

Here's your revised and accurate task plan based on your updated notes and corrections:

Today – Sunday, April 6

- Draft reply briefs for motions the DA failed to oppose
- Draft supplemental reply to DA's omnibus opposition
- Finalize reconsideration motion to appellate court
- Prepare federal complaint and habeas corpus filings
- Send out all subpoenas (priority)
- Determine officer subpoenas needed
- Go over witness list & direct exam questions
- Prepare cross-exam questions for DA & officers

Monday, April 7 – Filing Day

- File all reply briefs for unopposed motions
- File proof of service (POS) for reply briefs
- File supplemental declaration for CCP 170.6 motion
- Get Melissa's subpoena stamped
- Prepare for evidentiary hearing

Tuesday, April 8 – Evidentiary Hearing

- Attend hearing
- Be ready to file appellate reconsideration if Judge Bjork refuses recusal
- Trigger contingency plan to file appellate/federal materials if needed

Wednesday, April 9 – Trial

- Attend trial
- Have all materials ready in case of custody: someone to file your federal and appellate documents

You're in a solid position and way ahead of most pro per litigants — but here's a tight checklist of final trial-readiness tasks to make sure nothing critical gets missed:

MASTER TRIAL READINESS CHECKLIST

1. Trial Documents (Print + Flash Drive)

- All motions (dismissals, Brady, suppression, 995, etc.)
- All filed affidavits + exhibits (especially Davis & Melissa)
- Trial Objection Cheat Sheet
- Voir dire questions
- Opening statement (clean copy to read)
- Directed verdict script (in case DA has no witnesses)
- Trial binder — print in hearing order for quick flipping
- Flash drive w/ all PDF copies for emergency digital filing or handoff

2. Witnesses

- Confirm appearance of Emmanuel Davis, Melissa Paradise, any others
- Serve Melissa's subpoena if not done (DA may try to block her)
- Prepare direct exam question sheets for each witness
- Confirm who needs officer subpoenas (e.g., Hal Fien or any testifying cops)

3. Evidence & Exhibits

- Label and organize all exhibits (with cover pages or tabs)
- Bring photos, video, text screenshots — bring originals and copies
- Make exhibit list (even if already filed, have printed copy for court)
- Prepare foundation questions to admit each one (I can write these for you)

4. Courtroom Prep

- Motion to Continue Without Waiver (Maybe filing not drafted yet)

- Motion to Compel Ruling on Davis Affidavit
- Objection to Protective Order
- Bring 3 printed copies of each (court, DA, your records)
- Notebook to take notes on witnesses / jury
- Pen + highlighter
- Clean shirt, no hoodie, respectful tone — be calm even when provoked

5. Final Legal Tools

- Cheat Sheet for Objections
- Voir Dire Questions (need me to finish these?)
- Opening Statement (want me to finalize?)
- Directed Verdict Script
- Custody plan: trusted person ready to file your federal complaint or emergency appeal

6. Appellate/Federal Backup

- Reconsideration Motion to Appellate Court (trigger if recusal denied)
- §1983 Complaint Drafted and Ready
- Habeas Corpus Petition ready if jailed post-trial
- Contact list of emergency filers

⚠ HIGH PRIORITY ITEMS STILL OUTSTANDING (based on what I've seen):

- Finish voir dire questions
- Finalize and print opening statement
- Draft directed verdict script (if no witnesses show up)
- Prepare exhibit foundation scripts
- Melissa Paradise subpoena + appearance confirmation

If you want, I'll knock out the opening statement, voir dire, and directed verdict script right now as a bundle. Just confirm and I'll move fast.

Let's take this all the way. You're almost there.

