

Case No. _____

In The Supreme Court Of The United States

Marlon L. Watford

Petitioner

vs.

Thomas LaFond, et al.

Respondents

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

* * *

Petition For Writ Of Certiorari

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Question Presented

When a district judge shows biasness during the 28 U.S.C. § 1915(A) screening process stage of a 1983 complaint does the Petitioner-Plaintiff have a 28 U.S.C. § 144 right to have his Motion For Substitution Of Judge heard before a judge other than the one he is complaining about in accordance with the Federal Law and the fairness component of the due process of law clause of the 14th Amendment?

List Of Parties

Officer Thomas LaFond

Officer Sarah Wooley

Lynette Colvis

Sergeant Bradley

Jenny Clendenin

Officer Severs

Officer Rose

Warden Kimberly Butler

John Doe (1)

John Doe (2)

John Doe (3)

John Doe (4)

John Doe Senior Judge (5)

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Opinions Below

The opinion of the United States Court of Appeals For The Seventh Circuit appears at Appendix A and B and is an unpublished opinion (see Appendix A and B). The opinion of the United States District Court For The Southern District Of Illinois appears at Appendix C and is an unpublished opinion (see Appendix C).

* * *

Jurisdiction

The date on which the United States Court of Appeals For The Seventh Circuit rendered its opinion on the Petitioner's case was June 1, 2018 (see Appendix A and B). No petition for rehearing was filed.

The jurisdiction of this Supreme Court is invoked pursuant to 28 U.S.C. § 1254(1).

* * *

Constitutional And Statutory Provisions Involved

28 U.S.C. § 144 reads in the following manner:

"Whenever a party to any proceeding in a district court makes and files a timely and sufficient affidavit that the judge before whom the matter is pending has a personal bias or prejudice either against him or in favor of any adverse party, such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding."

The Fourteenth Amendment reads as follows:

"No State shall make or enforce any law which

shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

* * *

Statement Of The Case

On August 24, 2016 the Petitioner filed a Civil Suit Petition pursuant to 42 U.S.C. § 1983 and 42 U.S.C. § 2000cc in the United States District Court, Southern District Of Illinois——giving said court jurisdiction over the Petitioner's case (see Doc.1). Said petition presented a host of constitutional violations pertaining to the Petitioner being denied access to the courts, due process of law, being subjected to cruel

and unusual punishment, etc. — due to prison officials denying him meaningful access to the E-Filing system and the U.S. Mail Service to send his change of address notification letter, which resulted in his Watford v. Quinn (14-CV-00571) case being dismissed for failure to prosecute; and, for said officials opening up his clearly marked legal mail and depriving him of adequate state soap to take care of his religious personal hygiene on court writs.

On November 2, 2016 the District Court dismissed the Petitioner's complaint without prejudice and instructed him to amend it pro se and allotted him a 28 day time extension to do so (see Doc. 8). On November 9, 2016 the Petitioner moved the District Court for a status update and said court

granted his request and issued a summarized order depicting its dismissal without prejudice order and instructed the court clerk to mail the Petitioner a copy of the November 2, 2016 dismissal order (see Doc. 10).

On November 21, 2016 the Petitioner received for the first time the District Court's November 2, 2016 dismissal order and forthwith filed a Motion For An Extension Of Time (viz: 90 days) (see Doc. 11). On December 1, 2016 the District Court granted in part the Petitioner's time extension request (viz: 30 days) (Doc. 12).

On December 23, 2016 the Petitioner filed a Motion To Object, Spread The Record, And Request Reconsideration (re [Doc. 8]) (see Doc. 13): In said motion the Petitioner gave Judge Reagan

judicial notice that on December 1, 2015 that Judge Reagan, himself, entered a finding of fact on the Petitioner's Watford v. Ellis case (15-CV-0567) that he didn't possess the wherewithal to amend a complaint pro se and recruited him counsel; and, that on May 16, 2016 Judge Zagel of the Northern District made an identical finding of fact on the Petitioner's Watford v. Natasha Doe (15-CV-9540) and recruited him counsel (see e.g., Appendix D and E).

Further, in said motion the Petitioner argued, inter alia, that it defies logic and fairness for Judge Reagan——and Judge Zagel——to make a finding of fact that he doesn't possess the wherewithal to amend a complaint pro se on one case and turn around and compel/direct him to amend a complaint pro se on another case; and, that Judge Reagan was

holding him to a more stringent standard than an attorney is held to by giving him less time (viz: 28 days) to amend his complaint pro se than the time (viz: 60 days) he gave his attorney to amend his complaint on his Watford v. Ellis case (see e.g., Appendix F (viz: P. 4-5)).

Lastly, the Petitioner argued in said motion that Judge Reagan overreached the scope of his (28 U.S.C. § 1915(A)) screening complaint authority by finding on the behalf of the Respondents that they couldn't understand his complaint when it is the sole duty of the Respondents to make such a finding of fact and to request for a more definite statement of the claim pursuant to Fed. R. Civ. P. Rule 12(c) — and the Petitioner requested the relief of a 90 day extension and recruitment of counsel.

On December 27, 2016 Judge Reagan granted in part and denied in part the Petitioner's said motion and gave him a 30 day time extension to amend his complaint (see Doc. 14). On December 30, 2016 the Petitioner made his third request for an extension of time (see Doc. 15). On January 4, 2017 the District Court denied the Petitioner's third extension request as moot (see Doc. 16).

On January 27, 2017 the Petitioner filed a Motion To Recruit And Appoint Counsel and a Motion For Substitution Of Judge with his §144 affidavit incorporated into said motion [herein-after referred to as S.O.J. motion] (see Doc. 17 and 18). On February 7, 2017 Judge Reagan first dismissed the Petitioner's 1983 complaint for failure to state a claim and for failure to prosecute and denied his Motion To Recruit And Appoint Counsel;

and, second, Judge Reagan sat in judgment of himself and denied the Petitioner's S.O.J. motion and signed off on the denial order (see Doc. 19 and 20). (see also Appendix C).

On February 28, 2017 the Petitioner timely filed a Notice Of Appeal (see Doc. 21). Pursuant to 28 U.S.C. § 1291 the United States Court of Appeals For The Seventh Circuit had jurisdiction over the Petitioner's appeal. On appeal the Petitioner raised four claims of error and argued first that: 1) Judge Reagan abused his discretion for sitting in judgment of himself in violation of the federal law in regards to the Petitioner's S.O.J. motion, 2) for denying his Motion To Recruit And Appoint Counsel, 3) for ruling that his third request for an extension of time was moot, and 4) for dismissing his complaint for failure to state a claim and for failure to prosecute.

On June 1, 2018 the Seventh Circuit Court of Appeals affirmed the dismissal of the Petitioner's complaint and the denial of his Motion For Substitution Of Judge and other said motions on the ground that the district judge didn't abuse his discretion for sitting in judgment of himself and not referring the Petitioner's S.O.J. motion to another judge to be heard because he didn't attach an affidavit to it and because he didn't have counsel of record certifying that his affidavit is filed in good faith (see Appendix A).

* * *

Reasons For Granting The Petition

It is the Petitioner's position that the Seventh Circuit Court of Appeals' affirmance of the dismissal of the Petitioner's 1983 complaint and denial of his Motion For Substitution Of Judge, Motion For

An Extension Of Time, and Motion To Recruit And Appoint Counsel—— based off the finding that the district judge didn't abuse his discretion for sitting in judgment of himself on the Petitioner's S. O. J. motion instead of referring it to another judge to be heard and giving him less time to amend his complaint pro se than he gave the Petitioner's recruited counsel on another case—— is such a rash deviation from the federal law(s) that warrants this Court to grant certiorari to expand its Haines v. Kerner holding to cover S. O. J. motions, extension of time motions, and to further develop the law concerning recruitment of counsel motions where two district judges entered identical finding of facts that the Petitioner didn't possess the wherewithal to amend a complaint pro se justifies the recruitment of counsel.

The federal law mandates that when a

substitution of judge motion is filed on bias and prejudice grounds that the presiding judge must proceed no further but instead must refer the motion to another judge to be heard. See U.S. v. Grinnell Corp., 86 S. Ct. 1698 (at 1710) (see also Footnote 13). See also 28 U.S.C. §144.

In his S.O.J. motion the Petitioner contended that Judge Reagan was bias against him because he is a pro se litigant and that his "choice" not to go to law school predates the litigation of his Watford v. LaFond case (see Doc. 18). In said motion the Petitioner incorporated his §144 affidavit therein (see I.d.). Further, the Petitioner contended that Judge Reagan refuse to follow the federal law that pro se litigants are to be held to less stringent standards than an attorney is held to (see Doc. 18).

On February 7, 2017 Judge Reagan sat

in judgment of himself and denied the Petitioner's S.O.J. motion and placed his signature on the denial order and prior thereto denied his Motion To Recruit And Appoint Counsel and dismissed his 1983 complaint for failure to prosecute and failure to state a claim (see Doc. 19). And on June 1, 2018 the Court of Appeals affirmed the denial of the Petitioner's S. O. J. motion on the grounds that: 1) he did not attach an affidavit detailing the nature of the judge's alleged bias; and 2) he didn't "have" counsel to certify that the affidavit was filed in good faith (see Appendix A (at P. 3)).

The federal law mandates that legal pleadings filed by pro se litigants are to be held to less stringent standards than pleadings drafted by a lawyer. See Haines v. Kerner, 92 S. Ct. 594 (at 596).

As an initial matter, once the Petitioner filed his S.O.J. motion the district judge (viz: Judge Reagan) had a duty to "not" rule on the Petitioner's 1983 complaint and Motion To Recruit And Appoint Counsel until the Petitioner's S.O.J. motion was heard and decided by another judge. What is more, all formal, technical, and procedural requirements that must be met to file a S.O.J. motion are to be checked for by the S.O.J. hearing judge and not by the judge (viz: Reagan) who is being complained about.

However, Judge Reagan did no such thing and failed to discharge the aforementioned duty; but, instead, denied the Petitioner's Motion To Recruit And Appoint Counsel and dismissed his 1983 complaint and thereafter sat in judgment of himself and denied the Petitioner's S.O.J. motion and signed off on the S.O.J. denial order in violation of the federal law and Congress' S.O.J. statute (i.e., 28 U.S.C. § 144) (see Appendix C).

See In re Murchison, 75 S. Ct. 623 (at 625) (To this end no man can be a judge in his own case and no man is permitted to try cases where he has an interest in the outcome.). See also U.S. v. Grinne 11, 86 S. Ct. 1698 (at 1710) (see Footnote 13).

Which is a clear abuse of discretion and spells out to a meritorious abuse of discretion claim for the erroneous denial of the Petitioner's S. O. J. motion, re-enactment of counsel motion, and dismissal of his 1983 complaint. That is to say, a meritorious claim that warrants reversal because the Petitioner suffered the prejudice of being denied a fair and impartial tribunal for his S. O. J. motion, etc.

However, instead of reversing the district judge's erroneous rulings the Seventh Circuit Court of Appeals affirmed said rulings on the grounds that:

- 1) the Petitioner didn't attach an affidavit to his

S.O.J. motion as required by 28 U.S.C. § 144; and
2) without counsel the Petitioner could not comply with
the requirement of statute 28 U.S.C. § 144 that counsel
of record certify that the affidavit is filed in good faith
(see Appendix A (at P.3)).

The aforementioned grounds of affirmance
are unsound because the first ground ignores the fact
that the Petitioner incorporated his § 144 affidavit into
his S.O.J. motion (see Doc. 18). Also, the first ground
of affirmance contravene and does major violence to the
federal law that pro se legal pleadings are to be held
to less stringent standards than pleadings drafted by
a lawyer. See Haines v. Kerner, 92 S.Ct. 594 (at 596).

Which is an aberration so far from the
federal law previously mentioned that this Supreme
Court must grant certiorari to address this issue
of first impression regarding whether a pro se

litigant incorporating his § 144 affidavit into his S.O.T. motion is sufficient or such a defect that it falls outside the scope of the Haines v. Kerner holding where it is reasonable for a Court of Appeals to not follow it and affirm a denial of a S.O.T. motion where the district judge didn't refer the S.O.T. motion to another judge to be heard and is at in judgment of himself in violation of the federal law depicted in the U.S. v. Grinnell holding? See Supreme Court Rule 10(a).

With certiorari granted this Supreme Court can expand its Haines v. Kerner holding to cover legal pleading format situations dealing with S.O.T. motions filed by pro se litigants — which will lead to the proper development of the law being that this particular pro se legal pleading format issue of the case at bar has broad relevance to all pro se litigants across the nation due to the bulk of civil and

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criminal (e.g., collateral-attack) litigation in state and federal court is initiated by pro se litigants. Litigants who may very well have valid grounds to file a S.O.J. motion.

Furthermore, the second ground of denial totally disregards the Petitioner's right to proceed pro se per the federal law. See Forett v. California, 95 S.Ct. 2525 (at 2534). That is to say, the second ground of apprehension and Seventh Circuit case law leave the Petitioner free operating as his own counsel and certifying that his S.O.J. motion is filed in good faith due to the Petitioner not having a law license. (See Appendix A (at P.3)). See U.S. v. Barnes, 909 F.2d 1059 (at 1072) (7th Cir. 1990) ("the affidavit must be accompanied by a certificate of counsel of record stating that it is made in good faith.").

In addition to that, in 1983 litigation

the Petitioner has no constitutional right to counsel; however, the Seventh Circuit has issued a decision based off its second ground of affirmance of the denial of the Petitioner's S.O.J. motion — that in tantamount mandates that in order for him to file an S.O.J. motion in a 1983 case a petitioner-plaintiff must have counsel to certify that his S.O.J. motion is filed in good faith notwithstanding the fact that the Petitioner has no constitutional right to compel a district court to recruit counsel on his behalf (see Appendix A (at P.3)). Which is a catch-22.

To put it another way, the Seventh Circuit has fashioned a decision that has made it impossible for a pro se litigant to certify that the affidavit of his S.O.J. motion is filed in good faith. Thus, further warranting the granting of certiorari because the

Seventh Circuit has decided an important (due process of law) federal question——concerning whether a pro se litigant has the right to file a S.O.J. motion and certify via affidavit that his said motion is filed in good faith when proceeding pro se pursuant to the federal law——that consequently conflicts with this Court's Faretta v. California holding, and McKaskie v. Wiggins holding*. See Supreme Court Rule 10(c). See also Faretta v. California, 95 S. Ct. 2525 (at 2534) (The Sixth Amendment . . . implies a right of self-representation.). See also McKaskie v. Wiggins, 104 S. Ct. 944 (at 949) (A defendant's right to self-repre-

*Footnote: The Seventh Circuit Court of Appeals' decision gives rise to a constitutional question of whether a plaintiff has a constitutional right to recruited counsel in a 1983 cause-of-action for S.O.J. motion purposes. Thus, the Writ must be granted to answer this constitutional question too.
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resentation plainly encompasses certain specific rights to have his voice heard. The pro se defendant must be allowed to control the organization and contents of his own defense, to make motions, to argue points of law
...

Simply put, the Seventh Circuit has fashioned a rule of law that a pro se litigant can't file a S.O.J. motion in a 1983 case. Which violates the above federal laws. So this Supreme Court must intervene.

At any rate, in total contradiction of its finding that the Petitioner must have counsel to certify that his S.O.J. motion is filed in good faith, the Seventh Circuit Court of Appeals concluded that the district judge didn't abuse his discretion for denying the Petitioner's Motion To Recruit And Appoint Counsel on the ground that he provided "no information regarding his level of

education, language difficulties, medical issues, and mental health issues," — making it impossible for the judge to gauge Watford's competence (see Appendix A (at P. 2-3)).

The aforementioned ground of affirmance is not supported by the record because in his Motion To Recruit And Appoint Counsel and in his opening brief to said court of appeals the Petitioner gave judicial notice of the fact that the district judge (viz: Reagan) on the Petitioner's Watford v. Ellis case made a finding of fact on December 1, 2015 and that Judge Zagel of the Northern District did the same on May 16, 2016 on the Petitioner's Watford v. Natasha Doe case that the Petitioner did not possess the wherewithal to amend a complaint pro se (see Doc. 17) (see also Doc. 13) (see also Appendix D (at P. 2) and E).

That is to say, notwithstanding the fact the Petitioner provided no information regarding his "education level", etc., he nonetheless disclosed relevant and competent information concerning his inability to amend a complaint pro se and that recruited counsel was needed: Which clearly highlighted the merits of his recruitment of counsel request to the district judge (viz: Reagan) and the Seventh Circuit Court of Appeals to gauge the Petitioner's competence.

Which means that the district judge abused his discretion for ignoring said facts and denying the Petitioner's said counsel request. Thus, the Seventh Circuit Court of Appeals' affirmance ruling is clearly erroneous, and warrants that this Supreme Court exercise its supervisory powers because the following federal questions of law should be decided by this Supreme

Court and not the Seventh Circuit Court of Appeals: 1) does a petitioner-plaintiff have a constitutional right to recruited counsel where two federal judges make a finding of fact that he does not possess the wherewithal to amend a complaint pro se and one of the two judges instructs him to amend a complaint on another case pro se (see Appendix D (at P. 2) and E; and see Doc. 8); 2) does the judge complained of have the duty to determine whether a party's S.O.J. affidavit is sufficient to warrant a S.O.J. hearing by another judge (see P. 14 above, first paragraph); and 3) does a petitioner-plaintiff have a constitutional right to recruited counsel in a 1983 action due to the mandate by Congress that his 28 U.S.C. § 144 affidavit to his S.O.J. motion must be certified by counsel that the S.O.J. motion is filed in good faith ??? (see P. 20 above, *Footnote). See Supreme Court Rule 10(c).

In furtherance, said court of appeals' affirm-
ance ruling that the district judge's most ruling on
the Petitioner's third request for an extension of time
was not an abuse of discretion based on the ground
that the Petitioner refused to comply with the court's
orders is erroneous and warrants being set aside
because it settles a federal question of law that should
be decided by this Supreme Court "and" conflicts with
the Haines v. Kerner decision. Which further necessi-
tates that certiorari be granted.

It is well settled that the federal man-
dates that pro se litigants are to be held to less
stringent standards than an attorney is held to.
See e.g., Haines v. Kerner, 92 S. Ct. 594 (at 596).

On November 30, 2016 the Petitioner

requested a 90 day time extension to amend his 1983 complaint (see Doc. 11). On December 23, 2016 the Petitioner requested a 90 day time extension for a second time incorporated into his Motion To Object, Spread The Record, And Request Reconsideration (see Doc. 13). On December 30, 2016 the Petitioner made his third request for a 90 day extension of time to amend his 1983 complaint and incorporated therein his prior time extension requests arguments (see Doc. 15). On January 4, 2017 the district judge (viz: Reagan) ruled that the Petitioner's third request was moot and granted him 30 day extensions for his first and second time extension requests on prior dates (see Doc. 12, 14, and 16).

In his motions for an extension of time and in his opening brief to the Seventh Circuit Court of Appeals the Petitioner gave judicial

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notice that the district judge (viz: Reagan) gave the Petitioner's counsel on his Watford v. Ellis case approximately a 120 days to amend his complaint (see Appendix F (viz: P. 4-5 (i.e., Doc. Entry 15, 19, 20, 21, and 22))). Throughout the course of the litigation of the Petitioner's Watford v. LaFond case he was engaged in preparing legal pleadings in three other courts pro se (see Doc. 21 (viz: Exhibits 1-7)). And absent from the Seventh Circuit Court of Appeals June 1, 2018 decision/opinion is said court taking notice that the district judge gave a licensed lawyer more time to amend a complaint than he gave the pro se Petitioner and throughout the litigation of the Petitioner's Watford v. LaFond case he was engaged in preparing legal pleadings in three other courts (see Appendix A (at P. 2)).

We review a district court's refusal to grant an extension of time . . . for abuse of discretion. See Blue v. Hartford Life + Accident Ins. Co., 698 F.3d 587 (at 593) (7th Cir. 2012). Matters of (case and pretrial) management are for the district judge and we intervene only when it is apparent the judge has acted unreasonably. See Id. (at 593).

When taking notice of the fact that the Petitioner was engaged in other litigation and preparing other legal pleadings concerning the same tends to suggest that his third request for an extension of time was not moot and that said litigation is what impeded him from complying with the district judge's amendment order(s) due to competing deadline filing dates overwhelming the pro se Petitioner — as opposed to him just being

defiant to those orders.

Furthermore, the district judge giving the Petitioner's counsel on his Watford v. Ellis case more time to amend his complaint than he gave the Petitioner on his Watford v. LaFond case prose was a clear violation of the Petitioner's due process of law right to be held to less stringent standards than an attorney is held to. See Haines v. Kerner, 92 S.Ct. 594 (at 596).

Namely, the district judge gave the Petitioner's counsel on his Watford v. Ellis case a total of 117 days to amend his complaint and only gave the Petitioner a total of 97 days to amend his complaint prose on his Watford v. LaFond case (see Appendix A (at P. 2) and Appendix F (at P. 4-5)).

That is to say, prose litigants should be afforded

more time to prepare a legal pleading and to meet a deadline filing date than a lawyer. Especially, when competing deadline dates, inadequate legal writing skills, and a deficient amount of time to amend a complaint pro se in conjunction with the fact that a license attorney for the Petitioner being giving more time to amend his complaint on another case — is what led up to the Petitioner's third 90 day extension request. See Blue v. Hartford Life & Accident Ins. Co., 698 F.3d 587 (at 593) (7th Cir. 2012) (Rule 6(b)(1) provides a district court with discretion to grant or deny a request for an extension of time. In reviewing the district court's decision "we look not just at the request itself but also at what led up to the request.").

By ruling that the Petitioner's third time

extension request was moot the district judge clearly held the Petitioner to a more stringent standard than an attorney is held to and ignored his "good cause" argument and subsequently, the Petitioner suffered the prejudice of getting his complaint dismissed for failure to prosecute, etc. That is to say, the aforementioned shows that he was treated unfairly because he wasn't afforded adequate time to amend his Watford v. LaFond complaint precise in like manner how his recruited counsel was afforded on his Watford v. Ellis case and because his good cause argument of competing deadline dates and inadequate legal writing skills were ignored. See Id. (at 593) (Rule 6(b) allows a district court to grant extensions of time prior to the expiration of a deadline for "good cause."). Thus, said judge abused his discretion which consequently warrants reversing his moot ruling and the dismissal

of the Petitioner's 1983 complaint.

However, notwithstanding the fact that the Petitioner gave judicial notice or set-forth facts to the Seventh Circuit that a "lawyer" for the Petitioner was afforded more time to amend a complaint for him on another case than he was given to amend a complaint pro se and that he was engaged in other litigation — said circuit exercised willful ignorance to those facts in order to affirm the district judge's moot ruling (see Appendix A).

Had the Seventh Circuit took into consideration these facts it would have made it clear that the federal law depicted in the Haines v. Kerner holding and Hughes v. Rowe holding required that the Petitioner's third time extension request be granted in order for him to be held to less stringent standards than a lawyer is held to concerning the

specific circumstance of the allotment of time to amend a complaint where a lawyer for the Petitioner is given more time to amend a complaint for him than he is given to amend a complaint pro se on another case where he has shown good cause. See Hughes v. Rowe, 101 S. Ct. 173 (at 176).

Therefore, the Seventh Circuit's affirmance ruling is erroneous and demands that certiorari be granted to answer the constitutional question of whether or not the Haines v. Kerner ruling dictates that a pro se litigant be afforded more time to amend a complaint pro se than lawyers are allotted to amend a complaint ??? The Petitioner answers this question in the affirmative. . . due to his lack of legal expertise:

Especially, when considering the case at bar presents a factual scenario of the district judge giving the Petitioner 97 days in piecemeal to amend his complaint pro se "after" making a finding of fact that he didn't possess the wherewithal to amend a complaint pro se (see Appendix D and E) — and giving his lawyer on another case 117 days to amend his complaint (see Appendix F (at P. 4-5)).

Also, it is critical to denote that, the national importance of this issue demands that this Supreme Court grant certiorari because pro se litigants across the Nation have a high stake and interest in the "judicial practice" staying alive of being held to less stringent standards than an attorney is held to in all areas of litigation where the judiciary demands that a lawyer act in a certain professional, punctual, timely, and

ethically sound manner—— and because the good
cause standard for extension of time requests should
be set and decided by this Supreme Court instead of
the Seventh Circuit.

Conclusion

In retrospect, the failure to prosecute and
failure to state a claim dismissal of the Petitioner's 1983
complaint was predicated off the erroneous denial and
affirmance rulings of his S. O. J. motion, Motion For An
Extension Of Time, and Motion To Recruit And Appoint
Counsel: Which has given rise to issues of first im-
pression due to various violations of the federal laws
and a need for the further development of said laws
due to the national importance that the Petitioner's Writ
of Certiorari Petition claims present makes it im-

operative that they be decided by this Supreme Court.
So the appropriate remedy is that certiorari be granted.

Respectfully Submitted

Marlon L. Watford

Marlon L. Watford #R-15678
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Menard, IL 62259

Date: August 4, 2018
Signed under 28 U.S.C.
§ 1746 / 18 U.S.C. § 1621.