

**NO.19-6215**

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**IN THE SUPREME COURT OF THE UNITED STATES**

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**TWILA HAYNES, Petitioner**

**V.**

**ASSETS PROTECTION, INC. Respondent,**

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**ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED  
STATES COURT OF APPEALS FOR THE FIRST JUDICIAL  
DISTRICT OF PENNSYLVANIA CIVIL TRIAL DIVISION**

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**PETITION FOR REHEARING**

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**January 1, 2020**

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**Exhibits**

- A. Philadelphia court of common Pleas of Pa. Order
- B. Philadelphia Court of Common Pleas Of Pa. Opinion
- C. Superior Court Of Pa. Order

## PETITION FOR REHEARING

Pursuant to Supreme Court Rule 44.1, petitioner, Twila Haynes respectfully petitions for rehearing of the Court's per curiam decision issued November 18, 2019 Twila Haynes v. Assets protection, Inc. No. 19-6215. Twila Haynes moves this Court to grant this petition for rehearing and consider her case with merits briefing and oral argument. Pursuant to The U.S. Supreme Court Rule 44.1, this petition for rehearing is filed within 25 days of this Court decision in this case.

On August 31, 2017 Court of Common Pleas of Philadelphia entered an order denying petitioner's complaint. The court decision was based on P.A.R.C.P. 240 (J)(1) the court prior to acting upon the petition may dismiss the action, if it is satisfied that the action is frivolous.

In the Philadelphia Court of Common Pleas of Philadelphia opinion acknowledge petitioner's complaint set forth a series of allegations regarding petitioner's employment. The court also acknowledges the complaint also describes injuries that petitioner allegedly sustained during petitioner's employment.

**Under Pa. Court and Federal Court Rule involving Procedural, Due Process, requires that the procedures by which laws are applied must be *evenhanded*.**

A complaint must state all of the petitioner's claims against the Respondent, and must also specify what remedy petitioner wants. After receiving the complaint, respondent must respond with an answer.

The U.S. Supreme Court introduced a heightened standard for complaints in 2007 with the case Bell Atlantic v. Twombly, this case requires that the complaint must allege "enough facts to state a claim to relief that is plausible on its face."

## CONCLUSION

The 7 th. Amendment to the U.S. Constitution Protect the right of every American Citizen to a trial by Jury of their peers in civil court cases. The purpose in drafting the 7 amendment was to prevent the Government from abolishing Jury Trial, and becoming too powerful by allowing Judges to decide cases.

I ask this Court to study Philadelphia Court of Common Pleas Order and Opinion to determine if the court violated Petitioners 7th. Amendment Rights.

Pa. court provide for the process of filing a lawsuit in the court. Any lawsuit filed must be taken as factually True; the court cannot interpret the allegations of the lawsuit, the court is obligated to accept the complaint, certify the complaint and allow the complaint to move through the court system. This will allow the petitioner to serve the respondent. Once the respondent has been served, the respondent has 21 days to respond to the complaint. Once the respondent responds to the complaint depending on what motion if any was filed, only then can the court make a decision for or against either party.

Pennsylvania is a fact pleading state, the court define a frivolous action as one that "lacks an arguable basis either in law or in fact" Pa. court state, a complaint must not only give the respondent notice of petitioner claim but must summarize those facts essential to support the claim.


As stated in Philadelphia court of common pleas of Pa. opinion, petitioner set forth enough facts that the respondent would be able to understand. Under Pa. Court Rule involving procedural Due Process, the court is required to allow petitioner the right to serve the respondent with the complaint. Only then, base on the response of the respondent, is the court allow to enter an Order, for or against petitioner or respondent.

Therefore the court should have allowed petitioner complaint to be processed.

For these following reasons, this court should reverse Philadelphia Court of Common Pleas of Pa. Decision.

January 1, 2020

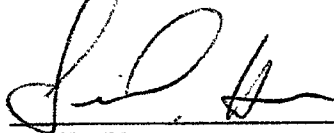
Respectfully Submitted,

  
Twila Haynes

**CERTIFICATE OF COUNSEL (Pro-se)**

I hereby certify that ground for this petition for rehearing are limited to intervening circumstances not previously presented.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Twila Haynes', is written over a horizontal line.

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January 1, 2020