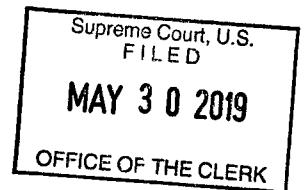


No. 18-9539

05-2019
U.S. Supreme Court

IN THE
SUPREME COURT OF THE UNITED STATES

KEENAN BROWN — PETITIONER
(Your Name)



vs.

WAL-MART STORE'S INC'S — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

SEVENTH CIRCUIT COURT OF APPEALS

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

KEENAN BROWN
(Your Name)

1325 North Bourch Aurthor Drive
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(City, State, Zip Code)

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(Phone Number)

SUPREME COURT OF THE UNITED STATES

KEENAN BROWN

Petitioner

Vs.

WAL-MART STORE'S INC'S

Respondent

On Petition for a Writ of Certiorari to

To the United States Court of Appeals

For the Seventh Circuit

QUESTION

The Importance of the **Constitution** of the United States established America's national government and fundamental laws, and guaranteed certain basic rights for its citizens. It was signed on September 17, 1787, by delegates to the **Constitutional** Convention in Philadelphia. To protect the rights of all U.S. citizens so that we all may have equal right.

Article VI, Paragraph 2 of the **U.S. Constitution** is commonly referred to as the Supremacy Clause. It **establishes** that the **federal constitution**, and **federal law** generally, take precedence over state **laws**, and even state constitutions.

Under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful practices of employee adverse actions. LLC that engage in unlawful practices gives employer the rights to file suits against LLC for discrimination for race sex and basis matters under the jurisdiction.

1. Did the Illinois Northern District Court erred its decision by not properly exercising Rule 56 Summary Judgment with all evidence being examined as a whole?

2. Did the Seventh Circuit Court Appeals & Illinois Northern District Court erred it's decision by not applying the Petitioner constitutional Civil Rights 42 U.S.C. §2000e-2 for unlawful employment practices ,42 U.S.C. §2000e-3 other employment practices 29 U.S.C. §791(a)-(b) prohibits against age,42 U.S.C. §12203 prohibits against retaliations and coercion 42 U.S.C. §12117, -21233 & 12188 (a) (b)Bill of Rights First Amendment & Whistle Blower Act of 1984 Discrimination Act

3. Did the Illinois Northern District Court & Seventh Circuit Court of Appeals erred it's a decision without truly understanding of the evidence of undisputed facts in this case?

TABLE OF AUTHORITIES CASE:

Burlington Northern and Santa Fe Railway Co. v. White, (2006)

*Page 2 of 18. 548 U.S. 53, *53; 126 S. Ct. 2405, **2405; 165 L. Ed. 2d*

Fisher v. Vassar College, 114 F. 3d 1332, 1344 (2d Cir. 1997)Page 13

Hithon v. Tyson Foods Inc. 151 F. 3d 1252 (2015) Ash v. Tyson Food, 126 S. Ct. 1195 (2006);

Arbaugh v. Y & H Corp., 126 S. Ct 144 Fed. Appx. 795 (11th Cir. 2006)...pg3 Hutson v.

McDonnell Douglas Corp v Green 63f 3d 771, 781 (8th Cir. 1995) Page 3

Maureen McPadden Vs Wal-Mart Store East, LP U.S. District Court Case No. 14-cv-475(Opinion No. 2016 DNH 160) page 7McDonnell Douglas v. Green 411 U.S. 792 (1973) 411 US 792, 93 S. Ct. 1817, 36 L. Ed. 2d 668 Page2

McLaughlin v. Esselte Pendaflex Corp. 50F 3d 507, 511 (8th Cir. 1995) page 5

Rodgers v. U.S. Bank N.A 417 F3d. 845, 852 (8th Cir. 2005)Page 6

Ortiz v. Werner Enterprises Inc. 834 F.3d 760, 764 (7th Cir.2016)Page14

Williams v. Consol Edison Corp of NY, 255 F. Appx. 546, 549 (2d Cir. 2007)Page 9

Albemarle Paper. Co. V. Moody 422.U.S.405 955. ct 2362(1975 pg.....8

PETITION FOR WRIT OF CERTIORARI

Petitioner Keenan Brown respectfully request that this court issue a writ of certiorari to review the judgment of Illinois Northern District Court and Seven Circuit Court of Appeals Judgment affirming their decision.

OPINION BELOW

The decision by the Illinois Northern District Court of Appeals of the Seventh Circuit Court. The Court of Appeals denied the appeal and request for oral argument on April 24rd, 2019. The order is attached at Appendix ("App".) at A-B.

JURISDICTION

The Illinois Northern District court issued its ruling on July 11th 2018 of Summary Judgment decision. The Seventh Circuit Court of Appeals issued its ruling on April 24th 2019 and the decision was affirmed. This court has jurisdiction over the appeal under 28 USC 1291 because an order granting a party's summary judgement is appealable. See *Caitlin v. United States*, 324 U.S. 229, 233 (1945)

Under the 28 U.S. Code § 1251. Original jurisdiction. The Supreme Court shall have original and exclusive jurisdiction of all controversies between two or more States. All actions or proceedings by a State against the citizens of another State or against aliens.

Under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful practices of employee adverse actions retaliation. LLC that engage in unlawful practices gives employer the

rights to files suits against LLC for discrimination for race sex and basis matters under the jurisdiction.

CONSTITUTIONAL AND STATUARY PROVISION INVOLVED

THE FIRST AMENDMENT FREEDOM OF SPEECH

THE CILVIL RIGHTS

42 U.S.C. 42 under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful practices of employee adverse actions retaliation. LLC that engage in unlawful practices gives employer the rights to files suits against LLC for discrimination for race sex and basis matters under the jurisdiction.

42 U.S.C. §2000e-2 for unlawful employment practices,

42 U.S.C. §2000e-3 other employment practices

29 U.S.C. §791(a)-(b) prohibits against age,

42 U.S.C. §12203 prohibits against retaliations and coercion

42 U.S.C. §12117, -21233 & 12188 (a) (b)

Bill of Rights First Amendment & Whistle Blower Act

Act of 1984 Discrimination Act

28 U.S. Code § 1257. State courts; certiorari

STATEMENT OF THE CASE

On October 13th petitioner has filed complaints with the EEOC and was granted a right to Sue letter on November 11th 2016. On January 17th 2017 Petitioner case was granted and received by Illinois NORTHERN DISTRICT COURT. On August 8th 2017 Petitioner and Respondent First court appearance was before a trial judge to discuss Magistrate Judge Court rules & procedures.

On February 20th 2018 was the cutoff date for discovery and Respondent Wal-Mart Stores Inc. filed for Rule 56 Summary Judgment Respondent motion was due March 23rd 2018. Petitioner response was due April 24th 2018 and the Respondent Wal-Mart Store Inc. was a reply was due May 5th 2018.

District Judge of the Northern District court made its decision on July 11th 2018 ruling in favor of the Respondent Summary Judgement. On July 17th Petitioner filed for Motion to appeal the District Judge decision. The Seventh Circuit Court of Appeals received to be look into on 23rd of July 2018. Petitioner filed its Brief with the Seventh Circuit Court of Appeals September 23rd 2018. Response was due October 23rd but asked for an extension for November 23 of 2018

Petitioner Reply was due on December 19th 2018 due to surgery. Petitioner requested for an oral argument but was denied by the Seventh Circuit Court of Appeals. On May 24th 2019 Seventh Circuit Court of Appeals has ruled its decision in favor of the Respondent.

Petitioner followed the Respondent Walmart Store Inc.'s Work Policy and its Ethic Global Policy. That gives all employees the right to express concerns when dealing with discrimination matters to members of management. During employment, Petitioner also spoke about serval discriminatory issues that affected his work ability to meet the demand of job

productivity. The Respondent Walmart Store Inc.'s management failed to honor Petitioner concerns regarding his complaints of misconduct that was displayed towards him while working within his department dealing with Racial Discrimination and physical abuse from employee and Manager of department.

The Respondent of Walmart Store Inc.'s employees were timing Petitioner lunch breaks along with spreading false gossip statement about Petitioner character increasing his job production duties even taking pictures of his work and also being physically abusive. The Respondent of Walmart Store Inc.'s has retaliated against Petitioner due to his awareness of racial discrimination that took place within his department on how the blacks were not treated equal to white employees within his company store. As Petitioner my First Amendment rights were ignored by the Respondent management.

Under the law of statute 42 U.S.C. §2000e-2 states that all unlawful employment adverse practices are prohibited. On August 17th 2016 PETITIONER continues to deals with racial discrimination & harassment. The Respondent of Walmart Store Inc.'s decided to use verbal abusive words to express authority as well get physical with Petitioner.

The Responder Walmart Store Inc.'s Bakery associate a white Female harassed Petitioner by following him from dish washer room to the bakery back room antagonize him with cruelty words yelling racial slurs" saying listen to me "Boy" I don't give a damn or care about your life or what you say your Life Don't Matter your "gonna" listen to me she "raised her hand within the argument and Slapped the Petitioner leaving a swelling bruise mark on hand. Petitioner seeked medical attention while looking for Respondent Walmart Store Inc.'s department supervisor to assist the matter of danger that was done to the Petitioner.

A reasonable juror could conclude those unlawful acts were done intentionally in fact are proven to be of racism's by here tone and statements her intention was to physically hurt the Petitioner without proper caused of not being threatened by the Petitioner. The Respondent Walmart Store Inc.'s employee a white female known that by her being a white female will not face any consequences due to her white privileged for discriminating against Petitioner.

In the case of *Hithon v. Tyson*, Supreme Court stated regarding racial term "**BOY**" in the workplace, "The meaning may depend on "context", inflection tone of voice, local customs and historical usage." *Hithon v. Tyson Foods Inc.* 151 F. 3d 1252 (2015) under the laws of statute 42 U.S.C. §2000e-2 for unlawful employment practices, 42 U.S.C. §2000e-3 other employment practices 29 U.S.C. §791(a)-(b) prohibits against age, 42 U.S.C. §12203 prohibits against retaliations and coercion 42 U.S.C. §12117, -21233 & 12188 (a) (b). The Respondent Walmart Store Inc.'s management and associates could have prevented this matter from accruing but chosen not to by ignoring Petitioner previous complaints.

In the case of *Williams v. Consol Edison Corp of NY*, 255 F. Appx. 546, 549 (2d Cir. 2007). Petitioner was qualified for the position due his food handling license but suffered adverse employment action. The adverse employment action displayed discrimination. In the case of *Fisher v. Vassar College*, 114 F. 3d 1332, 1344 (2d Cir. 1997)

The Respondent discriminated because it permitted serval white women & men to physically abuses an African American male as well spread false statement about the character to be humiliated by his Coworkers and members of management. The Respondent chose not follow through with Store Ethics Policy as well State and Federal laws to protect the Petitioner Constitutional Rights. *Rodgers v. U.S. Bank N.A* 417 F3d. 845, 852 (8th Cir. 2005) Page 6

Under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful practices of employee adverse actions. LLC that engage in unlawful practices gives an employee the rights to files suits against LLC for discrimination for race sex and basis matters under the jurisdiction. The Respondent kept Associate in the department where Petitioner was physically and verbal abused Petitioner for 33 days. Now what lesson does that prove? Petitioner waited weeks later to be transferred due unlawful practices by the Respondent. The Respondent waited for new hires to replace Petitioner before removing Petitioner from department. By his request due unlawful practices effecting his mental status and health leading to stress due management delaying to secure Petitioner, safety and health wellbeing from daily humiliation form Respondent. The replacement to that department were white. *Arbaugh v. Y & H Corp.*, 126 S. Ct 144 Fed. Appx. 795 (11th Cir. 2006)...pg3 *Hutson v.*

On September 16th 2016 Petitioner was called into Store manager's office to create Petitioner new work Schedule for the week September 17th through 23rd of 2016 for his new department the following week the Petitioner was terminated his first week in a new department. Petitioner was falsely terminated that week without a valid reason. Petitioner was issued a check and a document that states "Petitioner will be eligible for rehire 30days after termination?

This issue a known fact that Proves the defendant Walmart Store Inc.'s are liable for Adverse Employment Actions Retaliation and wrongful Termination by violating Constitutional Rights Under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful practices of employee adverse actions. LLC that engage in unlawful practices gives employer the rights to files suits against LLC for discrimination for race sex and basis matters under the jurisdiction.

Petitioner is appealing a filed case with the Northern District as well the Seven Circuit Court of Appeals due to these allegations of adverse employment actions **UNLAWFUL PRACTICES RAICAL DISCRIMINATION , HARASSMENT, RETALIATION , FALSE WITNESS OF JOB TERMINATION** and job discrimination for breaching their own policy that Petitioner dealt with during his employment with Respondent Walmart Store's Inc.'s. The Respondent has broken serval statues of code by retaliating against the plaintiff for raising concerns about the misconduct of management not following store policy.

The Respondent has proven to be liable for adverse employment actions by retaliating against plaintiff for raising concerns about his safety and health of unlawful practices he endured during his employment with the Respondent. Petitioner has proven his *prima facie* and Respondent proffered reasons was used as a pretext for termination. Petitioner experienced adverse employment action from Respondent Wal-Mart Stores Inc. Petitioner was meeting legitimate business needs.

Maureen McPadden Vs Wal-Mart Store East, LP U.S. District Court Case No. 14-cv-475(Opinion No. 2016 DNH 160)

Respondent has committed intentional discrimination and was fully aware that plaintiff was in a hostile work environment. Respondent is absolutely wrong about the law & Store Policy and was being selective on what policies they wanted to follow due to Petitioner race. Respondent failed to reasonably accommodate plaintiff by not removing employees who caused the discrimination and workplace violence based on the undisputed fact of them being a white females and males.

Respondent terminated Petitioner for the claim of Attendance. Respondent similar situated employees violated store policies also laws on discrimination in the workplace but were not terminated. Petitioner was terminated due to his protected status. Petitioner was retaliated against by Respondent for raising concerns, after Petitioner made several reports to Global Ethics, he was shortly terminated after the claims he filed to Global ethics.

Burlington Northern and Santa Fe Railway Co. v. White, (2006)

REASONING FOR GRANTING THE PETITION

The Court of Appeals erroneous decision circumvents the premise, permitting workplace violence, discrimination, and wrongful termination. The appellant court has not yet settled on a single law that constitutes an employee to be discriminated against based on his protected status. Petitioner points to all facts showing the causal connection of his termination. The ultimate decision maker was involved with leading the ethics investigation, interviewing all the was involved with the incident that accrued within petitioner employment also Respondent Store Managers was the ultimate decision maker and leading up to petitioner termination and has signed documentation of job transfer.

The Court of Appeals argues that the Respondent employee that hit Petitioner had no attendance points (, which is not on the record,) neither did the Respondent present such evidence. The Court of Appeal is going around the fact that employment laws were broken. The Court of Appeals is bias on their decision and making the law seem ok for an employee to be discriminated against and wrongfully terminated.

It is factual evidence that the petitioner was hit and moved out of the department and he was the not the one causing issues. He was a target because of his protected status and The Whistle Blower Act. The fact that Petitioner was terminated for a pretextual reasons contradicts the law. This case presents The Supreme Court to clarify the standard of discrimination that occurs in the workplace. *McLaughlin v. Esselte Pendaflex Corp.* 50F 3d 507, 511 (8th Cir. 1995) page 5

PETITIONER is seeking that UNITED STATES SUPREME COURT consider revaluation the case due to an Illinois Northern District Court ruling on Rule56 summary judgment as well United States Court of Appeals decision denial for a rehearing.

Under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful practices of employee adverse actions retaliation. LLC that engage in unlawful practices gives employer the rights to files suits against LLC for discrimination for race sex and basis matters under the jurisdiction.

After reviewing the Seventh Circuit Court of Appeals decision, Petitioner knows The Court of Appeals decision was not made in good faith and was very bias by ignoring appellant facts of evidence and arguments raised in statement. Within the verdict The Court of Appeals never mention any statement of evidence presented by the Petitioner but continually rely on one side of evidence declaration, but ignore undisputed facts of evidence Petitioner present. The Court of Appeals couldn't point to any true reason why the appeal was denied based off fact.

The Seventh Circuit Court of Appeals has ignored Petitioner declaration from an eye witness previous employed but chosen not to consider facts in written statement. The court of Appeals chosen to be one sided being in agreement with the Respondent WAL-MART STORE

INC'S by allowing Declaration of the Respondent to be the reason why the case is denied and the statement is false.

Petitioner submitted a request for oral arguments to explain case and evidence but was mailed a letter by the court of appeals stating "they'll look into to consider that "but was **denied and not giving a chance by the Seventh Circuit Court of Appeals or stating by law why its not needed for an oral argument.**

The Court of Appeals stated on page 2 one¶ claiming "that the Appellant did not get along with his colleagues in department got in argument where he only points his finger at the Respondent" and that was the reason why the incident accrued to abuse the Petitioner. Those are false one-sided statement only supporting the Respondent Wal-Mart Store Inc.'s.

The Appeals Court fails to mention the Respondent Wal-Mart Store Inc.'s pointed there finger first at the Petitioner as well **called him names disrespecting his character and threatening calling him names like" Rug Rat, listing to me Boy saying your Race Don't Matter Slapped as leading to physical abused by slapping" the Petitioner.**

Now after reading the court of Appeals response in statement you sense their biases decision has **No Merit of Facts** their decision was made only by Opinion not by the Law only sided in favoritisms of Respondent Wal-Mart Store Inc.'s ignoring the whole truth of evidence of undisputed facts submitted by the Petitioner.

On page three ¶2 Appeals Court "claims Petitioner failed to point evidence to suggest that Respondent who Slapped Petitioner was directly comparable to Petitioner in all material respects stating Petitioner also did introduce evidence to reflect that Respondent who Slapped Petitioner received more than four point or tardy was not fired that the Respondent was a new hire but the

Respondent was with Wal-Mart Store's Inc.'s for five or more". Petitioner has filed a motion for records in regarding these matters but The Northern District Court Magistrate Judge denied certain employee personnel files and records.

Secondly, Petitioner submitted documentation evidence of Respondent Wal-Mart Stores Inc.'s Global Ethic Policy. All employee and even management have signed documentation that explains Store Violation Policy and if anyone violate those rules by participating in unlawful conduct practices will lead to automatic termination in which no one exempt from these policies.

The Court of Appeals chosen to ignore those facts of store policy evidence submitted by the Petitioner but swayed with Respondent chosen to Breach their Own Store Policy by not following and being Selective on certain policy to follow. Respondent Wal-Mart Store's Inc.'s terminated Petitioner due to raising concerns about his safety and wellbeing of mental stress he's been dealing with on a daily bases while working for the Respondent Wal-Mart Store Inc.'s

Thereon page three 2¶ The Court of Appeals is in agreement with the violation of law and policies not terminate the Respondent whose been with company five or more years, who's has rank and seniority status in the company along with violating Wal-Mart Store Inc.'s policy on daily bases. Respondent chosen to keep all employee's who's been with the company more than one or five years more. The Court of Appeals id in agreement with Respondent seniority system on using policy as a pretext for discrimination against Petitioner. Respondent Walmart Stores Inc. seniority system was discriminatory. *McDonnell Douglas Corp v Green* 63f 3d 771, 781 (8th Cir. 1995)

Page 3

For this reason, the Appellate Court has chosen to ignore these evidences of the statement once again as we'll Under the 42 U.S.C. § 1984 prohibit against LLC engaging in unlawful -

practices of employee adverse actions retaliation. LLC that engage in unlawful practices gives employer the rights to files suits against LLC for discrimination for race sex and basis matters under the jurisdiction.

The Court of appeals hasn't comprehended the difference between Respondent Supervisor being aware of Wal-Mart 1800 Ethic Open Door Policy hotline complaints that were made by Petitioner and awareness of the incident that took place On August 17th 2016. All employees have the rights to call & report complaints about any unlawful conduct practices to Respondent Wal-Mart. Store Inc.'s Ethics Open door policy to raise concern when all level of Managerial position is not handling the matter properly.

The Appeals court stating in the declaration Of Respondent Supervisor claims "he wasn't aware of complaints made by the Petitioner of misconduct. "The Petitioner made phone calls to 1800- Wal-Mart Global Ethics Open Door Policy hotline to make complaints about unlawful conduct of discrimination harassment and racial activity being practiced.

Petitioner made phones call in the store parking lot inside his Vehicle on break time. Petitioner made complaints also made reports about Store Managers trying to fire him by watching his every move. The petitioner has provided documentation evidence records of calls reported to the court.

The Respondent supervisors was not present when petitioner made the phone calls to Wal-Mart Stores Inc.'s Global Ethics Open Door Policy inside his Vehicle of Store parking lot on the break time. But the Respondent supervisor was present and on schedule the Day of august 17th 2016 when petitioner reported the unlawful conduct that took place. Petitioner reported to a member of managerial position in personnel department. Respondent Supervisor was in the back

office listening the whole conversation and was of aware of this incident. Petitioner had worked his for Electronics Department a few times before being officially transferred to the new department.

Walmart Global Ethics Open Door complaints were made from Petitioner before transfer and after termination. Respondent Supervisor at the time of incident that accrued on the august 17th 2016 but Respondent Supervisor was aware of the reason why Petitioner has been transferred to his department. No employee is allowed a job transfer until six unless there been unlawful practices that took [place in the department. In which Respondent Supervisor was aware of the incident that occurred not the Petitioner Hotline phone call compliant.

In the Respondents Supervisor declaration, he never denied that he wasn't aware of the incident of unlawful practices that Petitioner dealt with on August 17th 2016. Also, Respondent Wal-Mart Store's Inc.'s Supervisor never provided documentation proof to support statement stating he's not aware of any complaints or incident that took place on the job site. Respondent Supervisor was on schedule and present work August 17th, 2016 the date that the incident occurred and he was aware along with the other Store Managers.

The Court of appeals is an agreement with Respondent Wal-Mart Store Inc.'s Seniority system on using policy as a pretext for discrimination against African American Petitioner in the case of Albemarle Paper. Co. V. Moody 422.U.S.405 955. ct 2362(1975 this district court found seniority system discriminatory.

The Court of Appeals states on Page 3¶1, Walmart's policy is to discharge new hires like brown. The Court of Appeals is only focusing on a policy that Respondent claims Petitioner violated. Petitioner employee records shows that is not so. The Court of Appeals has not yet addressed any complaints that Petitioner brought to this Court in the first place. Petitioner has

provided evidence to dispute every claim Respondent rebutted. But again, The Court of Appeals is denying the case to move forth and be tried in front of jury with all evidence submitted in favor of Petitioner. *Ortiz v. Werner Enterprises Inc. 834 F.3d 760, 764 (7th Cir.2016)*

The Court Appeals is in agreement with the Respondent Wal-Mart Store Inc.' claiming on page two ¶2 "That after shortly being transferred to new department Petitioner was tardy for his shift and has accumulated a certain number of unauthorized absence point while under company policy subjected to termination. The next day his Respondent supervisor fired Petitioner for occurring too many unauthorized absences." The Court of Appeals response shows their ruling decision was made in bad faith and bad judgment.

On page three ¶2 Appeals Court is an agreement with Respondent Wal-Mart Store's Inc.'s claiming "Petitioner offered no evidence to Dispute employment records reflecting that he had accrued four and a half points for his unauthorized absence- and Wal-Mart's policy is discharge new hire petitioner who accumulated four or more points within a six months' time frame during time of employment "

Respondent Wal-Mart Store's Inc.'s Transfer Policy allowed employee transfer to new department after be employed a full six months not going over points with the company in or in less there any violation of unlawful conduct being practices under these conditions an employee who's been dealing with those issues will be transferred immediately to a better safe environment.

Ortiz v. Werner Enterprises Inc. 834 F.3d 760, 764 (7th Cir.2016)

And for those the reason Petitioner was granted a transfer due to Respondent Wal-Mart Store's Inc.'s Transfer Policy in which Petitioner submitted Transfer Policy as proof of evidence

to support claims in the case in which was ignored by the SEVENTH CIRCUIT COURT OF APPEALS due to lack of understanding of evidence.

Petitioner has submitted evidence documentation proofing Respondent Wal-Mart Store Inc.'s Store and Co Manger employee number in they were responsible of completing Petitioner job new transfer on the date September 16th 2016 by looking into his personnel files records to correct any errors that would've prevent him from transferring to new department. It appears that Court of Appeals is wrong about the response submitted due to evidence Petitioner presented.

Williams v. Consol Edison Corp of NY, 255 F. Appx. 546, 549 (2d Cir. 2007)

CONCLUSION

For the foregoing reason, the petition for a Writ of Certiorari should be granted.

Respectfully submitted,

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