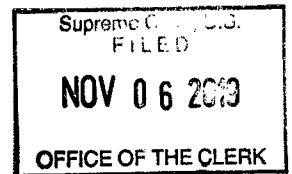


No. 19-7036 ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

JEREMY L DALE
(YOUR NAME) PETITIONER

VS.



MARION COUNTY SHERIFFS DEPT, ANTHONY ACOSTA

JOHN R. LAYTON, SHERIFF, MARION COUNTY TRANSPORTATION DIV

RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

JEREMY L. DALE (YOUR NAME)

WABASH VALLEY CORRECTIONAL FACILITY P.O. BOX 1111 (ADDRESS)

CARLSLE, IN 47838-0000 (CITY, STATE, ZIP CODE)

N/A (PHONE NUMBER)

QUESTION(S) PRESENTED

[FACTS]:

- 1) (FIRST ISSUE) § 1983, persons liable under § 1983 damages
BY MR. DATE BEING NOT [SEAT BELTED] April 30, 2013 and [subjected to obvious]
[Risk] and [harm] that [exacerbated] [injuries] [Not standing alone] was it a [unconstitutional]
deprivation of rights?

[FACTS]:

- 2) (SECOND ISSUE) § 1983, persons liable under § 1983 damages
Was it [unconstitutional] for MCSO to [denial of medical, and delay] MR. DATE [treatment] due to a
[conversation] with a [State Worker] [after accident] about [husband] working with officers [downtown] that [lead]
officers to allow another [non-injured] inmate [W/F] to gain [medical treatment] on [same accident] same [MCSO]
[denied] MR. DATE?

[FACTS]:

- 3) (THIRD ISSUE) § 1983, person liable under § 1983 damages
Was it [unconstitutional] for [MCSO] and [MCSO medical staff] to apply [further denial of medical treatment or delay]
by [intentionally denying] a [obvious risk] [prescribed] by [X-RAY Doctor] [MCSO] sent [MR. DATE] to see who [stated]
[X-RAY] was [incomplete examine]?

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	
STATEMENT OF THE CASE	
REASONS FOR GRANTING THE WRIT	
CONCLUSION	

INDEX TO APPENDICES

APPENDIX A
APPENDIX B
APPENDIX C
APPENDIX D

"CONSIDERED"
ONLY
AS "EVIDENCE"
NOT AS MR. DALE
[ORDERS] of the Court

TABLE OF AUTHORITIES CITED

[FACTS]

[CASES]

Dexter v. Ford Motor Co, 92 Fed. Appx 637, 641 (10th Cir 2004) —

Fluker v. County of Kankakee, 945 F. Supp 2d 972, 990 —

Monell v. Dep't of Social Services 436 U.S. 658 (1978) —

Knox v. Mc Binnis (US Court of Appeals, Seventh Circuit) —

Monroe v. Pape, 365 U.S. at 184 —

Cavalier v. Shephard 321 F.3d 616, 625-26 (7th Cir. 2003) —

Gomez v. Randle, 680 F. 859, 865-66 (7th Cir. 2012) —

Arnett v. Webster 658 F.3d 742, 753 (7th Cir 2011) —

Farmer v. Brennan, 511 U.S. 825, 128 L. Ed 2d 811, 114 S. Ct 1970 (1994) —

Estelle v. Gamble, 429 97, 97 Sct, 285, 50 L. Ed. 2d (1976) —

Adams, 153 Fed. Appx. at 975 —

King, 680 F. 3d at 1018 —

Kenneths v. O'Sullivan, 35 F. 3d 1171, 1175 (7th Cir. 1994) —

Petties v. Carter, 836 F. 3d 722, 728 (7th Cir. 2016) —

Largent v. Texas, 318 U.S. 418 (1943) —

Brown v. Missouri Dept of Corrections (8th Circuit) —

[CASES]

[FACTS]

[STATUTES AND RULES]

28 U.S.C § 1257 (A) —

Rules 14.1., 33, 34, 39, 39.7 Rule 13, and 10 also 33.2, 33.1 —

28 U.S.C. § 1254 —

28 U.S.C § 1746 —

28 U.S.C § 2244 (B) —

Supreme Court Rule 10 —

TABLE OF AUTHORITIES CITED

[FACTS]

[STATUTES AND RULES]

Rules for "minimal civilized measure of life's necessities —

Affidavit ————— D

[ORDER] IN THE MARION COUNTY SUPERIOR COURT CIVIL Division — Appendix (C)

[ORDER] IN THE UNITED STATES DISTRICT COURT SOUTHERN District of Indiana Indianapolis Div — Appendix (B)

[ORDER] FROM UNITED STATES COURT OF APPEALS FOR THE 7th CIRCUIT — Appendix (A)

[ORDER] ON CONSIDERATION OF THE PETITION FOR REHEARING Appeal of 7th Cir — Appendix (A)

[ONLY
EVIDENCE]

[STATUTES
AND
RULES]

[FACTS]

[OTHER]

(1) United States Constitution, 8th and 14 Amendment violations —

(2) Final judgment from of rehearing August 19, 2019, 2019 due to [Uniformity] —
Conflicts and [Exceptional Importance] AND NEED United States Supreme
Court to consider petition of [Writ of CERTIORARI TO]

(3) How [MCSO] medical staff also Failed to follow [Doctors] recommendation after —
told [X-RAY] was [INCOMPLETE EXAMINE] violating 8th and 14 Amendment Rights

(4) Stating [Fact] about [injuries and damages] Defendants and lower courts, Appeal
courts for rehearing panels are grossly over looking claims of [injuries caused] by
Defendants —————

[OTHER]

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

[First ISSUE] [Citations]: * DEXTER V. Ford Motor Co., 92 Fed. Appx. 637, 641 (10th Cir. 2004) state in Dexter decision noted the court was "loathe to say [unbelted] inmates are exposed to ~~risks~~ society chooses not to tolerate. Also * Fluker V. County of Kanakee 945 F. Supp. 2d 972, 990 The connection between a failure to (seat-belt) and the (risk) of (serious injury) and in fact was it [standing alone] or provided something more. * Monell V. Department of Social Services 436 U.S. 658 (1978) dealing with liability and how a municipality only maybe held [liable] under § 1983 for [Constitutional violations] throw it's on (policy) or (custom) and see; * KNOX V. MC Ginnis (US Court of Appeals, Seventh Circuit) where Knox maintains that the (Black box) caused him severe discomfort and (physical injury) and he was not in a [seat-belt] or [accident] and was [caused damages] * Brown V. Missouri Dept. of Corrections (8th Cir. 2004) (A state prisoner was allegedly [injured] from a [accident] [while enroute to a correctional facility].

* MONROE V. Pape, 365 U.S. 164 (quoting US V. CLASSIE, 313 U.S. 299, 326, 61 S.Ct. 1031 (1941)) ; And as the requirement of "state action" that must be [shown] to [prove] a [violation] of the [Fourteenth Amendment] and the two terms ARE often used interchangeably. [misuse of power] possessed by virtue of [state law] and made possible only because the (wrong doer) is clothed with the [Authority] of state law is action taken "Under color of state law" and [Federal Law].

[SECOND ISSUE] [Citations]: * Cavaliera V. Shepherd, 321 F.3d 646, 655-26 (7th Cir. 2003); A delay in treatment that causes unnecessary [pain] is actionable even if it did not [exacerbate] the [injury] or diminish the chances of a full recovery. * Gomez V. Randle, 680 F. 859, 865-66 (7th Cir. 2012) ("A delay in treating non-life threatening but [painful] [conditions] may constitute [deliberate - indifference] if the delay [exacerbated] the [injury] or unnecessarily [prolonged] an inmates [pain]

[Second Issue] also * Arnett v. Webster, 658 F.3d 742, 753 (7th Cir. 2011)

[Third Issue]

[Citations]: * FARMER v. BRENNAN, 511 U.S. 825, 128 L. Ed. 811, 114 S. Ct. 1970 (1994) including inference from (circumstantial evidence) and a fact finder may conclude that a prison official knew of a (substantial risk) from the very fact that the (risk) was (obvious) * ESTELLE v. GAMBLE, 429 U.S. 97, 97 S. Ct. 285, 50 L. Ed. 2d 1 (1976). This is true whether the [indifference] is [manifested] by (prison doctors) in their response to the prisoner's needs or by prison guards (intentionally denying) or (delay access) to (medical care) or (intentionally) interfering with the (treatment) once (prescribed) * Adams, 153 Fed. Appx. at 975; but [blatantly inappropriate treatment] or [intentional mistreatment] is actionable under § 1983. The standard is comparable to that required for [criminal recklessness] * King, 680 F.3d at 1018, * Kerrits v. O'Sullivan, 35 F.3d 1111, 1175 (7th Cir. 1994); see also * Gossmeier v. McDonald, 128 F.3d 481, 489-90 (7th Cir. 1997). The initial step in any § 1983 analysis is to identify the specific constitutional right which was allegedly violated. * Petties v. Carter, 836 F.3d 722, 728 (7th Cir. 2016) "the [totality of an inmates medical care] when considering whether that [care evidences] [deliberate indifference] to [serious medical needs]."

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 Seventh Circuit

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

[✓] reported at Southern District of Indiana Indianapolis Division

OPINIONS BELOW

[✓] For cases from state courts:

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

[✓] reported at IN THE MARION COUNTY SUPERIOR COURT

The opinion of the Notice of Removal deprived of jurisdiction Court appears at Appendix A to the petition and is

[✓] reported at IN THE MARION COUNTY SUPERIOR COURT

JURISDICTION

[✓] For cases from federal courts:

The date on which the United States Court of Appeals decided my case was Aug 21, 2019

[✓] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: Aug 19, 2019 and a copy of the order denying rehearing appears at Appendix A

[✓] For cases from state courts:

The date on which the highest state court decided my case was 28 USC § 1446 (D) deprived of jurisdiction
A copy of that decision appears at Appendix C

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

[Jurisdictional Authority] for the [Supreme Court] to review the [Supreme Court's Authority] to review the [final judgment] entered regardless of whether a petitioner is also seeking [Collateral Review] under a separate proceeding such as [habeas corpus]. This means that a defendant who has received final judgment in a state court of last resort or a federal court of appeals may petition the [U.S. Supreme Court] for a writ of certiorari even if he is also seeking relief through [Federal habeas corpus] also [28 U.S.C. § 1746].

Final judgments from the highest state court must involve an [important] [Federal question] in order to be [considered for review] by the [U.S. Supreme Court].

Following [Rules 14, 33, 34 and 39 SEE 39.7 Rule 13]

[Supreme Court Rule 10] quoted below, gives an overview of [Factors] considered in the court's decision to [grant a writ of certiorari].

(A) A United States Court of Appeals has entered a decision by a state court of last resort; or has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an [exercise] of this [court's supervisory power]

(B) A state court of last resort has decided an [important federal question] in a way that [conflicts with the decision of another state court of last resort or of a United States Court of Appeals];

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

(C) a state court or a [United States court of appeals] has decided an [important question] of [Federal law] that has not been, but should be, settled by this Court, or has decided an [important federal question] in a way that [conflicts] with [relevant decisions] of this [Court.]

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

* (Basis For Jurisdiction of the Supreme Court) *

Due MR. Dale not being able to seek review of orders entered in different lower courts by filing a petition for a writ of certiorari, MR. Dale only ~~choice~~ in the matter of "Constitutional Violations" is to [specify] the [order] of which he is [seeking] REVIEW. § 1983* Redress for injuries/Damages

So the [order] in which [MR. Dale is [seeking] REVIEW] is • § 1983* Damages Personal Injuries

1) OF [EXCEPTIONAL-IMPORTANCE] based on a miscarriage of Justice that involves an [important Federal question] that only the U.S. Supreme Court can answer by Mr. Dale petition for [Writ of certiorari] and these are the [orders] in which [MR. Dale is [seeking] REVIEW] • [Damages] and Relief For [personal injuries]

MR. Dale
"ORDER"

Seeking
Review

§ 1983
Redress

(A) [Important Federal question] : ? Under 42 U.S.C § 1983 [seek Redress]

By, MR. Dale being not [best-better] April 30, 2013 and subjected to a [obvious] risk and [harm] that [exacerbated-injuries] and [not standing alone] was it a [Unconstitutional-Deprivation] of said [rights] when all the [facts] point to this [evidence] being shown after [accident] or [crash] was it unconstitutional? so [Relief] for personal-injuries \$ 750,000 thousand dollars from [each Defendant] in his/her Individual-capacity/official capacity
"Relief And Granted"

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

§1983*

DAMAGES
PERSONAL
INJURIES

MR. DATE
"ORDER"

Seeking
Review
§1983
Redress

So the [ORDER] in which [MR. DATE] is [SEEKING] REVIEW is:

(B) [IMPORTANT FEDERAL QUESTION]: ? Under 42 U.S.C. § 1983* [SEEK REDRESS]

By, was it [UNCONSTITUTIONAL] for MCSO to [denial of medical, and delay] MR. DATE'S [TREATMENT] due to a [CONVERSATION] with a [STATEWORKER] AFTER [ACCIDENT] about her [husband] working with [MCSO] officers [downtown] in [MARION COUNTY], that [lead] officers to allow another [NON-INJURED] inmate [CANDICE BROWN W/F] to gain [medical treatment] ON [SAME ACCIDENT] SENE [MCSO] intentionally denied Plaintiff by [disregarding medical] then moving MR. DATE by [untrained] officers causing further [PAIN AND SUFFERING] SO [RELIEF] for personal-injuries \$2,500,000 million dollars from each defendant in his/her Individual-capacity/official capacity Relief and Granted

MR. DATE
"ORDER"

Seeking
Review
§1983
Redress

(C) [IMPORTANT FEDERAL QUESTION]: ? Under 42 U.S.C. § 1983* [SEEK REDRESS]

By, was it [UNCONSTITUTIONAL] for [MCSO] and [MCSO medical staff] to apply [further denial of medical treatment or delay] by [intentionally denying] a [obvious risk] [prescribed] by [X-Ray doctor] MCSO sent MR. DATE to see who [stated] X-ray was [INCOMPLETE EXAMINE] but force MR. DATE to suffering due to not upholding to [NOTICE] or [WARNING] that MR. DATE could still be [injured] but [overlooked] these signs and force him [unwarranted pain] by forcing a [injured] MR. DATE to sleep on a [steel-bed] causing further damages MR. DATE still suffers from to this day. SO [RELIEF] for personal-injuries \$2,500,000 million dollars from each defendant in his/her Individual-capacity/official capacity "Relief" and "Granted"

STATEMENT OF THE CASE

Due to the judges on the "original panel" of August 19, 2019 decision conflicts with a decision of the United States Supreme Court and of the court to which the petition is addressed and consideration by the (full court) is therefore necessary to secure and maintain ("uniformly") of the court's decisions; Plaintiff Mr. Dale in his petition asserts that the proceedings present questions of (Exceptional Importance) that involve an issue on which the panel decision (conflicts) with the authoritative decisions of other United States Courts of Appeals that have addressed the issue.

[First Issue] Due to [MCSO] not using [seat-belts] are any [safety device] Defendant's violated 8th Amendment Rights, and 14th Amendment due process rights, of Mr. Dale causing further (damages) to (injuries) when and after a [State Worker] [Amada Wusterfeld] crash her vehicle into back of [MCSO] for where Mr. Dale and another [Inmate] [Candice Brown] w/f was sitting, causing [Mr. Dale] to be [visibly thrown] into [steel walls] [exacerbating] [injuries] due to not being [seat-belted] when Ms. Wusterfeld in a (rush) to a (business meeting) for her company [Indiana Department of Natural Resources] was looking at a [map] and [told] MCSO officers [April 30, 2015] that [her] [husband] works [downtown] with said officers [causing] them to feel for [her distress] and due to that [conversation], MCSO Agresta and Supervisor [disregard] [medic sent to accident scene] and [applied] there on kind of [medical treatment] that caused further [pain and suffering] to a already [injured Mr. Dale] due to [crash] of [Ms. Wusterfeld] causing cause of [original injuries] to exacerbate by avoiding obvious (risks) because [seat-belt] issue was not standing [alone] and due to [Ms. Wusterfeld] crash added that [something more] than just a [seat-belt] argument and things [MCSO] officers did ~~soon~~ after

STATEMENT OF THE CASE

[Second Issue] Due to [MCSD] use of [denial of medical, and delay] by (MCSD) Agresta and [Defendants] under [Sheriff John Layton] [Policy] [disregarded a medic] due to [conversation] with [Ms. Wustefeld] about her [husband] working with [officers] [downtown] at [Marion County], caused MCSD to [deny and delay treatment] causing Mr. Date further [pain and suffering] denial of the "minimal civilized measure of life's necessities", and case lead (MCSD) to place Mr. Date under [condition posing a substantial risk] of [serious harm] due to [MCSD Agresta] sufficiently "[culpable state of mind]" that cause them to (blatantly or intentional) cause Mr. Date further [pain and suffering] due to trying to [cover up] "act" of Ms. Wustefeld who was looking at a [map] when her [vehical crash] into back of MCSD van, and the (RECORD) will show how (denial) caused a (medic) to be [disregarded] and not see [Mr. Date] on accident a (non-injured) inmate [Cawlee Brown] to be seen date of April 30, 2013 before allowing to leave, showing how [Defendants] proved they had [no training] and were [covering up] for a [fellow officer wife] and the [Indiana Department of Natural Resources] [interest] to [protect them self] and (MCSD) liability from [damages] caused by [personal injuries] of all [Defendants] that caused said [pain and suffering] to Mr. Date [April 30, 2013].

[Third Issue] Due to [MCSD] and [MCSD medical staff] applying [further denial of medical treatment or delay] is shown by (facts) that once back at [MCSD] there [medical staff] sent Mr. Date to [Wishard Hospital] for a (X-RAY) that was found out to be a [incomplete - EXSAIME] and [Doctors] at [hospital] "informed" MCSD and [medical staff] at [Marion County Jail] to the facts of [incomplete EXSAIME] giving them [notice] of still [risk of obvious harm] that if MCSD

STATEMENT OF THE CASE

[Third Issue] had [Any Concerns] for Mr. Dale [Health and Safety] get a [cat scan or MRI] in which [MCSO] with its [totality] over looked all together causing further [8th Amendment violations] by causing [unnecessary pain and suffering] that lead [MCSO] to force Mr. Dale to sleep in [injured] state on a [steel-bed] when in [fact] they had a [medical clinic] at [MCSO] but [blatantly or intentionally] [Caused] Mr. Dale claim this is not just [seat-belt] issue, but [pain] due to covering up for [Ms. Wusterfeld] another [state worker] that due to her [actions] lead [MCSO] and [MCSO medical staff] under [Sheriff John Layton's] "Authority and Policy" by being [Policy maker] failed [Mr. Dale] due to his [officers actions] and [medical staff] for failing to follow up on [Doctors] [order] and by not [following] such [rights] to [MRI] or [cat-scan] it [Lead] [MCSO] to cause [Mr. Dale] to subdue [injuries] [overlooked] until back at [Indiana State Prison] for where another [Doctor] sent Mr. Dale out for [MRI] and [cat-scan] and found [damages] MCSO [blatantly and intentionally] [overlooked] violating [8th and 14th Amendment of the United States Supreme Court and Constitution].

[Facts]

(First Issue): (Dexter v. Ford Motor Co. 92 Fed. Appx. 637, 641 (10th Cir 2004); Fluker v. County of Kankakee, 945 F. Supp 2d 972, 990); (Monell v. Department of Social Services 436 U.S. 658 (1978)); (Knox v. McGinnis (US Court of Appeals, Seventh Circuit)); (Maurice v. Pape, 365 U.S. 41 (1961))

(Second Issue): (Cavalier v. Shephard 321 F. 3d 616, 625-26 (7th Cir 2003)); (Gomez v. Rawlins, 680 F. 859, 865-66 (7th Cir 2012)); (Arnett v. Webster. 658 F. 3d 742, 753 (7th Cir 2011))

[Facts]

STATEMENT OF THE CASE

[FACTS]

(THIRD ISSUE): (Farmer v. Brennan, 511 U.S. 825, 128 L. Ed. 2d 811, 114 S.Ct. 1970 (1994)); (Estelle v. Gamble, 429 97, 97 S.Ct. 285, 50 L. Ed. 2d 1976); (Adams, 153 Fed. Appx. at 975); (King, 680 F.3d at 1010); (Kernats v. O'Sullivan, 35 F.3d 1171, 1175 (7th Cir. 1994)); (Goss Meyer v. McDonald, 128 F.3d 481, 489-90 (7th Cir 1997) (Pettes v. Carter, 836 F.3d 722, 728 (7th Cir. 2016))

STATEMENT OF THE CASE

[FACTS]

DUE to the [Conflict] in said, lower court's MR. Dale need this court to make a Ruling on the "Aptaility of circumstance" of all MR. Dale Claims, that of State, [Southern District of Indiana], and [United States COURT OF APPEALS] FOR [SEVENTH CIRCUIT], and [Rehearing] the court failed to hear [fact] or [Constitutional Rights] by 3 panel judges voting to not consider same REHEARING court's gave extention to hear claim, so Plaintiff tried chance at EN Banc Determination that was denied, so before filing with United States Supreme Court Plaintiff tried one more chance at a [28 U.S.C § 2244 (B)] all denied so in hopes of MR. Dale claims, being heard not only on [Constitutional violation] MR. Dale hopes this court may also look at his [Injuries] said [damages] caused by [defendants] and allowed by Lower courts due to [Conflict] and [miscarriage of justice]

REASONS FOR GRANTING THE PETITION

[Facts]

① The (7th CIR) reasoning is flawed; on its review of [MR. DATE] 8th and 14th amendment rights that the (lower courts) and (Appeal Court) are [erroneous] about applying, and for that reason it causes a [conflict] with the decisions of other [Appellate Courts] and that of its own [decisions by the 7th CIR]. By the way the lower courts applied (*Fluker v. County of Kankakee*) to MR. DATE case, because it shows by their rulings it's as if they [never read] the [rules], or it's [standing's] for such case when applying a [seat-belt] issue, and it proves it is unconstitutional by how it's applied, by what it means by [standing alone] and how it proves [more] adds to claim as it does in [MR. DATE] claims because a [8th amendment violation and 14 amendment due process] when in [fact] the [evidence] proves such acts; also The [Tenth Circuit] reasoning correctly captures the [requirements] more clearly in the case of **Dwyer v. Ford Motor Co.* 92 Fed. Appx. 637, 641 (10th Cir. 2004) when in case express how in [detail] how [inmates] may be [exposed to risks society chooses not to tolerate] and just like **Fluker v. County of Kankakee*, 945 F. Supp. 2d 972, 996. The connection between a failure to (seat-belt) and the (risk) of [serious-injury] and in fact was it (standing alone) or was proven [more] in that [case] that Plaintiff failed to appeal, MR. DATE must protect United States Constitutional rights violated by defendants.

[Facts]

② The [Supreme Court] rulings are good and sound whereas the [lower courts], and [Appeal courts] are in [conflict] with [MR. DATE claim] on which [how to rule] on same facts another appellate court has found true justice on same matter. And due to such matters not following "Law" has caused a [National importance] due to forcing the [Supreme Court] to decide the

REASONS FOR GRANTING THE PETITION

[Facts]

[Visiously thrown] into [steel walls] also [exacerbating] [injuries] due to [MCSO] [failure] to [place] MR. DALE in any [protection gear] of any sort, or [seat belt] as did both officers had on April 30, 2013 doing [transport] going on a trip on [high ways] with other vehicles on a trip up to [100 miles] there and back April 30, 2013. SEE * KNOX v. McGinnis (U.S. Court of Appeals, Seventh Circuit) * also BROWN v. Missouri Dept of Corrections (8th Circuit)

② [REASONS]

[Facts]

For [Accident] that CAUSED [personal damages] by [Facts] of [Record] and [Medical Records] MR. DALE suffered from unwanted pain to [back], [leg] and [several other body parts] for where he still suffer CRUE and UNUSALLY due to all [partys] trying to [cover up] [liability issues] for where [medical prove] was caused by all party's date of April 30, 2013, and in said [Facts] of [medical records] it will show [MR. DALE] was [stricken] to a [wheel-chair] for NEARLY [2-years], and had to learn how to walk with a [cane] for NEARLY [1 1/2 YEARS] and [continues] to go through [further damages] to this [date], causing [pain and suffering] due to how by the totality of [MCSO] and [Annex Wustefeld] actions lead them to respond to [MR. DALE] [medical-needs] after [Annex Wustefeld] [told] or [suggested] to officer's of [MCSO] her [husband] [work's demand] with [MCSO officer's] which [defendants] never [objected] to in SEE [MR. DALE] by [Facts] SEE [Depositions] to reflect [Facts] [Defendants]

REASONS FOR GRANTING THE PETITION

[FACTS]

[Challenge] or [objected] to that [lead] MCSD under Sheriff John Layton Policy] to [disregard] [medic], causing Mr. Dale further [pain and suffering] by [untrained] MCSD officers trying to [cover up] wrong doing of these [Department] for failing to have [seat-belts] on when [Amada] [State worker] a wife of a fellow [Marion County officer] who threw [Conversation] lead somehow [MCSD] officer's to take [Mr. Dale] [medical-injuries] into their own hands

[FUTHER REASONS]

[FACTS]

For how [MCSD] had a [CONVERSATION] with [Amada Wustefeld] about [her husband] working [downtown] with fellow [MCSD] officer's [April 30, 2013] [After] said [accident] lead them to [delay or intentionally] [deny] a obvious medical need that soon worsen by how officer's (disregarded) the "[minimal civilized measures of life's necessities]" that continued to cause [further] by [FACTS] and [medical records] unwanted [pain and suffering] when in after [MCSD] caused such [Constitutional violations of 8th and 14th] Amendments violations and it will show in [RECORD] [how] and [why] the [COVER-UP] said [accident] as they did with a [culpable state of mind] wrong doing but left [evidence] records point [clearly] to by allowing a [non-injured] inmate who [never complain] of pain as the the [MCSD] [records reflect] as did [Mr. Dale did], [Candice Beaman W/F] who was allowed to see a [medic] on the same [accident scene] that that [officers] [cover up] [liability] under [Sheriff John Layton Policy]

REASONS FOR GRANTING THE PETITION

[FACTS]

who was [Policy maker] April 30, 2008 when MCSO officers acted by [Training, or lack of training] who [insures] the training of such [Department] or said officers and [MCSO] [medical staff] follows [safe practices] also provide [Health and safety] to and by a standard of [Constitutional] Level that such care meets "minimal civilized measure of life's necessities" that of his [Department] under said [United States branch] or [State of Indiana] govern itself by the "totality of circumstances" meeting [Policy] but [Failed] not only on a [state] [Tort-Level], but also a [United States Constitutional] level that will show not only [both amendment violations], but that of [14th amendment due process] of [equal protection] when [MCSO] on [Records] will show how a [Non-injured] inmate [Candice Brown] white female received a [medical treatment] when in [FACT] [Mr. Dale] was the one who was [injured] in [pain] and was [denied] said to rights by [Constitutional level] to have receive help due to "actual injuries" caused by [State worker] [Amada Wustefeld] [Crash] and [actions] then followed by [MCSO] [failure] to [seat-belt] that [exacerbated injuries] to further [create and usual punishment] causing [pain and suffering] that by the "totality of harm" these stay at [MCSO] to even [MCSO] [medical staff] who sent [Mr. Dale] for only a [X-RAY] after [accident] when needed [cat-scan] or [MRI] [Doctors] at [Wishard hospital] in Indiana [Recommended] in [Medical Records] by [FACTS] chose to still [disregard] [Doctors] claims of [X-RAY] being a [INCOMPLETE-EXAMINE] by [FACTS] and see [medical and court record] of [Doctor] on [Record] about [X-RAYS] that [MCSO] was placed on [notice] by [Doctor and Wishard hospital], Plaintiff

[FACTS]

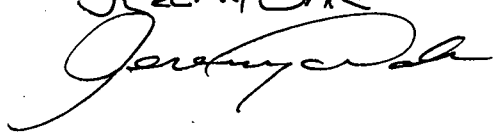
REASONS FOR GRANTING THE PETITION

[FACTS]

[did not] receive [proper] care with-in [medical-claims] of [X-RAY] and [MRI] until back at [Indiana State Prison] [Another Facility] so in it's [totality] Mr. Date while in [MCSO] custody after said [accident] April 30, 2013 [suffered] [Constitutional violations] and [State tort-issues] till out of there [Custody] see (Petties v. Carter 836 F.3d 722, 728 (7th Cir. 2016))

(CONCLUSION)

The petition for a writ of certiorari should be [granted], and all other [Reliefs] for [damages due to any and all injuries] caused by all [party's, or defendants] be sought.

Respectfully submitted
JEREMY DATE


4 Dec 2019

Comm Exp: 10/30/2024
Co. of Res: SULLIVAN


RANDALL D. PURCELL