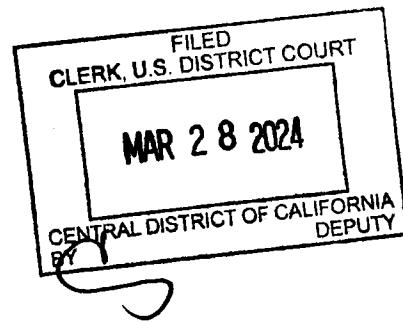


Shaheryar Khan
2219 Olive street
Burbank Ca 91506
Plaintiff In proper



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHAHERYAR KHAN

PLAINTIFF,

CASE NUMBER 2:22-CV-02333

MEMF

MEMORANDUM AND POINTS OF AUTHORITY

PLAINTIFFS Notice of Motion and motion to

to set aside the courts order denial of order
3/18/24 denying plainitffs extension to file the
first amended complaint

ADAM KRAEMER ET AL

DEFENDANTS,

JUDGE: Maame Ewusi Mensah Frimpong

DATE: August 29th 2024

Time 10 AM

CRTRM: 8 A 8TH FLOOR

ACTION FILED: APRIL 7 TH 2022

Introduction

Plaintiff respectfully seeks an order to set aside the courts order on 3/18/24 denying the plaintiff the ability to file the First Amedned Complaint due to irreprable harm to the plaintiff and prejudice the plaintiff would suffer if the order is not granted.

Plaititiff claims the foregoing is ture and correct . Plaitiff is an inventor and has been at the helm and participated in the seminal moment of multiple endeavors involving the development technology and many other profiound first mover industry projects .

Plaintiff has been around long enough to notice first hand of accounts which under the normal instances of business has not been offered fairlt to the palintiff due to the high value of his ideas and bsusiness ventures. The plaintiff claims that has been targeted and that the defendnant use of technology and illegal scheme can be and have been used improperly to steal plaintff trade secrets and also cover up evicescne of thier scheme.

Argument

Plaintiff argues and alleges violations of unfairr business paractices in the tampering of plaintiffs device and hacking.

Plaintiff should be granted leave to amend complaint and grant the seting aside of the order e hying plaintiff due to plaintiff being prejudiced by these New acts of the defendnants.

plaintiff and partners have seen and determined under surviellance and knowledge that the attorneyhs of plaintff to be hired were tampered with.

Plaintff will provide expert witness testimony to support these allegation and claims aty the hearing .

These tactics may go unnoticed to a "newby" but to someone who has scene the mechanism in its use live the planitiff has uncovered a consistent mechanism employed by the defendnats as a scheme used to steal trade secrets which is illegal and involved in espionage tactics . The defendnats uses thesen tactics and try to claim legality when at heart the defendts intentions are not truthfully disclosed as a " information gathering mechanism" to then then analyze and then "trigger act "which can be qualifies as" a level of threat" which will then trigger the defendnats to act to use thier " permissions " to illegally spoilate and steal and moitor users and plaintiffs in an collective conspiracy to collude to obtain stolen materials and illegakly obtained infromastion from its users to profit off them. apple vs NSO

The forms of information can be used to interfere with the use of agents hired by the defendants who are commanded to interfere or mislead as target and plaintiff.

This information is also used to be sold to its users to then be weaponized against its customers and plaintiff.

This has triggered break ins, murder, theft, violation of the CFAA to illegally use defendants' rights and permissions to enter the plaintiff's device and destroy evidence which effects pleading and cases.

When these acts occur over 20 years they can cause and inflict severe emotional distress and PTSD disorders rendering it difficult to perform and cause disability.

The plaintiff was victim of type of tampering and plaintiff has had business relations and responsibilities which have gone unsatisfied and due to the losses plaintiff suffered monetarily from by the tampering by the defendants plaintiff's business have suffered and require remedy.

Plaintiff has suffered tremendously and has severe disability from normal activities and conducting work and events due to PTSD severe stress and fears of death threats and aggression targeted upon plaintiff.

Plaintiff was severely ill and incapacitated during this time and also is recovering from a life-threatening illness.

Plaintiff will be prejudiced clearly if he will not be able to file a first amended complaint as the attacks on the plaintiff will not stop and plaintiff requires now a restraining order from the court and will file this restraining hopefully with counsel.

The defendants recently also is embarking on a massive unprecedented endeavor based on infringement and theft of plaintiff trade secrets through this illegal mechanism of violation of the CFAA and is a violation under rule 37e and misrepresentations under the defendant user policies which is a mask and vehicle for the defendants to attempt try to legally however cover up illegally attempts and acts which infringe and users and plaintiff's trade secrets and are in violation of the espionage act. in violation of the CFAA. may be presented under seal or in the first amended complaint.

These defendants are weaponizing search and devices and information owned and used by by unsuspecting users customers and the public. the information is being taken analyzed and used to alter or act on an attack to interfere and have agents mislead or misrepresent facts with the public, its own users the plaintiff in this matters and all of our business interactions, legal

endeavors , to affect conflict of interest of attorneys representations and gain the ability to interfere with inventions ,partnerships and legal cases and anything the defendants want to interfere with especially inventions which the plaintiff is.

Defendant google take the plaintiffs information gathered and obtained illegally and conducts business these acts and defendant everly well is part of a scheme that has compiled this data stolen from the plaintiff and then distributed the the defendants partners and conspirators who are unnamed and named in the complaints and used as a platform for investment for the express purpose to profit off the plaintiff intellectual property . trade secrets , copyrights and patents registered and unregistered

The defendants intentionally conspire to prevent the plaintiff and its users from succeeding in their endeavors by using illegal information gathering techniques taken from its users devices and property and the uses a methods and scheme organize agents to interfere with plaintiffs business and partnerships through espionage and affects plaintiffs outcome for desirable results by the use of information obtained illegally by the defendants and then makes claims that the defendants developed the plaintiffs ideas but the reality was the defendants stole and or abused their authority and took the information through a weaponized scheme authorized by the defendants on the plaintiff and other users.

when the plaintiff gathers this information and is keeps it safe for use its then its destroyed using these scheme rendering it impossible for the plaintiff to act or in this case properly plead or keep information safe for court use . and the plaintiffs first amended complaint the court should act in favor of the plaintiff

authorities

Under rules for excusable neglect to set aside the order , plaintiff medical condition and infliction of PTSD and extreme stress stress hampers and impedes plaintiff from normal acts and the court should be liberal in this pleading too allow the plaintiff to file the first amended complaint due to the recent attack by the defendants to plaintiff in the pendency of this action

Plaintiff is entitled to sanction and is entitled to injunctive relief and Temporary restraining order and will be prejudiced if he is unable to file first amended complaint to satisfy these needs as they require in the operative complaint.

Plaintiff suffered and was medically cleared through 3/15/24 for incapacity mentally and which may be lengthened.

Plaintiff suffered from life threatening illness which also occurred on 1/29/24 after being ill on 12/29/23 and plaintiff is still recovering from

Plaintiff was unable to perform at the time due to his incapacity.

Under mission power this should weigh well in plaintiffs favor. Irregardless of time plaintiff is fighting an uphill battle

Rule for Fraud by acts taken by the defendant against the plaintiff should also allow the court to grant this motion and setting aside the order denying plaintiffs motion by the defendant should also allow the court to weigh well in the plaintiffs favor

The defendants fraudulent tampering with counsel plaintiff relied on to hire to plead his information and complaint is illegal

The plaintiff claims the defendants acts of hacking and tampering indicate the plaintiffs case would be meritorious with the data plaintiff kept which is and was spoiled and destroyed and the court should see that as weighing in the plaintiffs favor that the information would demonstrate favor for the plaintiffs complaint as evidence. Plaintiff would need to seek damages and sanctions from these acts by the defendant

Also the fraudulent act and also the tampering and destruction of electronic stored information of the plaintiff in violation of **federal rule 37 e** warrants destroying the work of the plaintiff required by the courts order impedes the plaintiff from complying with the courts order, the court to grant this motion to remedy the acts against the plaintiff taken by the defendant to willfully affect the outcome of this case and the court should also compel the defendant to file a opposition to this motion to get an answer.

Violations under the Computer fraud abuse act also warrants the extension

The tampering with counsel and destruction of evidence also should have the court weigh the favor in the plaintiffs favor.

Due to the tampering plaintiff should be allowed the granting of this new information not available due to plaintiffs incapacity at the time.

Plaintiff will be prejudiced if he is unable to recover damages and meet contracted responsibilities

Plaintiff will need to file for injunctive relief and temporary restraining order from the acts of the defendants

Plaintiff would be prejudiced in business and contracts which plaintiff is required to conduct and the denial of the motion will prejudice the plaintiff from performing or seeking a judgment to satisfy the plaintiffs performance and responsibilities and rights.

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