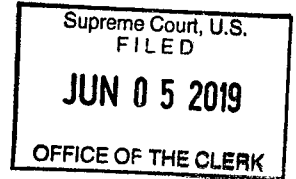


No. 18-9733

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES



Bobby F. McReynolds — PETITIONER  
(Your Name)

vs.

Preston Glenn, ET AL — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals For The Eighth Circuit  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Bobby F. McReynolds  
(Your Name)

PO Box 970 ~~XXXXXXXXXXXXXXXXXXXX~~  
(Address)

Marianna, AR 72360  
(City, State, Zip Code)

N/A  
(Phone Number)

### QUESTION(S) PRESENTED

I wish the court to review my medical file showing I am still needing surgery from the fall in Nevada County Jail. This incident happened on November 30th 2016. To show how they dismissed my case without me receiving any medical attention that I feel I was due. Federal Judge Susan O'Hickey dismissed my case behind false accusations from Preston Glenn. I'm still suffering from this and even using a cane to walk. I ask the court to allow me the proper medical attention and operations that I need. The prior dismissal of my case has not allowed that to happen. These as well as anything else the court feels I'm entitled ~~to~~ to. Signed Bryanne Reynolds

Medical notified me on 6-5-19 that I am scheduled to have surgery on my right bicep sometime in the month of June 2019.

## LIST OF PARTIES

[ ] All parties appear in the caption of the case on the cover page.

[X] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

PRESTON GLENN, Jail Administrator,  
Nevada County Jail;

DANNY MARTIN, SHERIFF  
Nevada County Jail;

DR. ELKINS, Nevada County Jail;

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APPENDIX A	<i>Appeal From U.S. District Court for the Western District of Arkansas - Texarkana</i>
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# TABLE OF AUTHORITIES CITED

LEGAL BULLETIN 7.1

Set 7.1 CRUEL and UNUSUAL Punishment Bulletin 7.1

medical neglect is covered in our Bulletin 8.1

The Eighth Amendment and conditions of confinement  
not cruel and unusual punishment inflicted."

U.S. CONST. amend. VIII. The "Cruel and unusual Punishment" Clause was originally intended to stop torture and other similar practices that occurred during the reigns of the Stuart Kings in Great Britain. However, overtime the meaning of "Cruel and unusual Punishment" has grown. In IRVING V. DILLER, 356 U.S. 86, 78 S. CT. 590, 598 (1958), the U.S. Supreme Court stated, "The words of the Amendment are not precise, and that their scope is not static. The Amendment must draw its meaning from the evolving standards of decency that mark the progress of a maturing society."

Because the Amendment does not specify what constitutes "Cruel and unusual punishment," the Courts have developed certain guidelines that they follow. A Punishment is "Cruel and unusual" if it is disproportionate to the offense, if the punishment is too severe or harsh, compared to the general ideas of dignity, decency, and civilized standards, it is proscribed by the Eighth Amendment.

Ehrman V. Georgia 408 U.S. 238, 92 S. CT. 2726, 2742-47 (1972)

Deliberate indifference in medical neglect  
ESTELLE V. GAMBLE, 429 U.S. 97, 975, CT. 285, 292 (1976)

Common Pleas, 2006 U.S. DIST. LEXIS 40125 (ED. Pa. June 15, 2006)

unnecessary and wanton infliction of Pain  
Rhodes V. Chapman, 452 U.S. 337, 101 S. CT. 2392 (1981)

MENTAL ANGUISH Bulletin 8.1 Trop v. Dulles, quoted on Page 1 of  
This bulletin, sets forth the standard that a violation of the Eighth Amendment  
is an act which offends the "evolving standards of decency that marks  
the progress of a maturing society." This test looks at the act itself.

I will show the Courts in my best ability to let  
them know that all parties were negligent in the  
fact. See Phillips vs. Jasper County Jail 437 F.  
3d 791 13. Also Refer to Dulany vs. Carnahan - 132 F.  
3d 1234, 1237-38 (8th Circuit, 1997)

Susan Vaughn vs. Christopher Gray - 557 F.3d 904  
March 6, 2009 Civil Rights Five. Refer to Number  
Six of Vaughn vs. Gray, ~~on Number Six~~

~~on Number Six~~

## 9 Civil Rights

12 Sentencing and Punishment. See Vaughn vs. footnote #5,  
see State of Rosenberg by Rosenberg vs. Cranberry May  
30, 1995. 56 F.3d 35.

1 Sentencing and Punishment

7 "

8 "

10 "

See Opinion 2 of Rosenberg vs. Crandell.

# STATUTES AND RULES

MOTION TO AMEND UNDER RULE 15(A)

OTHER

I Bobby Mc Reynolds FILED ON 01/03/2019  
APPELLANT Brief

BRIEF FILED - APPELLANT REPLY BRIEF  
FILED BY Bobby F. Mc Reynolds ON 09/25/2018

Amended 09/24/2018 14:24:27;  
NOTICE OF DOCKET ACTIVITY

IN THE  
SUPREME COURT OF THE UNITED STATES  
  
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the \_\_\_\_\_ court appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.





## JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was February 25, 2019.

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: April 11, 2019, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. \_\_\_\_ A \_\_\_\_.

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

☐ For cases from **state courts**:

The date on which the highest state court decided my case was \_\_\_\_\_.  
A copy of that decision appears at Appendix \_\_\_\_\_.

☐ A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. \_\_\_\_ A \_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Eighth amendment rights were violated. 8.1

Due process of law was violated.

Civil rights were violated.

Falsified documents were used against me.

~~I Barry Mc Reynolds~~

## STATEMENT OF THE CASE

got back to Nevada County Jail from the Hope hospital on 11-30-16. The jailor told Preston Glenn that I asked for a second opinion at the hospital and they did nothing for me. I asked for a second opinion from Preston Glenn with no assistance on that date.

Preston Glenn placed me on top tier on top rock. I had to walk up stairs and down. I had to climb in and out of my bunk. Later to find out I had a fractured leg from the 11-30-16 fall that I suffered. From having to pull myself in and out of my bunk I have a degenerative muscle disorder in my right arm that needs surgery. The fall initiated this injury the pulling myself in and out of my bunk furthered this injury to what it is now. My ~~leg~~ Neck is also messed up as a result of the fall I suffered. I am handicapped for life now. I need operations now and in the future to correct my arm and my neck. If proper medical attention would have been provided to me from the start and I would not have had to climb stairs would not be in this condition. As a result of the neglect of the parties involved I am unable to work as I once did. I wish to receive the amount of money I've already asked for which is \$350,000 for pain and suffering, \$350,000 for mental anguish, and \$3,000,000 for other purposes from each of the parties listed in my petition. It is my belief this court will do what is necessary to ensure I get what I feel like I deserve. I trust the court to do so. Signed ~~Barry Mc Reynolds~~

## REASONS FOR GRANTING THE PETITION

I ~~Buffy McReynolds~~

The Court should grant this Petition for the following reasons:

- 1) The lower court Judge Susan O'Hickey dismissed my case under false reasonings from statements of Preston Glenn. That stated my back was broken which it never was.
- 2) I am still suffering from the results of this fall and the Neglect that followed. I was not hurt before being in Nevada County Jail and I am now injured for life. Surgery will help but I will probably never be well again.
- 3) The ones responsible for neglect should be held accountable for not acting properly towards me or my injuries. The money I ask for will help but no price will ever get me my health back which I lost through this ordeal.

For these reasons the court should grant my writ of Certiorari and for any other reasons the Court deems Necessary.

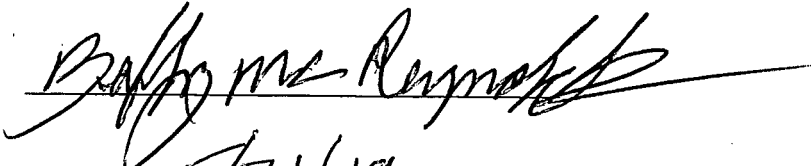
With Respect

Signed ~~Buffy McReynolds~~

### CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

  
Date: 5/31/19