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PLAINTIFF IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

DIINELE DINAALI, an individual,
Plaintiff,

vs.

SHEIN DISTRIBUTION CORPORATION, a Delaware corporation;
SPEEDX, a New York corporation;
BROWNSTEIN HYATT FARBER SCHRECK, LLP, a Colorado corporation;
IDENTITY DIGITAL INC., a Washington corporation;
CHRIS XU, an individual;
RICHARD BENSON, an individual;
ERIC D WALTHER, an individual;
MADYSON B BATHKE; an individual;
JENNIFER SWALLOW, an individual;
AKRAM J ATALLAH, an individual;
CAMERON WALKER, an individual;
DAVE MCBREEN, an individual;
DOES 1-20;
ROE CORPORATIONS 1-10, inclusive;
Defendants.

Case No.: 25STCV07490
Dept.: 57
[Hon. Michael Small]

PLAINTIFF'S SUPPLEMENTAL MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SANCTIONS AGAINST DEFENDANTS

Hearing Date: October 9, 2025
Time: 8:30 am

Complaint Filed: March 17, 2025
Trial Date: Not Set

RESERVATION ID: 614295628744

TO THIS HONORABLE COURT, DEFENDANTS AND ATTORNEYS OF RECORD:

Plaintiff DIINELE DINAALI respectfully submits this addendum to the previously filed Motion for Sanctions against Defendants SHEIN DISTRIBUTION CORPORATION ("Shein"), attorney ERIC D. WALTHER ("Walther"), and attorney MORGAN E. PIETZ ("Pietz"), in light of continuing misconduct, procedural violations, and retaliatory legal tactics that threaten the integrity of this proceeding and Plaintiff's constitutional rights.

I. OVERVIEW OF DEFENDANT MISCONDUCT

The following updated information supports Plaintiff's pending Motion for Sanctions and demonstrates a pattern of litigation abuse, misrepresentation, unauthorized legal practice, and bad faith conduct by Defendants and their counsel.

1. **Walther has submitted a knowingly false and perjured declaration** in support of the fabricated Anti-SLAPP motion, falsely claiming that the domain registrar took action on its own and that Plaintiff voluntarily de-published her websites. In truth, Walther personally threatened the registrar, causing Plaintiff's sites to be removed under duress. This false declaration constitutes material perjury under penalty of perjury and is part of a coordinated scheme to suppress Plaintiff's protected speech and gain improper advantage in litigation.
2. **Attorney Morgan Pietz has appeared and filed pleadings in this Court despite not being admitted pro hac vice in Nevada**, which constitutes unauthorized practice of law under Nevada Supreme Court Rule 42 and potentially violates Business and Professions Code §§ 6125 and 6126 in California as well. Pietz's conduct is not merely procedural but criminal and unethical.
3. **Defendants Shein and its attorneys have abused the Anti-SLAPP process** by filing a frivolous motion based on mischaracterized facts and false statements, with the intent to:
    a- Dismiss Plaintiff's meritorious claims,
    b- Extort attorneys' fees,
    c- Preempt jurisdictional challenges,

d- Silence Plaintiff's protected speech.

II. ONGOING INVESTIGATION AND REFERRALS

Plaintiff has initiated complaints and referrals against Defendants and their counsel with multiple oversight bodies, including:

- The State Bars of California and Nevada;
- The California Attorney General and District Attorney's Office for perjury, extortion, and false business filings;
- The Nevada Commission on Judicial Discipline for apparent ex parte collusion between Judge Gloria Sturman and defense counsel;
- The FBI and U.S. Attorney's Office, regarding deprivation of civil rights under color of law and obstruction of justice.

These complaints are pending and provide additional context for why sanctions are not only warranted but essential to protect the administration of justice.

III. PIETZ'S MALICIOUS LITIGATION TACTICS

Pietz, rather than addressing the substance of his client's alleged misconduct, has resorted to a pattern of fraudulent and unethical behavior that warrants serious scrutiny. In lieu of presenting a valid defense to Plaintiff's claims, Pietz has combed through Plaintiff's past court history and selectively misrepresented events, statements, and filings in an effort to prejudice the presiding judges and distort the factual record. This strategy not only undermines the integrity of the proceedings but is also designed to distract from the unlawful and retaliatory actions of his clients.

In particular, Pietz has made false and misleading statements regarding Plaintiff's legitimate attempts to obtain injunctive relief through ex parte applications filed in both Nevada and California. In filings submitted to this Court and others, he has portrayed Plaintiff's efforts as meritless or procedurally defective without acknowledging the legal context or Plaintiff's good faith efforts to comply with court rules.

In the Nevada action, Pietz and co-counsel Walther falsely described Plaintiff's ex parte application for preliminary injunction in the present case as improper, ignoring the fact that the application was necessitated by their own clients' conduct, which included the retaliatory takedown of Plaintiff's websites. The Nevada judge refused to rule on or acknowledge the ex parte motion, which still remains pending. Instead, the Court advanced Defendants' anti-SLAPP motion with only seven days' notice, denying Plaintiff due process and confirming what appears to be a coordinated effort between the Court and Defendants to suppress Plaintiff's claims.

In the present action, Plaintiff filed an ex parte application with the Writs and Receivers Department on April 29, 2025, requesting an urgent hearing for the following day, April 30. The application was rejected within two hours—without a hearing—on technically erroneous grounds that could have easily been addressed if Plaintiff had been afforded an appearance. The rejection was improper, and Plaintiff maintains that her application complied in substance with the court's procedural requirements.

Pietz has falsely asserted that this application was rejected for merit-based reasons, knowing full well that the Los Angeles Superior Court's local rules prohibit ex parte hearings prior to a case management conference—a fact the court clerk had already informed Plaintiff. Despite this, Pietz mischaracterized the procedural rejection as substantive failure, once again seeking to bias the judge and divert attention from the actions of his clients.

Most troubling is the apparent ex parte communication and collusion between defense counsel and the judge. Plaintiff gave timely notice of her ex parte application and served Defendants around 5:00 a.m., well before the scheduled hearing time. Yet, within hours, the application was rejected, and the speed and alignment between Defendants' narrative and the judge's response strongly suggest improper contact or influence. This mirrors similar conduct in the Nevada action, where Defendants appeared to influence scheduling decisions behind closed doors.

In light of these events, Plaintiff is actively pursuing criminal and administrative complaints

against attorneys Pietz and Walther, and the Writs Department judge, Honorable Stephen I. Goorvitch, for collusion, obstruction of due process, and abuse of judicial discretion.

These events are not isolated missteps—they reflect a coordinated campaign to deprive Plaintiff of constitutional rights, suppress protected speech, and subvert the judicial process through misinformation, intimidation, and procedural manipulation.

Plaintiff reserves the right to amend this list as further evidence of misconduct emerges.

IV. PRAYER FOR RELIEF

Plaintiff respectfully renews her request for:

1- Monetary and non-monetary sanctions under Code of Civil Procedure § 128.5 and § 128.7;

2- A referral to the California State Bar for ethical violations;

3- Judicial notice of ongoing investigations;

4- Any other relief the Court deems just and appropriate in the interest of justice.

Respectfully submitted on May 21, 2025,

/S/DIINELE DINAALI

Plaintiff in Pro Per, DIINELE DINAALI

PROOF OF SERVICE

I, Ali Fardi, am over the age of eighteen years and not a party to this action. On May 15, 2025, I served the document listed below:

PLAINTIFF'S SUPPLEMENTAL MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SANCTIONS AGAINST DEFENDANTS

via efiling and email, to the following addresses:

1- **Morgan E Pietz**

morgan@pstrials.com

2- **Shein Distribution Corporation**

us_legal@sheingroup.com

legal@shein.com

3- **Brownstein Hyatt Farber Schreck LLP**

Norman Brownstein: nbrownstein@bhfs.com

Richard Benson: rbenenson@bhfs.com

Eric Walther: ewalther@bhfs.com

Madyson Bathke: mbathke@bhfs.com

4- **Identity Digital Inc.**

support@identity.digital

I declare under the penalty of perjury that the forgoing is true.

DATE: May 15, 2025