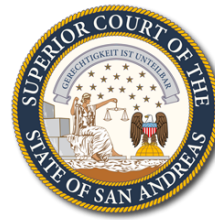


Motion - 0002

County of Los Santos



Litt Blackwell - Law Office of San Andreas

Case No. N/A

OFFICIAL DOCUMENTATION

PLAINTIFF'S MOTION TO DISQUALIFY JUDGE KAT MONTGOMERY

COMES NOW, the Plaintiff, Apollo Ross and Prince K, by and through counsel (Litt Blackwell), and respectfully moves this Honorable Court to disqualify **Judge Kat Montgomery** from presiding over this case due to judicial negligence, procedural error, and conduct that undermines the integrity of the judicial process. In support of this motion, Plaintiff states as follows:

FACTUAL BACKGROUND

1. This case was properly scheduled for a hearing on **February 3, 2025, in the evening**, as reflected in the court's official records.
2. Despite this, **Judge Kat Montgomery** convened court in the **afternoon** without providing proper notice to the parties, effectively preventing the Plaintiff from appearing at the originally scheduled time.
3. Due to this **judicial error**, Judge Montgomery **wrongfully issued warrants** against Plaintiff and other parties, despite the fact that they were in compliance with the scheduled appearance.
4. This **improper issuance of warrants** constitutes an abuse of judicial authority, causing unnecessary legal hardship and violating fundamental due process protections.
5. Judge Montgomery's actions **demonstrate a clear lack of impartiality and competence**, raising legitimate concerns regarding her ability to fairly and justly preside over this matter.

ARGUMENT

I. Judicial Conduct Rules Require Disqualification When Impartiality is in Question

Under **San Andreas State Judicial Code of Conduct**, a judge must recuse themselves if their impartiality might reasonably be questioned. Judge Montgomery's negligence, refusal to correct the error, and unjustified issuance of warrants **create a strong appearance of bias and unfairness**, warranting her removal from the case.

II. Due Process and Fair Trial Rights Have Been Compromised

By unilaterally altering the court schedule and penalizing the Plaintiff for the court's mistake, Judge Montgomery has **violated fundamental due process rights** guaranteed under the **Fifth and Fourteenth Amendments**. A fair and impartial judge is essential to ensuring justice, and Judge Montgomery's actions **call into question her ability to uphold these principles**.

"JUSTICE DELIVERED, EXCELLENCE GUARANTEED."

Litt Blackwell ©



Motion - 0002

County of Los Santos



III. The Integrity of the Judicial System Requires Her Removal

Allowing Judge Montgomery to remain on this case would **undermine public confidence in the judiciary** and create a perception of unfairness. To **restore trust in the legal process**, it is imperative that she be removed and replaced with a neutral judge.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. **Immediately disqualify Judge Kat Montgomery** from presiding over this case;
2. **Assign a new, impartial judge** to oversee the proceedings;
3. **Void any improper rulings and orders issued as a result of her judicial error;** and
4. **Grant any additional relief** this Court deems just and proper.

Damian Blackwell

Damian Blackwell
Senior Partner - Litt Blackwell

Louis Litt

Louis Litt
Managing Partner - Litt Blackwell

"JUSTICE DELIVERED, EXCELLENCE GUARANTEED."

Litt Blackwell ©