

AUG 27 2018

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18-7368

Case No. 1:17-cv-00385 at the US District Court for the District of Maryland,
18-cv.pr.01016 & 18-cv.pr-01092 at the US Court of Appeals for the Fourth Circuit.

ORIGINAL



In the
SUPREME COURT OF THE UNITED STATES
Redmond J. Howard,
Plaintiff and Disciple at US Courts,
New Petitioner at the Supreme Court of the United States 2018,
vs.
Daryl McCready,
Bryan Matthew Lloyd,
Mark Thomas,
Michael Duane Rittenhouse,
Jared Mylon Rittenhouse
Respondent(s),

PETITION FOR A WRIT OF CERTIORARI

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i.

QUESTIONS PRESENTED FOR REVIEW

- 1) Had Judge Russell III drafted an inaccurate OPINION based on the American Disabilities Act (ADA), rather than the plaintiff's true claim: What the US Department of Justice's Special Litigation enforces.
 - a. The US Department of Justice enforces disability rights, even upon worship sites. Ex. Disability accommodation; i.e. physical, and mental.
 - b. Was Judge Russell III there? Even dismissed, another threat from any defendant may result to a brand new claim.
- 2) The Court of Appeals for the Fourth Circuit have an extensive history on AFFIRMING, allegedly unreasonably. It still results to countless Americans i.e. current events dissatisfied and also filing PETITIONS FOR WRIT OF CETERIORI's to the Supreme Court.
 - a. This PETITION shall also serve as a COMPLAINT.
 - b. Per the petitioner's former second bachelor's program, Rehabilitation Services at the University of Maryland Eastern Shore, I report these concerns to higher jurisdiction.
 - c. Redmond J. Howard currently studies for a Master's Degree at Liberty University Online Programs. I continue to be inspired by my college president, Dr. Jerry Falwell, Jr.
- 3) Is the plaintiff able to file a brand new case if the American Disabilities Act (ADA) was not his claim upon review?
 - a. "Howard has not alleged that any of the Defendants are otherwise required to comply with the ADA." Therefore, the petitioner's DOJ affiliated claim is not with prejudice, a synonym to discrimination.
- 4) As well as Judge Bredar, did Judge Russell III not provide disability accommodation as well during the case? It is apparent in the opinion below.

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LIST OF PARTIES

- 1) REDMOND J. HOWARD, Petitioner, plaintiff, appellant, but disciple first.
- 2) DARYL MCCREADY, Defendant
- 3) BRYAN MATTHEW LLOYD, Defendant
- 4) MARK AARON THOMAS, Defendant
- 5) MICHAEL DUANE RITTENHOUSE, Defendant
- 6) JARED MYLON RITTENHOUSE, Defendant

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OPINIONS BELOW

UNITED STATES DISTRICT COURT

DISTRICT OF MARYLAND

Chambers of 101 West Lombard Street

George L. Russell, III

Baltimore, Maryland 21201

United States District Judge 410-962-4055

December 28, 2017

MEMORANDUM TO PARTIES RE: Redmond Howard v. Daryl McCready, et al.

Civil Action No. GLR-17-385

Dear Parties:

Pending before the Court are Defendants Daryl McCready, Bryan Matthew Lloyd, and Mark Aaron Thomas' (collectively, the "Sonrise Defendants") and Defendants Michael Duane Rittenhouse and Jared Mylon Rittenhouse's (collectively, the "Rittenhouses") Motions to Dismiss for Failure to State a Claim (ECF Nos. 11, 12).¹ The Motions are ripe for disposition, and no hearing is necessary. See Local Rule 105.6 (D.Md. 2016). For the reasons outlined below, the Court will grant the Motions. On February 10, 2017, Plaintiff Redmond Howard, proceeding pro se, commenced suit against the Sonrise Defendants, alleging violations of his civil rights under 42 U.S.C. § 1983 (2012). (ECF No. 1). Howard filed an Amended Complaint on March 29, 2017. (ECF No. 3).

On May 2, 2017, Howard filed a Second Amended Complaint, which added the Rittenhouses as defendants. (ECF No. 5). Federal Rule of Civil Procedure 12(b)(6) authorizes the dismissal of a complaint if it fails to state a claim upon which relief can be granted. "The purpose of a Rule 12(b)(6) motion is to test the sufficiency of a

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complaint,” not to “resolve contests surrounding the facts, the merits of a claim, or the applicability of defenses.” *Edwards v. City of Goldsboro*, 178 F.3d 231, 243–44 (4th Cir. 1999) (quoting *Republican Party v. Martin*, 980 F.2d 943, 952 (4th Cir. 1992)). A complaint fails to state a claim if it does not contain “a short and plain statement of the claim showing that the pleader is entitled to relief,” Fed.R.Civ.P. 8(a)(2), or does not “state a claim to 1 Also pending are Howard’s three motions: (1) Motion for a More Definite Statement (ECF No. 22); (2) Motion for Failure to Properly Support or Address a Fact (ECF No. 29); and (3) Motion for Partial Summary Judgment (ECF No. 32). Because the Court will grant Defendants’ Motions, the Court will deny Howard’s Motions as moot.

Additionally, the Sonrise Defendants’ move to strike and seal ECF Nos. 1-2, 5-2, and 5-3 because the documents contain the full names of minors and identify individuals who purportedly have disabilities or substance abuse issues. (ECF No. 13). Federal Rule of Civil Procedure 12(f), in relevant part, permits the Court to strike from a pleading any “redundant, immaterial, impertinent, or scandalous matter.” Because Rule 5.2(a)(3) requires filings that include the names of minors to only include that minor’s initials and because the material contained in ECF Nos. 1-2, 5-2, and 5-3 is immaterial to this case, the Court will grant the Sonrise Defendants’ Motion. 2 relief that is plausible on its face,” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)). Pro se pleadings, however, are liberally construed and held to a less stringent standard than pleadings drafted by lawyers. *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (citing *Estelle v. Gamble*, 429 U.S. 97, 106 (1976)); accord *Brown v. N.C. Dep’t of Corr.*, 612 F.3d 720, 722 (4th Cir. 2010). Pro se complaints are entitled to special care to determine whether any possible set of facts would entitle the plaintiff to relief. *Hughes v. Rowe*, 449 U.S. 5, 9–10 (1980). Nonetheless, “[w]hile pro se complaints may ‘represent the work of an untutored hand requiring special judicial solicitude,’ a district court is not required to recognize ‘obscure or extravagant

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claims defying the most concerted efforts to unravel them.” Weller v. Dep’t of Soc. Servs. For Balt., 901 F.2d 387, 391 (4th Cir. 1990) (quoting Beaudett v. City of Hampton, 775 F.2d 1274, 1277 (4th Cir. 1985)).

Defendants contend that Howard’s Second Amended Complaint fails to state a claim for two principal reasons.² First, Howard fails to allege that any of the Defendants is a state actor, which is required to bring a civil rights claim under § 1983. Second, assuming Howard intended to bring a claim under Title III of the Americans with Disabilities Act (the “ADA”), 42 U.S.C. § 12181 et seq. (2012), the ADA expressly exempts religious organizations.³ Howard has not alleged that any of the Defendants are otherwise required to comply with the ADA.

Section 1983 Claim

“Section 1983 ‘is not itself a source of substantive rights,’ but merely provides ‘a method for vindicating federal rights elsewhere conferred.’” Albright v. Oliver, 510 U.S. 266, 271 (1994) (quoting Baker v. McCollan, 443 U.S. 137, 144 n.3 (1979)). To prevail on a § 1983 claim, a plaintiff must demonstrate a violation of constitutional rights or federal law and that the alleged violation was committed by a “person” acting under color of state law. 42 U.S.C. § 1983; West v. Atkins, 487 U.S. 42, 48 (1988) (citation omitted). “[T]he under-color-of-state-law element of § 1983 excludes from its reach merely private conduct, no matter how discriminatory or wrongful.”⁴ Am. Mfrs. Mut. Ins. Co. v. Sullivan, 526 U.S. 40, 50 (1999) (internal quotation marks omitted) (quoting Blum v. Yaretsky, 457 U.S. 991, 1002 (1982)).

² The Court notes that although the Sonrise Defendants and the Rittenhouses filed separate motions to dismiss, both groups of Defendants present the same arguments. ³ In the Civil Cover Sheet to the Second Amended Complaint, Howard indicates that he is bringing suit under § 1983. (ECF No. 5-1). ⁴ The United States Court of Appeals for the Fourth Circuit has identified four circumstances when a private actor acts under the color of law for the purposes of a § 1983 claim, none of which apply here. See Goldstein v. Chestnut Ridge Volunteer Fire Co., 218 F.3d

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337, 342 (4th Cir. 2000) (identifying the circumstances as when: (1) the private party is an agent or instrumentality of the state; (2) the state “delegates its obligations to a private actor”; (3) a private party performed what is traditionally a state function; and (4) when state officials commit an unconstitutional act when enforcing the rights of a private citizen).

3 Here, the Second Amended Complaint is devoid of allegations that any of Defendants acted under the color of state law. Construing Howard’s pleading liberally, sometime in 2016 he apparently attended church services at Sonrise Church, at which the Sonrise Defendants are “lead pastors.” (Second Am. Compl. at 1, ECF No. 5).⁵ Howard’s Second Amended Complaint implies, but does not expressly state, that the Rittenhouses are affiliated with a different church, 3CUSA. (See *id.* at 1). Howard claims that the Sonrise Defendants have “not accommodated nor treated properly” persons with disabilities. (*Id.* at 3). Howard alleges that Jared Rittenhouse told Howard, “I treat those with disabilities as if they don’t,” and that Michael Rittenhouse “threatened” Howard. (*Id.*). Further, Howard states that Defendants engaged in “[d]isability, harassment, and retaliation” forms of discrimination. (*Id.* at 1). Howard fails to allege, however, that any of Defendants’ conduct implicated the state. Thus, the Court concludes that Howard has failed to state a § 1983 claim.

ADA Claim

Title III of the ADA applies to public accommodations and services that private entities operate. See 42 U.S.C. § 12181 et seq. Title III prohibits disability-based discrimination by “any person who owns, leases (or leases to), or operates a place of public accommodation. 42 U.S.C. § 12182(a). But the ADA expressly exempts from its requirements “religious organizations or entities controlled by religious organizations, including places of worship.” 42 U.S.C. § 12187. Here, Howard alleges that the Sonrise Defendants are pastors at Sonrise Church—a place of worship and religious organization. Similarly, Howard implies that the

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Rittenhouses are affiliated with 3CUSA—another place of worship and religious organization. Finally, Howard does not allege that either the Sonrise Defendants or the Rittenhouses own, lease, or operate a place of public accommodation. See 42 U.S.C. § 12181(7) (defining “public accommodation”). Thus, the Court concludes that Howard fails to state an ADA claim. Accordingly, the Court will grant Defendants’ Motions to Dismiss.

Based on the foregoing reasons, the Sonrise Defendants’ Motion to Strike and Seal ECF Nos. 1-2, 5-2, and 5-3 (ECF No. 13) is GRANTED. The Court directs the Clerk to STRIKE and SEAL ECF Nos. 1-2, 5-2, and 5-3. The Sonrise Defendants’ and the Rittenhouses’ Motions to Dismiss for Failure to State a Claim (ECF Nos. 11, 12) are GRANTED. The Complaint is DISMISSED. Howard’s Motion for a More Definite Statement (ECF No. 22), Motion for Failure to Properly Support or Address a Fact (ECF No. 29), and Motion for Partial Summary Judgment (ECF No. 32) are DENIED AS MOOT.

⁵ Unless otherwise noted, the Court describes facts taken from the Second Amended Complaint and accepts them as true. See Pardus, 551 U.S. at 94 (citations omitted). Citations to the Second Amended Complaint refer to the CM/ECF pagination.

⁴ Despite the informal nature of this memorandum, it shall constitute an Order of this Court, and the Clerk is directed to docket it accordingly, CLOSE this case, and mail a copy to Howard at his address of record.

Very truly yours,

/s/

George L. Russell, III
United States District Judge

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STATEMENT OF THE CASE,

in accordance with the United States Department of Justice Special Litigation

The Special Litigation Section is one of several Sections in the Civil Rights Division. We work to protect civil rights in the following areas: 1) the rights of people in state or local institutions, including: jails, prisons, juvenile detention facilities, and health care facilities for persons with disabilities; 2) the rights of individuals with disabilities to receive services in their communities, rather than in institutions; 3) the rights of people who interact with state or local police or sheriffs' departments; 4) the rights of youth involved in the juvenile justice system; 5) the rights of people to have safe access to reproductive health care clinics; and 6) the rights of people to practice their religion while confined to state and local institutions. We can also act on behalf of people at risk of harm in these areas.

RIGHTS OF PERSONS WITH DISABILITIES Overview the Special Litigation Section protects the rights of people in institutions run by state or local governments, and in private facilities receiving public money. We can ensure that people are safe, receive adequate care, and have access to that care in the most integrated setting appropriate to their needs. We can also act on behalf of people who are at serious risk of being institutionalized unnecessarily. We use information from community members affected by civil rights violations to bring and pursue cases. The voice of the community is very important to us. We receive hundreds of reports of potential violations each week. We collect this information and it informs our case selection. We may sometimes use it as evidence in existing cases. However, we cannot bring a case based on every report we receive. Description of the Laws We Use in Our Disability Rights Work the Civil Rights of Institutionalized Persons Act (CRIPA), 42 U.S.C. § 1997a, allows the Attorney General to review conditions

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and practices within institutions run by, or for, state and local governments. Under CRIPA, we have no authority to assist with individual claims. We also cannot correct a problem in a federal facility or actions by federal officials. We do not assist in criminal cases. After a CRIPA investigation, we can act if we identify a systemic pattern or practice that causes harm. Evidence of harm to one individual only - even if that harm is serious - is not enough. If we find systemic problems, we may send the state or local government a letter that describes the problems and what says what steps they must take to fix them. We will try to reach an agreement with the state or local government on how to fix the problems. If we cannot agree, then the Attorney General may file a lawsuit in federal court. The Attorney General may also use the Americans with Disabilities Act (ADA), 42 U.S.C. § 12132, to ensure that people with disabilities can access care without being institutionalized. Our ADA investigations ask whether the State uses institutions to serve people who can benefit from and would prefer to receive those services in the community. These investigations rely on the Supreme Court's decision in *Olmstead v. L.C.*, 527 U.S. 581 (1999). In *Olmstead*, the Court said that people with disabilities have a right to be served in the most integrated setting appropriate to their needs and wishes. These investigations can also fix poor conditions by reducing the number of people crowded into institutions. Results of Our Disability Rights Work We obtain broad remedies where possible. For example, we have agreements about the entire system serving people with developmental or intellectual disabilities in Virginia, the entire mental health system in the State of Delaware, and all of the state-run mental health hospitals in Georgia. Tens of thousands of institutionalized persons who were living in dire, often life-threatening, conditions now receive adequate care and services because of this work. Many more thousands of people with disabilities have left segregated institutions after years of confinement, or avoided this confinement in the first place. We currently have open matters in more than half the states. Our work includes many different kinds of activity. We speak with community

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stakeholders. We review and investigate complaints. We file lawsuits in federal court when necessary, and enforce orders we obtain from the courts. We participate in cases brought by private parties. We work closely with nationally renowned experts to provide training and technical assistance. We work closely with other parts of the Justice Department and other federal agencies that regulate, fund, and provide technical assistance to state and local governments. We work with the Office of Juvenile Justice and Delinquency 8/25/2018 Rights of Persons with Disabilities | CRT | Department of Justice <https://www.justice.gov/crt/rights-persons-disabilities> 2/2 Was this page helpful? Yes, No Prevention, the National Institute of Justice, the Bureau of Prisons, the United States Department of Education, the Department of Housing, the United States Department of Health and Human Services, Center for Medicare and Medicaid Services, and Substance Abuse Mental Health Services Administration, among other agencies. In addition, our staff serves on the Department's Health Care Fraud Working Group and other task forces.

FREEDOM OF ACCESS TO CLINIC ENTRANCES & PLACES OF RELIGIOUS WORSHIP The Special Litigation Section also enforces the civil provisions of the Freedom of Access to Clinic Entrances Act of 1994 (FACE). This Act prohibits the use or threat of force and physical obstruction that injures, intimidates, or interferes with a person seeking to obtain or provide reproductive health services or to exercise the First Amendment right of religious freedom at a place of religious worship. It also prohibits intentional property damage of a facility providing reproductive health services or a place of religious worship. FACE authorizes the Attorney General to seek injunctive relief, statutory or compensatory damages, and civil penalties against individuals who engage in conduct that violates the Act. The Section has served a pivotal role in enforcing the Freedom of Access to Clinic

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Entrances Act (FACE), 18 U.S.C. § 248, to protect patients and health care providers against threats of force and physical obstruction of reproductive health facilities. The Department has filed more than 15 FACE actions in more than a dozen states and there are ongoing investigations in other states. Section attorneys have obtained temporary restraining orders and preliminary and permanent injunctions under the FACE and have won civil contempt motions for violations of these injunctions. For example, the Section obtained a preliminary injunction against 35 defendants for blockading a reproductive health facility in a suburb of Philadelphia, Pennsylvania. In another case, the Section won preliminary and permanent injunctions prohibiting defendants from threatening a California reproductive health doctor and his wife. In addition, the Section secured a temporary restraining order and then a preliminary injunction prohibiting a defendant, who had threatened a doctor, from approaching the Ohio clinic. When the defendant violated the injunction, the Section was successful in obtaining criminal contempt. The Section won civil contempt and fines against another defendant based on violation of an injunction creating various buffer zones outside a Connecticut reproductive health care clinic. The Section also successfully defended against constitutional challenges to FACE. Section attorneys work closely with the offices of the United States Attorneys and State Attorneys General by providing technical assistance and conducting joint FACE prosecutions. In addition, the Section serves on the Attorney General's National Task Force on Violence Against Health Care Providers.

RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT¹ Summary
the Section enforces the "institutionalized persons" provisions of the Religious Land Use and Institutionalized Persons Act ("RLUIPA"), 42 U.S.C. § 2000cc. These provisions recognize the crucial role religion plays in the rehabilitation of prisoners and in the lives of those who are institutionalized, and they require that state and

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local institutions not place arbitrary or unnecessary restrictions on religious practice. "Institutions" include prisons, jails, pretrial detention facilities, juvenile facilities, and institutions housing persons with disabilities when these facilities controlled by or provide services on behalf of State or local governments. Since Congress passed RLUIPA in 2000, the Section has opened more than a dozen investigations and made numerous informal inquiries to State and local governments. The Section is often able to change restrictions on religious exercise before formally investigating or filing in court under RLUIPA's "safe harbor" provision. The safe harbor provision lets governments avoid court action by changing their policy or practice or otherwise lifting the burden on religious exercise. This is efficient and effective. It can help protect institutionalized persons from negative health effects or discipline that may follow their efforts to honor their religious tradition. When necessary, the Section will sue to protect the religious rights of individuals in institutions. Over the past few years, the Section has sued in three cases and has filed a Statements of Interest explaining the law in five cases filed by other parties. The Section also works closely with the Appellate Section to file amicus curiae briefs that explain how RLUIPA should apply in cases before the federal appellate courts. The links below include several of our briefs, and guidance we issued on the Tenth Anniversary of RLUIPA: "Statement of the Department of Justice on the Institutionalized Persons Provisions of the Religious Land Use and Institutionalized Persons Act." Examples of our Work with People Seeking the Freedom to Worship in Institutions Diet: In some cases, our enforcement is critical to protecting the health and safety of institutionalized persons, in addition to promoting their rehabilitation and connection to the community. For example, in several cases individuals have been denied a diet that is consistent with their religious practices. There can be serious health consequences when a person refuses to eat because the food available violates the person's religious beliefs. We often can address restrictions on religious exercise informally by working with State or local

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officials to ensure that the individual's health is monitored and that an appropriate diet is provided. In other cases, we must investigate or sue before inmates are allowed to exercise their religious beliefs. For example, after we opened an investigation of a Utah prison, the prison gave vegan meals to an inmate to accommodate his Hindu faith. Similarly, a nursing home in New York agreed to train its staff members so that Sikh residents' religious practices, including an appropriate diet, are honored. Even after an investigation, some jurisdictions refuse to provide an appropriate diet. We are currently suing a state that refuses to give most of its Jewish prisoners a kosher diet. Hair Length: Sukhjinder Basra is a lifelong practitioner of the Sikh faith. As an observant Sikh, he must keep his hair unshorn, including facial hair. Sikhs believe that cutting one's hair is a grievous sin. Mr. Basra has always maintained uncut hair. While Mr. Basra was in medium-security prison, he was allowed to keep his beard without any restriction on its length. After he was transferred to a minimum-security prison, however, he was repeatedly disciplined because of his religiously-based refusal to trim his beard. We joined Mr. Basra's lawsuit, and the State ultimately repealed its regulation requiring Mr. Basra to trim his beard. Religious Texts: The Berkeley County Detention Center banned a wide array of books, publications, and religious and educational materials, including the Washington Post, USA Today, the Koran, and Our Daily Bread, a widely-used Christian devotional. The Division joined an existing lawsuit against the sheriff's office, arguing that this ban violated the First Amendment and RLUIPA. The case eventually settled, and we obtained a consent injunction. Now, prisoners in the detention center can receive a variety of publications and religious materials. ¹

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REASONS WHY CERTIORARI SHOULD BE GRANTED

Reversible Error(s).

A MOTION FOR A MORE DEFINITE STATEMENT was accompanied with a REQUEST FOR ACCOMMODATION WITH A DISABILITY.

Judge Russell III did not at least acknowledge this entitlement that parties, all members in society have. Examples include the Rehabilitation Act of 1973, and the Civil Rights Act of 1964, and 1968. The other parties did not oppose this respectful motion, or the request to the judge.

The case itself, and previous circumstances reveals that persons with disabilities are not respected. Lack of accommodation therefore results to violations.

I had emphasized time and time again within the docket that the case does not involve the American Disabilities Act (ADA). It entails the acts from the US Department of Justice.

Further information can be found at the following website that discusses when churches deprive rights, privileges and immunities:

<https://www.justice.gov/crt/special-litigation-section>

<https://www.justice.gov/crt/rights-persons-disabilities>

<https://www.justice.gov/crt/freedom-access-clinic-entrances-places-religious-worship>

The second AMENDED complaint especially contains relevant information. Judge Russell III had overlooked this information prior to his order and memorandum.

Furthermore, there was no need for the American Disabilities Act (ADA) to be included towards his memorandum. It is not what the plaintiff claimed was violated. Even if intended, the Maryland Commission of Civil Rights revealed back

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in 2016 that churches were exempt from the American Disabilities Act. This section after review of his memorandum is moot.

This was also emphasized with the Clerk when I had arrived at the courthouse in person. Upon review, this case prior to this petition was overlooked.

5TH AMENDMENT DUE PROCESS OF LAW.

Due process, and affiliated with the Fifth Amendment is when all parties receive a fair case. Otherwise, it is a violation of the party's rights. Administration of this case has not been a fair one. The plaintiff claims this violation.

The defendants' tactics of dismissing a case, then requesting that evidence be moot is a poor metaphorical version of double dipping. It is not fair to the other party when a claim has been stated, yet evidence was deprived. Special treatment, personal feelings regarding the case also appears to be alleged.

GOSPEL.

It is about persons with disabilities receiving a welcoming environment, salvation, accommodation, kindness in all church settings. If one seeks salvation into heaven, it starts with faith, repentance, and welcoming ALL people in God's home. We cannot follow US law without following God's law.

TIMELINESS.

The plaintiff sincerely was not aware in regards to health conditions. However, Howard v. Floyd et al: a party expressed concern regarding when Judge Russell III would respond. Responded late 2017, the case was filed a year ago. Timeliness, which is in this case, several months opens doors towards likelihoods of overlooking information. It therefore results to another reason to appeal ORDERS, especially two in the same case.

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CONCLUSION

A CONCISE STATEMENT IN WHICH JURISDICTION IS INVOKED:

The Supreme Court of the United States has jurisdiction when a petitioner seeks to appeal a decision when he or she feels an OPINION is an incorrect one.

For example, the petitioner and appellant did not file a claim under the ADA act. In addition, the petitioner exercises his 5th Amendment right to due process of law, such as when disability accommodation is not provided.

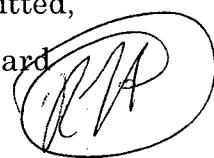
There are countless in the United States who have been discriminated against. This includes race/color; African-Americans especially have been discriminated against because cultures have stated within themselves, "Don't worry, we'll help you out." I respectfully seek to be the last.

The plaintiff is an African-American Multiethnic; the plaintiff has a disability. The complainant/appellant is also Pro Se. None defines the capability for a party to prove one's case. This includes as a class action for persons with disabilities. Physical, mental, even without a disability, all persons are sinners, imperfect, yet can do it. As a proud representation of Philippians 4:13, I respectfully submit that this PETITION FOR WRIT OF CERTIORARI be GRANTED.

Dated: November 26th, 2018 (Extension Provided by Court).

Respectfully submitted,

Redmond J. Howard



____/s/____

Plaintiff and Disciple at US Courts

Petitioner at the Supreme Court of the United States 2018

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