

Document Q

RELEVANT AND FULLER TIMELINE

Concise summary

This chronology supports six main points:

1. From 2005-2025, Ms Tomlin had a long history of attending Karma Kagyu and other Buddhist events without incident as a devout student, participant. From 2017 onwards, as a published Buddhist scholar-translator attending and speaking as an invited guest speaker at international academic conferences.
2. Tomlin's public writing and research about the named Plaintiff, Gyalton Rinpoche from May-September 2025 was continually positive and devotional, not hostile or defamatory. She is the first person to have done active transcripts, research and translations related to his work voluntarily.
3. Before the April 2026 legal escalation by Plaintiff's associates, Titi Dolma and Thinley Topden, Ms Tomlin states there had been no direct personal verbal or written warning, boundary request, or complaint from Gyalton Rinpoche alleging stalking, harassment, or clearly requesting she not attend his future classes or events.
4. The **20 April 2026** urgent application order was filed after the publicly listed Delhi teachings had ended on **17 April 2026**, and after Ms Tomlin had already left India on **18 March 2026**.
5. **The Plaintiff's teachings continued outside India from May 2026 onwards in Nepal, and will move to North America from August to September 2026.** So, it was a **false and manufactured emergency injunction** in India and no stalking or harassment by Tomlin, who had not had any written contact since January 2026, or physical proximity to Gyalton Rinpoche since beginning of March 2026.

6. The Plaintiff and/or his administrative associates committed an active and deliberate fraud and deception on the court, as part of an ongoing smear campaign, bullying and harassment documented by Tomlin since May to September 2025. This is evidenced by active deception and deliberate non-disclosure, concealing key dates, locations, and their use of inadmissible, illegal, derogatory anonymous online content to support false “claims of bad character” and “threat” to the teacher, in order to disrupt their connection our of jealousy and aversion. As well as email screenshots of alleged incidents in Europe that are outside Indian jurisdiction and over six months ago.

BRIEF BIO BACKGROUND

Date / Period	Event	Court relevance
2005	Adele Tomlin first met the 17th Karmapa, Ogyen Trinley Dorje in India and took refuge with him.	First establishes long-standing guru, Karma Kagyu and Tibetan Buddhist connection.
2006–2008	Attended several Kagyu Monlams, teachings, and empowerments in India; began studying Tibetan in Nepal and India.	Shows long-term pattern of lawful attendance at public Buddhist events.
2014–2017	Completed postgraduate Tibetology studies in Hamburg with excellent result.	Establishes academic background.

2017 and 2019	Two academic level books authored/translated by Tomlin were published by the Library of Tibetan Works and Archives, with forewords by esteemed Professors.	Shows public scholarly record.
	One of the books is an active and personal collaboration and transmission of Kalacakra texts by a Jonang lineage teacher, Chokyi Nangwa.	Shows prior close collaborations with Tibetan Buddhist teacher.
September 2018-September 2019	Meets Sangye Nyenpa Rinpoche in Nepal. This initially positive collaboration turns into one of active online defamation, impersonation, ban from Benchen monastery and centres of Tomlin, after she and other women report him for sexual misconduct and dishonesty.	Shows relevant background to bullying, exclusion and harassment in relation to Gyalton Rinpoche.

October 2018	Attended Kālacakra empowerment in Portugal with Garchen Rinpoche and provided Innate Kālacakra translation. No disruption, objection, or exclusion reported.	Shows prior incident-free attendance at Buddhist events.
2020–2025	During COVID lockdown two years in India , continued independent research, translation, and publication and creation of Dakini Translations. Interviewed by Tricycle Magazine and speaker delegate at international academic conferences. Published in other Buddhist platforms and media and in conference publications. Attends teachings and empowerments with other teachers, such as 12th Gyaltsab Rinpoche, Garchen Rinpoche and others without any issue or complaints	Shows continuing research, translation work and public acknowledgement despite serious and persistent blacklisting/defamation/loss of funding, and lack of institutional support.

THAILAND, JANUARY -FEBRUARY 2025		
3 January 2025	2nd Kagyu Monlam Thailand led by Drupon Dechen Rinpoche. Tomlin attended without incident	Shows attendance at major Kagyu Buddhist event without exclusion or incident.
January-February 2025	39th Kagyu Monlam Chenmo held in Bodh Gaya. Tomlin states she attended without incident.	Shows attendance at major Kagyu event without exclusion or incident.
April 2025-current date	Anonymous online smear campaign targeting and harassing Defendant/Tomlin begins on Wordpress and Blogspot website hosts using Defendant's name in the URL. Derogatory, misogynist and false content calling Defendant "excrement" and a "sex pest". Taken down after complaint by Defendant and Youtube channel (@pestdissolver) geo-blocked in UK. Anonymous author moves the unlawful content to Github	Shows background of malevolent bullying, malicious, false and defamatory content online for months during the Asia and Europe 2025 teachings of Plaintiff. Presence of this anonymous content in the Plaintiff is clear evidence that Plaintiff and associates are connected with the online content, or were unduly influenced by it without fact-checking it.

	Repository and continues to post false and defamatory information. This information is cited without reference to the author or its origin by Plaintiff's associates in their Complaint and supporting statements.	
VIETNAM MAY 2025		
6–8 May 2025	Attended United Nations Day of Vesak conference in Ho Chi Minh City as “all-expenses paid” invited speaker/delegate. Meets Carlo Luyckx of EBU for first time. They get on and exchange Whatsapp numbers.	Shows public recognition and professional standing as an academic-translator in the international Buddhist community.
18–21 May 2025	Attended Gyalton Rinpoche's “Discovering the Buddha Within” teachings at Sui Pagoda, Hanoi. First time meeting.	First substantial in-person contact; public reporting of course was positive.
22 May 2025	Published positive report on Gyalton Rinpoche's Hanoi teachings. Reports invasive photography,	Contradicts false portrayal of harassment, hostile intent or defamation.

	bullying, and exaggerated incidents of asking the translator her “Dharma background” over dinner. Unknown to Tomlin at the time, she is then excluded from access to online class links and recordings of teachings by Damien Jampa and Titi Dolma. She is not informed of this decision, or told reasons why.	Shows that the administrators, Titi Dolma and Damien Jampa were already acting unfairly and blacklisting, not including Tomlin in discussions and decisions affecting her participation in the course.
TAIWAN, JUNE-JULY 2025		
14–23 June 2025	Attended empowerments and teachings with Gyalton Rinpoche in Taipei, Taichung, Kaohsiung, Taiwan.	Continued attendance and positive reporting.
	Published several positive reports and transcripts on Gyalton Rinpoche’s teachings including translation of long-life prayer.	Shows supportive public activity and genuine intent.
23 June 2025	Gyalton Rinpoche thanked/praised Tomlin privately by Facebook	Key evidence. Shows amicable and supportive relationship that contradicts

	message after she sent him her work after Taiwan.	false narrative of 20 th April Plaint. Non-disclosure to court.
27–29 June 2025	Attended Taiwan Kagyu Monlam in Taipei led by Bokar Rinpoche.	Further recent public Buddhist attendance without exclusion.
5–6 July 2025	Attended 12th Gyaltsab Rinpoche events in Taipei, including birthday dinner on 5 July.	Shows continued access to major Kagyu events without incident.
16 July 2025	Published report connected to Taiwan Kagyu Monlam and Bokar Rinpoche teaching/empowerment.	Further positive public reporting and attendance.
EUROPE AUGUST -SEPTEMBER 2025		
2 August 2025	Tomlin travels to Vienna, Europe and registers and pays online for the Palpung Vienna empowerment (17 August 2025) and plans to attend Berlin and Prague teachings.	Shows devotion and no allegations of stalking or harassment at that time, or requests not to attend,
	Palpung Vienna immediately respond to her credit card registration with an	Shows hostility and discrimination of whistleblower by European administrators and centre

	anonymous email telling Tomlin she is barred from attending the empowerment due to “their samaya connection with Sangye Nyenpa”.	due to Sangye Nyenpa misconduct issue.
	Tomlin verbally informs Damien Jampa (a course administrator) and the Plaintiff, Gyalton Rinpoche (on Facebook) of the ban and email. No response.	Shows knowledge of the ban and exclusion but no support or assistance offered to Tomlin by the Plaintiff or course administrator.
Berlin, 6–7 August 2025	Attended Gyalton Rinpoche’s Berlin teachings and group walk. Tomlin states there was no disruption for the whole event, other than when Titi Dolma demanded removal and destruction of video evidence of a group walk. And then later demanded a German administrator treat Tomlin as a “threat and danger” see below. Titi Dolma was not	Video and photo evidence clearly shows peaceful attendance during the walk and teachings, and no immediate objection by others present, and no disruption by Tomlin or concerns by others she was present.

	attending the Berlin course.	
7 August 2025	Maria, Berlin centre administrator suddenly demands Tomlin leave the centre while she is sitting in the garden next to the stupa peacefully meditating. When Tomlin asks Maria why, she responds that Titi Dolma (and unnamed others) told her that Tomlin was “bad and dangerous” and she trusted them. This causes significant distress and harm to Tomlin.	Shows malicious bullying, harassment and discrimination while peacefully attending teachings due to defamation and actions by course administrator, Titi Dolma.
Vienna 13–17 August 2025	Palpung Europe Gyalton Rinpoche’s Vienna “Discovering the Buddha Within” programme, with empowerment on 17 August.	Shows Vienna event dates.
Vienna 17 August 2025	Tomlin states she was barred from the Vienna empowerment despite	Shows relevant discriminatory exclusion based on Defendant’s

	prior registration and no refund. Police were called by administrator, Susanna while Tomlin remained outside locked gate requesting a refund. Police arrived and insisted that Susanna give money to Tomlin and no charges were filed. This incident causes significant distress and loss of time to Tomlin.	whistleblower reports of Sangye Nyenpa misconduct. Shows provocative, hostile and unlawful conduct of administrator refusing a refund yet barring entry or ability to speak to the Plaintiff. Wasted police time.
Prague-Late August 2025	Gyalton Rinpoche actively tells Damien Jampa not to bar Tomlin (or others) from attending the Prague DBW course, who registered before a special change of rule in June 2025 (intended to bar Tomlin). Attended Gyalton Rinpoche's Prague course; later published positive report on 28 August.	Shows continued attendance and permission to attend by the Plaintiff, despite alleged screening/exclusion attempts by administrators Titi Dolma and Damien Jampa. Contradicts the narrative that Defendant was stalking and harassing and disrupting the Plaintiff prior to the course.
	Tomlin is emotionally and hysterically accused of obscene conduct on third	Shows that Plaintiff did not consider Tomlin's conduct threatening or dangerous.

	day and physically assaulted twice by a centre member of staff, Micha, as she was peacefully and lawfully leaving the centre to speak to a relative on the phone. Gyalton Rinpoche, the Plaintiff, allows Tomlin to continue attending the course and does not demand her removal, even though Titi Dolma, Damien Jampa and Micha and others request it.	Shows that administrators had already primed people on the course, such as Micha, to regard Tomlin with suspicion and hostility.
France, 1-8 September 2025	Tomlin registers to attend the following course at a Karma Kagyu centre in France. She is falsely told there is no accommodation available by the resident teacher, Lama Sangyay. When she informs the teacher of her discovery of the lie, and her wish to attend, he does not respond.	Shows evidence of deception, hostile and malicious intent to discriminate and exclude Tomlin from teachings without stated reason or discussion.

China 5-6th September 2025	Tomlin leaves Europe and goes to Chengdu, China, for an international art conference invited by a renowned US academic, before returning to Europe. Reports distress at being actively excluded from attending France teachings.	Shows location, and evidence of public standing in Buddhist world in China.
11-12 September 2025	Tomlin returns to Europe at her own expense. Attended Gyalton Rinpoche's Belgium teachings in Brussels.	Supports continued attendance without any recorded disruption, harassment or "threatening" conduct.
13-14 September 2025	Tomlin travels at her own expense to attend Beaumont centre course Belgium. She is allowed to stay in a room at the centre. Then harassed and bullied and not allowed to sit on front row like other participants. Defendant is then told that organisers had received an email from administrators with her photo warning them to keep her away from	Supports claim of deliberate smear campaign by administrators that caused targeted bullying and harassment by volunteer staff and course participants without good reason.

	Gyalton Rinpoche. Despite there being zero incidents in Brussels when she sat near the teacher. One of the men harassing her, Emile, she later found out had a lifetime ban from Kagyu Samye Dzong Dublin for misconduct towards women.	
September-October 2025	Tomlin reports the bullying, exclusion, and defamation to Gyalton Rinpoche (Plaintiff), Damien Jampa, the European Buddhist Union and related third parties. No response and no investigation. Damien Jampa later sends email to Tomlin after a brief meeting with Sherab Ling administration in India, in Tomlin's absence/without her input, informing her it had	Shows prior notice and institutional failure to investigate or provide support/guidance.

	been decided/ordered that Tomlin should be sent links to the online review classes and recordings for the Discovering Budhha Within classes. He sends the links and online login details in email, but offers no apology or explanation for her exclusion. 30th September 2025, Tomlin sends email asking Damien Jampa why they excluded her from getting the information before. No response or apology.	
November-December 2025	Tomlin travels to SE Asia (Vietnam and Thailand) for pilgrimage, travel and research. Messages Gyalton Rinpoche for responses on Facebook about what happened during the teachings and asks for help and guidance in the Vajravarahi practice. No response or help offered.	Contradicts false narrative that Tomlin/Defendant stalking and harassing Gyalton Rinpoche. She does not travel to India or follow him to his next location. Shows Tomlin used Facebook messenger to contact Plaintiff for legitimate reasons to ask for advice, help and support.

	Plaintiff responds “he is not in a position to help” and suggests she find a teacher who might be able to.”	Shows Gyalton Rinpoche did not accuse Tomlin of stalking or harassment nor inform or warn her not to attend his teachings or events in the future.
INDONESIA JANUARY 2026		
January 2026	Tomlin travels to attend 12th Tai Situpa events in Borobudur, Indonesia and Bali. No disruption, objection, or exclusion reported. Tomlin asked Indonesian organizer to contact Gyalton Rinpoche and find out if he was attending the event but also to help her arrange audience to ask him about the incidents in Europe and seek his advice. Gyalton Rinpoche refuses to personally respond to her or arrange any audience. Cites health	Further incident-free attendance at Palpung event. Contradicts false narrative Tomlin was disrupting events. Writes positive reports and transcripts about the events for her website.

	reasons for not attending the event.	
INDIA FEBRUARY -MARCH 2026		
February to March 2026	Unknown to Tomlin at the time, later disclosed in the Plaintiff of 15 th April, Titi Dolma is personally requesting and gathering statements from people in Europe to try and use against Tomlin, even though the incidents were in Europe, over six months prior, and Tomlin was in India.	Show prior malicious intent, persecution and vindictive actions of Titi Dolma , a close associate of the Plaintiff, and others, who is mainly responsible for filing the vexatious order and suit, during Tomlin's stay at Sherab Ling monastery.
15 February– 15 March 2026	Tomlin travels from Vietnam to India and stays at Palpung Sherab Ling Monastery guesthouse, India during residence of Gyalton Rinpoche and 12 th Tai Situpa. Attends three events at which Plaintiff is present, including Losar New Year. Stay was extended twice, first to 10	Important: permission and extensions were granted by monastery administration. No exclusion or disruption. Contradicts false narrative that Tomlin was stalking and harassing Gyalton Rinpoche.

	March and then to 15 March.	
13 March 2026	Published English-language compilation/translation of contents outline of 8th Tai Situpa's Collected Works, completed during Sherab Ling stay and other research and translation reports.	Supports productive research activity. And peaceful stay without exclusion.
	Tomlin registers online for the Delhi teachings and is accepted and notified in an email by Damien Jampa without objection.	Active non-disclosure/deception on court. Contradicts narrative that Tomlin was a threat and disruption to Plaintiff and teachings.
6 and 14 March 2026	Tomlin verbally/physically harassed twice by a European woman, Ma Tara Palmo, while staying alone at the guesthouse and reported this to monastery staff. Woman initially tries to get staff to remove Tomlin from the	Shows bullying and harassment by laypeople associated with the administrators Damien Jampa and Titi Dolma. Active non-disclosure/deception on court.

	guesthouse, but they refuse to do so and so she harasses Tomlin first in a café, and the a few days later outside the guesthouse when she returns. Tomlin reports the incidents to monastic staff of guesthouse who tell her they will do nothing as it is a “personal issue” even though it took place on monastery property. Tomlin stays in a Bir guesthouse with a relative that night due to personal safety concerns and to avoid any further incidents.	Shows negligence and lack of provision or enforcement of Sherab Ling personal safety and community guidelines on appropriate conduct towards guests on guesthouse property.
15 March 2026	Tomlin checks out the guesthouse that day as planned. Tomlin reports the incidents, including a monastic staff member threatened to kill her and perform black magic to make her “lose her mind” to Lama Dragpa, general secretary of Sherab Ling.	Shows further bullying and harassment and intimidation on Sherab Ling property without good cause. Active non-disclosure to court.

17 March 2026	Lama Dragpa, General Secretary of Sherab Ling, issued blanket exclusion/ban letter to Tomlin. Cites White Tara artwork, idea for stupa flower garden and Tomlin's writing on Gelugpa sectarianism and Dalai Lama institution as reasons to exclude, as well as "Inappropriate conduct" with Gyalton Rinpoche. No discussion or warning beforehand. Causes significant emotional distress and suffering and severely interrupts and disrupts holiday time with her relative.	Core document; attach as exhibit. Shows lack of due diligence, political decision to exclude and defamation. Active non-disclosure/deception on court. Mental and emotional distress, loss and damages to Tomlin.
MARCH-APRIL 2026 LEGAL ESCALATION BY MONASTIC ADMINISTRATION AND GYALTON RINPOCHE'S ASSOCIATES		
18 March 2026	Tomlin leaves India to SE Asia for planned holiday with relative.	Active non-disclosure/deception on court.

25 March 2026	Tomlin sent formal cease and desist response to Lama Dragpa rejecting false allegations, defamatory statements and ban in 17 March letter. Instructs a lawyer to help her with the case, who agrees to send a legal notice if there is no response to this letter.	Active non-disclosure/deception on court.
1 April 2026	Gyalton Rinpoche/named associates instruct lawyer and first allege formal stalking/harassment allegations, relying partly on Lama Dragpa's 17 March letter and unlawful, anonymous online content and hearsay gossip.	Relevant to timing, retaliation, and inadmissible evidence of first formal legal allegation. Causes serious mental and emotional distress, loss and damages to Tomlin and severely damages spiritual connection with teacher. And interrupts and disrupts vacation time with her relative.
2 April 2026	Unknown to Tomlin, Carlo Luyckx of EBU emailed Plaintiff's associates Titi Dolma and Damien Jampa and relied on anonymous, false and	Relevant to alleged bias/conflict/discrimination and defamation and institutional malpractice.

	derogatory online content (cited in the Plaint as screenshot evidence) informing them he had personally blocked an EBU investigation into my bullying and harassment allegations, without any formal discussion with me.	
6 April 2026	Tomlin sent response to Plaintiff lawyers denying stalking, harassment, and disruptive conduct and with full timeline.	Active non-disclosure/deception on court , who only disclose the email of 6 th April not the full letter or timeline.
1–17 April 2026	Public Palpung/Palpung Institute online media show New Delhi teachings programme scheduled at Leela Ambience Convention Hotel.	Key point: Delhi teachings were scheduled to end 17 April, before 20 April filing.
15 April 2026	Tomlin's lawyer sends legal notice to Lama Dragpa and Gyalton Rinpoche re 17 March letter. Gyalton Rinpoche's legal counsel sent proposed interim	Active non-disclosure/deception on court.

	injunction order to Tomlin.	
16 April 2026	Tomlin sends detailed response to Plaintiff's lawyers, stating date she had left India and no intention to attend Delhi teachings.	Active non-disclosure/deception on court.
20 April 2026	Interim order application/lawsuit filed in Delhi High Court against Tomlin.	Central date. Application filed after publicly listed Delhi events had ended and Tomlin outside India. Active deception of court.
5 May -mid June 2026.	Public Palpung-related material records Tai Situpa's arrival in Nepal on 5 May and Mahamudra teachings beginning at Tergar Ösel Ling, Nepal, on 8 May until mid-June 2026.	Active deception of court. Shows that teaching activities were not continuing in India after April 2026.
August - September 2026	Publicly advertised teachings of Plaintiff in USA, and Canada.	Active deception of court. Shows that teachings activities were not continuing in India after April 2026.

November 2026	Publicly advertised teachings of Plaintiff in USA, and Canada.	Active deception of court. Teachings not continuing in India after 17 April 2026 for several months.
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