No. _____

_____

IN THE SUPREME COURT OF THE UNITED STATES

_____

In The Matter of Maurice Daniel

Petitioner -Petitioner,

-VS-

Brooklyn Law School

Respondent –Respondent.

_____

ON PETITION FOR A WRIT OF CERTIORARI TO

THE COURT OF APPEALS STATE OF NEW YORK

PETITION FOR WRIT OF CERTIORARI

Maurice Daniel

240 Christie Street

Ridgefield Park, NJ 07660

201-853-9264

QUESTIONS PRESENTED

1) IS AN ACADEMIC DEAN'S DECISION TO BAR A STUDENT FROM TAKING TWO MAKEUP EXAMS, AND KICK HIM OUT OF SCHOOL BECAUSE OF HER MISTAKEN BELIEF THAT THE STUDENT WAS MENTALLY ILL A VIOLATION OF TITLE III OF THE AMERICANS WITH DISABILITIES ACT, AND IF SO, IS THE VIOLATION A MATTER OF STATEWIDE IMPORTANCE?

2) IS A DEAN'S DECISION TO RENEGE ON HER AGREEMENT TO ALLOW A STUDENT TO TAKE TWO OF HIS FINAL EXAMS AFTER MISTAKENLY PERCIEVING THE STUDENT AS MENTALLY ILL WHEN HE ARRIVED TO TAKE THOSE EXAMS AT THE AGREED UPON DATE AND TIME AN EXAMPLE OF AN EDUCATIONAL INSTITUTION'S JUDGMENT OF THAT STUDENT'S ACADEMIC PERFORMANCE, OR AN EXAMPLE OF AN OVERLY HARSH AND DISCRIMINATORY PUNISHMENT THAT IS IN VIOLATION OF TITTLE III OF THE AMERICANS WITH DISABILITIES ACT AND ITS SUBSET SECTION 8-107(4)(A) OF THE NEW YORK CITY HUMAN RIGHTS LAW?

3) WAS RESPONDENTS' DECISION TO BAR A STUDENT FROM TAKING EXAMS AFTER MISTAKENLY PERCIEVING HIM AS MENTALLY ILL A DISCRIMINATORY, ARBITRARY, AND CAPRICIOUS, ABUSE OF AUTHORITY THAT IS IN VIOLATION OF TITLE III OF THE AMERICANS WITH DISABILITIES ACT AND ITS SUBSET SECTION 8-107(4)(A) OF THE NEW YORK CITY HUMAN RIGHTS LAW?

4) DID RESPONDENT BROOKLYN LAW SCHOOL PROCEED IN EXCESS OF THEIR DISCRETION BY PERFORMING UNORTHODOXED ACTIONS THAT THE SCHOOL'S HANDBOOK DOES NOT EXPLICITLY ALLOW SUCH AS, BLOCKING A STUDENT'S ACCESS TO THE WEB ADVISOR PROGRAM, AND PLACING A "STUDENT EVALUATION" HOLD ON THE STUDENT'S ACCOUNT AFTER HE INFORMED THEM THAT HE WAS ILL AND REQUESTED A MAKEUP EXAM, AND DO THESE ACTIONS VIOLATE TITLE III OF THE AMERICANS WITH DISABILITIES ACT AND ITS SUBSET SECTION 8-107(4)(A) OF THE NEW YORK CITY HUMAN RIGHTS LAW?

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

Petitioner:

Maurice Daniel

240 Christie Street

Ridgefield Park, NJ 07660

201-853-9264

Respondent:

Brooklyn Law School

(Represented by Stephanie Vullo, Esq.

Attorney for Respondent-Respondent)

250 Joralemon Street, Room 900

Brooklyn, New York, 11201

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PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of Certiori issue to review the judgment below.

OPINIONS BELOW

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is unpublished.

The opinion of the Supreme Court of the State of New York, Appellate Division: Second Judicial Department appears at Appendix A to the petition and is unpublished.

JURISDICTION

The date on which the highest state court decided my case was March 27, 2018.
A copy of that decision appears at Appendix A.

The Jurisdiction of this court is invoked under 28 U.S.C. §1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

STATEMENT OF THE CASE

During my college years, I got only A's and B's in my courses (R. 63). As a result, when I applied to Law School, Brooklyn Law School offered me a Scholarship to help fund my education. (R. 19) Eventually, I accepted Brooklyn Law School's offer, and became a part-time student at BLS in the fall of 2013. (R.44) When Brooklyn Law School allowed me to take all of my final exams, I finished my first semester almost at the top of my respective class by earning two B plus grades, and one B grade. (R. 135, 63). In the spring of 2014, I was enrolled in Constitutional Law, Contracts, and the fundamentals of Law Practice. (R. 63)

In April of 2014, I began to feel ill. (R.44) Nonetheless, although I was not feeling well, I knew how important attendance was to our class grades, so even though I was sick on one or two occasions, I made sure that I still came to class. (R.44) In 2014, the policy on BLS's website stated that if you had a certain amount of Absences, the professors could give a student either an F or a W grade for the course. (R. 21, 24, 27,) Even though I was physically ill, I did not want either of these grades on my transcript after I had already done so much work in each class.

On or around April 17, 2014, after one of my classes, I literally fell physically ill and was in pain, and unresponsive in the back of the classroom after all of the other students left. (R. 54,81) I was still in pain when my classmates left the room, so I stayed in the classroom waiting for my symptoms to subside while the next class came in. (R.54, 81) On or around this date, an anonymous student or staff member from that second class reported the incident to the law School, and the Law School filed an incident report (R.54, 81). I initially objected to the admission of the report because the respondent redacted it, and intentionally omitted both the

section regarding illness or injury, and the section related to the actual person who reported the incident. Moreover, in addition to the other issues, the report also contained a false accusation from this anonymous, unnamed student or staff member. According to Brooklyn Law School's documents, the anonymous individual is alleged to have accused me of having a conversation with her, and of saying something that I did not say. (R. 81)

I made myself clear in the lower court, and I am once again making it clear that I did not actually know anyone in the classroom, nor did I mention anything about being kicked out of school to this anonymous, unnamed person who conveniently chose not to sign the report. Nevertheless, the incident report is still crucial in that it confirms three things:

1) The report confirms that I was in fact sick and unresponsive in the back of a classroom;

2) The report confirms that the incident was reported to the law school, and

3) The report confirms that Brooklyn Law School had knowledge of me being sick. (R. 54, 81,) Unfortunately for me, my legal writing classmates randomly chose to have our final group meeting on the same day that I fell ill. (R. 55) I was not given advanced notice of the meeting, and it was considered our final exam, which was going to determine our final grade in the legal writing class. (R.55)

The next day, I approached my legal writing professor, Jill Maxwell, and let her know that I fell ill, and was unable to attend the meeting. (R.55) After explaining the situation to her, I then asked if there was another project that I could do to make up for the missing final grade. (R. 55) Although she was not specific, she told me that we would work something out.

(R. 55) She never got the opportunity to issue me another project because the Academic Dean intervened. As a result, I obtained a C grade in the class instead of the higher grade that I would have received if I had been permitted to take my final exam. (R.63, 135) I did not receive a failing grade for the Legal Writing class because it had more than one exam, and I had already passed my previous exams with high enough marks to secure a passing grade without taking the final. (R. 63, 135) Therefore, contrary to the false narrative that the Respondent was attempting to illustrate in the lower court, my work quality was not poor. In fact, even after being deprived of the opportunity to take my final exam, I was still able to obtain a passing grade in The fundamentals of Law Practice / Legal Writing. This proves that the quality of my work was up to Brooklyn Law School's standards.

On or around April 24, 2014, my constitutional law professor Nelson Tebbe asked if he could meet with me after class, but did not give me a reason for the meeting. (R. 55-56) I agreed, and he asked if everything was ok. (R. 55-56) I told him that I hadn't been feeling well for the past few days, but other than that, I was ok. (R. 55-56) We then discussed study techniques, and I left his office. (R.55-56) Towards the end of April, I was getting over my physical illness. (R.56) Nonetheless, on April 28, 2014, one day before my last day of classes, I began to feel ill towards the end of one of my classes again. (R.56) I walked over to the professor's desk, and informed him that I was leaving to go home and lay down because I was not feeling well. (R.56) Professor Nelson Tebbe discusses this conversation in one of his emails with academic Dean Jennifer Lang. (R.165) The email is a crucial piece of evidence, because although he mistakenly claims that I "really wouldn't say why I left," the email unequivocally proves that I was attending my classes, it unequivocally proves that I was present one day

before the last day of class, and it unequivocally proves that the Academic dean Jennifer Lang was aware of this.

In the lower court, the respondent's primary excuse for discriminating against me was their unfounded, false claim that i went missing. In spite of the false contentions that the respondents made on the record, it is the respondents' own evidence that proves that I was attending my classes. (R.165) Nevertheless, even with all evidence pointing to the contrary, Stephanie Vullo, Brooklyn Law School's General Counsel, Chief Compliance Officer, and representative in this matter, still came in to court on May 7, 2015 and falsely testified that I "vanished" and that the school had to search for me. The respondent's representative testified this way despite the Respondent's own records placing me in class on April 28, 2014, just one day before the last day of class. (R. 15a-18a, 165) In reality, in addition to proving that i did not vanish, the Respondents' records even prove that Academic Dean Jennifer Lang actually received written confirmation that I was attending my classes. (R. 165)

The record is also clear that during the end of the 2014 semester, the respondents had knowledge that I was physically ill. Although the Respondents affidavits all came from clever lawyers who used words such as "acting strange," instead of the words physically ill, the strange behavior that the respondents continue to misleadingly reference was me leaving class visibly sick and in pain on one or two occasions. (R. 165) when people are physically ill, they behave in a way that is consistent with being physically ill. The color of my skin should not cause any one of the professors at this school to view me being physically ill, or quietly excusing myself from the classroom due to a visible physical illness as strange behavior. (R. 165) The

non-minority students at the school, excused themselves from class on several occasions, and they were not singled out, they were not barred from taking their exams, and they were not kicked out of school. Nothing that I did during the semester was disruptive or distracting. On one or two occasions, I was not feeling well, so I quietly excused myself from class and went home to rest. If Brooklyn Law School had more compassion for sick students, and minority students in general, then we would not be in court litigating this issue.

Our last class was on the 30th of April. (R. 165) Our class did not meet on April 29th, and we then had a break from May 1, 2014 through May 8, 2014, the date of my first exam. (R. 165) Although the Respondent conveniently refrains from referencing anything about this break in an attempt to convince the court that I went missing, the Respondent's email makes it clear that April 28, 2014 was one day before the last day of classes. (R. 165) The record is also clear that my first exam was on May 8, 2014. (R. 44)

During the break, I was doing much better than I was during the end of the semester. Unfortunately, on May 8th, 2014, I fell severely ill. (R. 44) On this date, I contacted more than one staff member at the school to call out sick, and to request an opportunity to take the next regularly scheduled exam. (R. 56) I provided phone records, and witness testimony proving that I did this. (R.62, 82-83) These records are extremely important because they prove that I called out sick, and requested the opportunity to take the next regularly scheduled exam like the BLS handbook requires. (R. 62, 82-83) While I still regret being unfortunate enough to fall ill on exam day, I am only human. Like all other human beings, I also have no control over when I fall ill.

Between May 8th, 2014 and May 12, 2014, Brooklyn Law School applied a "student evaluation" hold to my web advisor account. (R. 21, 27,47-48,52-53) Their handbook does not mention anything about the respondents having the authority to do this. (R.52-53) The hold prevented me from withdrawing from classes, and it prevented me from taking any exams online. During the first semester when I was not physically ill, the respondents did not place any holds on my account. (R. 52-53, 58-59) This hold was only applied to my account because I was physically ill, which makes it a discriminatory hold. (R.52-53, 58-59) I called to question the school about the hold, but they would not give me an explanation. (52-53, 58-59) Instead, they told me to contact the Academic Dean. (R.58) I made a number of calls to her, but she would not come to the phone and speak to me. Instead, her office mates took messages and made excuses for her. (R. 58) Most of these calls were not included in the phone records that I provided to the court, because when I first sued the school, I believed that the calls I made from my house phone would be sufficient to prove that I called the school when I was supposed to call them. (R.44) I was also poor during that period, and did not have a cell phone of my own. Thus, I was using other people's phones, pre-paid phones, and pay phones to make a large number of the calls. (R. 44) During my exam week, I also had no reason to think that the school would discriminate against me, and kick me out of school for being sick. Henceforth, I had no reason to go overboard and get affidavits from everyone who allowed me to use their phone to make calls to the school, or to attempt to preserve proof of every call that I placed to the school. Consequently, although I made a large number of phone calls to the school, I only provided the court with phone records related to the calls that I made on my house phone. (R.63) They prove that I called the school, and did everything that was required of me.

On May 12, 2014, I was still sick, and even though I had already called the school to inform them of my illness, and I had actually spoken to a staff member that same day, Academic Dean Jennifer Lang still saw the need to call my local police department to have them come to my residence and perform a "welfare check". (R. 56, 66-67) I was annoyed by this action, because I just spoke to the school a short time before she called the police on me. As if this were not intrusive enough, Dean Lang also reported me as a missing person, even though I just made contact with the school on that same day, and even though her email records to Professor Tebbe prove that she knew that I was not missing, and knew that I had been attending my classes. (R. 165)

During the month of May, I left several messages on the Dean's answering machine, and with her staff members in an attempt to have her reschedule my exam. (R. 129) She continued to intentionally ignore them. (R. 129) After having my voicemails, and messages ignored, I made several trips to her office. (R. 129) However, on each occasion, the dean had a separate excuse for refusing to meeting with me. (R. 129) On some occasions, I was told that she was in a meeting for the entire day. (R. 129) On other occasions, her fellow staff members told me that she was not in the office. Unfortunately, according to their policy, she was the only one who could reschedule my exams, so I was forced to continue trying to communicate with her.

By June, I was still frequently contacting the school to have my exams rescheduled, but the dean still wasn't returning my calls. (R. 129) On June 5, 2014, I spoke to Brendan Flynn. (R. 198) Much like all of the other staff members that I had already spoken to, I told him that I needed my exam rescheduled. (R. 198) At this point, the school was already aware of the fact

that I was ill during my exam week, because I explained it to them back in May. (R. 115) Hence, I saw no need to once again explain my reason for wanting to have my exam rescheduled to Mr. Flynn, who didn't have the authority to grant my request. Like all the other staff members that I spoke to around this time, I told him to transfer me to the Dean's phone number. The record is clear that Academic Dean Jennifer Lang receives the June 5, 2014 message that I left on her machine, and with Brendan Flynn. Although she promptly responds to Mr. Flynn, and her staff members to let them know that she will handle the matter, the record is clear that she intentionally does not return my call, or any of my correspondence for an entire month. (R. 7-409) She did the same exact thing during exam week. (R. 7-409) Once again, contrary to the false narrative that Respondents were trying to portray in the lower court, it is Dean Lang that was ignoring, and avoiding me for almost two months. I did not go missing, and I was in constant communication with Brooklyn Law School. Section J8 of the BLS student Handbook for 2014 makes it clear that after missing an exam, students are not allowed to contact professors, or simply show up to the school to take the exams whenever they wanted. (R. 68-71) Instead, I had to obtain permission directly from Dean Lang. (R. 68-71) The dean had complete control over the situation. When she intentionally ignored my messages, my correspondence, and my trips to her office, for over a month, this left me with no way to actually take the exams, or avoid receiving a failing grade for two of my classes. (7-156) Her actions in this instance were calculated, malicious, and intentional.

After nearly 2 months of me reaching out to Brooklyn Law School to have them reschedule my exams, they finally agreed to meet with me, and allow me to take them on June 24, 2014. (R. 45,116, 129-130) When I arrived at the meeting to take my exams on the agreed

upon date and time, I apologized to the deans for coming into my classes even though I was physically ill on one or two occasions at the end of my semester. (R. 45,116, 129-130) The Deans, however, disregarded my apology and let me know that not only were they no longer allowing me to take the exams that they invited me there to take, but they were also taking away my scholarship. (R. 45,116, 129-130) I told them that that was unfair considering that they knew that I was physically ill during my exam week, and they made me wait for almost 2 months to take my exams. (R. 45,116, 129-130) The Dean told me that Life is not fair. (R. 45,116, 129-130) I informed both of them that I would protest their decision to take my scholarship away. They let me know that the decision was final. I thanked them for meeting with me, and our 10 minute meeting was over. (R. 45,116, 129-130) At this point, I was still enrolled as a student, and there was no discussion about kicking me out of the school.

During the court proceedings, both deans would go on to submit contradictory affidavits regarding what was discussed during our meeting. (R. 222-223, 230-231,157-159) One Dean claimed that at our meeting, I accused 2 of my professors of telling me not to come back to school, while the other claimed that at that same meeting instead of accusing 2 professors, I accused all of them. (R. 222-223, 230-231,157-159) Dean Dana Brackman Reiser went on to add a defamatory description of the meeting to her affidavit, where she falsely claims that I made outlandish statements, and actually attempts to describe me as someone with a mental problem. (R. 230-231) All of her statements were defamatory, unequivocally false, and insulting. (R. 230-231) Moreover, only 3 of us were present in that meeting, dean Jennifer Lang, dean Dana Brackman Reiser, and I. (R. 222-223, 230-231,157-159) Hence, if they were telling the truth, then their testimony regarding what I actually said would be consistent. Their

testimony was inconsistent because I did not actually make either of the false statements that they accused me of making.

The next day June 25, 2014, the Deans once again sent police to my house. This time, they falsely claimed that I was going to hurt myself. (R. 82-83, 58-59,73-75) When the police arrived at my residence, I informed them that I did not say anything like that. (R. 82-83, 58-59,73-75) They then told me that the school claimed that I came to my meeting and said that I was part of an experiment. (R. 73-75) I told the officer that I did not say anything like that either. (R. 82-83, 58-59,73-75) All of this is listed in the police report that the school filed. (R. 73-75) This is yet another example of the dean providing a misleading and false affidavit to an official just like she did in the lower court. Although she was unsuccessful, the Associate Dean attempted to mislead police into performing a 72 hour involuntary detainment on me. That's why she included these false allegations in her police report and not her Supreme Court affidavit. The police report proves that Brooklyn Law School is intentionally attempting to mislead the court. The school cannot file an unfounded, unverified false police report claiming that they believed I was mentally ill, and then come to court and testify that they did not believe that I was sick during exam week, and that they had no knowledge of any sickness at all. The lower court completely ignored their conflicting testimony.

Furthermore, the police report is clear. (R. 73-75) Brooklyn Law School believed that I was mentally Ill. (R. 73-75) The report is also clear that the purpose of me attending the meeting with them was to retake the exams that I missed. (R. 73-75) This was my only reason for contacting BLS staff members (R. 198), and this was the only reason that I came to the

meeting. (R. 198, 73-75) Although the allegations that Brooklyn Law School made in their police report were as false as the testimony that they gave in court, even if the school somehow genuinely believed that I walked into the meeting, and stated that "I was part of an experiment," Even that statement would not give them the right to refuse to let me take my tests, after they had already agreed to do so. (R. 73-75) Moreover, if the court compares the police report that they filed just one day after meeting with me to the two affidavits that the Deans filed, the court will notice that none of them are consistent with each other. (R. 73-75, 222-223, 230-231,157-159) The reason for this is that when I took them to court for discriminating against me, the Deans were forced to create a excuse to try and justify ignoring my correspondence for so long, and kicking me out of the school. (R. 7-156) While Brooklyn Law School felt comfortable telling the police that they refused to provide my exams because they viewed me as mentally ill, they are a group of savvy lawyers who know that doing so in court would be admitting to discrimination. Nevertheless, this is the exact reason why I included their police report along with my other evidence. In the police report, the law school admits to withholding my tests from me solely because they believed that I was mentally ill. (R. 73-75) These were their words. It is not a theory that I am presenting to the court, but it is a fact. This is a clear violation of the Americans with Disabilities act. My mother was also present on both occasions when they sent police to my residence (R. 82-83, 58-59,73-75)

Days after our meeting, the school notified me that since my scholarship had been taken away, I could apply for a needs-based grant, which I did. (R. 76, 78-79) I paid the fee, and applied for the grant to help fund my education. (R. 76, 78-79) They also registered me for one of the mandatory courses, and allowed me to pick 2 more courses, which I did. (R. 72, 59) On

July 3, 2014, Brooklyn Law School sent me my tuition bill for the upcoming semester. (R. 59, 77) At this time, I registered, and was already enrolled as a fall semester Brooklyn Law School Student. (R. 76, 78-79, 72, 59) There was absolutely no indication that the school had any intention of kicking me out.

On July 10, 2014, I received a random dismissal letter from Dean Dana Brakman Reiser. (R. 14) In this letter, she accused me of accusing my professors of telling me not to return to school. She cited this as the reason why she refused to allow me to take my exams, and kicked me out of school. (R. 14) The school then retroactively removed me from the three courses that I was already enrolled in, and retroactively academically dismissed me after I was already enrolled as a student. (R. 14, 59)

Since I had now been kicked out of my law school, I was forced to apply for other law schools. (R. 31, 109, 45, 46) After speaking with them, and notifying them of exactly what transpired between the school and I, they told me that it was rare for Deans to take such a harsh stance with their students. (R. 31, 109, 45, 46) However, they also informed me that if Brooklyn Law School wrote me a 505 letter, explaining that my dismissal was due to illness, and them not allowing me to take my tests, and not due to a lack of capacity to complete my courses of study, I would be able to transfer. (R. 4, 109, 45, 46) I requested the letter from the deans. (R. 15-29) They were ignoring my correspondence at the time, so I sent the letter to all of the deans and the president of the school via certified mail. (R. 15-29) Unfortunately, their posture towards me was so discriminatory that they refused to mitigate the damage that they were causing to my legal career by writing a simple letter explaining the truth. (R. 29) Instead,

they 1) screened, and never returned my phone calls, 2) completely ignored the first few letters I sent, just like they ignored all of my phone calls during exam week, and 3) sent me a written refusal. (R. 15-30)

Because of Brooklyn Law Schools refusal to write a letter explaining the truth, and the ABA rules, the law schools that I attempted to apply to did not have the paperwork required to admit me as a student. (R. 31) According to the ABA rules, even though they discriminated against me, and kicked me out of school under false pretenses, once the dean categorized my dismissal as an academic dismissal, that dismissal prevented me from attending another ABA accredited law school for a period of three years. Henceforward, I was unable to attend Law school for a period of three years. Moreover, since Respondent Brooklyn Law School intentionally ruined my academic record in law school, they have made it much more difficult for me to obtain another academic scholarship from another law school. They also voided all four of the classes that I already passed, and caused me to lose all of the tuition that I paid for those classes, and for the ones that they did not allow me to complete. So now, even if I wanted to go to another Law School, I would have to retake the classes that I already passed with high marks, and I would have to pay for the same classes all over again. Consequently, instead wasting my three years off from school, being a helpless victim, I spent them taking Brooklyn Law School to court. I am hopeful that in my pursuit of justice, either the court will see the error of its ways, and render a decision that is in sync with current antidiscrimination laws, or new case law will be created which will make it harder for any institution to discriminate against another student in the way that Brooklyn Law School discriminated against me.

REASONS FOR GRANTING THE PETITION

1. THE SUPREME COURT SHOULD GRANT THIS PETITION BECAUSE IT IS AN ISSUE OF STATEWIDE IMPORTANCE AND THE LOWER COURTS DECISION IS IN CONFLICT WITH VARIOUS ANTIDISCRIMINATION LAWS

The Supreme Court should grant this petition because it is an issue of statewide importance. The problematic ruling in the lower court deems it just for an institution like Brooklyn Law School to refuse to provide students with makeup exams based on the institution's perception of the student when he or she arrives at the school on the agreed upon date to take their exams. Additionally, since the lower court's ruling is ambiguous, a Law School could technically perceive all sick students or all minority students as unworthy and unfit to take their exams, and individually start barring people who fall into any of these categories from taking their makeup exams. Withholding exams from students because you perceive them as mentally disabled is discrimination, and it is against the law. See *42 U.S. Code § 12182;* 28 CFR § 36; Title III of the Americans with Disabilities Act of 1990 (42 U.S.C. 12181–12189); Pushkin v. Regents of the University of Colorado, 658 F.2d 1372 (1981) In this case, I was discriminated against, barred from taking two of my exams, robbed of my scholarship, and kicked out of school because of an academic dean's false and discriminatory opinion of me. The case is distinguishable from those that have preceded it because unlike other petitioners, I did not fail any of my exams. Instead, I was robbed of the opportunity to take my exams because of the way that someone else perceived me when I arrived at the school on my makeup exam date. This matter is a text book example of discrimination, simple and plain.

In the lower court, I provided clear and convincing evidence which proved that aside from being hurtful and discriminatory, Brooklyn Law School's actions were in violation of 42 U.S.C. § 12182, and Section 8-107(4)(A) of the New York City Human Rights Law, which is a subset of Title III of the Americans With Disabilities Act. Moreover, any ruling that supports actions which violate constitutional statutes cannot be in accordance with the law. Although I am but one student who was deprived of the right to continue my education, the issues involved in this case are of statewide importance, and have the potential to negatively affect rulings on other similar cases. That is why I have been pursuing justice, and why I will continue to pursue it for myself and others who may be dissuaded from doing so when they find themselves in this situation.

The lower court's ruling on this matter sets a judicial precedent which deems it acceptable for educational institutions to deprive students of the right to take their exams based on the institution's perception of the student's illness and or mental state. That perception is no different than the educational institution's perception of the color of a student's skin. Moreover, judicial precedent has already established that broad stereotypes of the limitations of individuals with various disabilities whether temporary or permanent are not properly the basis of a decision that someone is not "otherwise qualified." See *42 U.S. Code § 12182; 28 CFR § 36*; Title III of the Americans with Disabilities Act of 1990 (42 U.S.C. 12181–12189); Pushkin v. Regents of the University of Colorado, 658 F.2d 1372 (1981) Brooklyn Law School did not have the right to discriminate against me, take away my scholarship, and remove me from the school because of the way that they felt about me. Subsequently, since the lower court's decision ignores the school's discriminatory actions, it is out of sync with the law.

Hereafter, In the interest of justice, I would like the Supreme Court to grant my petition, and overturn the lower court's decision as it conflicts with various antidiscrimination laws.

2. **THE SUPREME COURT SHOULD GRANT THE PETITION BECAUSE BROOKLYN LAW SCHOOL BARRED ME FROM TAKING TWO OF MY MAKEUP FINAL EXAMS SOLELY BECAUSE THEY MISTAKENLY PERCIEVED ME AS MENTALLY ILL WHEN I ARRIVED TO TAKE THE EXAMS AT THE AGREED UPON DATE AND TIME, WHICH IS AN OVERLY HARSH AND DISCRIMINATORY PUNISHMENT THAT IS IN VIOLATION OF TITTLE III OF THE AMERICANS WITH DISABILITIES ACT AND ITS SUBSET SECTION 8-107(4)(A) OF THE NEW YORK CITY HUMAN RIGHTS LAW**

In the lower court I made it clear that the only reason that I ended up with two F grades on my transcript was because the Dean reneged on her original agreement to allow me to meet with her and take my final exams on June 24, 2014. (See R. 43-44, 48-49, 58-59, 7-156, 75) I raised the issue in the lower court, the Appellate Division, and the court of Appeals as well. (App. Br & App Reply br.) Ultimately, the respondents' actions amount to an overly harsh, discriminatory, abuse of discretion in the mode, penalty, and form of discipline imposed upon me. (See R. 120, 132) Brooklyn Law School refused to allow me to take my exams, and kicked me out of school because of the type of illness that they mistakenly believed I had. I proved this by providing the police report that Brooklyn Law School filed when they refused to let me take the makeup exams that they scheduled for me on June 24, 2014. (See R. 75) The report makes it clear that they withheld my makeup exams because they viewed me as mentally ill. (See R. 75) Before this meeting, the school agreed to reschedule my exams, and they had no problem readmitting me as a student and allowing me to register. After the meeting, because of the Law School's false perception of me, they refused to even allow me to take my exams,

and they kicked me out of school for having two F grades on the exams that they refused to let me take.

While the courts are sometimes reluctant to intervene in disputes involving an educational institution's determination as to a student's academic performance, the facts in this case are clear that when I arrived at the school on June 24, 2014 to take the exams that Brooklyn Law School rescheduled for me, the school refused to provide the tests to me based on a determination related to their perception of my mental health, and not my academic performance. (R. 75) Webster's Dictionary defines unlawful discrimination as "unfair or unequal treatment of an individual (or group) based on certain characteristics, including: Age & Disability." In this instance, I was denied the right to take my exams because the Dean perceived me as mentally disabled. (R.75, 129-130) This denial is unlawful, and is no different than the school denying me the opportunity to take my test because of the Dean's perception of the color of my skin. See *42 U.S. Code § 12182*; *28 CFR § 36*; Title III of the Americans with Disabilities Act of 1990 (42 U.S.C. 12181–12189); Pushkin v. Regents of the University of Colorado, 658 F.2d 1372 (1981); *Heart of Atlanta Motel Inc. v. United States, 379 U.S. 241 (1964)* The court is clear that there must be an individualized inquiry into the circumstances of each individual and that broad stereotypes of the limitations of individuals with various disabilities whether temporary or permanent are not properly the basis of a decision that someone is not "otherwise qualified." See *42 U.S. Code § 12182*; *28 CFR § 36*; Title III of the Americans with Disabilities Act of 1990 (42 U.S.C. 12181–12189); Pushkin v. Regents of the University of Colorado, 658 F.2d 1372 (1981). When I was a student at Brooklyn Law School, I passed every exam that I was allowed to take. Henceforth, the dean's decision to prohibit me

from taking 2 exams, and then dismiss me for having two F grades on those exams had nothing to do with my academic ability, and everything to do with her false perception of my condition. Moreover, Brooklyn Law School's decision to withhold my tests from me because they perceived me as "paranoid" on the makeup exam date is considered a punishment that the court has the discretion and authority to review. "Suspension or expulsion for causes unrelated to academic achievement involve determinations quite closely akin to the day-to-day work of the judiciary." See Tedeschi v. Wagner Coll., 49 N.Y.2d 658 (1980). Consequently, the courts have the authority to look closely at the actions of educational institutions in such matters. See Tedeschi v. Wagner Coll., 49 N.Y.2d 658 (1980).

Pursuant to CPLR § 7803, the court is allowed to intervene in matters that involve Respondents who have proceeded in excess of their jurisdiction. See *Mtl". of Haggertv v. Himelein & Nevis, 89 N.Y.2d 431 (1997).* After the Dean mistakenly perceived me as mentally ill, her decision to punish me by withholding my exams and kicking me out of school is a prime example of Brooklyn Law School proceeding in excess of their jurisdiction. These actions violate tittle III of the Americans with Disabilities Act, and the school does not have the authority to discriminate with impunity and withhold tests from students simply because the Law School perceives them as ill. *42 U.S. Code § 12182; 28 CFR § 36*; Title III of the Americans with Disabilities Act of 1990 (42 U.S.C. 12181–12189); Pushkin v. Regents of the University of Colorado, 658 F.2d 1372 (1981); *Heart of Atlanta Motel Inc. v. United States, 379 U.S. 241 (1964)* In the interest of justice, I ask that the court grant my petition.

3. THE SUPREME COURT SHOULD GRANT THE PETITION BECAUSE BROOKLYN LAW SCHOOL'S DECISION TO BAR ME FROM TAKING EXAMS AFTER MISTAKENLY

PERCIEVING ME AS MENTALLY ILL, WAS AN ARBITRARY AND CAPRICIOUS ABUSE OF AUTHORITY THAT IS IN VIOLATION OF TITLE III OF THE AMERICANS WITH DISABILITIES ACT AND ITS SUBSET SECTION 8-107(4)(A) OF THE NEW YORK CITY HUMAN RIGHTS LAW

"Relief in mandamus is appropriate where the right to relief is 'clear' and the duty sought to be enjoined is performance of an act commanded to be performed by law and involving no exercise of discretion." See Kupersmith v. Pub. Health Council of State, 101 AD.2d 918, 919 (3d Dep't 1984), affd, 63N.Y.2d 904 (1984). Discrimination is against the law. Henceforth, Brooklyn Law School is obligated to follow the law and refrain from discriminating against its students. Once the Law School agreed to reschedule my exams to June 24, 2014, and I arrived at the school to take those exams, Respondent Brooklyn Law School did not have the authority to withhold those exams from me because of their perception of my mental state. (R.75, 129-130) See *42 U.S. Code § 12182; 28 CFR § 36; Americans with Disabilities Act of 1990, Pub. L. No. 101-336, 104 Stat. 328 (1990).* Furthermore, Respondents' perception of me had absolutely no effect on my ability to complete my exams. Respondent's actions are in direct violation of both Section 8-107(4)(a) of the New York City Human Rights Law, and Tittle III of the Americans With Disabilities Act. The issue was raised extensively at all stages of this proceeding. (R. 7-156, 132-133, Appellant Brief. 24-32).

Section 8-107 (4) (a) of the New York City Human Rights Law protects against unlawful discriminatory practices, and discriminatory denial of reasonable accommodation. This section states that:

*"**It shall be an unlawful discriminatory practice** for any person, being the owner, lessee, proprietor, manager, superintendent, agent or employee of any place or **provider of public***

accommodation because of the actual or perceived race, *creed,* ***color,*** *national origin, age, gender,* ***disability,*** *marital status, partnership status, sexual orientation or alienage or citizenship status of any person directly or indirectly, to refuse, withhold from or deny to such person any of the accommodations, advantages, facilities or privileges thereof, or, directly or indirectly, to make any declaration, publish, circulate, issue, display, post or mail any written or printed communication, notice or advertisement,* ***to the effect that any of the accommodations, advantages, facilities and privileges of any such place or provider shall be refused, withheld from or denied to any person on account of race,*** *creed, color, national origin, age, gender,* ***disability,*** *marital status, partnership status, sexual orientation or alienage or citizenship status or that the patronage or custom of any person belonging to,* ***purporting to be, or perceived to be, of any particular race,*** *creed, color, national origin, age, gender,* ***disability,*** *marital status, partnership status, sexual orientation or alienage or citizenship status is unwelcome, objectionable or not acceptable, desired or solicited."*

The abovementioned state statute is a state extension of the Americans with Disabilities act. (R.117-118) Title III of the ADA provides that: *"no individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation."* See 42 U.S.C. § 12182(a); 28 CFR § 36; Americans With Disabilities Act of 1990, Pub. L. No. 101-336, 104 Stat. 328 (1990).

A Plaintiff in a Title III ADA claim must prove 3 elements in order to prevail: (1) that Plaintiff is disabled within the meaning of the ADA; (2) that the Respondent owns, leases, or operates a place of public accommodation; and (3) that Plaintiff was denied public accommodation by the Respondent due to his or her disability. See Arizona ex re. Goddard v. Harkins Amusement Enters, Inc., 603 F.3d 666, 670 (9th Cir.2012); see also Dunlap v. Ass'n of Bay Area Gov'ts, 996 F.Supp. 962, 965 (N.D. Cal. 1998); see also, Shultz v. Hemet Youth Pony League, 943 F.Supp. 1222, 1225 (C.D. Cal. 1996); See also, Chapman v. Pier I Imports (U.S.), Inc.,

631 F.3d 939, 945 (9th Cir.2011); Donald v. Cafe Royale, 218 Cal.App.3d 168, 183 (The third element – whether Plaintiff was denied access on the basis of disability – is met if there was a violation of applicable accessibility standards).

As to the first element, the ADA defines a disability as a "physical or mental impairment that substantially limits one or more of the major life activities of such an individual." 42 U.S.C. § 12101(2). The Justice Department defines an "impairment" as a condition affecting one or more of the bodies' systems, including the musculoskeletal and neurological systems, and defines "major life activities" to include "functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working." See 28 CFR 36.104. In this instance, the court has enough evidence to conclude that even if Brooklyn Law School was mistaken about the nature of the impairment, they were still aware of the fact that I was temporarily disabled towards the end of the semester. For instance, the police report that the Deans filed right after our June 24, 2014 meeting confirms that the reason why they did not allow me to take my exams was because they mistakenly believed that I was "paranoid." Although they were wrong, the school was so convinced that something was wrong with me, that they called the police on me, told the police that they believed I would hurt myself, and requested that police check my mental health. (R. 75) Once again, although they were completely wrong about the nature of my ailment, the record is clear that the school mistakenly perceived me as mentally ill. (R.75) This was the one and only reason that Brooklyn Law School gave the police for refusing to provide me with my makeup exams. (R. 75) Subsequently, the school does not get to go to the police to falsely report me as being extremely ill, and then come to court and falsely report they had no knowledge of me being ill

at any point in the semester. Nonetheless, the court has completely ignored their inconsistent testimony.

Even though my impairment at the time was not a mental one, mental impairment also qualifies an individual to be protected by the Americans with Disabilities Act. See 28 CFR 36.104. Furthermore, in addition to their police report, the Respondents also filed an incident report relating to me falling physically ill, and being in pain and unresponsive after one of my classes. (See R. 81, 225) Being unable to move or respond at the end of a class is a temporary disability, but a disability nonetheless. (R. 81, 225) Despite the temporary nature of my disability, it is still covered in the language of the ADA. *See* 42 U.S.C. § 12101(2). During my exam week, for the first time in life, I was physically impaired, and unable to travel from New Jersey to Brooklyn NY to take my exams. (R. 56, 125, 44, 7-156) hence, element one is satisfied.

Element two is also satisfied because Brooklyn Law School owns and operates a place of public accommodation. As such, Brooklyn Law School is required to comply with Tittle III of the Americans with disabilities act. See 42 U.S.C. § 12182(a); 28 CFR § 36; Americans With Disabilities Act of 1990, Pub. L. No. 101-336, 104 Stat. 328 (1990). During my final exam week, because of the way Brooklyn Law School views minority students who are unfortunate enough to fall ill, they withheld my exams from me, and allowed all the students that they perceive as healthy to take their exams. (R. 7-156)

Element three is satisfied as well, because the Respondent Brooklyn Law School denied me the accommodation of taking my makeup final exams, the accommodation of being able

register for classes or take exams online, and the accommodation of being allowed to remain in the school solely because of their mistaken belief that I was mentally ill. (R. 7-156, 132) As they admitted in the police report, my access to makeup exams, the web advisor program, my publicly funded scholarship, and the school itself, were all curtailed because of an Academic Dean's false opinion of me. Once again, that is a violation of Title III of the ADA. See Chapman v. Pier I Imports (U.S.), Inc., 631 F.3d 939, 945 (9th Cir.2011); Donald v. Cafe Royale, 218 Cal.App.3d 168, 183 (The third element – whether Plaintiff was denied access on the basis of disability – is met if there was a violation of applicable accessibility standards).

Ultimately, the Respondent Brooklyn Law School's decision to withhold my tests from me after mistakenly perceiving me as mentally ill is a discriminatory denial of public accommodations that rises to the level of an abuse of discretion and authority. Moreover, their decision to do so also violated numerous statutes and laws. "Once there is procedural noncompliance by an administrative board that violates a mandatory statutory provision and rises to the level of an abuse of discretion or authority, the noncompliance alone is sufficient to warrant granting judicial relief (multiple citations omitted)." See Mtl'. of Svquia v. Bd. of Educ. of the Harpursville Cent. Sch. Dist., 80 N.Y.2d 531 (1992). In this instance, the court has the authority to assess whether there is a rational basis for the Law School's determination, or whether that determination is arbitrary and capricious. See MtL of Arrocha v. Bd. of Educ. of Citv of N.Y., 93 N.Y.2d 361 (1999). If Brooklyn Law School genuinely believed that I was ill when I arrived to take the exams that they rescheduled for me, then the rational thing to do would have been to reschedule them for another date. Instead, because of what they mistakenly perceived as a mental illness, they chose to discriminate against me by taking away my opportunity to take my

exams, taking away my scholarship, retroactively removing me from all the courses that I was already enrolled in, and retroactively kicking me out of school altogether. That is discrimination. If the Academic Dean felt so concerned about her unsubstantiated belief that I was mentally ill that she saw the need to call the police on me, that same concern should have motivated her to either allow me to take my exams on the spot, or as soon as she perceived me as well enough to do so. Instead, because of her false, hateful, discriminatory perception of me, she robbed me of all my opportunities, and took actions that would ensure that I would not be able to continue my education for at least 3 years. Her actions are no different than those of hate groups that used to kick minorities out of restaurants and other establishments because of the way that the groups perceived them back in the 1950s. See *Heart of Atlanta Motel Inc. v. United States, 379 U.S. 241 (1964).* Discrimination is a hateful and unlawful act that has no rational basis. The Respondent's perception of me has no bearing on my actual ability to complete my exams. The court system takes a step backwards anytime it allows one individual's ridged view of the innate and unchangeable characteristics of a minority group to curtail the progress of a minority and eliminate that minority's ability to continue their education. Any decision that rules in favor of the respondents' actions in this matter is an unconscionable decision that is not in accordance with the law. Subsequently, I would like the Supreme Court to grant my petition.

4. **THE COURT SHOULD GRANT THE PETITION BECAUSE AFTER I NOTIFIED THEM THAT I WAS ILL, BROOKLYN LAW SCHOOL PROCEED IN EXCESS OF THEIR DISCRETION BY PERFORMING UNORTHODOXED ACTIONS THAT THE SCHOOL'S HANDBOOK DOES NOT EXPLICITLY ALLOW SUCH AS, BLOCKING MY ACCESS TO THE WEB ADVISOR PROGRAM, AND PLACING A "STUDENT EVALUATION" HOLD ON MY ACCOUNT WHICH NULLIFIED MY ABILITY TO WITHDRAW, NULLIFIED MY ABILITY TO TAKE EXAMS ONLINE, AND**

VIOLATEED TITLE III OF THE AMERICANS WITH DISABILITIES ACT AND ITS SUBSET SECTION 8-107(4)(A) OF THE NEW YORK CITY HUMAN RIGHTS LAW

Pursuant to CPLR § 7803, the court is allowed to intervene in matters that involve respondents who have proceeded in excess of their jurisdiction. See Mtl". of Haggertv v. Himelein & Nevis, 89 N.Y.2d 431 (1997). One of the many accommodations that Brooklyn Law School awards to all of its students is the ability to withdraw from classes or take exams online. (R. 118-119) Every student has access to a program called web advisor. (R.118-119) This program can be used to manually withdraw from classes if the need arises. (R.118-119) In my case, during exam week, I was being ignored by the only person who had the authority to allow me to take my exams. (R. 128) That is the perfect situation for a student to use the program to insure that they are not unfairly issued F grades. My access was not restricted during the first semester, and was only restricted after I fell ill at the end of one of my classes, and called the school to inform them that I was sick. The school's decision to block my web advisor access left me with no way to take my exams or withdraw from any of my classes. I was left completely at the mercy of an individual who refused to grant me the opportunity to take my exams because of her false perception of my mental state, not my academic ability, but her perception of me and my state of mind. (R. 73-75) While I have no control over the way that Dean Jennifer Lang perceives me, sick students, or minorities in general, I take solace in the fact that Tittle III of the Americans with Disabilities Act was written for situations exactly like this one.

Tittle III of the Americans with Disabilities act makes it clear that it is illegal to deny someone access to public accommodations based on your perception of their disability. *See*

Dunlap v. Ass'n of Bay Area Gov'ts, 996 F.Supp. 962, 965 (N.D. Cal. 1998); see also, Shultz v. Hemet Youth Pony League, 943 F.Supp. 1222, 1225 (C.D. Cal. 1996); See also, Chapman v. Pier I Imports (U.S.), Inc., 631 F.3d 939, 945 (9th Cir.2011); Donald v. Cafe Royale, 218 Cal.App.3d 168, 183 (The Tittle III violation occurs if there was a violation of applicable accessibility standards). In this instance, once Brooklyn Law School mistakenly perceived my illness as a mental one, they put a "Student Evaluation" hold on my account, and restricted my access to the web advisor program, thus ensuring that I would not be able to manually withdraw from any of my classes, or take any tests online. Again, the web advisor program was explicitly created for the purpose of allowing students to withdraw if the need ever arose. Brooklyn Law School does not have the right to pick and choose who they allow to use it. This is especially true if that choice is related to an academic dean's perception of a student's mental state. Chapman v. Pier I Imports (U.S.), Inc., 631 F.3d 939, 945 (9th Cir.2011); Donald v. Cafe Royale, 218 Cal.App.3d 168, 183. (The Tittle III violation occurs if there was a violation of applicable accessibility standards). Once again, I respectfully ask that the court help remedy this problem by granting my petition.

CONCLUSION

In general, people who discriminate against others based on the color of their skin, or their false perception of a person's ailment, do not come into court and admit to their discriminatory actions. Instead, most of them do exactly what the two Deans did to me. They give inconsistent versions of what transpired when they met with the person that they discriminated against. In this case, the deans gave three conflicting affidavits explaining what transpired on the makeup exam date that they set for me. They gave an affidavit with one false narrative to the police, and when I sued them, they drafted affidavits and gave conflicting false narratives to the court. Ultimately, when all else failed, the deans chose to blame the victim. The Deans blame me for being a human being and getting sick during exam week. They blame me for not being able to make Academic Dean Jennifer Lang do her job and return my phone calls, or communicate with me as she should with any person who is unfortunate enough to fall ill at such a critical time. They blame me for the abnormally long length of time that they took to reschedule my exam after I called out sick on exam day. They blame me for being robbed of my scholarship, and being too poor at the onset of this case to afford an attorney who's presentation would have been more effective. They blame me for failing to recognize the unethical nature of the individuals that I was reaching out to when I fell ill, and the importance of preserving evidence of every single call that I made to each of the unethical Brooklyn Law School staff members, who either remained silent during the court proceedings, or falsely denied ever hearing from me during exam week. I could continue on, and discuss more ways in which the rational actions that I took after falling ill during exam week have been demonized,

and skewed by the respondent, but instead, I will emphasize the point that I am the victim in this case, and I was discriminated against simple and plain.

One of the main reasons why I wanted to become an Attorney was to get justice for the unjustly accused, to advocate for those who are poor and less fortunate, and to stand up for those who are incapable of standing up for themselves. Logically, when I found myself in that same position, I was not going to let the prestige of the institution, or the intellect of my opposition deter me from seeking justice for myself, just like I would for those who I eventually plan to advocate for. In the end, Brooklyn Law School discriminated against me, and academically dismissed me in the only way that they could. They robbed me of my ability compete against my fellow students. Any dean who willfully and maliciously engages in actions that are designed to deprive a student of his or her education is a dean that should not be employed in that capacity. It takes a high degree of hatred to boldly deprive a student of his ability to compete for the right to go to school. To put this hatred into perspective, in the 1930s when Germany hosted the Olympics, even Adolf Hitler with, all his hatred for minorities, did not deprive Jesse Owens of his ability to compete. When Owens competed, he went on to win 4 gold medals, proving that Hitler's hate filled perception of him meant absolutely nothing. Like civil rights icon Jesse Owens, with the help of the Supreme Court, I would like to be given the opportunity to take my exams and prove that Brooklyn Law School's hateful and discriminatory perception of me also means nothing. Accordingly, just as Oliver Brown did in Brown v. Board of Education, and the other brave souls that preceded him, I now stand before the Supreme Court to once again act as a voice for an underprivileged, disabled, and often unheard minority group, by protesting the unconstitutional actions of Brooklyn Law School. In

2014, when I informed Brooklyn Law school that I was sick, they barred me from taking my exams, constantly called the police on me for no reason, retroactively withdrew me from all of the classes that I was already enrolled in, and eventually kicked me out of the school altogether simply because I was a minority who fell ill at the wrong time. I was robbed of my scholarship, and kicked out of school not because I was unable to complete my courses of study, but because of Brooklyn Law School's perception of people who fall ill, and their negative perception of minorities in general. In the interest of justice, I ask that the Supreme court overturn the erred, unconstitutional decision of the lower court to ensure that students are not discriminated against and barred from taking exams based on the color of their skin, the existence of actual or perceived disabilities, or the false perception of the abilities of those with temporary or permanent disabilities.

Subsequently, I humbly request that the court grant the petition for a writ of certiorari, and grant the following relief:

(1) I petition the court to reexamine the evidence that I submitted, and the arguments that I made when I submitted my original order to show cause, as much of them were ignored by the lower court

(2) I Petition the court to compel respondent to issue me the W grades that I would have received if the respondents refrained from discriminating against me, blocking my access to the web advisor program, and withholding my final exams, as this will enable me to continue my education at the school and take the exams that they barred me from taking;

(3) In lieu of the grade reversal, then I petition the court to compel Respondent to allow me to retake the tests that they barred me from taking after they mistakenly perceived me as mentally ill, and compel Respondent to allow me to retake the courses that Respondent did not allow me to complete as the material has changed since 2014;

(4) In lieu of the above referenced relief I petition the court to compel the Respondent to refund me the tuition money that I lost because of them discriminating against

me and baring me from taking my exams, and the money that I will now have to spend to retake the courses that I already completed, and the ones that the Respondents barred me from completing, which amounts to $45,705.

(5) In the event that it is not within the court's jurisdiction to grant the abovementioned relief, then I ask that the court compel the respondent to provide me with adequate relief that is within the court's jurisdiction, and or grant such other and further relief as the court may seem just and equitable.

DATED: 6/13/18

Respectfully Submitted,

Signature: Maurice Daniel

Print Name: Maurice Daniel

Address: 240 Christie Street, Apt. 1

Ridgefield Park, NJ 07660

Phone: 208-853-9264

Sworn to before me this 15

Day of June, 2018

Maurice Daniel

Signature

Josephine Bourne

Notary Public

JOSEPHINE BOURNE
Notary Public, State of New York
No. 04BO6325374
Qualified in Kings County
Commission Expires May 26, 2019