

IN THE SUPREME COURT
OF THE
UNITED STATES

Renee D. Bell
Petitioner/Appellant

Case No:

Tribunal No:

(Petition)
18-6523

2012-CA-10614P

v.

Orlando Health, D.B.A.
Winnie Palmer Hospital
Respondent/Appellee.

**The Appellants "OBJECTION"/AND MOTION RECONSIDERATION" to
the Appellees "Brief" and Opposition to the Appellees, objection for denial to
issue "Writ of Certiorari"**

Comes now, the appellant, Renee' D. Bell, proceeding by and
through Pro Se, authority, and in accordance with Title 28 U.S. Code § 1654,
1652, and Article (1) Sec: 5,21,22, Fl. Constitution, and U.S. Constitution.

2. The appellant, comes before this honorable court, with the request
that the Appellees "Brief" in opposition, to the appellants "Petition"
is "*stricken*" from the courts record. The request is premise on issues
below, which demonstrate that the appellees, have no grounds, or
foundational standing, to ascertain from this court, any favor, or for
denial of a "Writ" in reference to the appellant, in the above caption.

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3. The appellant, ("Bell"), contend with the following which is not to delay any action, or proceedings, which would necessarily be taken by this court, or to delay, or withhold any orders which the court would deem proper.

4. The appellant, ("Bell"), advises this honorable court, that the Attorneys which represent Appellees, violate the rules of the Florida Bar, which concern a conflict of interest. The defendants Attorneys, are involve in another case before the courts, which The appellant, ("Bell") is a party thereof. Therefore, by violation of the rules which represent the Florida Bar, doing so, also violate the rules of this honorable court.

Rules Regulating the Florida Bar.

- a. Chapter (4) Rules, Rules of professional conduct/Preamble
The representing attorney in the above style case, has no authority, to proceed, **either himself**, or **any office personnel** which the "Firm" should have located a representing attorney.

- b. The imputation of a conflict of interest should not be apparent Rules Regulating the Fl. Bar, Rules, 4-1.11, 4-1.12, 4.1.18.

- c. Violation of the rules of professional conduct, Rules 4-1.2©), 4-1.6 (a), 4-1.7(b), and 4-1.18.
Therefore, at no given time has the plaintiff/appellant agreed or provided consent in writing, to grant release per: 4-1.7(b).

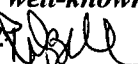
Underlying issue that the attorney which represent Orlando Health, (*DBA*) as Winnie Palmer Hospital, violate the law of the Florida Bar Assoc., and Code of Ethics for the legal profession which the office of Mateer & Harbert, Francis Pierce, and Asst. Susan Sewell, which the attorney, and or his assistant (Sewell) represent the defendant, Orlando Health, in another case which involve the plaintiff, ("Bell"), this is a conflict of interest.

5. Furthermore, the Appellees, response brief claim that it will proceed

Pursuant, to this courts rule, U.S. Supreme Court, Rule: No: 10.

Demonstration: Governing Review on Writ of Certiorari:

- A. The Certiorari decision, should be premise on the accepted and usual course of judicial proceedings, which occur in this case.
1. The Plaintiff/Appellant, Renee D. Bell, agree that a "*Writ of Certiorari*," is not a matter of right, but it is judicial discretion. The request of the appellant, is reference to compelling reason, which a civil cause is dismiss base on the non-appearance in a status conference which the appellant, receive an un-timely notice. Moreover, summary judgment, and other pending motions left un-answered, and where there is *not proof* by court docket or any other verification that the appellant, is ever contumacious, with given/ or received authority from any court. Moreover, the improper and immediate dismissal waives the appellants, U.S. Constitutional right of Due Process. The appellant is denied within its jurisdiction, the equal protection of the law, which provide legal obligation of all states, not to make or enforce any law which abridge the privileges or immunities of a citizen of the United States. The tribunal court, by way of an "Order" enforce law which deprive ~~the~~ of entitlement to redress, to the appellant, which is abuse of discretion that the argument of the court is premise alone on argument of defendants.

The appellants, constitutional -right, abridged which is without the opportunity to be heard premise on a decision ordered by a lower tribunal. Const.Amend.5,14 Further, at the courts secondary, appellate- level jurisdiction, opportunity is remove, which the access to the court is impeded by statement of "Lack of Jurisdiction" which statement is "Improper." However, the block of access to the court, which an inference of the sort is thrown, to claim, a "Lack of" "Jurisdiction" which doesn't exist, and the argument of the appellant, circumvents the system, where the "last-court, of final result is this court, "The United States Supreme" and which it is *well-known* doctrine that all petitions, are not entertained, and or selected for a review 

- B. The defendants asserted errors consists of erroneous factual findings, which mislead the court, and there is no properly stated rule of law, in support thereof. [[The tribunal advise, it would take the defendants argument "Under Advisement"]]
Which were prior, "Motions" un-addressed with both parties to suit, later, ruling Rendered, and the appellant, is "without redress" to the court.

1. The defendants, request dismissal. However, there was no evidence on the record to support the allegations of the defendants. Further, there were no opinions submitted and filed into the court record, in support of the final findings of said status conference. However, the filings contained basically "re-cap" of the arguments presented the honorable judge. The facts, and conclusion of law, to any evidence presented not provided. The plaintiff/Appellant, ("Bell") objected to decisions, with pending motions, and motion for summary judgment which were not heard, and or address. The tribunal dismiss the cause, per the defendants/Motion, which issues are unaddressed in "A status conference", the defendants, are acknowledged in the status conference, which their pending motions, will be considered. The judge order Which the "Motions" wouldn't be address during conference. Thereafter, ruled Only on the defendants "Motions" which judgment or ruling on partial findings, "must be supported by findings of fact" and conclusions of the law are required, in this cause the issues pending, were from the defendants premise on their argument, to dismiss, without the appellant, having redress, and the arguments are granted without the requirement by the law.

2. Therefore, if the matter before the lower tribunal, was in proper procedure, and the appellant, receive redress, there would not be need for an appeal, because the tribunal would have dispose of issues raised on appeal, and care would have been evoked on the part of the trial judge, in ascertaining the facts, which the law could be applied, and which would have served as providing the measure of "Due process" to the appellant, and which would have provided, and allowed for Meaningful appellate review. The manner in which the tribunal proceeded, removed the privilege and rights, to proper appellate review, in doing so removed access to the court.

C. The state court of last resort, decided an important federal question, which conflicts with a decision of a United States Court of Appeals.

1. The decision of the "Fifth District Court of Appeal" which base its denial to review premise on "Lack of Jurisdiction", remove the appellants, opportunity to redress. Clearly stated, this matter is "state law claim, not federal. Moreover, it is not federal-question jurisdiction. However,

Supreme Court, Rule: 11

A. A petition for writ of certiorari, is rarely granted when THE 'asserted errors' consists of erroneous factual findings, or the misapplication of a properly stated rule of law. However, Rule: 11, states a petition for a writ of certiorari to review a case pending in a United States Court of Appeals, *BEFORE judgment*, is entered in that court, will be granted only upon showing that the case is of such *imperative public importance as to justify deviation from normal appellate practice* and to require immediate determination in this Court. See 28 U.S.C. § 2101 (e).

B. (1) The final decision of the tribunal, is dismissal. (2) The next level of jurisdiction, which is "Fifth District Appeals Court" dismiss on "Lack of Jurisdiction" without judgment, (3) The Florida Supreme, follow: because, of "Lack of Elaborated Opinion." Therefore, is without a necessary judgment. Wherefore, this court of "final result", has the Petition before it, with a pending return to the tribunal. *Wherefore*, the issues would be of utmost importance to the general public, for any citizen to have court access remove, and stripped of redress, and their constitutional permissions, and rights. U.S. Const. Amend. 14; Due Process of law; Lewis v. Casey, 518 US 343 (1996). The role of the courts is to provide relief to claimants. Jones v. Doherty, 2008 WL 733468 U.S. District Court, S.D. Calif.

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12/14 /2018

CERTIFICATE OF SERVICE:

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