

THE SUPREME COURT OF THE UNITED STATES

Petition for Rehearing

Docket Number: 18-9078

Petitioner: Tina Bradford

2838 South Sycamore Ave, Apt 1

Los Angeles, Ca 90016

Case Number(s): S250516; B290453;

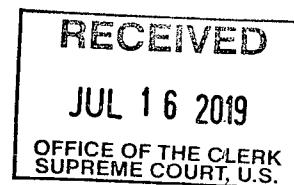
ADJ10064793; ADJ8736268

Tina Bradford, In Forma Pauperis, MBH; MA. SPC.ED Vs
Workers Compensation Appeals Board And
Los Angeles County Office of Education
York Risk Services, Inc.

I am writing this Petition for Rehearing to ask the court to decide important questions of the law that are not uniformly applied by the United States. Federal Labor Laws that govern workers' compensation disability are being denied to injured workers.

I am writing this Petition for Rehearing to ask the court to address matters that the Plaintiff could not have known at the time of initial filing with the Workers' Compensation Appeals Board (WCAB). A Compromise and Release was signed before the Cumulative Trauma Began. After the Cumulative Trauma began and discovered of its effects on a long- term basis, a claim for disability relief was brought forward again for just and ethical compensation. Plaintiff realizes the State of California maintains a strict and rigorous adherence to the signing of Compromise and Release waiver of disability benefits however, there are times when the C&R need be amended and this is one of those times. Instead of investigating the disability case in its entirety based on the ponderance of evidence Plaintiff Bradford was denied benefits without regard to the effects it would have on the injured worker and a right to live life with a sense of normalcy and dignity. It has been later discovered Bradford was telling the truth about MRSA (Methicillin Resistant Staphylococcus Aureus Bacteria) and evidently was

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exposed to the bacteria on the job, due to multiple exposures over a long period of time which is what was stated on Dr. Linn Qualified Medical Examiners Report (QME) and other county employee statements that they also contacted the same type illness at other Los Angeles County Facilities across Los Angeles. This MRSA is turning out to be a natural Disaster throughout Los Angeles County and other States throughout the United States. Something need be done to protect the people from this epidemic why it not be now by Rehearing docket number 18-9078 and deciding and directing the United States on what to do about this problem, owing to uniformly apply the law on this type of disease that never goes away, once it enters the blood, it breaks down other organs in which it has done to me.

There are intervening and substantial circumstances (Rule 44 of Rules of the Supreme Court of the United States (11-13, 2017) that influenced the judgement of this Supreme Court Case, Docket Number 18-9078. I must state everything has been done to not render good faith, just, unbiased judicial relief, decision and opinion on this case from the very beginning to what could be one of the most important, land mark cases in the history of America and to mention I am praying for due compensation of 10.000.000 for the 10 years I have been fighting this disease for it to only return under stress plus Worker's Compensation Benefits, including ongoing medical treatment, preferably holistic and functional medical treatment, in order for me and my family to live with dignity throughout the remaining years of my life. This is why it is important to me to make sure this case is decided upon in its entirety (ponderance of evidence, not just a doctor's diagnosis, due to the nature of my illness which is silent, degenerative and dormant and not detectable by normal conventional medical testing and treatment protocols), including all evidence, from all respondents who have an interest in the case.

There has been frequent and sudden reversal of direction of who bears the burden of proof and change in identity of court employees this making it just impossible to get relief through the courts. I have reached the highest level I can go in the court judiciary system and the immediate need to Rehear this case if not heard with action taken by this court will continue to plague California and the United States. At least Rehearing this case will get Los Angeles County Office Of Education (LACOE) to admit there is MRSA in juvenile hall facilities and jails. It has only been until recently pending this case (May, 2019) that LACOE and police, sheriff and even a public defender have admitted they too have contacted MRSA,

although some doctors want to call it typhoid, typhus or contact dermatitis such as with my case. LACOE did not inform its employees, including myself that we are to work at our own risk of catching MRSA. LACOE failed to take preventive measures to make sure public employees don't get sick. As a result, speaking for myself the MRSA knocked me out the box as a professional employee, I can't seem to heal from it and its painful and reoccurs.

The intervening and substantial matters including any and all matters I mentioned above I bring before you are as follows (Supreme Court rule 44):

1. Composition of Court Membership was changed at time case was pending in court, this is cause for Rehearing. At the same time that Justice Kavanaugh had been appointed and was being sworn in to the Supreme Court of the United States, U.S. Supreme Court docket number 18-9078 was lost in the shuffle pending filing (case was first originally postmarked October 19, 2018). I don't know how this influenced the Judgement of this case if there was a split court decision, a vacancy in the court or if Justice Kavanaugh helped to decide this case. This is reason enough on its on merit according to United States v. Ohio Power Co 353 U.S. 99, 109 (1957) (Harlan J., dissenting). In the absence of a Rehearing there is no way for me to know court numeric division. Docket number 18-9078 was also pending same time Neil Gosuch was appointed Justice to the United States Supreme Court, under case number ADJ1006479 Workers' Compensation Appeals Board (W.C.A.B.). This means Docket 18-9078 has under gone two new appointments of Justices to the United States Supreme Court awhile this case was pending argument.

2. California Appellate Court, second district conducted a discretionary review after order rendered, denying the Petition for Writ of Review. Congress regulates discretionary review. Congress has intervened (Appendix D) in the matter of this case to ensure the Plaintiff and the public are receiving good faith ethical, moral, and just justice in the courts. I was not aware there was a discretionary review conducted until I saw posted to Supreme Court of the United States website filed under docket number 18-9078 (2019). I still have not been made aware of the outcome of this discretionary review and who actually ordered or initiated it and what for. This issue is a good cause for new matters. Disputed facts in the case did not matter because undisputed facts were controlling.

3. There was a breech in the confidentiality of this case. This case was delayed being docketed by six months due to not receiving a letter that was supposedly sent to me on October 24, 2018 that I never received. I had just spoken to my assigned specialist two weeks prior to his leaving the position of analyst March (2018) nothing was mentioned to me about the letter. When I did call back at the end of March (2018) I was informed Jacob C. Tavers was no longer working there by Jacob Levitan and that he was my new analyst and I had succeeded the time to make the amendment requested. Since I never received the letter A new letter generated dated April 1 (2019). I later found out Levitan was only filling in and not an analyst and the analyst for this case is Susan Frimpong. I don't know if/because of this error if this case was reviewed in an expedited manner, after delaying docketing for six months. In addition I have not been made aware if there is a missing or stolen original copy of 18-9078 floating around somewhere as the Supreme Court of The United States usually returns the original copy of the Petition for Writ of Certiorari along with the letter listing corrections and since I did not receive the letter that means someone has their hands on a copy as a result I have heard issues via media surrounding the case such as ponderance of evidence, burden of proof, medical treatment, disability insurance, crime against humanity etc., al.

4. Ineffective assistance of council should have been defaulted under independent and adequate state ground. Petition 18-9078 has new evidence available that was not presented at time of filing of Petition for Writ of Certiorari, the evidence not presented was three separate filings of Worker's Compensation Claim Forms (DWC 1), date of injury (8-1-09-8-1-2010, Appendix A) was the adjudicated claim (ADJ10064793). The second one dated of injury 3/1/2014 (Appendix B) was filed before the claim form (Appendix A) and is, the one filed by Plaintiff/Appellant and was the form intended for adjudication, the Tribunal court errored in not taking up this matter, in that it is against Federal labor code and Worker's Compensation labor code that employer ignored the claim and did not provide immediate medical treatment for this new claim (Appendix B) for Cumulative Trauma. Claim form filed by Plaintiff Bradford was filed before previous attorney, Ronald M. Canter who in turn filed a claim, which was the claim form adjudicated. Appendix C (ADJ8736268) is the first claim that settled This is also a good cause for rehearing in the least the Supreme Court of the United States can do is hand this matter back to district court and order the court to settle this claim. It would be an honor for me if Ruth Bader Ginsburg (RBG)

offers opinions and decision on this matter. Here again disputed facts in the case did not matter because undisputed facts were controlling.

5. I would like very much to publish this case

6. This issue is a good cause for new matters. The effect that the MRSA had on my mental health was not disputed at W.C.A.B. or with York the claims administrator. Mental health, especially since I am a teacher cannot be written off in a C&R injured worker settle agreement under the Labor Code for no reason should mental health be denied. Disputed facts in the case did not matter because undisputed facts were controlling. There is a file pertaining to this case that can be requested to be sent to the United States Supreme Court from all respondents listed on file and the previous law firm that held Deposition hearing.

7. Another good cause for a Rehearing would be for the United States Supreme Court to decide on settlement liability. Which of the respondents are responsible for settlement of this case? Is it Los Angeles County Office Of Education for not informing its public employees' of the risk of coming into contact with this deadly flesh eating bacteria such as MRSA and not taking preventive measures of facility cleanliness, and then denying workers' fair injured workers' compensation after being infected with this deadly disease and then continuing to deny the problem or York Risk Services, Inc., for helping LACOE to deny there is MRSA in their county facilities by denying the worker their fair share of worker's compensation from the beginning without investigating the matter. I was paid on a 1% disability when QME doctor Linn's report stated that I was 100% impaired, the MRSA spread over my entire body which gave me a zero chance of surviving. This makes me think the respondents were all waiting for me to die and then to waive my rights for my family to receive the death pension is totally against humanity (C&R, WCAB clerks record) I kept trying to tell York I was sick and was not getting better and would not get back to normal healthy functioning, I have been damaged for life or Worker's Compensation for ordering settlement of workers' compensation without a hearing without hearing from the injured worker on an illness of this sort.

Index to Appendix

Appendix A: Claim Form filed by Ronald Canter, Previous Attorney for Petitioner, this claim form has an incorrect date of Cumulative Trauma Injury.

Appendix B: Claim Form filed by Petitioner contains the correct date of cumulative trauma injury. Not Disputed

Appendix C: First claim form with the first date of known injury

Appendix D: Letter from Congress notifying Bradford that Congress would be also intervening with this case.

Appendix E: Letter from mental health provider as evidence I am seeking treatment for anxiety due to the prolong effect of having MRSA.

Certification of Counsel

This Petition for Rehearing is restricted to the grounds of Rules of the Supreme Court of the United States (Rule 44, paragraph 2) and is presented in good faith and not for delay.

Respectfully Submitted by,

Tina Marie Bradford, MHCM, MA.SPC.ED

Tina Marie Bradford

**Additional material
from this filing is
available in the
Clerk's Office.**