

SUPREME COURT OF THE UNITED STATES

Office of the Clerk

Washington, DC 20543-0001

FILED

OCT 25 2019

OFFICE OF THE CLERK
SUPREME COURT, U.S.

JOHNNY KIRKLAND

Petitioner

NO: 19-5173

V.

HUNTINGTON INGALLS INCORPORATED

Respondents

PETITION FOR REHEARING

Comes NOW, TO: The Honorable Judges of THE SUPREME COURT of the UNITED STATES. I Johnny Kirkland, pro se files a Petition for rehearing for writ of certiorari, which was denied on October 7 2019, but its grounds shall be limited to intervening circumstances of a controlling effect or to other substantial grounds not previously presented.

I am filing a Petition for Rehearing on the grounds: where I was hired in 1971 in Huntington Ingall Incorporation as a underage minor only 13 years old. I put my age up to 18 years old because I heard people inside the office saying you have to be 18 yrs. old, and I was expose to

Asbestos.

Where there is dangerous asbestos the vessel owner have a duty to act reasonable to avoid foreseeable risks of injury which extends to any person, because it is likely that minors are lurking around trying to get a job. The act of a minor child like me who didn't know any better by just overhearing what other people are saying, and repeating it saying I was eighteen to get a job, and sharing social security numbers with my cousin Hercules Armstrong. I or my cousin didn't know any better.

The act of a minor child, who puts his age up, and share social security numbers to get a job, and expose to asbestos is not an intervening cause of the asbestos exposure so as to relieve the vessel owner of liability since the results must have been seen, or least should have been foreseen, and a person is held liable under the general rule: That a negligent person is responsible for all of the consequences of his negligent, which ought reasonably to have been foreseen. See American Mutual Liberty Insurance Co. v. Buckley & Co. 117 F. (2d) 845 (C.C.A. 3rd, 1941.)

The vessel owner had a duty to keep minors off the vessel by checking for proper ID, which should have been foreseen by the ^{proper} discovery of exercise of just reasonable care, but the duty of care was breached.

Where a defendant's conduct creates a foreseeable zone of risk, the law will generally recognize a duty placed upon defendant either to lessen the risk, or see that sufficient precautions are taken to protect others from the harm that the risk poses. *Duisenberry v. Huntington Ingalls INC.* Supreme Court of Virginia (2018).

Johnny K. Beard

CONCLUSION

For the foregoing reasons, the Petition for Rehearing should be granted. I pray for the Judgement of 4 million dollars.

Respectfully Submitted
Johnny K. W. Bland

CERTIFICATE

I hereby certify that the Petition for Rehearing is restricted to the grounds specified, and it is presented in good faith, and not for delay.

Johnny K. W. Bland