



1 **REQT**
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10 *Attorneys for Shein Distribution Corporation*

11
12 **DISTRICT COURT**
13 **CLARK COUNTY, NEVADA**

15 DIINELE DINAALI, an individual,
16
Plaintiff,
17 v.
18 SHEIN DISTRIBUTION CORPORATION,
a Delaware corporation; BROWNSTEIN
HYATT FARBER SCHRECK, LLP, a
19 Washington Corporation; CHRIS XU, an
individual; YINAN ZHU, an individual;
20 NORMAN BROWNSTEIN, an individual;
RICHARD BENSON, an individual; ERIC
21 D WALTHER, an individual; MADYSIN B
BATHKE, an individual; DOES 1-20; ROE
22 CORPORATIONS 1-10, inclusive;;
23
Defendants.,
24 Defendants.

Case No. A-25-915392-C
Dept. 26

**SDC’S REQUEST THAT
HEARING BE RESET**

25 Defendant Shein Distribution Corporation (“SDC”) hereby requests that the hearing on
26 SDC’s: (1) Anti-SLAPP Special Motion to Dismiss, or, in the Alternative, Motion to Dismiss the
27 First Amended Complaint, filed May 8, 2025, and (2) Motion to Associate Counsel, filed May 13,
28 2025, be reset to the Court’s first available hearing date. Both of these motions were previously

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1 set to be heard by this Court on May 20, 2025.

2 After the plaintiff and SDC appeared at the May 20 hearing, the Plaintiff indicated that she
3 intended to file a document seeking to disqualify The Honorable Judge Gloria J. Sturman.

4 Following the hearing, however, Ms. Dinaali emailed counsel for SDC and advised that she
5 no longer intends to file a Statement of Disqualification as to Judge Sturman. In this email, Ms.
6 Dinaali has advised that she is purportedly not able to afford a \$500 bond,¹ and has accordingly
7 decided instead to seek injunctive relief as well as “sanctions for discrimination” in “federal
8 jurisdictions”. A copy of the email in question is attached hereto as **Exhibit 1**.

9 As of midday on Tuesday May 27, 2025, it appears that no disqualification papers have
10 actually been filed in this Court. Since there is a statutory requirement for speedy disposition of
11 anti-SLAPP motions, NRS 41.660(3)(f), and in order to make sure that this matter proceeds
12 expeditiously in the appropriate department, SDC therefore respectfully requests that its two prior
13 motions previously set for May 20, 2025, be re-set to the Court’s first available hearing date.

14 DATED this 27th day of May, 2025.

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16 */s/ Eric D. Walther*

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22 *Attorneys for Shein Distribution Corporation*

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27 ¹ *But see* Original Complaint, which was verified, at ¶¶ 13-16 (alleging that the plaintiff is “long
28 time VIP customer of Shein” with “a total of nine hundred and ninety-nine (999) purchase orders
totaling approximately \$25,000 with Shein” many of which were “meant as costumes for the
characters” in a “large-scale music video production”).

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and pursuant to NRCP 5(b), EDCR 8.05, Administrative Order 14-2, and NEFCR 9, I caused a true and correct copy of the foregoing **SDC’S REQUEST THAT HEARING BE RESET** to be submitted electronically for filing and/or service with the Eighth Judicial District Court via the Court’s Electronic Filing System and via U.S. Mail on the 27th day of May, 2025, to the following:

Diinele Dinaali
4200 Paradise, Apt. 2028
Las Vegas, NV 89169
deenna@my.email

/s/ Eric D. Walther

An employee of BROWNSTEIN HYATT FARBER
SCHRECK, LLP

EXHIBIT 1

Morgan Pietz

From: Deenna <deenna@my.email>
Sent: Tuesday, May 20, 2025 11:34 AM
To: Docketing
Cc: Morgan Pietz; us_legal@sheingroup.com; legal@shein.com
Subject: Re: FW: Dinaali v SDC - LASC No. 25STCV07490
Attachments: Statement of Disqualification of Judge Gloria Sturman.pdf

Mr. Pietz,

As you are aware, Judge Sturman did not accept the filing of my Statement of Disqualification on her at the hearing this morning and referred me to the administrative office on the second floor for filing where they referred me to the clerk of the court on the third floor and they refused to accept my filing unless I paid a \$500 bond/fee and after that I filed in the judge's chambers.

So, as I cannot afford the \$500 and even if I were the judge is not accepting any filings in her court (I am basically being given the runaround) I am unable to file the Statement of Disqualification on the judge, I will be hiring a LGBT civil rights attorney and pursuing sanctions for discrimination in federal jurisdictions.

Therefore, based on Judge Sturman's statement this morning, the case cannot proceed until such time as I get an injunction from the District of Nevada so that I can file my Statement of Disqualification on the judge.

I am attaching a courtesy copy of the Statement of Disqualification which I had ready for you in the court and would have made available to you had you appeared in person at the hearing.

Please let me know if you still plan to continue abusing my rights so that I can take the next step I have planned for you.

Regards,
Diinele Dinaali



On May 16 2025, at 4:47 pm, Deenna <deenna@my.email> wrote:

Mr. Pietz,

I just want to bring it to your attention that it appears that after my communication with you, your team had an appropriate ex parte communication with the Nevada judge as my ability to efuel has been compromised again.

I am preparing two motions, one is an opposition to the anti-SLAPP and the other reply to your opposition to the preliminary injunction. Once you see my filings, you will see that not only you had no

grounds for making of either of those, but you are now subject to criminal prosecution along with the judge.

It is going to take me about 3 hours to prepare them. You have until 8 tonight to make up your mind. After that I will not be negotiating with you ever again.

What you do not understand is that [name.com](#) is crapping in its pants right now. Any adverse ruling on me not only will not fly, but will reinforce my case against [name.com](#).

So go ahead and ignore me and continue your criminal conspiracy and see where your careers are going to go.

You have till 8. After that my sole purpose would be criminal prosecution of the lot of you. I don't need any money from you anymore, just your imprisonment.

Regards,
Diinele

On May 16 2025, at 1:46 pm, Deenna <deenna@my.email> wrote:

Mr. Pietz,

Please view the draft form of a complaint I am drawing up against you, your clients and BHFS. I am going to update it after I have had a chance to add your opposition to the matter and intend to: (1) file this with all agencies mentioned, (2) file another ex-parte application asking the judge to halt the May 20 proceedings or else I intend to take the matter to the Chief Judge Wiese to have this judge disqualified from the case.

Because of the magnitude of the abuse of process by you, your client and other attorneys in this case exerting influence over a biased and racist judge, I consider this to be a Federal Civil Rights violation and I intend to hire a civil rights attorney to sue the judge and the District too for violation of my civil rights.

This complaint will be ready before the end of today and will be filed with the court and oversight agencies. As such, I am giving you and your clients until the end of business today that you rescind the frivolous anti-SLAPP motion or in the alternative let me tell you in no uncertain terms that once this complaint is complete and goes out, your clients, other attorneys and the judge can shove that anti-SLAPP ruling as I intend to pursue criminal prosecution at this time against all of you including the judge.

Based on what I have read so far in your opposition, having an agent does not absolve your client of having an accessible physical address.

I am going to respond to your opposition and you will see that by challenging my service, you are undermining the very argument for the need for access.

If I could not have served the documents at that address, it means your client is breaking the law. You cannot have it both ways.

I set you a trap and you fell for it. I will give you until the end of business today to adjust your stance. You guys are playing with fire and could get burnt.

The civil lawsuits should be the least of your worries. You went after my business and I am now going after yours through criminal prosecution. I am going to show Walther a lesson he will never forget in his pathetic and miserable life. I am going to fuck up the asshole's law license and put him behind bars.

<http://jerrywiese.online/>
<http://gloriasturman.online/>

Regards,
Diinele Dinaali

P.S. : Your pitiful BHFS colleagues have blocked this email address which is my official case email. Please forward this to them and I will be using the other email for service and communication from now.

On May 16 2025, at 12:11 pm, Docketing <docketing@pstrials.com> wrote:

Ms. Dinaali,

It appears you were omitted from the below email. Please confirm receipt.

PS TRIAL DOCKETING

From: Docketing
Sent: Friday, May 16, 2025 11:40 AM
Cc: Morgan Pietz <morgan@pstrials.com>
Subject: Dinaali v SDC - LASC No. 25STCV07490

Ms. Dinaali,

Please find attached an email courtesy copy of the papers that this office filed on May 9, 2025 on behalf of SDC in the above-referenced action:

1. DEFENDANT SDC'S NOTICE OF GENERAL APPEARANCE AND OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
2. DEFENDANT SHEIN DISTRIBUTION CORPORATION'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF IT'S MOTION
3. DECLARATION OF MORGAN E. PIETZ IN SUPPORT OF SDC'S OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
4. APPENDIX OF EXHIBITS

The attached papers were in opposition to the motion for preliminary injunction that you filed on April 24, 2025, which is currently set hearing on May 22, 2025.

On a going forward basis, would you like to agree that any documents being served between you and SDC in the above-referenced action can be done via email? For service on SDC in this case, you may serve SDC using the email address sending this message (docketing@pstrials.com). If you would like to agree to accept service via email, then you will need to please complete form EFS-005-CV ([which can be found here](#)).

Thank you.

PS TRIALS DOCKETING TEAM