

IN THE SUPREME COURT OF THE UNITED STATES

19-7068

ORIGINAL

JANICE BAKER,

PETITIONER,

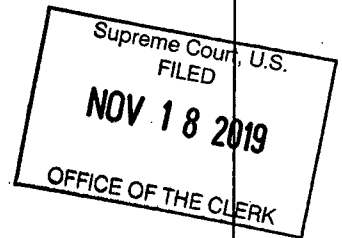
Vs.

CASE NO. 4D18-3618

MACY'S FLORIDA STORE LLC,

RESPONDENT,

L.T. CASE NO: 50-2016-CA-011132



PETITION WRIT OF CERTIORARI

(Petition for Writ of Certiorari to review 4th Appeal District

Circuit Court final on 10/3/19

Mrs. Janice Baker

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561-578-4336

A. QUESTIONS PRESENTED FOR REVIEW

1. Whether the Appendix A has discretionary jurisdiction to review a decision expressly and directly conflicts with a decision of the Appendix B on the same question of law See. Art. V., (b)(3) Fla Const; Fla R. App. 9.120(a), 9.030(b) (1) (a) (b) (c) (2) (a) (b) (3) (4) (a) (b)
2. How important for the Appendix A to have a Petition Writ of Certiorari to look at the lower court ruling for non-final (interlocutory) decisions according to 28 U.S.C. &1292, and 28 U.S.C.&1291, gives jurisdiction of appeals of final decisions by district courts to the courts of appeals in most cases.
3. There are exceptions to the final judgment rule, however these includes instances in which a trial court commits a plain or fundamental error, questions about whether a trial court has subject-matter jurisdiction, or constitutional questions. According to Appellate Procedure Florida Rule 9.130 (a) (1) (h) Respondents are lawyers in this case they have the power to have the review stop. The pro-se who have long term disability feels her rights and evidence regarding this case is being dismiss by the clerk at Appendix A to keep the review from happening in the Petition of Writ of Certiorari but Taylor v. Board of Pub. Instruction, 131 So. 2d 504 (Fla.1st DCA 1961) used the common law certiorari to provide relief.
4. U.S. Code & 1257. State Courts; Certiorari (a) Final Judgments or decrees rendered by the highest court of a state in which a decision could be had may be reviewed by the Supreme Court by Writ of Certiorari where the validity of a treaty or statute of any state is drawn in question on the ground of its being repugnant to the Constitution, treaties,

or laws of the United States, or where any title, right, privilege, or immunity is specially set up or claimed under the Constitution or the treaties or statutes of, or any commission held, or authority exercised under, the United States.

(June 15, 1948, ch. 646, 62 Stat, 929; Pub. L. 91-358, title I, & 172 (a) (1), July 29, 1970, 84 Stat. 590; Pub. L. 100-352, June 27, 1998, 102 Stat. 662.)

5. As the Appendix C articulated in *Hall v Talcott*, 191 So.2d 40, 46-47 (Fla.1966).

The granting or denial of rehearing is a matter within the sound discretion of the trial court, but it is never an arbitrary decision. As indicated above, when the motion is filed by one against whom a Summary Judgment has been entered, the discretion not to grant is narrowed every disposition should be indulged in favor of granting motion. Only after it has been conclusively shown that the party moved against cannot offer proof to support his position on genuine and material issues in the case should his right to trial be foreclose.

6. U.S. CODE & 2101 (a) A direct appeal to the Supreme Court, from any decision Under section 1253 of this title, holding unconstitutional in whole or in part, any Act of Congress, shall be taken within 30 days after the entry of the interlocutory or Final order, judgment or decree. The record shall be made up and the case docketed Within 60 days from the time such appeal is taken under rules prescribed by the Supreme Court. (b) Any other direct appeal to the Supreme Court which is authorized by law from a decision of a district court in any civil action, suit or proceeding, shall Be taken within thirty days from the judgment, order or decree, appealed from, interlocutory, and within sixty days if final. (c) Any other appeal or any writ of certiorari intended to bring any judgment or decree in a civil action, suit or proceeding before the Supreme Court for review

Shall be taken or applied for within ninety days after the entry of such judgment or decree.

A justice of the Supreme Court, for good cause shown, may extend the time for applying
for a writ of certiorari for a period no exceeding sixty days.

June 25, 1948, ch.646, 62 Stat. 961; May 24, 1949, ch.139, &106, 63 Stat. 104;
Pub. L. 98-209, & 10 (b), Dec. 6, 1983, 97 Stat. 1406; Pub. L 100-352, & 5(b),
June 27, 1988, 102 Stat. 663; Pub. L. 103-337, div. A, title IX, & 924 (d) (1) (C),
Oct. 5, 1994, 108 Stat. 2832.)

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B. PARTIES INVOLVED

The parties involved are identified in the style of
The case.

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13.	Hall v. Talcott, 191 So. 2d 40, 46-47 (Fla 1966)	i

FLORIDA STATUES:

768.075 57.082 57.081(1)

APPELLENT PROCEDURE RULES

9.120 9.130 (a) (1) (h) 9.030 (b) (1) (a) (b) (c) (2) (a) (b) (3) (4) (a) (b)

OTHER

Florida Const. Article I 28 U.S.C. &1257 28 U. S. C. & 1291 Rule 13

Florida Const. Article V 28 U.S.C. & 1292 Rule 10 (a) (b) Rule 11

See 28 U.S.C &2101(a) (b) (c) (e) (f)

The Petitioner pro-se, Janice Baker requests 4th District Court of Appeal to issue its Writ of Certiorari review which is causing conflict with the decision made by the 15th Judicial Circuit Court on 12/06/2018. According to the Florida Constitution, Article V Section 4 (1) (2) (3) and Section 21 the courts shall be open to every person for redress of any injury, and justice shall be administered without sale, denial or delay.

E. JURISDICTION

The U. S. Supreme Court over Appendix A, B, and C state courts to review non-final orders from Appendix A, after issuing its Petition of Writ of Certiorari according to the United States Rules 10 (a) (b) Rule 11 See 28 U.S.C & 2101(a) (b) (c) (e) and (f) and Rule 13 (1) and Article V, Section 4(1) (2) (3), Appendix A-10/3/19 shows Per Curiam, Affirmed for Case# 4D18-3618

1. Reference to the Appendix to this petition will be made by the designation

Exhibits from A to G

1. Appendix A- decision of State Courts of Appeals- 12/7/18 (a) Notice of Appeal was filed by Petitioner pro-se Janice Baker and Determination of Indigent Status. 12/10/18- Order from the 4th Appeal District Circuit Court, stating they need a final order on a non-final judgment. Exhibit A. 12/17/18- Petitioner filed a Notice of filing of final judgment with evidence. 12/21/18- Petitioner filed a Motion for reconsideration showing evidence. 12/21/18-Petitioner filed a Notice of filing of transcript showing evidence. 12/27/18- Petitioner ask for extension of time to comply with the 12/26/18 orders. 1/9/19- Petitioner filed Initial Brief with Appendix Brief showing evidence, and they both were stricken by the 4th Appeal District Circuit Court. 1/15/19- Petitioner

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2 filed a Petition for rehearing, and En banc Rehearing and Motion for Clarification was
3 denied on 2/18/19. 1/22/19- Petitioner filed a Motion to File Flash drive regarding tape
4 recording between previous Attorney Bryan Boysaw, stating the Respondent was not
5 going to give up the surveillance camera-a copy of flash drive will be provided to the
6 U.S. Supreme Court as evidence. 1/28/19- Petitioner filed a Notice to Appearance and
7 Motion to file email which all these things were denied by the 4th Appeal District Circuit
8 Court on 2/18/19. Petitioner hired Dave Roy from 1/31/19 to 10/3/19 to represent her in
9 this Appellant case, which Petitioner provide new lawyer with all the evidence from her
10 Initial Brief and Appendix to Brief, which was not used in the Petitioner's favor on 10/3/19.
11 10/21/19 Petitioner filed Petitioner Writs of Certiorari with Appendix to Petition, which
12 was later denied. 4th Appeal District Circuit Court filed an Acknowledge letter on 10/23/19
13 regarding a new case which is docket #4D19-3261. 10/25/19 a Mandate filed by the 4th
14 Appeal District Circuit Court, stating not to file anymore documents on case # 4D18-3618.
15 Exhibit A, B. 10/27/19- Petitioner wrote a letter to Judge Spencer Levine addressing Petitioner
16 concern over her Petitioner Writs of Certiorari filed on 10/21/19. 11/4/19- Petitioner filed
17 Amended Petition of Writs of Certiorari, and denies asking for a rehearing in this case, which
18 Petitioner was later denied on 11/6/19. On 11/14/19 -Petitioner filed the correct Petition of Writs
19 of Certiorari, which was stricken by the 4th Appeal District Circuit Court, stating Appellant frivolous
20 filing warning on 11/15/19. Petitioner evidence for Petition of Writs of Certiorari was filed on time
21 because this case shows active on file docket 4D19-3261. 10/25/19- Respondent filed a Motion
22 for Sanction twice on case# 4D18-3618, later transferred over to case# 4D19-3261, which was
23 later denied on 10/31/19, and Respondent filed a Motion for Sanction on 11/4/19. Petitioner
24 responded to the Respondent Motion for Sanction on 11/5/19, which the 4th Appeal District
25 Circuit Court denied their Motion for Sanction again on 11/6/19. Exhibit A, B

- 26
27 2. Appendix B-decision of State Trial Court- Petitioner pro-se represented herself on 12/6/2018,
28 showing the lower judge all the Petitioner evidence, which were denied except pictures taken

by witness Linda Davis, showing Petitioner lying on the floor filed on 5/23/2018, and Petitioner's pictures were filed on 5/18/2018. Affidavit by Richard Baker filed on 5/22/2018. Janice Baker filed an Affidavit showing all her evidence on 5/16/2018. Rebuttal the Respondent Deposition on 7/26/2018, and Opposition to the Defendant Motion for Summary Judgment filed on 5/16/2018, Rebuttal Defendant Reply to Plaintiff's Opposition to Defendant's Motion for Summary Judgment on 11/29/2018, Interrogatories Questionnaire was answer on white copy paper, and changed by someone who forged the Petitioner signature filed on 5/18/2018. Previous Attorney Bryan Boysaw, wrote Respondent a letter to preserve the surveillance camera for litigation on 06/17/2016, mailed to Macy's manager Michelle Languedoc, and not to the Respondent nor Judy Collins or Julie. Previous Attorney Bryan Boysaw, wrote a letter to Cynthia Rheude and not to the Respondent asking for 300,000 dollars for Petitioner's injuries, which did not include new injuries of right Shoulder, and pending surgery of the right hip and right laceration of leg on 10/14/2016 and filed with lower courts on 5/18/2018. Respondent filed a Motion for Tax Cost on 11/22/2019 charging Petitioner for Tax Coast on 11/24/19, which Petitioner rebuttal Respondent Motion for Tax Cost on 11/24/2019, showing all evidence in the Petition of Writs of Certiorari, and Appendix for Petition. Exhibits C, D, E, F, G

3. Appendix C- decision of Supreme Court of Florida- Petitioner file a Notice to Invoke Discretionary Jurisdiction on October 16, 2019. On October 17, 2019 the Supreme Court of Florida dismissed the Petitioner case due to lack of jurisdiction to review an elaborated decision from the Appendix A, after the Petitioner received this dismissal. Petitioner filed a grievance complaint with ADA due to Petitioner gets long term disability and Indigent Status. Petitioner received an email from Clerk, John A Tomasino, telling Petitioner to write a correct Petition for Writ of Certiorari, stating this case is without prejudice. Petitioner did a correct Petition for Writs of Certiorari for the old case 4D18- 3618 on 10/21/19, later transferred over to the new case 4D19-3261. On 11/4/19 and 11/14/19 Petition of Writ of Certiorari was filed at Appendix A but later denied by the clerk on November 15, 2019. Exhibit A, B

F. CONSTITUTIONAL PROVISIONS AND LEGAL
PRINCIPALES INVOLVED

According to Article V, Florida Constitution, Section 4 (b) (1) District Courts of the appeal shall have jurisdiction to hear appeals, that may be taken as a matter of right, from final judgments orders of trial courts, including those entered on the review of administrative action, not directly appealable to the Supreme Court or a circuit court. They may review interlocutory orders in such cases to the extent provided by rules adopted by the Supreme Court. (2) District courts of appeal shall have the power of direct review of administrative action, as prescribed by general law. (3) A District Courts of Appeal or any judge thereof may issue Writs of Habeas Corpus returnable before the court or any judge thereof or before any circuit judge within the territorial jurisdiction of the court. Exhibit A, B

A District Court of Appeal may issue a writ of mandamus, certiorari, Prohibition quo warranto, and other writs necessary to the complete exercise of its jurisdiction. To the extent necessary to dispose of all issues in a cause properly before it, a District Court of Appeal may exercise any of the appellate jurisdiction of the circuit courts. See Art. V., (b)(3). Fla Const; Fla R. App.(a) and 9.030 (b) (1) (a)(b) (c) (2) (a) (b) (3)(4) (a) (b).

1992 Amendment. Subdivision (c) (1) (B) was amended to reflect correctly
That the Appendix A jurisdiction of Appendix B extended to all non-final orders
Of the lower tribunals as prescribed by rule 9.130, and not only those defined in
Subdivision (a)(3) of that rule.

According to Rule 9.030, the Appendix C have jurisdiction over discretionary jurisdiction decisions of district courts of appeal that (ii) expressly construe a provision of the state or federal constitution.

According to Florida Constitution, Article I Section 26 Claimant's Right To Fair Compensation (a) Article I, Section 26 is created to read "Claimant's Right to fair Compensation. "In any medical liability claim involving a Contingency fee, the claimant is entitled to receive no less than 70% of The first \$250,000.00 in all damages received by the claimant, exclusive of Reasonable and customary costs, whether received by judgment, settlement Or otherwise, and regardless of the number of defendants, the claimant is Entitled to a 90% of all damages in excess of 250,000.00, exclusive of reasonable And customary costs and regardless of the number of defendants. This provision Is self-executing and does not require implementing legislation.

Amendments: History- proposed by an initiative petition filed with the Secretary of State September 8, 2003; adopted 2004 (Florida Medical Liability Compensation, Amendment 3 (2004).

G. STATEMENT OF CASE AND FACTS

1. This is a slip and fall case which was filed on September 30, 2016 to the Respondent on March 24, 2017, the Respondent submitted a Motion of Summary Judgment on May 16, 2018. Petitioner did an Opposition to the Defendant Motion of Summary Judgment on 5/16/18, using Petitioner original pictures, and witness Linda Davis pictures. Exhibit C, D, E, F,

2. On January 17, 2018 mediation took place at Attorney Robyn Hankins office, Who was the mediator for this slip and fall case, which should have been report? back to Judge Garrison so a trail and juror could take place in this case. The Respondent was later granted a Motion of Summary Judgment on 12/6/2018 at 9:45 a.m. using pictures showing a Karen Kane sign for their motion.
3. Petitioner's fall occurred at Macy's Department Store at the Palm Beach Garden's Mall as a customer at Macy's shopping before Mother's Day on May 7, 2016. The Petitioner enter the doors at Macy's between 10:30 a.m. or 11:00 a.m. observing the Surveillance cameras and sales rack due to Mother's Day. Petitioner stopped in the INC Department first because it was next to the entrance doors of Macys. Petitioner stayed in each department 15 to 20 mins before going to Calvin Klein, Michael Kors and Karen Kane Department.
4. Petitioner begin looking at the sale racks in the Karen Kane Department, before picking something from the sales rack; which included a dress, skirt and blouse, and from the Ralph Lauren and Michael Kors Department the Petitioner did notice the mannequins from a distance, as a customer I didn't think anything about the mannequins besides they were tall.
5. When the Petitioner was looking at the 2nd sales rack before going to the last rack. The Petitioner needed some assistance with the price, but no salesperson wasn't around, Petitioner ended up looking at the last sale rack, looking forward facing the Michael Kors and Ralph Lauren Department. I recall looking at a white shirt from the last rack in the Karen Kane Department, Petitioner proceeded to check the price on this shirt and turn forward and I fell over the table cutting the right leg, right shoulder tear, and causing bursitis trochanter of the right hip with pending surgery. The last clothing

rack, table, and mannequins are 2 to 3 inches or feet apart from each other when the sun was beaming down from the roof toward the aisle walkway. Exhibit C

6. Respondent is a Macy Department Store located in the Palm Beach Gardens Mall in Palm Beach Garden, Florida. Macy's is a well-known store where everybody goes to shop including men. On May 7, 2016 before Mother's Day, Macy's store was very busy with customers, and a huge sale in every department, which employees were very busy assisting customers, and security guards are nowhere on the floor to notice any shoplifting, or someone being injured due to a dangerous hazardous area.
7. Petitioner did an Affidavit showing Respondent did have the surveillance camera, and husband Richard Baker did an Affidavit hearing Attorney Bryan Boysaw telling his client, the Respondent was not going to give up the surveillance camera, and Bryan Boysaw office sending the Respondent, a letter telling them to preserve the surveillance camera. If Petitioner Affidavit for Janice Baker and Richard Baker wasn't the truth? Why the Respondent never Object to the Petitioner Affidavit. Exhibit C, D, E, F, G

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- a. A direct verdict is proper only when the record conclusively shows and absence of facts or inferences from facts to support a jury verdict, viewing the evidence in alight most favorable to Sear, Roebuck & Co v. McKenzie 502 So. 940,941(Fla. 3d DCA 1987 the nonmoving party.

8. The Petitioner was a customer invitee of Respondent at the time of the fall. The Respondent owe Petitioner, a duty to use ordinary care to keep the premises in a reasonably safe condition or to warn the invitee of dangerous conditions, not readily apparent, which the owner knows or should know of in the exercise of reasonable care. Petitioner's sworn testimony reveals that she fell over a table that she didn't see, because the sun was beaming down from the roof in

the area where the mannequins, and table was located at the edge of the aisle near the walkway, and not far back in the Respondent pictures, showing a tall Karen Kane sign in front of the last clothing rack. Exhibit C

A property owner owes two duties to its business invitees: (a) to warn of concealed dangers, which are or should be known to the owner and which are unknown to the invitee and cannot be discovered through the exercise of due care, and (b) to use ordinary care to maintain its premises in a reasonably safe condition”

9. The Affidavit of Janice Baker with Exhibit A through M, showing the actual pictures of how the Respondent scene was first set-up. According to *Shaw v. Cambridge Integrated Service Group, Inc* 888, So. 2d 58, 63 (Fla. 4 DCA 2004). It states a spoliation claim compensates the Petitioner for the loss of recovery in the underlying case due to the Petitioner’s inability to prove the case because of the lost or destroyed evidence and not for the bodily injury sustained. Exhibit C, D, E, F

10. Affidavit by Richard Baker shows the Respondent had surveillance camera, After receiving pictures from the witness Linda Davis showing the same exact scene of the Petitioner Opposition to the Respondent Motion of Summary Judgment. This is a jury issue of whether the Respondent had constructive notice of the dangerous condition. Exhibit C, D, E, F

H. REASONS FOR GRANTING THE WRIT

1. The standard of review for an order granting summary judgment is de novo.” 5th Ave. Real Estate Dev., Inc. v. Aeacus Real Estate Ltd. P ’ship, 876 So 2d 1220, 1221 (Fla. 4th DCA 2004). “When reviewing a ruling on summary judgment, an

appellate court must examine the record and any supporting affidavits in the light most favorable to the non-moving party.” Weinstein Design Group, Inc. v. Fielder, 884 So. 2d 990, 997 (Fla. 4th DCA 2004).

2. Summary Judgment cannot grant unless the pleadings, depositions, answer to interrogatories, and admissions on file together with affidavits, is any conclusively show that there is no genuine issue as to any material fact the moving party is entitled to a judgment as a matter of law. Fla. R. Civ. P. 1.510. at the burden is upon the party moving for summary judgment to show conclusively the complete absence of any genuine issue of material fact.” Albelo v. S. Bell, 682. So. 2d 1126, 1129 (Fla 4th DCA 1996)

“When a Respondent moves for Summary Judgment, the court is not called upon to determine whether the Petitioner can actually prove his/her cause of action rather, the court’s function is solely to determine whether the record conclusively shows that the claim cannot be proved as a matter of law. “Jennaro v. Bonita-Fort Myers Corp., 752 So. 2d 82, 83, (Fla. 2d DCA 2000

3. Petitioner pro-se with ADA Accommodation was denied the rights to be heard in court, and found the trial court abused its discretion in refusing to allow Petitioner to present argument at the hearing. See Love v. Gruner, 658 So. 2d 1180, 1181 (Fla. 4th DCA 1995 (it is an abuse of discretion for a trial court to deprive a party of an opportunity to be heard at a hearing; Phillips 66 Co, v Int’l Tele-Coin Co., 564 So. 2d 1219,1120 (Fla. 3d DCA 1990) (due process requires that before summary judgment is entered, the non-moving party must have a full and fair opportunity to contest the proposition that there is no genuine issue of material fact): see also Carmona v. Wal-Mart Stores, E., LP, 81 So.3d 461, 464, (Fla.2d DCA 2011 (a summary judgment proceeding must be “essentially fair. According to Florida Constitution, Article 1 Section

2 states that all-natural person female and male alike, are equal before the law and have

inalienable rights, among which are the right to enjoy and defend life and liberty, to pursue happiness, to be rewarded for industry, and to acquire, possess and protect property. No person shall be deprived of any right because of race, religion, national origin, or physical disability.

4. THE EXPERT AFFIDAVITS PROFFERED BY THE PETITIONER MUST BE
CONSIDERED BEFORE RENDERING SUMMARY JUDGMENT IN FAVOR
OF THE RESPONDENT.

- A. The lower courts in this case have questioned the applicability of the expert Affidavits Proffered by Petitioner, specifically referencing the conclusions reached by each and their appropriateness in a Summary Judgment determination. Florida law is well Settled as to when expert witness testimony is appropriate. The Florida Supreme Court In the case Buchman v. Seaboard Coast Line Railroad Company, 381 So.2d 229 (Fla 1980 set forth the element required for expert's testimony must be "beyond the common Understanding of the average layman" and the expert witness must have knowledge Which will aid the jury in finding the truth. See id. at 230. Exhibit D
- B. In determining whether to admit scientific expert testimony, the Florida courts have Adopted the Frye standard which requires that the conclusions reached by the expert be generally accepted in the pertinent field of knowledge. In the instant case the Respondent did not file any expert Affidavit in opposition to the findings reached by the Petitioner's expert therefore the question of the admissibility of the expert's conclusions should not be before this court. The question is whether the expert Affidavit submitted by Petitioner are admissible and what weight is afforded to the opinions expressed therein in Opposition to the Motion of Summary Judgment filed by the Petitioner. Exhibit C, D, E, F, G

C. The use of expert witness Affidavits at the Summary Judgement stage of a case has Also been accepted in the Courts of Florida. See Charlonne v. Rosenthal. M.D. 642 So.2d 632(Fla. 3d DCA 1994). Permitting the use of expert Affidavits created an issue of fact.). Moreover, the Florida Rules of Evidence permit an expert to render an opinion on the ultimate issue. "Section 90.703 codifies this principle by providing that opinion testimony is not objectionable solely because it includes an ultimate issue to be decided by the trier of fact. 'The jury has the power to accept or reject the testimony of expert or lay witnesses and are not bound by their conclusions,'" Ehrhardt, Florida Evidence statues 703.1,554 (citations omitted).

D. Therefore, the expert witness Affidavits proffered by the Petitioner must, and should be considered by the court in determining whether any genuine issue of material fact exists before granting a Motion for Summary Judgment according to Florida Rules 1.510.

5. THE AFFIDAVITS OF PETITIONER'S EXPERTS PRESENT GENUINE ISSUES OF MATERIAL FACT PRECLUDING RESPONDENT'S MOTION FOR SUMMARY JUDGMENT AND THE ORDER OF THE DISTRICT COURT OF APPEALS SHOULD REVERSED.

A. The rule of Granting Summary Judgment is set forth in the Florida Rules of Civil Procedure 1.150 As follows: (c) The judgment sought shall be rendered forthwith if the pleadings, depositions, answers to Interrogatories, and admissions on file together with the Affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law. (emphasis added) Exhibit C, D, E, F, G

I CONCLUSION

1. The Petitioner pro-se, Janice Baker, who is competent and sound minded, would like for this Honorable U.S. Supreme Court to review why the 4th Appeal District Circuit Court refuses to look at evidence in the Petitioner's Petition of Writs of Certiorari, and Appendix for Petition on 10/21/19, 11/4/19, and 11/15/19 for case# 4D18-3618, which shows final on 10/3/2019. Petitioner is telling the U.S. Supreme Court the truth, and would like the U.S. Supreme Court to reward Petitioner whatever they feel is right in the court of law for the new Injuries I sustain in this slip and fall case, along with pain and suffer I endure throughout this case concerning this Summary Judgment filed by the Respondent on 3/24/2017 when Petitioner was still represented by Attorney Bryan Boysaw before he withdrew from this case on 6/6/2017 by Judge French; which means Attorney Bryan Boysaw had plenty of time to rebuttal this Summary Judgment file by the Respondent in this Macy's case.

I hereby a copy of this Petition of Writ of Certiorari will be mailed to Attorney Robert J. Squire of Resnick & Louis P.C. at 444 Brickell Avenue, Suite 300 Miami, Florida 33131 on this 17th day of December 2019

December 17, 2019

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