

No. 18-5537

In The
Supreme Court of the United States

ALLA OPENGEYM,

Petitioner,

vs.

HEARTLAND EMPLOYMENT SERVICES, LLC,

Respondent.

**On Petition For A Writ Of Certiorari
To The United States Court Of Appeals
For The Sixth Circuit**

PETITION FOR REHEARING

ALLA OPENGEYM
7340 Silver Leaf Lane
West Bloomfield, MI 48323
(248) 910-4324

QUESTIONS PRESENTED

- 1) Whether the offensive joke, "how many Jewish people can you fit in a Volkswagen? The answer being, 2 in the back, 2 in the front and 96 piles of ashes" can be understood by me, my communities, and Heartland Employment Services, LLC's, patients as a threat of harm and fear of injury.
- 2) Whether my communities, Employment Services, LLC, patients, Employment Services, LLC, employees and I are not getting the protection we deserve.
- 3) Whether the Heartland Employment Service, LLC, has intentionally failed to sufficiently and properly to investigate my reports.
- 4) Whether the Heartland Employment Service, LLC, knowingly supported the untruthful statements told by a fellow employee, promoting engagement in harassing actions, causing ongoing harm and delay to prevent and promptly correct the harassing behavior.
- 5) Whether the employer's complaint procedure was not followed and failed the employer to take corrective action to prevent harm to the hardworking employee and her community.
- 6) Whether the preventive remedy and corrective actions were taken in order to avoid hostile and offensive environment to my communities, Heartland Employment Services, LLC's, patients, employees and me.
- 7) Whether it is our responsibility to make sure that "Cycle of Jewish History" will never repeat again.

LIST OF PARTIES

All parties do not appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

All other subsequent corporations and individual facility who are or will take over the Heartland Employment Services, LLC, at the present and in the future time. Present and former executives, administrations, nurses.

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**IN THE SUPREME COURT
OF THE UNITED STATES
PETITION FOR REHEARING**

Petitioner respectfully prays that a petition for rehearing issue to review the judgment below.

OPINIONS BELOW

The order of the United States Court of Appeals appears at Appendix A to the petition and is unpublished.

The opinion of the United States Court of Appeals appears at Appendix B to the petition and is unpublished.

The opinion of the United States District Court appears at Appendix C to the petition and is unpublished.

JURISDICTION

The date on which the Supreme Court of the United States decided the petition of certiorari was November 13, 2018.

The petition for writ of certiorari was denied.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.

Title VII and the Civil Rights Act of 1964.

STATEMENT OF THE CASE

With respect to the United States District Court, Eastern District of Michigan, Southern Division.

With respect to the United States Court of Appeals for the Sixth Circuit.

With respect to the Supreme Court of the United States.

As an American citizen and a member of a lifelong socially excluded ethnic group, I am Alla Opengeym, the Petitioner, have a moral responsibility to write the petition for rehearing on the United States behalf in good faith and not for delay. Unfortunately, all these years authorities of the United States District Court, Eastern District of Michigan, Southern Division, the United States Court of Appeals and the Supreme Court of the United States have made a serious mistake when they overlooked and did not pay attention to the documents that have described my concerns related to the "Jewish Joke" which can be understood by

me and my communities as a threat of harm and fear of injury.

REASONS FOR GRANTING THE PETITION

As a person of a family most of which did not survive the Holocaust and a person who has suffered from discrimination, I am Alla Opengeym, the Petitioner, has strived diligently in memory of the almost vanished Ashkenazi Jewish Community to protect survivors, so that nobody ever has to be treated “as a pile of ashes.”

Indifference never was, is not now, and never will be the solution to Anti-Semitism.

As a fact, by educating people about Jewish history, culture and values, and by giving equal respect which Jewish people have deserved, we are preventing mental pain, suffering from limitations and irreparable harm, as a result of destroying innocent people’s lives for all human beings.

To make sure that “Cycle of Jewish History” will never repeat again, I have a dream to create the Center of Ashkenazi Communities, showing the life of the almost vanished Ashkenazi ethnic group, to retain their cultural identity, share their values, and celebrate lives.

All these years, Heartland Employment Services, LLC, has treated me and my community without dignity and respect, continually and intentionally has

used untruthful statement by nurse Paula to cover discrimination and has ignored my recommendation for employees education, did not give equal protection to me, innocent defenseless patients and my communities based on race, ethnicity, national origin, causing ongoing harm and delay of corrective actions.

CONCLUSION

For the reasons stated above, the Supreme Court should reverse the decision made on November 13, 2018, and make Heartland Employment Services, LLC, be fully responsible for ongoing intentional harm. The Petitioner prays that the proper process issue to the respondent and the Honorable Court grant a judgment for the petitioner and against the respondent for any and all actual, special, compensatory, and punitive damages to which this Honorable Court deems the Petitioner to be entitled, and for attorney fees, interest, court cost and any and all further relief under the applicable states mentioned above to which this Honorable Court deems the petitioner to be entitled.

Respectfully submitted,

A. OPENGEYM

Originally Filed: December 21, 2018
Refiled: January 10, 2019

CERTIFICATE OF GOOD FAITH

Pursuant to Rule 44, Rules of the Supreme Court I hereby certify that this petition for rehearing is restricted to the grounds specified in Rule 44, paragraph 2, Rules of the Supreme Court, and is being presented in good faith and not for delay.

ALLA OPENGEYIM