

**PAGE 8-11 OF..**  
**MOTION TO**  
**RECUSE**  
**#4**

Judge Nancy Purpura incomplete Presentation of  
Evidence in Violation of Maryland Rule 5-106

**Incomplete Presentation of Evidence in Violation of Maryland Rule 5-106**

At the November 23, 2023, hearing, opposing counsel played brief clips of Ms. [REDACTED]'s advocacy group's TikTok videos. Ms. [REDACTED] repeatedly requested to view the entire videos, explaining that she could not answer the questions accurately without seeing the full context. Judge Purpura assured her that she had "the right to have the entire videos played" and promised they would be shown at the end of the trial. Despite this assurance, the full videos were not played due to time constraints, and Judge Purpura promised they would be shown at the next trial on May 29, 2024.

Throughout the November 2023 Contempt hearing, Ms. [REDACTED] was forced to continue answering questions about the video clips, even though she repeatedly stated that she could not provide accurate answers without seeing the entire videos. Despite these requests, Judge Purpura questioned Ms. [REDACTED] inability to answer and confusingly asked, "Don't you know where you are?" This comment made no sense, as Ms. [REDACTED] concern was about the content of the videos, not her location. Judge Purpura again assured Ms. [REDACTED] that the complete videos would be played at the end of the trial. However, due to time constraints, the videos were not played, and Judge Purpura promised they would be shown by opposing counsel at the next trial on May 29, 2024.

Relying on this assurance, Ms. [REDACTED] did not prepare the videos herself for the May 29 hearing because Judge Purpura assured her that she would make opposing counsel play the entire videos. During the hearing, despite Ms. [REDACTED] request to play the full TikTok videos, Judge Purpura appeared confused and mistakenly thought Ms. [REDACTED] was referring to unrelated police body camera footage. Opposing counsel clarified the issue, but Judge Purpura did not follow through on her assurance to make opposing counsel play the full videos. Instead, she told Ms. [REDACTED] that she had to play the videos herself if she wanted them shown. Since Ms. [REDACTED] did not have the videos with sound on her laptop, they were never played, unfairly influencing the trial.

At this point, in the May 29, 2024 contempt hearing filed by Mr. [REDACTED] Judge Purpura stated that Mr. [REDACTED]'s contempt hearing had been concluded at the November 2023 hearing date, questioning why Ms. [REDACTED] would want to play those videos. Opposing counsel once again corrected her, stating that we were currently in the contempt hearing that they filed

and that it had been continued from November 2023. This exchange happened at approximately 4 PM, after a full day of trial, where Judge Nancy Purpura provided procedural guidance to Ms. [REDACTED] for what she believed was a different trial.

Under Maryland Rule 5-106, when a party introduces part of a recorded statement, the opposing party has the right to have any other part of the statement introduced if it is necessary to ensure the statement is not taken out of context. Judge Purpura's handling of the video evidence and the resulting procedural errors illustrate a significant procedural error that unfairly affected the trial. The refusal to provide the full context by not playing the complete videos goes against the spirit of Maryland Rule 5-106, which is intended to prevent such scenarios where incomplete evidence distorts the proceedings.

Judge Purpura often aligns her decisions with opposing counsel's arguments, neglecting the substantial evidence Ms. [REDACTED] has provided. This reliance on one-sided narratives, rather than an impartial review, breaches the judicial standard of impartiality (Maryland Rule 2-504.1). Critical evidence, such as video footage, police reports, and eyewitness testimony supporting Ms. [REDACTED] claims of abuse, is frequently disregarded. These omissions, particularly regarding abuse incidents, violate the requirement for a thorough and fair consideration of all evidence (Maryland Rule 5-401).

Quotes from November 2024 hearing:

Mr. Nicholson starts to introduce the "TikTok videos from Ms. [REDACTED] advocacy group page.

Ms. [REDACTED]: I have a question. Are they playing the whole video?

Mr. Nicholson: I'll go through them with you, ma'am.

Ms. [REDACTED]: Can I request for the whole video to be played?

Judge Purpura: Sure, do you have the whole video?

Mr. Nicholson: I have the whole video, Your Honor, but what is it, like 9 hours?

Ms. [REDACTED]: I don't know, but this is what you do; you take bits and pieces and you twist it.

Judge Purpura: Strike from record. It's not a free for all. Mr. Nicholson, if she requests for the entire video to be played, she has a right to see the whole thing.

Mr. Nicholson: Can I have a minute?

Judge Purpura: Sure, and Ms. [REDACTED] I don't know what's on the entire video, but you would have a better idea of what it is than I would, but I would think about what might be there and whether or not you would think it would be in your best interest to play it. I'm happy to accommodate you.

Ms. [REDACTED]: I appreciate it. I would like to have the whole video played.

Judge Purpura: Alright then.

Mr. Nicholson then shows an exhibit of the summary of the video. He states that he "picked out a couple of them" to play.

Ms. [REDACTED]: I want you to play the whole video, not just a portion of it.

Mr. Nicholson: When you say the whole video, do you mean every possible video you ever posted?

Ms. [REDACTED]: No, if you're playing one video, I don't want you to pick the piece out that you want played. I want the whole video played.

Mr. Nicholson: I'm going to play my videos. I'm going to ask you some questions, and if you think there's something or some other video that you want played, let me know and I'll be happy to play it.

Ms. [REDACTED]: Ok, but are you playing the full video? One video, are you playing the full video?

Judge Purpura: I think what he's saying is that he's going to play the portion that he wants to play, and then if you want the entire video to be played, I will order him to play it for you.

Ms. [REDACTED]: Thank you.

Video played. Questions asked.

Ms. [REDACTED]: I need to see the whole video. This is why I didn't want to do it this way.

Mr. Nicholson: Ok.

Ms. [REDACTED]: This isn't fair.

Judge Purpura: Well, you can see the setting right where you are with the blue background and so forth. You would know where that is, right?

Ms. [REDACTED]: Right, but I have multiple videos—

Judge Purpura: Let me finish.

Ms. [REDACTED]: I'm sorry, I thought you were finished.

Judge Purpura: So, are you telling me that looking at your picture and what you said, you have no idea of where you were or what you said or why?

Ms. [REDACTED]: I know where I am and what I said. There are 3 videos with this background where I am reading from the transcripts verbatim, and when I just said that a second ago, that's where I thought I was. That is what I thought this video was, but now I think it's a different video.

Mr. Nicholson: So you weren't reading from the public transcript, were you, ma'am?

Ms. [REDACTED]: I'm not an attorney, but I would like to make some type of objection.

Judge Purpura: Ok, I think the answer is no.

Ms. [REDACTED]: I don't think it's fair that I do not get to see the whole video and then you're asking me questions.

Judge Purpura: We just explained it to you.

Ms. [REDACTED]: Ok, but I can't answer these questions unless I see the whole video.

Judge Purpura: Ok, she can't answer the questions without seeing the whole video.

Mr. Nicholson plays another video. He then continues to ask questions about the video.

Ms. [REDACTED] I don't want to answer questions until I see the whole video.

Mr. Nicholson: Ok, and continues to ask questions.

Ms. [REDACTED]: I cannot answer these questions unless I can see the whole video.

Judge Purpura: He's asking you what you said.

Mr. Nicholson: That's what I asked.

Ms. [REDACTED] Can you ask the question again?

Mr. Nicholson: You report from reading from a public transcript, correct?

Ms. [REDACTED] I answered that question wrong because I didn't see the whole video.

Judge Purpura: There are no wrong or right answers to the question.

Ms. [REDACTED] I'm being treated like I lied, though I did not lie. I just didn't see the whole video, so I was mistaken.

Mr. Nicholson: Is it your testimony that without you seeing the whole video, you do not know what you're reading from?

Ms. [REDACTED] I'm not reading from the testimony. It's clear now I didn't know that earlier. It's because I didn't see the whole video and I didn't realize it.

Judge Purpura: Ok, that's not a problem. That's understandable.

More videos played, more questions asked. They continue to play multiple videos asking multiple questions.

Ms. [REDACTED] Again, I would like to see the whole video, but believe I'm talking about the privacy settings... If that's what I'm talking about. But again, since I haven't seen the whole video, I don't know.

Mr. Nicholson: Do you have the video?

Ms. [REDACTED] I wasn't going to play these videos, so no, but I'm sure I can get them from my TikTok page on my laptop.

Ms. [REDACTED] had to result to guessing due to the fact that Judge Purpura would not play the entire video and allowed them to continue to play parts of videos and continues to ask her questions even though she had stated multiple times she could not answer without seeing the entire video and was now guessing.