19-332



No.
IN THE

# Supreme Court of the United States

Davis et, *al,*
on behalf of himself and all
Petitioners' Members

Petitioner(s)

V.

Bank of America Corporation N.A. *et, al.*

Respondents

On Petition for A Writ of Certiorari
United States Court of Appeals for The Seventh Circuit

**PETITION FOR WRIT OF CERTIORARI**

[Additional Petitioners and Respondents

Listed on Inside Cover]

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## QUESTIONS PRESENTED

The Pro Se Petitioners were unequivocally deprived of all their "Constitutional Rights". Seven Petitioners were wrongfully denied the right to file *forma pauperis* pursuant to 28 U.S.C. § 1915.Congress enacted 28 U.S.C. § 1915(a) to Enable Plaintiffs who could not afford the costs of litigation to bring civil lawsuits.

The questioned asked? Do pro se litigants have any

**"CONSTITUTIONAL RIGHTS"**

**PARTIES TO THE PROCEEDINGS**

Petitioners:

Steven E. Davis
Zdzislaw Krajewski
Peggy L. Strong
Louis G. Bartucci
Cheryl M. Malden
Jeffrey Sanders
Yvonne Singleton
Steven Segura
Cheryl Bell
Elizabeth Robinson
Geraldine Blanton
Denise Woodgett
Mack Glover
Dennis F. and Susan R. Martinek
Darryl and Ann Coney-Bell
Emmauel S. and Connie C. Bansa
Ralph E. and Joan M. Holley
Ulsen and Georgia Anderson

**Respondents:**

Bank of America Corporation
Bryan Cave Leighton Paisner LLP
Atty: Jena M. Valdetero
Robert W. Brunner

MERS and Merscorp Inc.
K &L Gates LLP
Atty: Andrew C. Glass
Gregory N. Blasé

Citigroup Inc., HSBC Bank USA, N.A.
Wells Fargo & Co.
Mayer Brown LLP
Atty: Lucia Nale
Thomas V. Panoff
Christopher S. Comstock
Tyler Alfermann
Michelle V. Dohra

U.S. Bank Trust National Association
and Irina Dashevsky
Locke Lord LLP
Atty: Ryan M. Holz

SunTrust Banks Corp.
Pilgrim Christakis LLP
Atty: Jeffrey D. Pilgrim
Carter B. Stewart

Chase Manhattan Bank a/k/a
JP Morgan Chase
Morgan, Lewis & Bockius LLP
Atty: Megan R. Braden
Kenneth M. Kliebard

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## PETITION FOR WRIT OF CERTIORARI

Petitioners Steven E. Davis, Steven Segura, Cherly M. Malden, Cheryl Bell, Larry and Belinda Brown, Louis G. Bartucci, Dennis F. and Susan R. Martinek, Darryl and Anna Coney-Bell, Denise Woodgett, Zdzislaw Krajewski, Peggy L. Strong, Jeffrey R. Sanders, Emmauel S. and Connie C. Bansas, Geraldine Blanton,Mack Glover, Yvonne Singleton, Ralph E. and Joan Holley,Ulsen and Georgia Anderson, Elizabeth Robinson as of June 10, 2019 Respectfully petitions for a writ of certiorari to review the judgment of the United States Court of Appeals for the Seventh Circuit in this case.

## OPINIONS BELOW

The opinion of the United States Court of Appeals for the Seventh Circuit, Davis et, al, v. Bank of America N. A. et, al, (7th Cir. 2019), is reproduced are App. A. The district court's opinion, never published on Davis et, al, v. Bank of America N.A. is reproduced at App B. The Seventh Circuit's order denying rehearing by panel is reproduced at App. B.

## JURISDICTION

The Seventh Circuit entered judgment on March 14, 2018. Petitioners filed a timely motion for rehearing/ reconsideration in March 2018. The Seventh Circuit denied the motion on March 14, 2018. This petition denied the motion on March 14, 2018. This petition of the United States Supreme Court, Rule 13.1. This Court has jurisdiction under 28 U.S.C. § 1254(1).

## RULES INVOLVED

Rule 56(a) and 4(1)(e) of the Federal Rules of Civil of Procedure 56 (a) provides:
A party may move for summary judgment, Identifying each claim or defense--- or the part of each claim or defense on which summary judgment is sought.
The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant are entitled to judgment as a matter of law.
The court should state on the record the reasons for granting or denying the motion.

Procedure Rule 4(1)(e) provides:
(E) notify the defendant that a failure to appear and defend will result in a default judgment against the defendant for the relief demanded in the complaint;

## STATEMENT OF THE CASE

This petition arises from a declaratory judgment action Respondents seeking summary judgment for default. Which was wrongfully denied. On October 25, 2017, the Petitioners re-filed their original complaint as Case No.17-cv-7714 from previous case16-cv-5993 which was dismissed without any statement declaring "with or without prejudice" within The Northern District of Illinois Eastern Division. Against Respondents Bank of America Corporation, Well Fargo & Company, HSBC Bank USA, N.A., US Bank Trust as Trustee for LSF9 Master Participation Trust, JP Morgan Chase Bank N.A., Bank of New York Mellon USA, Ditech Financial LLC., Deutsch Bank National Trust Company, Solely in its capacity as Trustee, Bear Stearns

Companies, LLC; Citigroup Inc, Merscorp., Holdings Inc., Mortgage Electronic Registration System Inc., SunTrust Banks, Inc., Irina Dashevsky, Locke Lord LLP, and Richard A. Rice.

## ARGUMENT

The merits were based on Respondents violation of Breach of Mortgage Contract, Gramm-Leach-BlileyAct 15 U.S.C.§ 6801-6803, Invasion of Privacy-142 judicial Remedies and penalties for violating the Privacy Act U.S.C. Sec. 552a., Illinois Constitutional Right of Privacy, and Obstruction of Justice 18 U.S.C.A.§§ 1501-1517 aim to protect the integrity of federal judicial proceeding section 1503.
Most courts will interpret a pro se litigant's pleading "liberally" and will not dismiss the complaint for Mere technical violations of rules. Stanley v. Goodwin, 475 F. Supp. 2d 1026, 1032-33 (D. Haw.2006) (citing Haines v. Kerner, 404 U.S. 519, 520-21 (1972)) Silence can only be equated with fraud where there is a legal or moral duty to speak, or where an inquiry left unanswered would be intentionally misleading....Prudden, supra, p. 1033.

There was no reasoned opinion, but a pro se should be especially entitled to have one in a federal case. On October 26, 2017, Bank of America Corporation, Wells Fargo & Company, US Bank Trust N.A., as Trustee for LSF9 Master Participation Trust, JP Morgan Chase Bank N.A., and Citigroup Inc.

Were served, their answer or otherwise plead was rightfully due November 16, 2017. Bank New York Mellon USA, and Irina Dashevsky of Lock Lord LLP was served on October 30, 2017, answer was rightfully due on November 22, 2017,

Merscorp Holdings INC., Mortgage Electronic Registration Systems Inc., The Bear Stearns Companies, LLC and Richard A. Rice, served on November 17, 2017, and SunTrust Banks was served on November 27, 2017, Ditech Financial LLC aka Green Tree Financial Corp., were certified mail on November 21, 2017.

The last Respondents' answers were due no later than December 6, 2017. Additionally, the Defendants-Respondents had already been served and failed to file a response in the time required by civil rules and procedures resulting a default judgment against them.

Respondents fail to respond to court order on November 3, 2017, by Judge Charles P. Kocoras Which states in parts: Lead counsel for each party is required to attend the initial hearing. **Failure to appear at any schedule court hearing may result in the** dismissal of claims for want of prosecution.

Respondent Bank of New York Mellon, and Ditech Financial LLC, omnipotent. These scrupulous believers really believe they can neglect Fed. R. Civ. P. 30 a 1. See *Christy Akright v. Flex Financial Holding 2:08-cv-02037 CM-GLR (10th Cir.) articulates the tension in default cases between enforcing procedural rules and observing fairness:*

[The Court does not] favor default judgment... purely as Penalty for delays in filing or other procedural erred However, a workable system of *justice requires that litigants Not be free to appear* at their pleasure.

We therefore must hold Parties we therefore must hold Parties and their attorneys to a reasonably high standard of diligence in observing the court's rules of procedure. The threat of judgment by default serves as an incentive to meet this standard.]

Whereas, Respondent Attorney Richard Rice filed his Pro Vic appearance with all due respect was once the Attorney-in-fact on behalf of the Petitioners.
As of October 25, 2017, he became a member of the Respondents for conspiring with the Respondents against his own clients. Attorney Richard A. Rice intentionally disregarded his needed appearance on court dates December 5, and 14, 2017.
Respondent failed his legal responsibility as officer of the Court and deliberately acted intentionally to injure the Petitioners.

There was no attempt on the Respondent's part to Seek any settlement with the Petitioners as per the Court Order nor any communication to where any Possible settlement was in existence, with the Respondents. As if they had prior knowledge of the Court's intention to dismiss Petitioners case without any recourse on December 5, 2017.

A Pro se Petitioners complaints, if construed liberally, prevent a judge from using hyper critical misrepresentations and arbitrarily ignoring the facts to punish pro se plaintiff's by hinging their rights, or the denial of them, on the pleading alone rather than the irrefutable facts.

This is so "common sense", rather than prejudice, prevails. Also, in the interest of justice, the judge has the flexibility to request additional facts or evidence or a more definite statement before making an

arbitrary adverse judgment without context and devoid of common sense.

PLEADING §103 Importantly, said the Court, plausibility is not an invitation for judges to engage in probabilistic reasoning to weed out improbable, but well-pleaded complaints.

Therefore, the Trial Court judge misapplies his own ruling see *Arkenbrandt v. Richards 504 U.S. 689 703 (1992) and Bell Atl. Corp v. Twombly, 550 U.S. 544, 570 without a reasoned opinion as supporting their position.* Judge Kocoras wrongfully disregarded our plead in open court by his own words if any party fails to appear will result in a dismissal of claims for want of prosecution.

The court, rather than helping the pro se plaintiffs exercise their rights, is acting as an adversary as if they are employed by the Respondents in that capacity.

Petitioners were unequivocally deprived of that "Due Process". As the Petitioners, we were totally numbed, emotionally harmed which has brought a great deal of stress and deep depression to the Petitioners' who are 90% Senior Citizens'? Sad to say we have lost (Deceased) three of the Petitioners' since the beginning of this civil action.

After Petitioners were wrongfully denied on December 5,2017, they immediately filed for reconsideration on the 14th of December. Whereas, the Respondents Ditech Financial LLC, Bank of New York Mellon, and Attorney Richard A. Rice, this was

His and their opportunity, on the one hand to reconsider theirs' and his legal responsibility as officers of the court and do the right thing and on the other, to file any appropriate motion to show cause, to show that the Petitioners complaint was frivolous.

If the Petitioners would have defaulted in any shape form or fashion for failure to follow court procedure this would have brought penalties on the Petitioners'. Without any hesitation from the Court and the Respondents.

During the procedure on December 5, and, 14, 2017, Petitioners were the only party to address the Judge Kocoras court. Judge Kocoras response was *"your relief----we are on the 23rd floor. The Court of Appeals is on the 27th floor. And that is where you have to go to seek relief from my ruling."*
Petitioners believes that the trial Court erred in the law by deliberately dismissing Petitioners case without justifying the dismissal.

See The final judgment in a case should be complete and self-contained. *Claybrook Drilling Arthur R. Miller, 11 Federal Practice and Procedure Sec. 2785 at 15-16 (1973). See also Rappaport v. United States, 557 F.2d 605 (1977) (dismissing an appeal from* minute order that grants a motion for summary judgment but does not explicitly declare the case over); Foremost Sales Promotions, Inc. v. Director, BATF, 812 F. 2d. See The final judgment in a case should be complete and self-contained *Claybrook Drilling Co. v. Divanco, Inc., 336 F.2d 697* (10th Cir.1964); *Charles Alan Wright & Arthur R. Miller,* 11 Federal Practice and Procedure Sec. 2785 at 15-16

(1973). See also *Rappaport v. United States* 557 F.2d 605 (1977) (dismissing an appeal from minute order that grants a motion for Fed. R. Civ. P. 12(b)(6), should say:" Defendant's motion to dismiss is with prejudice." That indicates both the ruling and the disposition--the latter being the more important.

The Trial Court Doc [s]# [68][78] Notice of docket Entry didn't clarify if the Respondents/Defendants Motion to dismiss was granted. In a separate document entitled "Judgment in civil case" The Court checked box other: This case is dismissed with prejudice and the last box checked X decided by judge Charles P. Kocoras (hereinafter "Judge Kocoras") A document stating "Insofar as the court has determined X it need not consider Y" is insufficient. It refers the court back to the opinion, it does not state how "far" the court has determined X, it does not state the disposition of the motion, and does not terminate the case. It contains neither an award of relief nor a declaration that the case is concluded. It is not a final judgment. See also *Glidden, 808 F.2d at 623.*

Therefore, the facts given the Petitioners is pleading for mercy that the United States Supreme Court would reverse and remand Petitioners appeal.

*"Every truth passes through three stages before it is recognized in the first it is ridiculed in the second it is opposed in the third it is regarded as self-evident" ... Arthur Schopenhaue*

Everyone has the constitutional right to proceed without counsel. The reasoning behind that decision

means that the Constitution requires our justice system to be neutral towards the self-represented litigants. That in turn means that the courts must offer a level playing field for the represented an unrepresented alike, consistent with basic principle of fairness.

December 27, 2017 Petitioners filed their first "Notice of Appeal" within the Seventh District Court of Appeal, as case No. 17-3656 for failure to answer or otherwise plead and appear.

Ditech Financial LLC, and Bank of New York Mellon Trust have intentionally failed to respond to the filed "Notice of Appeal". The Appeal Court recognized they were listed as Respondents/Defendants.

The Court Clerk failed to submit "Notice of Entry for Default". November 27, 2017, after Petitioners filed their motion for default. Motion for default was also filed on March 17, 2018, against Respondents Ditech Financial LLC, Bank of New York Mellon Trust, and Richard A. Rice. Within the Appeal Court It was Denied that same date.

The court, rather than helping the pro se plaintiff exercise their rights, acted as an adversary as if they are employed by the defendants in that capacity.

A third motion for default and summary judgment was also filed on September 18, 2018, against Respondents whereas, the Court unduly failed to respond.

On June 25, 2018, the appeal was dismissed claiming that the remaining 34 Petitioners had failed to sign appeal notice. The Appeal was filed by Petitioner Sonya Davis on behalf of all members. She was appointed in open court by the Judge Charles P Kocoras Court as spokesperson for the 33-original class-members' as per transcript dated 06/06/2017 verbatim: Page 13 lines 15 Court: *So, we will treat you as the spokesperson for the group*. Upon filing the appeal, the terminology used by Petitioner Sonya Davis "behalf of herself and all Plaintiffs members" it was also explained in detail that Judge Kocoras appointed Sonya Davis.

If the remaining Petitioners' signatures were needed then the remaining Petitioners should have been given an opportunity to amend their notice of appeal see *Lewis v. Lenc-Smith Mfg.Co., 784 F. 2d 829 (7th Cir. 1986) According we strike both the Appearance of Anna Marie Wright in this appeal and the brief that she filed. Lewis, since she is not represented by counsel must take responsibility for her appeal. See Herrera-Venegas, 681 F.2d at 42. As such, Lewis is required to sign the notice of appeal.* This is equal justice!!

In fact, some courts will go so far as to advise the pro se litigants of the defect in their pleadings and give them an opportunity to amend before dismissal. *Fedrik v. Bonzelet, 963 F.2d 1258, 1261 (9th Cir. 1992)).*

The Respondents were given leniency to amend their Jurisdictional Statement Whereas, Respondent attorney Richard A. Rice was given many leniency

opportunities to amend and submit his court ordered documents. Whereas, Petitioners' had no voice.

**"CONSTITUTIONAL RIGHTS"**

whereas, they were denied every motion that they filed. The Court Clerk misled the Petitioners that everything they had done was "Complete and Correct".

The Seventh Circuit denied rehearing on the question, on July 17, 2018, Petitioners filed a petition for rehearing and rehearing en banc which was also denied without any opinion. A motion was filed seeking an opinion which also was denied.

On August 6, 2018, (19) Petitioners filed a second "Notice of Appeal" arising from the same civil case 17-cv-7714 *"Davis et, al, v. Bank of America N.A. et, al,"* as well as motion to show cause. These appeals Were filed separately as case Nos. #18-2701-18-2719.

August 15, 2018, Appeal Court on its own initiative consolidated these appeals for purposes of briefing and disposition as Doc# [4]. August 22, 2018, (12) Petitioners' by court order filed their docketed fees of $505.

Six of the (19) Petitioners' filed on their own behalf *forma pauperis* pursuant to 28 U.S.C.§ 1915. After, the initial 30-days Petitioners assumed that these applications were approved there was no response from the court.

August 27, 2018, Petitioners were ordered to file a brief "memorandum" stating why these appeals should not be dismissed for lack of jurisdiction.

September 7, 2018, all the Respondents attorneys-in-fact except Rice responded to Petitioners "memorandum" per the court order on September 7, 2018, Petitioners were ordered to file a "Docketing Statement" to show "Cause" which was due by September 21, 2018. Petitioners filed a motion for "summary judgment" and to "strike," Respondents response to Petitioners' "memorandum".
These motions went unanswered by the appeal courts. At that point...the Petitioners knew the fight for justice and their Constitutional Rights was hopeless.

The Petitioners knew that Rice was literally being unseen and unheard by both the courts and the parties. Therefore, the Petitioners had no choice but to enquire about any kind of discipline actions taken against him.

September 21, 2018 motion to discipline Attorney Richard A. Rice for refusal to comply with court orders; Appeal Court reply order on September 20, 2018, the Court refusal to show Petitioners that Disciplinary action has been enforced against Rice.

Petitioners' were informed that the motion seeking answer for Rice would be docketed only. Petitioners later discovered that the Appeal Court was trying to cover-up Rice's obstructive and unprofessional behavior by allowing him to respond on his own time; to several courts orders.

This a brief sample of the number of times the Appeal Court had to request documents from Attorney Rice: April 2, 2018, and April 13, The Appellee brief was

electronically filed on April 2, 2018, April 24, 2018, This show how repeatedly appeal court ordered attorney Rice to filing his motions.

Reviewing these facts shows how the Appeal Court separated facts from fiction in *RE: John H. Davis, No. 17-1732 We issued an order directing Attorney John H. Davis to show cause why he should not be subject to discipline for failure to comply with court rules and for unprofessional conduct, including his refusal to heed straightforward directions from a district judge. Davis filed his response, but it does not alleviate our concerns about his professional competence. We, therefore, conclude that Davis should be removed from the bar of this court. See FED. R. APP. P. 46.*

The Appeal Court had shown attorney Richard A. Rice leniency despite that he was just as much responsible for his own action regarding this civil matter. This was unfair and unjust to both the Petitioners and the other Respondents. It appears that the Appeal Court deliberately showed favoritism toward Richard A. Rice.

This was the second beginning of Petitioners devastation. 90-days later Petitioners uncovered the truth behind the *forma pauperis* whereas, Judge Kocoras **HAD NO INTENTION** on responding to the *Forma pauperis affidavits.*

November 23, 2018, One of the seven Petitioners' borrowed $505 for her filing fees. Petitioners' discovered that the applications were literally sitting on Judge Charles P. Kocoras clerk desk for a period of 90-days.

November 26, 2018 four of the seven Petitioners Processed their payments with the Northern District Circuit Court Clerk' office between the hours of 3 & 4:03 p.m. After speaking to the Chief Clerk Thomas G. Bruton informing him about the concerns Petitioners had concerning their *forma pauperis* application. Since this was the "Thanksgiving Holiday" the judges were off duty that day. Including Judge Kocoras at approximately 4:28 Petitioners received this email;

> usdc_ecf_ilnd@ilnd.uscourts.gov: Notice of Electronic Filing The following transaction was entered on 11/26/2018 at 4:28 PM CST and filed on 11/26/2018 Case; Name Davis et al v. Bank of America Case Number: 1:17-cv-07714 filer: WARNING: CASE CLOSED: 12/5/2017 Document Number: 208 Doc Text.

Whereas, the Petitioners had successfully filed their fees prior to this order. Judge Kocosar filed his order denying the *forma pauperis* affidavits. Petitioners knew the Chief Clerk made that call. Petitioners also filed that same day "Motion to Withdraw" two Petitioner's Yvonne Singleton who has stage-four cancer, Petitioner's Georgia Anderson fighting to save her feet from amputation.

These two Petitioners' Requested to "Withdraw" from The case because they refused to hinder the case from moving forward.

November 30, 2018 Appeal Court unconstitutional Denied the Petitioners/Appellants rights to withdraw. Regardless if they or the Petitioners'

members could afford to pay the fees on behalf of these two Petitioners. They were totally denied that "Due Process".

Judge Kocoras claimed within his order filed on November 26, 2018. Criticizing Petitioners for re-filing their complaint on October 25, 2017. There was no quoting or paraphrasing any Federal Rules or Regulations that the Petitioners' violated.
Also, claiming that the Respondents file a motion Prior to December 5, 2017, court status for extension of time. Whereas, the Respondents failed to exercise that right. Judge Kocoras refused to execute his own order. Without any recourse, Judge Kocoras had every intention on dismissing Petitioners case without any regards to Petitioners.
Judge Kocoras also stated within his order that the Petitioners/Plaintiff failed to appeal the denial for the *forma pauperis* pursuant Fed. R. App. P. 24(a)(5). The Petitioners would have appeal within the 30-day timeline if their *forma pauperis* would Have been ruled on within that same 30-days requirement timeline. How can the Court determine such? an unfair ruling toward the Moving party. And give praises to the defaulting Respondents? Therefore, this Court should grant Petitioners "writ of certiorari".

Prior to Petitioners' dismissal on or around March 5, 2019, Petitioner Sonya Davis and Class Members received by United Postal notice of Ditech Financial LLC filing for Chapter 11 Bankruptcy Protection on February11, 2019.

The notice was addressed to Sonya Davis the representative for the Class Members. followed-by a "notice of claim" whereas, Petitioner Sonya Davis filed it on behalf of herself and Petitioners Members motion for relief from the stay, notice of claim as well as notice of appearance.

A copy of this motion was filed with "The United States Bankruptcy Southern District of New York and the United States Court of Appeals for the Seventh Circuit as case no. 19-10412 (JLG). The Court date was scheduled for April 11, 2019.

The Petitioners felt as if that was the legal hold-up For the court to give notice of dismissing of the Final appeal.

Petitioners later discovered that Ditech Holding Corporation aka Ditech Financial LLC notified the Court and the Respondents in September 2018, concerning the Chapter 11 filing. Petitioners were the last to know. Petitioners' also discovered that on November 30, 2017, after Ditech was served they filed Chapter 11 Bankruptcy protection unfortunately, Petitioners were unaware of these filing and Petitioners were not a party of that filing.

March 14, 2019, (19) Petitioners "Notice of Reconsideration" was wrongfully dismissed for "Lack of jurisdiction". On the pretense of 244-days.

If this was considerate equal justice, then Petitioners should have received the same treatment as in the case *Cooke v. Jackson Nat. Life Ins. Co. 2018 U.S.*

*Dist. Lexis 197908 (N.D. III. Nov. 20, 2018) the insured filed another appeal (18-3527), which we* resolved using the briefs filed in its initial appeal (17-2080). Its further states in part: *This Court believes that this case could have resolved on the Plaintiff's motion for Judgment on the pleading one year ago,.* Petitioners insert how can the Appeal Court grant one party to refile their appeal after one year and reverse their decision. Whereas, another Petitioners' were denied after 244-days?

When in fact the original appeal was filed accordingly. RE: *Appellee/Plaintiff Norma L. Cooke first appeal to the Court* states in part: *There remains the rule that a judgment must provide the relief to which the prevailing party is entitled.*

Petitioners believe that the Court erred at law based On the above fact Respondents refusal to communicate with Petitioners when they unequivocally defaulted.

Whereas, Bankruptcy Court stated in open court Ditech Holding Corporation collectively settle with Petitioners'.

Once again Petitioner's Sonya Davis reach-out to the Respondents informing them of the bankruptcy Actions and submitted a copy of the amended "Notice of Claim" Respondents' have disrespectfully refused to communicate. As if, Petitioners' had some unknown contagious disease as they refused to have any contact with Petitioners'. The most important part is that the Court allows this disrespectfully

display to take place without repercussion to the Respondents.

The Petitioners were unduly deprived 18 U.S. Code § 242. Deprivation of rights under color of law.

The Pro Se Petitioners' pray on the mercy of United States Supreme Court Petitioners be Entitled to Equal Justice and able to exercise our **"CONSTITUTIONAL RIGTHS"**.

To prevent future Petitioners' from meeting the same faith as the Petitioners in this case.

We the Petitioners pray that our case will not cause Harm to other litigants.
This case will set the Propounded precedent for complaints to go unanswered by Defendants'.

## CONCLUSION

The petition for writ of certiorari should be granted.

Respectfully submitted,

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