUNDS FOR DISQUALIFICATION**

7 Under NRS 1.230 and NRS 1.235, a judge must recuse themselves when their impartiality
8 might reasonably be questioned, or when there is actual bias or prejudice against a party. In this
9 case, the Judge has demonstrated conduct which raises reasonable concern over impartiality,
10 fairness, and potential conflicts of interest.

11 **I- Demonstrated Bias and Prejudice**

12 Plaintiff has observed specific conduct by the Judge that suggests a pattern of bias and
13 prejudicial treatment toward Plaintiff, including but not limited to:

- 14 - Failing to set hearings or respond to time-sensitive motions submitted by Plaintiff, such
15 as Plaintiff’s motion for preliminary injunction filed on March 28, 2025.
- 16 - Granting requests and signing orders submitted by Defendants’ counsel via ex parte
17 channels without proper notice or opportunity for Plaintiff to be heard.
- 18 - Advancing Defendants’ motions on shortened time while refusing to rule on or
19 consolidate Plaintiff’s related motions set for later hearing.
- 20 - Blocking Plaintiff’s ability to submit courtesy copies through the Court’s e-filing system
21 after Plaintiff warned Defendants that courtesy service would be sent due to email blocking.

22 **II- Pending Administrative and Criminal Complaints**

23 Plaintiff has submitted or intends to submit formal complaints with judicial oversight and
24 administrative bodies alleging violations of due process and misconduct in this case. While the
25 complaints themselves are not determinative of disqualification, their existence contributes to a
26 reasonable appearance of impropriety and may create conflicts of interest moving forward. A true
27 and correct copy of the Universal Complaint form filed in the case is attached as [Exhibit 1].

28 **II- Appearance of Impropriety**

Canon 2 of the Nevada Code of Judicial Conduct requires judges to avoid both impropriety

1 and the appearance of impropriety. The combination of ex parte activity, unexplained procedural
2 denials, and preferential treatment of defense motions raises a serious question as to whether
3 justice can be fairly administered in this matter under the current judicial assignment.

4 **B- LEGAL STANDARD**

5 Nevada Law Requires Disqualification for Actual or Perceived Bias. Pursuant to NRS 1.230, a
6 judge must be disqualified if they are interested in the action or biased against a party. Additionally,
7 NRS 1.235(1) allows a party to file an affidavit of bias if they believe the judge has a personal bias or
8 prejudice that would prevent fair judgment.

9 In *Millen v. Eighth Judicial Dist. Court*, 122 Nev. 1245, 148 P.3d 694 (2006), the Nevada
10 Supreme Court stated: A fair trial in a fair tribunal is a basic requirement of due process. This applies
11 to administrative agencies as well as to courts.

12 The United States Constitution guarantees litigants the right to due process under the
13 Fourteenth Amendment, which includes the right to a neutral and detached judge. In *Caperton v.*
14 *A.T. Massey Coal Co.*, 556 U.S. 868 (2009), the U.S. Supreme Court held that: “There is a serious risk
15 of actual bias... when a judge has a personal interest or there is an extreme appearance of partiality.”
This standard applies to state courts as well.

16 Judicial Canon 2A of the Nevada Code of Judicial Conduct states that a judge must “act at all
17 times in a manner that promotes public confidence in the independence, integrity, and impartiality
18 of the judiciary.” Ex parte conduct or unexplained procedural irregularities can give rise to
19 disqualification, as shown in *Goldberg v. Kelly*, 397 U.S. 254 (1970).

20 If a party believes the judge is prejudging motions, denying procedural fairness, or engaging
21 in ex parte discussions, those facts support disqualification. The judge should not rule on issues
22 involving themselves; a separate judge must be assigned per NRS 1.235(6).

23 Even if actual bias cannot be proven, the appearance of impropriety is grounds for recusal.
24 In *Ybarra v. State*, 127 Nev. 47, 247 P.3d 269 (2011), the Nevada Supreme Court affirmed that: “A
25 judge must recuse himself when there is a reasonable question regarding his impartiality.”

26 Where a party has initiated administrative or criminal complaints against a judge, continued
27 judicial oversight could be perceived as retaliatory, thus compromising impartiality.

1 **CONCLUSION**

2 Given the legal framework outlined above and the conduct described in Plaintiff's original
3 motion, this case clearly meets the threshold for judicial disqualification under Nevada law and
4 federal due process standards. Plaintiff respectfully requests that a neutral judge be assigned to
5 evaluate this request and that the sitting judge recuse herself in the interest of justice.

6
7 Respectfully submitted,

8 DATE: May 20, 2025

9 /s/ DIINELE DINAALI

10 _____
11 Plaintiff in Pro Per, Diinele Dinaali

Exhibit 1

UNIVERSAL CRIMINAL AND ADMINISTRATIVE COMPLAINT

Submitted by: Diinele Dinaali

Date: May 20, 2025

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I. INTRODUCTION & SUMMARY

I, Diinele Dinaali, am a customer of Shein Distribution Corporation (Shein), a Fascist and Communist Chinese online retailer opposed to Freedom of Speech and access to courts for redress.

I am a Middle Eastern, Muslim, transgender woman.

Not only I was the subject of retaliation at the hands of Shein when I complained about three of my orders which were stolen by Shein's logistic company's drivers and I was prevented from posting negative reviews on its site, but I have faced systemic retaliation, discrimination, and denial of due process in the course of pursuing justice for contract violations, suppression of free speech, and malicious legal tactics.

As a self-represented plaintiff, I brought civil actions in California (LASC 25STCV07490) and Nevada (A-25-915392-C) against Shein and its attorneys after my rights were violated by a paid off commissioner in a small claims court in Los Angeles.

The litigation escalated when attorneys representing Shein retaliated against me by fraudulently forcing the take-down of my websites, filed motions containing falsehoods, including a fraudulent anti-SLAPP motion authored by an attorney not licensed to practice in Nevada.

The motion falsely mischaracterized the factual basis for the anti-SLAPP motions and contained a perjured statement by another attorney.

More troublingly, the presiding judge of the Nevada case, Judge Gloria Sturman has appeared to facilitate and expedite defense motions while ignoring my ex parte applications, blocking access to e-filing service functions. The judge appears to be participating in what I believe to be improper ex parte communications. These patterns of conduct—occurring in a context where my protected identity as a Middle Eastern transgender woman appears to be a motivating factor—suggest a coordinated effort to suppress my civil rights.

This summary outlines a complaint supported by filings, evidence, and factual chronology now being presented to judicial oversight agencies, attorneys general, state bars, and federal civil rights authorities for review, investigation, and appropriate disciplinary and prosecutorial action.

II. NAMED PARTIES & JURISDICTIONS

A. Parties

1. Shein Distribution Corporation (Shein)
2. Chris Xu (Shein CEO and Founder)
3. Yunan Xhu (Shein General Counsel)
4. Norman Brownstein & Richard Benson LLP (BHFS)
5. Norman Brownstein (BHFS CEO and Founder)
6. Richard Benson (BHFS Managing Shaerholder)
7. Eric Walther (BHFS Shareholder)
8. Madyson Bathke (BHFS Attorney)
9. Morgan E. Pietz (Pietz & Shahriari LLP Attorney)
10. Gloria J. Sturman (Judge, Eighth Judicial District of Nevada)

B. Agencies for Referral

- State Bars: California, Nevada, Colorado, Washington
- Attorneys General: California, Nevada, Colorado, Washington
- FBI Civil Rights Division
- DOJ Civil Rights Division
- Clark County District Attorney
- Los Angeles County District Attorney
- Nevada Commission on Judicial Discipline

III. SUMMARY OF KEY VIOLATIONS BY DEFENDANTS

A. Criminal Violations

Eric Walther: Perjury (NRS 199.120 / CCP § 118)

Morgan Pietz: Unauthorized practice (SCR 42 / NRS 7.285)

Shein/BHFS: Extortion (NRS 205.320 / PC § 518, BPC 17200, BPC 17500)

Judge Sturman: Judicial collusion (NRS 197.020, 197.040)

Unknown: Interference with legal communications (18 U.S.C. § 241)

B. Attorney Misconduct

- Filing frivolous Anti-SLAPP to harass and extort
- Misrepresenting court records
- Ex Parte communications
- Using unlicensed attorney
- Suppressing First Amendment protest speech

C. Federal Violations

- Conspiracy Against Rights (18 U.S.C. § 241)
- Wire Fraud (18 U.S.C. § 1343)
- Obstruction of Justice (18 U.S.C. § 1512)

IV. JUDICIAL MISCONDUCT

Judge Gloria J. Sturman:

- Ignored time-sensitive Ex Parte Motion for Preliminary Injunction
- Set critical hearing dates benefiting defendants without notice to Plaintiff via Ex Parte communications
- Approved defense orders via Ex Parte communications
- Blocked Plaintiff from sending e-service courtesy copies
- Enabled rapid processing of defense motions while ignoring Plaintiff's filings
- Appears to have discriminated based on Plaintiff's transgender and Middle Eastern identity

These actions violate Canon 1, 2, and 3 of the Nevada Code of Judicial Conduct and may constitute criminal misconduct under NRS 197.040.

V. CONSPIRACY TO RETALIATE & DEPRIVE RIGHTS

Plaintiff engaged in protected protest speech via websites. In retaliation:

- Walther directly contacted registrar and falsely claimed "spam" activity
- Registrar issued takedown of Plaintiff's protest and personal websites
- Attorneys falsely claimed registrar independently flagged sites
- Pietz and others filed an Anti-SLAPP motion based on this false claim

VI. RELIEF REQUESTED

1. Investigate judicial misconduct, unauthorized practice, and perjury.
2. Discipline attorneys for ethical breaches.
3. Refer for prosecution under state and federal criminal statutes.

VII- STATEMENT OF FACTS

A- Background

On December 28, 2024, Shein breached our contractual agreement by refusing to reimburse me for several items I had purchased on its website that were never delivered. The items were stolen by the Shein-contracted SpeedX delivery driver who was assigned to deliver them to me.

Following my complaint regarding this breach, Shein further violated our agreement on December 29, 2024, by banning me from posting any warnings or reviews about the incident on its website, thereby silencing my efforts to inform other customers.

Subsequent research revealed that I am not alone. Thousands of customers have shared similar experiences online, expressing frustration with Shein and its logistics provider, SpeedX.

It appears to be a common practice among some SpeedX drivers to leave packages at customers' doors, take a photograph to create the appearance of completed delivery, and then retrieve the packages after logging the delivery in Shein's system. This deceptive practice has resulted in widespread consumer harm.

A snapshot of the online reviews can be viewed at <http://shein.pictures>.

Shein, a company based in China, effectively deprived me of my right to free speech, a right I was entitled to exercise as a paying customer, in order to protect its relationship with SpeedX and allow its delivery drivers to continue stealing customers' packages without accountability.

B- Small Claims Court

Shein's Terms of Use require arbitration for most disputes, except for those that fall within the jurisdiction of small claims court. Under those terms, I was required to initiate a request for arbitration, after which Shein would have 60 days to respond.

Due to this clause, I proceed in small claims court and on December 31, 2024, I filed a small claims action in Los Angeles County against Shein for breach of contract.

At the small claims hearing on March 13, 2025, a paralegal named Jennifer Swallow appeared in person on behalf of Shein. I appeared remotely from Las Vegas, where I was residing at the time.

At the outset of the hearing, Ms. Swallow falsely told the court that I had agreed to continue the hearing—a claim that was entirely untrue, as Shein had never responded to any of my communications, let alone discuss a stipulation to continue.

Despite this blatant misrepresentation, the judge failed to allow me to even speak and address the false statement and continued the hearing to a later date, additionally ordering me to appear in person, despite my being over 400 miles away.

C- California Unlimited Civil Case

Faced with the financial and logistical burden of attending the rescheduled hearing in person, combined with the clear indication that the judge was unlikely to provide a fair hearing, and the effects of two other incidents which occurred around the same time, I was effectively forced to dismiss my claim. I had no confidence that the court would grant my legitimate request, nor did I have any avenue for appeal in the small claims context.

First, the 60-day waiting period under Shein's Terms of Use expired without Shein responding to my request to initiate arbitration proceedings. This failure cleared the way for me to initiate a civil case—particularly given Shein's continued violations of my civil rights, including my right to free speech. I sought injunctive relief to compel Shein to restore my access to its platform so I could post truthful reviews and warn other customers.

Second, on December 31, 2024, the same day I filed my small claims case, I developed serious breathing issues and was rushed to the emergency room. Following examinations, I was diagnosed with heavy calcification, a condition that would require multiple medical procedures to address.

As of this filing, I continue to undergo treatment and still suffer from the lingering effects. It was determined that the damage was most likely caused by toxic products purchased from Shein, compounding the harm I had already suffered.

Given these developments, I dismissed the small claims case without prejudice and, on March 17, 2025, filed a superior court case in California: Diinele Dinaali v. Shein Distribution Corporation, Case No. LASC 25STCV07490.

D- Nevada Unlimited Civil Case

After Shein ignored my warnings regarding legal action in Nevada, I subsequently initiated a parallel case in Nevada: Diinele Dinaali v. Shein Distribution Corporation, Case No. A-25-915392-C, filed on March 25.

On March 28, I filed an Ex Parte Motion for Preliminary Injunction in the Nevada case, seeking urgent relief against Shein to restore my constitutional rights. Despite the

urgency and time-sensitive nature of that motion, the Court has, to date, failed to rule on, acknowledge, or set a hearing for the motion.

To this day, my rights remain violated as a result of Shein's tortious conduct, as well as the negligence and apparent collusion of its attorneys and Nevada Judge Gloria Sturman.

After not receiving a ruling on my Ex Parte Motion for Preliminary Injunction within the ten-day period mandated by statute, I attempted to obtain injunctive relief in California by filing an Ex Parte Application on April 9. However, the judge denied my application, stating that I could not file an Ex Parte Application directly in the assigned department because the Management Conference had not yet occurred. I was directed to instead file my Ex Parte Application with the Writs and Receivers Department of the courthouse.

On April 29, pursuant to local rules, I e-filed a request to appear at an Ex Parte hearing in Department 82 for an appearance scheduled on April 30. Nevertheless, my application was immediately rejected without a hearing on multiple technical grounds which I believe to be baseless. As a result, I was deprived of the opportunity to have my Ex Parte Application heard both in Nevada and California as of the date of this filing.

In the meantime, on April 17, in response to my First Amended Complaint filed in Nevada, Shein filed a Motion to Dismiss, which was set for hearing on May 20. While the motion may have had a legitimate legal basis to seek dismissal or a stay because of the duplicity of the filings, it became clear that Shein was attempting to exploit the motion as a vehicle to have me declared a vexatious litigant, going far beyond the procedural purpose of the motion.

The motion contained numerous irrelevant and defamatory statements regarding my past litigation history, which Defendants' attorneys had taken out of context deliberately included in an attempt to incite bias and prejudice against me.

Moreover, Attorney Morgan E. Pietz, who is licensed to practice only in California, appeared and signed the motion in violation of Nevada Supreme Court Rule 42, which prohibits out-of-state attorneys from practicing in Nevada courts without prior authorization. The violation constitutes a felony offense in Nevada.

As of this filing, Pietz has not obtained the court's approval to appear pro hac vice. A hearing for association of Pitz was hastily filed within hours of my notice to Shein and Pietz that I intended to pursue criminal and him for practicing law in Nevada without license through criminal collusion and ex parte communication between the judge and attorneys.

In this frivolous and malicious motion, Defendants' attorneys portrayed me as a vexatious litigant solely seeking to harass Shein, including by referencing a prior case I had filed in this district against another large online company, Doublelist.com, an online dating site.

In that case, just as in the present case, I alleged judicial bias and corruption after the presiding judge, Judge Joanna Kishner, engaged in ex parte communications with opposing counsel. This misconduct led me to file a protest website against Judge Kishner and to file a police report, after I observed a pattern of adverse rulings issued against me without notice, proper process, or legal justification—similar to what I am now experiencing in the present case.

In that incident, even after I objected to the ex parte communications, I was physically blocked from attending a court hearing where the judge met privately with the opposing attorney in chambers. The judge then had the audacity to issue an order against me, falsely stating that I had failed to appear at the hearing—despite the fact that the courtroom was, in fact, locked and inaccessible to me.

Upon contacting the district's staff, I was informed that the court's roster reflected the proceeding as a closed chambers meeting between the judge and opposing counsel only.

As a result of these events, and following the criminal referral I filed regarding the judge's misconduct, the judge was forced to recuse herself from the case. The matter was reassigned to another judge, and I subsequently settled with Doublelist and dismissed the case.

Despite the favorable resolution, Shein's attorneys have maliciously sought to mischaracterize the facts of that case, portraying me as a vexatious litigant. Their intent is transparent: to mislead the court into declaring me a vexatious litigant by falsely accusing me of engaging in malicious and baseless litigation.

E- Shein's Malicious and Frivolous Litigation Tactics

Shein and its frivolously attorneys have followed the same exact playbook in California.

This pattern mirrors the conduct of attorneys in an earlier lawsuit I brought against Bridge Property Management, a large national property management company. In that case, the presiding judge, Ronald Israel, similarly abused my civil rights, blatantly lying under oath in response to a motion I filed to have him disqualified from my case.

After the judge refused to disqualify himself and I published a protest website criticizing Judge Israel, I was contacted by a Sheriff's Lieutenant, who informed me that the judge had initiated a criminal referral against me, falsely accusing me of sending a terroristic email threatening to harm him and his staff.

When realizing the claim was completely fabricated, the lieutenant admitted he had launched the investigation solely on the judge's word, without ever having seen such an email—this because no such email existed.

When I initiated a counter-action against the company and their malicious attorneys, they ultimately fired the attorney responsible for the misconduct, and his replacement settled the matter with me.

In response to Shein's malicious motion to dismiss, filed on April 17, I took action by publishing several websites critical of BHFS, its two attorneys, Walther and Bathke, as well as Pietz. I also sent the website links to several BHFS attorneys and personnel.

On April 21, I filed a motion to strike Shein's objection and for sanctions against Shein and its attorneys, which was scheduled for hearing on June 10.

At approximately 2:30 AM on April 22, I received four take-down notices from my domain registrar, name.com, regarding three protest websites targeting BHFS and its attorneys Walther and Bathke.

Shockingly, the takedown notice also included my personal website, diinele.com, where I sell my music. This personal site had no connection to the ongoing litigation whatsoever.

The registrar ordered me to remove the websites within 24 hours or face domain deactivation. It is important to note that these websites were not even hosted by the registrar; I had only purchased the domain names from Name.com, and they had no authority over the content or hosting of the sites.

It appears that Walther had performed an online search to identify the hosting provider of my websites. Because my sites are protected by privacy features that block ownership details, the only publicly visible information was that the domains were registered through name.com.

It appears that Attorney Walther contacted Name.com, threatening the registrar with litigation. In response, the registrar's overseas support agents—reportedly paid minimal wages and lacking proper legal training—succumbed to Walther's threats and issued the take-down notices without any due process or independent investigation.

Despite my immediate objections to the take-down notices, the registrar failed to respond. To avoid losing ownership of the domains, I reluctantly removed the four websites within the imposed 24-hour deadline.

The four websites are offline as of this filing.

According to a later admission by the registrar, Attorney Walther had made false representations, falsely accusing me of sending spam emails to the law firm's employees.

Even after I submitted a formal complaint to the registrar objecting to the unlawful take-down actions, they failed to provide any response or justification for their conduct. As a result, I amended both my California and Nevada complaints to include these new wrongful acts.

In their Motion to Dismiss Complaint, Defendants argued that the California and Nevada cases were duplicative and that, under the First-to-File rule, the Nevada case should be dismissed or stayed pending resolution of the California action.

F- Amendment of Complaints

To eliminate any such procedural argument, I amended both complaints to assert distinct causes of action and modify the list of named defendants, ensuring the First-to-File rule no longer applied.

On April 23, I amended the California complaint to include Name.com and its management for breach of contract and negligence, and added BHFS, its CEO and founder Norman Brownstein, Richard Benson, managing partner, and its attorneys Eric Walther and Madyson Bathke for engaging in frivolous and malicious business practices.

On April 24, I amended the Nevada complaint to assert a single cause of action against Shein, its CEO and founder Chris Xu, general counsel Yunan Xu, BHFS, Brownstein, Benson, Walther, and Bathke.

The focus of this complaint is the defendants' unlawful retaliation against me by causing the takedown of my websites, thereby depriving me of my First Amendment rights and the ability to generate income from my online platforms.

G- Unauthorized Appearance of Pietz

On May 5, Shein filed an opposition to my motion for sanctions. Despite not being authorized to practice in Nevada, Pietz co-signed the opposition and submitted a

declaration in which he referenced my protest websites against him and other attorneys.

It appears that after posting of a protest website against Attorney Bathke who initially appeared in Shein's first filing at madysonbathke.co, Bathke removed herself from the case and she was replaced by Pietz who is also representing Shein in California.

While in his frivolous opposition Pietz accused me of defective service of legal documents, Pietz himself did not serve me his opposition and I have had to file a reply without any knowledge of the content of the opposition as I could not afford to purchase the four documents he had filed containing hundreds of pages.

I only received the documents after I lodged a complaint with Pietz who was obviously avoiding the service of documents on me to put me in disadvantage and deprive me of the ability to respond to the malicious and fabricated allegations of his filing.

Pietz also referenced my prior protest websites against Judge Joanna Kishner, attempting to further portray me as a malicious and vexatious litigant.

In their opposition, Shein offered to waive formal service of the First Amended Complaint (FAC), which, at that point, had not yet been served.

H- Fabricated anti-SLAPP Motion

Despite this, on May 8—one day before the Sacramento County Sheriff formally served the FAC on May 9—Shein filed a fabricated and wholly meritless anti-SLAPP motion, seeking to dismiss the FAC and recover attorneys' fees.

In this baseless motion, Shein and its attorneys, with blatant disregard for the facts, truth, justice, and due process, resorted to outright lies and deception. They falsely argued that the gist of the FAC was not the unlawful and retaliatory takedown of my websites, but rather the attorneys' appearance in the case, thus inventing grounds for an anti-SLAPP motion where none existed.

I- Walther's Perjury in Fabricated Declaration

Attorney Walther committed perjury in his declaration submitted in support of the anti-SLAPP motion, falsely feigning ignorance regarding the takedown of the websites—when in fact, it was he who orchestrated the takedowns in retaliation for my protected speech.

In his May 8 declaration, Walther, under penalty of perjury, falsely stated:

"My understanding is that the online registrar that hosted Plaintiff's websites flagged them as abusive due to Plaintiff's SPAM email campaign, after which Plaintiff chose to de-publish all four sites flagged by the registrar."

Walther knew this statement to be entirely false for multiple reasons:

1. My emails to BHFS employees, who by then were defendants in two lawsuits, did not constitute spam but rather constituted protected speech during ongoing litigation.
2. The domain registrar had no jurisdiction or authority to make any determination regarding the legality of my litigation-related communications with the defendants.
3. Even if the registrar somehow had such jurisdiction, or my emails could be considered spam (which was not the case here), neither BHFS nor the registrar provided any justification for also targeting and demanding the removal of my personal website, diinele.com, which had no relation whatsoever to the ongoing litigation.

J- Extortion

I consider the defendants' actions in seeking attorneys' fees through a fabricated anti-SLAPP motion—as well as the takedown of my websites and the perjury committed by Walther—to constitute criminal acts of extortion and perjury.

Immediately upon receiving the anti-SLAPP motion on May 8, I contacted Shein and its attorneys, warning them of the consequences unless they withdrew the fraudulent motion. Receiving no response, I filed three motions on May 12:

1. Motion to Strike Anti-SLAPP Motion.
2. Motion to Strike all filings submitted by Pietz, who continues to practice in Nevada without authorization.
3. Motion for Sanctions against Shein and its attorneys.

These matters were set for hearing on July 15.

It appears that following these filings, ex parte communications occurred between Attorney Walther and Judge Sturman, as the originally scheduled hearing date for the anti-SLAPP motion was abruptly moved from June 10 to May 20, 2025—just 12 days after the motion's filing and less than 10 judicial days after service, violating procedural

timelines. Notably, May 20 was originally set for Shein's Motion to Dismiss the Complaint, further suggesting procedural manipulation and collusion.

The Court gave me only seven days to prepare, response and appear for the anti-SLAPP hearing.

On May 13, I filed an Ex Parte Motion to Continue the Anti-SLAPP Hearing, explaining that I needed additional time to secure legal representation and to pursue administrative and criminal referrals against Attorney Walther for perjury, Attorney Pietz for unauthorized practice of law in Nevada, and Shein for its frivolous and retaliatory business practices.

Later the same day, following my filings, Shein filed a Motion to Associate Pietz as counsel, requesting a hearing date. Within an hour, and through an ex parte appearance without my notice, knowledge, or participation, Shein obtained an Ex Parte Order setting the hearing on the Pietz association motion for May 20—the same date as the anti-SLAPP hearing—giving me only seven days to respond.

On May 14, I filed a motion requesting that my pending motions, currently set for July 15, 2025, be advanced and consolidated with Shein's motions set for May 20, so that all related matters could be heard together.

However, the Court has not ruled on my request to continue the hearing, which had already been set in violation of my procedural due process rights, and further refused to consolidate my motions for joint consideration.

Within hours, Attorney Walther filed a frivolous opposition to my Motion to Continue the Hearing, claiming that my request was frivolous and intended to delay Shein's legitimate rights—despite the obvious procedural and factual discrepancies favoring my position.

As of the date of this filing, none of my three Ex Parte motions filed with this Court have received any response, while Shein's frivolous motions have been expedited at an unprecedented speed following what I believe to be unlawful communications between Shein's attorneys and the Court, all done without my knowledge, presence, or consent; just as had been the case in my two previous cases in Eighth Judicial District.

Despite the fact that I have filed multiple documents in this case, supported by facts and evidence clearly demonstrating the validity of my claims and exposing the baselessness of Shein's filings, none of that appears to matter.

It has become abundantly clear that Judge Gloria Sturman is not acting impartially, and appears to be favoring Shein's attorneys regardless of the law or facts before the Court.

K- Gross Abuse of power and Violation of Civil Rights

Not only is Judge Sturman abusing her authority through these biased rulings, but it also appears that she has engaged in improper, extra-judicial activities, further undermining the integrity of these proceedings.

After I began my email campaign, both BHFS and Shein blocked my email address. In response, I attempted to use several alternative email addresses to reach over 400 law firm employees, but each was blocked immediately after sending the initial batch of emails.

Following this pattern of obstruction, I warned Shein and its attorneys that, moving forward, I would send courtesy copies of my court filings to their employees via the court's e-filing system, ensuring they could not block or avoid receiving official communications.

However, shortly after issuing that warning, I discovered that I was blocked entirely from using the e-filing system to send courtesy copies—even to myself. I was effectively shut out from serving anyone through e-filing.

This alarming development reinforced my belief that there is an ongoing criminal conspiracy between Shein, its attorneys, and Judge Gloria Sturman to deprive me of due process and unlawfully suppress my rights.

L- Further Violation of Civil Rights

In response, I sought to file a Statement of Disqualification to have Judge Sturman removed from the case. However, when I attempted to do so, I was informed by the court clerk that I would be required to pay a \$500 filing fee—despite the fact that I have an approved fee waiver and publicly available resources, including the Court's own information, make clear that no such fee is required for a judicial disqualification filing in the Eighth Judicial District of Nevada.

M- Pattern of Abuse of Power and Violation of Civil Rights in Eighth Judicial District

This is now the third case in which I have appeared in pro per before the Eighth Judicial District of Nevada, only to have my rights systematically violated by what appears to be a pattern of judicial bias favoring powerful corporations and their high-profile attorneys.

As a Middle Eastern transgender woman, I believe I have once again become the target of discriminatory and malicious treatment at the hands of vindictive and biased Jewish judges, whom I allege have been influenced by the racially charged and defamatory tactics used by corporate attorneys in these proceedings.

These repeated abuses of power, relying on the same harmful playbook of racial and political prejudice, have caused me profound emotional, physical, and financial harm.

It is clear to me that these judges have abandoned their duty to uphold justice, and instead prioritize protecting corporate interests over safeguarding the rights of vulnerable individuals like myself.

VIII. SUPPORTING EVIDENCE

All relevant evidence is publicly available at: <https://complaint.legal>

SIGNATURE

Respectfully submitted,

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