

QUESTION(S) PRESENTED

1. Whether a pretrial prison staff may violate ~~a~~ pretrial prisoner's medical civil rights in order to cause him UNNECESSARY injuries by (delay ^{deliberate} and denial) of timely prescribed and foreseen medical care, AS I WAS, VAUGHN HARRIS?
2. Whether a state law that excuses (violation) ~~abuse~~ of civil rights, of pretrial prisoners, Tennessee Code Annotated §29-20-205, is constitutional, or whether Tenn. Code Annotated §29-20-205 violates the ~~1st, 5th, 8th~~ 1ST, 5TH, 8TH, and ~~14th~~ Amendments of the United States Constitution?
3. Whether torture inflicted by Metropolitan Nashville and Davidson County, Tennessee government employees ~~and~~ agents of the Davidson County Sheriff's Office that cause injuries unnecessarily by abuse of pretrial detainees as punishment violates constitutional case law by persons working under color of (Tenn.) law? (Tennessee Code Annotated 29-20-205 violates federal laws)
4. Whether all ^{D.C.S.O. METRO. D.C.S.O. +} parties, municipality, and ^{METRO. D.C.S.O.} contracted agents and employees are liable for the unnecessary torture, injuries, and abuse inflicted upon me, VAUGHN HARRIS, from 2015 until 2020 of today for the injuries and damages I have sustained from the defendants deliberate indifference to my health and safety from the dates stated?

LIST OF PARTIES

[] All parties appear in the caption of the case on the cover page.

[X] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

1. The Metropolitan Government of Nashville and Davidson County, Tennessee.
2. CORRECT CARE SOLUTIONS and its medical and dentle care agents* from 2014 through 2020.
3. DR. Krystal Lewis, Jenny Jaynes, etc...
4. page 2B and
5. The Davidson County Sheriff's Office staff of employees.

14 Amendment of the U.S. Constitution

DUE PROCESS CLAUSE → RELATED CASES

- *1. City of Revere v. MASS. Gen. Hosp., 463 U.S. 239, 244, 103 S.Ct. 2979, 77 L.Ed.2d 605 (1983), pretrial detainees have a right to adequate medical treatment.
2. Estelle v. Gamble, 429 U.S. 97, 104, 97 S.Ct. 285, 50 L.Ed.2d 251 (1976), for failure to provide medical treatment, plaintiff must establish that the defendants acted with deliberate indifference to serious medical needs.
- *3. Farmer v. Brennan, 511 U.S. 825, 835-37, 114 S.Ct. 1970, 128 L.Ed.2d 811 (1994) Deliberate indifference requires that the defendants knew of and disregarded a substantial risk of serious harm to Harris's health or safety.
- *4. CARVER v. KNOX County, TENN., 753 F. Supp. 1398 (E.D. TENN. 1989) remand (1990) (substantial delay in necessary dentle treatment violates the Constitution. ^{1370, 1391} adhered to on remand, 753 F. Supp. 1398 (E.D. TENN. 1990).)
- *5. CARVER v. K. C. TENN., 753 F. Supp. 1370, 1391 (E.D. TENN. 1989), remand for reconsideration, 887 F.2d 1287 (6th Cir. 1989) adhered to on remand, 753 F. Supp. 1398 (E.D. TENN. 1990).
- 5A. DEAN v. Coughlin, 623 F. Supp. at 403-404, 392, 405 (S.D.N.Y. 1985) dentle conditions are serious if they cause pain, discomfort, or threat to good health and denial and delays in filling cavities, performing root canals, providing crowns, etc... violated the 8th Amendment (of the U.S. Constitution).
- *5B. CHANCE v. Armstrong, 143 F.3d 698, 703 (2d Cir. 1998) ^{dentist proposed extraction rather than saving teeth for FINANCIAL GAIN.}
6. Bounds v. Smith, 430 U.S. 817, 825-26, 97 S.Ct. 1491 (1977)
7. Heitman v. Gabriel, 524 F. Supp. 622, 627 (W.D. Mo. 1981) (emergency fillings and pain relief measures required).
8. Miller v. Carson, 401 F. Supp. 835 (M.D. FLA. 1975) applied in most part, 563 F.2d 741 (5th Cir. 1977).
9. Limbaugh v. Coffee Med. Ctr., 59 S.W. 3d 73 10. Burgess v. Fischer, 735 F.3d 462
- *11. Villegas v. Metro. Gov't of Nashville, 709 F.3d 563, 568 (6th Cir. 2013)
- *12. Bell v. Wolfish, 441 U.S. 520, 535, 99 S.Ct. 1861, 60 L.Ed.2d 447 (1979)

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~~RETURN THE~~ APPENDIX A → MOTION REQUESTING THE CLERK OF THE U.S. SUPREME COURT
 6TH Circuit Court of APPEALS (FINAL DECISION RULING) 12-11-2018
 I MISTAKINGLY MAILED ALREADY TO THE 19-504-1 Supreme Clerk

APPENDIX B → MOTION ASKING THAT THE U.S. SUPREME COURT ORDER THE
 CLERK TO REQUEST THE FINAL DECISION OF CASE No 3:15-cv-00356
 FROM THE U.S. FEDERAL MIDDLE DISTRICT COURT FOR TENNESSEE 12-11-2018
 APPENDIX C (Doc. No 356) ←

APPENDIX D

APPENDIX E

APPENDIX F

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
1. <i>Bounds v. Smith</i> , 430 U.S. 817, 825, 26, 975.Ct. 1491 (1987) #1	p#1
2. <i>Farmer v. Brennan</i> , 511 U.S. 873, 114 S.Ct. 1970, 128 L.Ed2d 871 (1994) #2	p#2
3. <i>Estelle v. Gamble</i> , 429 U.S. 104-05, 975.Ct. 285 (1976)	p#4
4. <i>Farmer v. Brennan</i> , 511 U.S. 873 (1974) 1	p#4
5. <i>Pembaur v. City of Cincinnati</i> , 475 U.S. 469, 89 L.Ed2d 452, 106 S.Ct. 1222 (1986) #5	p#5
6. <i>Monell v. Dep't. Soc. Servs.</i> , 436 U.S. 658, 56 L.Ed2d 611, 98 S.Ct. 2018 (1978) p#5	p#5
7. <i>Blackmore v. Kalamazoo County</i> , 390 F.3d 896-900 (6th Cir. 2004) p#5	p#5
8. <i>Farmer v. Brennan</i> , 511 U.S. 825-837, 114 S.Ct. 1970, 128 L.Ed (1994) p#5	p#5
9. <i>City of Canton, Ohio v. Harris</i> , 489 U.S. 378-389, 103 L.Ed. 2d 412, 107 S.Ct. 1197 (1987) p#1+6	p#1+6
10. <i>Monell v. Dep't. Soc. Servs.</i> , 436 U.S. 985, Ct. 2018 (1978) p#6+8+10	p#6+8+10
11. <i>Harrison v. Barkley</i> (2d Cir. 2000) 12 <i>Carver v. Knox County Tenn.</i> (E.D. Tenn 1989)	
13. <i>Chance v. Armstrong</i>	

STATUTES AND RULES

Tennessee Code Annotated § 29-20-205 and § 29-20-201

OTHER

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 *in process of being recovered for the Court.*

☐ reported at C-2 + 20 pages; or,

☒ has been designated for publication but is not yet reported; or,

☒ is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is *in process of being recovered for the Court.*

☐ reported at C-3 + 20 pages; or,

☒ has been designated for publication but is not yet reported; or,

☒ is unpublished.

☐ For cases from **state courts**:

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

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

1.

C-4

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was 12-11-2019.

☒ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was 12-11-2018
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The defendants violated my 1ST 4TH 5TH 6TH 8TH ^{AND} 14TH Amendment rights of the United States Constitution, I was entitled to, by persons working under color of state law.

The defendants also violated my (Tennessee^{Nashville}) state rights, of Tennessee Code Annotated § 29-20-101 and 201, that I, HARRIS, was entitled to, but was denied by Nashville, Tennessee Davidson County Sheriff's Office employees and medical care agents.

1. The U.S. Federal District Court for the Middle District of Tennessee has jurisdiction over the plaintiffs' claims of violation of federal constitutional rights under 42 U.S.C. § 1331(1) and 1343 and 42 U.S.C. § 1983, this court also has supplemental jurisdiction over the plaintiffs' state law tort claims under 28 U.S.C. § 1367. (U.S.C. = United States Constitution)
This is an individual and class action lawsuit claim action filed under 42 U.S.C. § 1983 by I, Vaughn Harris, on behalf of ^{ALL pretrial} ~~and~~ prisoners of Metro."

2. This is a Medical Care Injury ^{AND} Rights legal suit claim action for relief, filed by I, VAUGHN HARRIS, a pro-se pretrial prisoner of the Municipality of Metro. Nashville or the Metropolitan Government of Nashville and Davidson County, Tennessee from date 10-1-2014 to 5-26-2018, for the defendants, Metro D.C.S.O. of Nashville, and its agents of Medical and Dentle Care, CORRECT CARE SOLUTIONS, and its medical employees, and the C.C.S. dentle care agents, DR Krystal Lewis, and her assistant, Jenny Jaynes, denial of timely, reasonable, foreseeable, and prescribed adequate medical care, that let my teeth deteriorate unnecessarily, left me in unbearable dentle pain for 8 months, made me suffer an unnecessary heart attack, and denied me dentle pain relief prescribed dentle care after oral surgery unnecessarily, and injured my hearing due to medical negligence and indifference to my serious medical needs under UNCONSTITUTIONAL Tennessee state policy, TENN. Code ANN. 29-20-205(1)(2), that violates my 8TH and 14TH Amendment Rights of the United States Constitution, I AM entitled to, and Tennessee state rights under TENN. Code ANN. 29-20-201(2), I WAS entitled to also, but was denied by persons working under color of Tennessee state law, that violates the ^{13TH, 14TH, 15TH, 17TH, 18TH, 19TH, 20TH, 21ST, 22ND, 23RD, 24TH, 25TH, 26TH, 27TH, 28TH, 29TH, 30TH, 31ST, 32ND, 33RD, 34TH, 35TH, 36TH, 37TH, 38TH, 39TH, 40TH, 41ST, 42ND, 43RD, 44TH, 45TH, 46TH, 47TH, 48TH, 49TH, 50TH, 51ST, 52ND, 53RD, 54TH, 55TH, 56TH, 57TH, 58TH, 59TH, 60TH, 61ST, 62ND, 63RD, 64TH, 65TH, 66TH, 67TH, 68TH, 69TH, 70TH, 71ST, 72ND, 73RD, 74TH, 75TH, 76TH, 77TH, 78TH, 79TH, 80TH, 81ST, 82ND, 83RD, 84TH, 85TH, 86TH, 87TH, 88TH, 89TH, 90TH, 91ST, 92ND, 93RD, 94TH, 95TH, 96TH, 97TH, 98TH, 99TH, 100TH} United States Constitution which Trumps Tenn. state law.

(9-18)

CASE 17-5502

1-18-19

1. This is a legal suit claim action filed by I, VAUGHN HARRIS, the plaintiff, a pretrial prisoner of Nashville, Tennessee government from 10-28-2014 to today 12-2018, for \$250,000.00 in punitive damages of relief from the defendants, the Metropolitan Government of Nashville and Davidson County, Tennessee, the Davidson County Sheriff's Office Administrative staff, and its agents, Correct Care Solutions, and its staff, and its agent of dentle care, Dr Krystal Lewis, and her assistant JENNY JAYNES, for injuries I, VAUGHN HARRIS, suffered and still suffer from the defendants denial of adequate dentle care, pain relief care, medical care, and life sustaining medications (being) given in a timely manner, which amounted to assault and battery torts of ~~neglect~~ ^{WILLFUL} by omission of needed medical care by the defendants and their employees. I, HARRIS suffered teeth deterioration, unbearable teeth pain for months, had a heart attack because C.C.S. employees refused to give me my prescribed blood pressure medicine due to ill will, I was denied dentle pain meds again. After oral tooth surgery at Meharry Hospital, for a week, by C.C.S. medical personnel, to torture me and make me suffer cruel and unusual punishment again, and my hearing was injured due to malpractice by a C.C.S. (negligence) ^{EMPLOYEES}, therefore I am suing all the tortfeasors of this case under 42 U.S.C. §1983, and the Tennessee Government Tort Liability Act (GTLA) TN Code Ann. 29-20-201, and the ^{FED} 8th and 14th Amendment of the United States Constitution, I was entitled to, but ^{WAS} (denied) by persons working under color of ^{TENN} STATE LAW. *Jurisdiction, ^{NASHVILLE} the U.S. citizen that is suing, lives in Tennessee, the U.S. District Court of Tennessee, for the Middle District, has jurisdiction over my claims of violation of my federal constitutional rights under 42 U.S.C. §1331(1) and 1343, and the court also has jurisdiction over the plaintiff's state law tort claims under 28 U.S.C. §1367.
2. I, Vaughn Harris, the plaintiff have exhausted all of my administrative remedies with respect to all claims and all defendants.
3. Standard of Review: *Chance v. Armstrong* 143 F.3d 698 (1998 U.S. Ct App.) and *Limbaugh v. Coffee Med. Ctr.*, 59 S.W.3d 73 (Tenn. Ct. App. 2000 Lexis 756 or 354).

The defendants, the Metropolitan Government of Nashville and Davidson County, Tennessee and its employees and agents, adopted and executed law, policy, and custom, Tennessee Code Annotated 29-20-205, legalized abuse of pretrial prisoners in the municipality's custody to inflict harm, punishment, and injury to us pretrial prisoners in any manner of discretion by it and its employees and its agents under the municipality's policy, custom, law, and direction. Which was the moving force behind the municipality's and its employees and agents deliberate indifference to our pretrial prisoners health and safety and caused the medical agents to carry out assault and battery by medical care delay, neglect, and denial of medical care and wanton unnecessary injury and infliction of pain on us plaintiffs. The municipality's agents and employees of the Davidson County Sheriff's Office also used law (Tenn. Code Ann.) to withhold adequate (access) to adequate Federal Law Library materials to us pretrial prisoners from 2015 to 2019 so we could not file a nonfrivolous lawsuit complaint and redress and respond to the court in a meaningful timely manner with adequate legal council. The plaintiffs seek to hold the City of Nashville, Tennessee and its employees and medical care agents liable for injuries caused by it and its agents and employees execution of policy, custom, and law (Tenn. Code Annotated 29-20-205) used against (pretrial prisoners) of Metro. Nashville, Tennessee that suffered injuries due to violations of these plaintiffs Due Process Clause rights and violations of their 1st, 4th, 5th, 8th and 14th Amendment Rights of the United States Constitution, by persons working under color of state law of Nashville, Tennessee from 2015 until today of 2019 and possibly into the future. Local governing bodies can be sued under 42 U.S.C. § 1983 only where "the action that is alleged to be unconstitutional implements or executes a policy statement, ordinance, regulation, or decision officially adopted and promulgated by that body's officers, agents, or employees and the municipality) or is visited pursuant to governmental custom even though such a custom has received formal approval through decision making channels, *Monell v. Department of Social Services*, 436 U.S. 658, 690-91, 98 S.Ct. 2018, 56 L. Ed. 2d 611 (1978). "A municipality can be liable under 42 U.S.C. § 1983 only where its policies are the moving force behind the constitutional violation" and there is a direct causal connection between the policy, custom, or law of the city and the constitutional injury to the plaintiffs. *VAUGHN HARRIS* (quoting *City of Canton v. Harris*, 489 U.S. 378, 389, 70 S.L. Ed. 2d 412, 109 S.Ct. 1197 (1989)).

The Municipality of Metropolitan Nashville and Davidson County, Tennessee's adoption of the city's official policy, custom, and law, Tenn. Code Ann. 29-20-205(2)+(1) is an illegal legislative enactment of law that claims that ^(entities) ~~governmental~~ employees of medical care are allowed to ignore or violate inhabitants of Nashville, TN civil rights or federal U.S. 8th and 14th Amendment Rights of the United States Constitution, I was entitled to, but was denied by persons working under color of Tenn. Code Ann. 29-20-205(1)+(2)+(6), Metro. Nashville, TN. state law. It is only when the execution of the government's policy or custom inflicts the injury that the municipality may be held liable under 42 U.S.C. 91983, City of Canton, Ohio v. Harris, 489 U.S. 378, 385, 103 L. Ed 2d 412, 109 S. Ct. 1197 (1989) (citation omitted). All the unnecessary injuries I, Harris, ^{and others} suffered and sustained from Metro. and its agents were a direct result of Metro. Nashville, TN official municipal policy and custom and law Tenn. Code Ann. 29-20-205(1), (2), and (6), used by these ^(medical) agents to deny ^(us) medical care, by the discretionary ^(abuse) clause, 29-20-205(1) and the civil rights immunity clause, (2) of 29-20-205, that they knew I ^{and others} needed, but refused to give ^(us) for the very purpose of causing me, Harris, ^{and others} harm or assault and battery by medical neglect, with the knowledge that harm will result. Even though they all knew ^{we} I had a sufficiently serious medical need while incarcerated, Farmer v. Brennan, 511 U.S. 825, 837, 128 L. Ed 2d 811, 114 S. Ct. 1970 (1994) and showing the prison medical staff possessed a sufficiently culpable state of mind in denying me, Harris, medical care for the very purpose of causing harm or with the knowledge harm would result ^(quoting) (Farmer 511 U.S. at 834, 835) The act of deliberate indifference by prison officials to an ^(inmate's) ~~pretrial~~ detainee's serious medical needs constitutes unnecessary and wanton infliction of pain in violation of the 8th and 14th Amendment prohibition against ^(quoting) cruel and unusual punishment, ^{ESTELLE V. GAMBLE 429 U.S. 97, 104, 60 L. Ed 2d 251, 97 S. Ct. 285 (1976)} MOLTON V. CITY OF CLEVELAND, 839 F.2d 240, 243 (6th Cir. 1988) Where any person acting under color of state law abridges rights secured by the Constitution or United States laws including a detainee's 8th and 14th Amendment rights 91983 provides civil redress, City of Canton, Ohio v. Harris, 489 U.S. 378, 388-89, 103 L. Ed 2d 412, 109 S. Ct. 1197 (1989)

The Municipality of Metropolitan Nashville and Davidson County, Tennessee's adoption of the city's official policy, custom, and law, Tenn. Code Ann. 29-20-205(2)+(1) is an illegal legislative enactment of law that ^{states} that (entities ⁴ +) employees of medical care are allowed to ignore or ^{ABUSE} violate inhabitants of Nashville, TN civil rights or federal U.S. 8TH and 14TH Amendment Rights of the United States Constitution, I was entitled to, but was denied by persons working under color of Tenn. Code Ann. 29-20-205(1)+(2)+(6), Metro. Nashville, TN. state law. It is only when the execution of the government's policy or custom inflicts the injury that the municipality may be held liable under 42 U.S.C. § 1983, City of Canton, Ohio v. Harris, 489 U.S. 378, 385, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989) (citation omitted). All the unnecessary injuries I, Harris suffered and sustained from Metro. and its agents were a direct result of Metro. Nashville, TN official municipal policy and custom and law Tenn. Code Ann. 29-20-205(1), (2), and (6), used by these ^(MEDICAL) agents to deny me ^{TIMELY} medical care, by the discretionary ^{ABUSE} clause, 29-20-205(1), and the civil rights immunity clause, (2), of 29-20-205, that they knew I needed, but refused to give me for the very purpose of causing me, Harris, ^{AND OTHERS} injuries and assault and battery ^{AND} medical neglect. With the knowledge that harm would result, even though they all knew I had a sufficiently serious medical need while ^{PRETRIAL} incarcerated, Farmer v. Brennan, 511 U.S. 825, 837, 128 L. Ed. 2d 811, 114 S. Ct. 1970 (1994) and showing the prison medical staff possessed a sufficiently culpable state of mind in denying me medical care for the very purpose of ^{INJURY OR TO ME} causing harm or with the knowledge harm will result, ^{Quoting} Farmer 511 U.S. at 834, 835) The act of deliberate indifference by prison officials to ^{INMATES} inmates' serious medical needs constitutes unnecessary and wanton infliction of pain in violation of the 8TH and 14TH Amendments prohibition ^{DUE} against cruel and unusual punishment, ^{PROCESS} ^{CLAUSE} ESTELLE v. GAMBLE 429 U.S. 97, 104, 50 L. Ed. 2d 251, 97 S. Ct. 285 (1976) ^{Quoting} MOLTON v. CITY OF CLEVELAND 839 F.2d 240, 243 (6TH Cir 1988) where any person acting under color of state law abridges rights secured by the Constitution or United States laws, including a detainees 8TH and 14TH Amendment rights § 1983 provides civil redress, City of Canton, Ohio v. Harris, 489 U.S. 378, 388-89, 103 L. Ed. 2d 412, 109 S. Ct. 1197 (1989)

(MEDICAL INJURY)

This is a United States Constitution Rights legal suit claim action for ^{DAMAGES} relief filed by I, Vaughn Harris, a pro-se pretrial prisoner of the Municipality of the Metropolitan Government of Nashville and Davidson County, Tennessee from 10-28-2014 until today of 5-27-2018, "Metro", for \$250,000.00 in punitive and compensatory damages and injunctive relief from the defendants, the Municipality of (Nashville ^{METROPOLITAN} AND DAVIDSON County, Tennessee), "Metro", the Davidson County Sheriff's Office staff and administrators, its Medical Agents, Correct Care Solutions, C.C.S., AND ^{SOME} NAMED AND ^{SOME} UNKNOWN C.C.S. Medical staff and supervisors, and the C.C.S. Agents of dentle care, Dr Krystal Lewis, and her dentle assistant, Jenny Jaynes, for execution of UNCONSTITUTIONAL MUNICIPAL policy and law custom, Tennessee Code Annotated 29-20-205 (1) AND (2) AND (6) USED AGAINST me, HARRIS, by the defendants from 2014 to 2018, that caused me to suffer UNNECESSARY ^{MEDICAL, PHYSICAL} PAIN AND INJURY AND CRUEL AND UNUSUAL PUNISHMENT discrimination, AND AN UNNECESSARY heart attack for the defendants willful, wanton, gross ^{deliberate} neglect ~~and~~ of denying me, Harris, timely, needed, reasonable, foreseeable, and prescribed adequate medicine and dentle care, that let my teeth deteriorate UNNECESSARILY by UNCONSTITUTIONAL MUNICIPAL policy ^{TN. Code Ann. 29-20-205 (1) & (2)} AND C.C.S. Medical staff. It allowed the dentist and her assistant to subject me to injury and ^{PUNISHMENT} (CRUEL AND UNUSUAL) physical dentle torture ^{AND} PAIN by omission of adequate reasonable ^{dentle relief} PAIN CARE for 8 months after I filed suit for the dentle abuse and neglect (under MUNICIPAL policy) ^{29-20-205 (1) AND (2)} allowed the Correct Care Solutions and C.C.S.O. staff employees the ability and discretion to withhold needed (prescribed high blood pressure medication) I, Harris, needed to sustain life, in a C.C.S. staff conspired manner of retaliatory abuse for my legal suit, ^{MEDICAL CARE AND} under UNCONSTITUTIONAL MUNICIPAL policy - TN. Code Ann. 29-20-205 (1) AND (6), that caused me, Harris, to suffer AN UNNECESSARY heart attack after

This is a class action lawsuit claim action filed ^{separately and} jointly with all pretrial prisoners. ^{assault and battery} This is a Medical and Dentle Injuries Lawsuit (Claim) action for relief damages, filed by ^{Verdell Williams, and} VAUGHN HARRIS, ^{pro-se} pretrial prisoners of the Metropolitan Government of Nashville and Davidson County, Tennessee from dates 1-1 2014 to today of 2020, the defendants, for the denial of adequate medical and dentle care being given to I, VAUGHN HARRIS, that caused unnecessary cruel and unusual punishment, and ^{grossly} pain to me that was unbearable, and physical ^{external and} internal injuries from denial of prescribed and foreseeable medications and medical care, by Metro. Nashville, TN. government and its D.C.S.O. (Davidson County Sheriff's Office ^{staff and} medical agents) under Metro. Nashville, TN. government unconstitutional ^{Nashville, TN.} municipal policy, Tenn. Code Annotated 29-20-205(1), (2), (6), that was the cause and moving force behind ^{our} injuries ^{of} assault and battery, ^{injury and} medical abuse ^{and} omission's of obvious ^{written} medical care by the defendants. That violated and is still violating ^{our} 8th and 14th Amendment Rights of the United States Constitution, ^{we were} entitled to, but was denied by persons working under color of Nashville, Tenn. state law. Therefore ^{we} demand relief damages.

The trier of fact can conclude that the professionals knew of the needs from evidence that it was obvious and further it can be assumed that what might not be obvious to a lay person might be obvious to a professional acting within her or their area of expertise. Deliberate indifference in a pretrial detainee's care may be inferred by a medical professional's erroneous treatment that is a substantial departure from accepted professional judgment, practice, or standards, so as to demonstrate that the person responsible did not base the decision on sound professional judgment and practice; Youngberg v. Romeo, 457 U.S. 307, 323, 102 S.Ct. 2452 (1981)

REASONS FOR GRANTING THE PETITION

Because the 6TH Circuit United States Appeals Court did not uphold the 1ST, 5TH, 4TH, 8TH, and 14TH Amendments of the United States Constitution, in my ^{CIVIL} APPEAL case 19-5041, that appealed my state federal case 3:15-cv-00356, for the Metropolitan Nashville and Davidson County, Tennessee Government staff of the Davidson County Sheriff's Office pretrial detention center violation of my constitutional and state ^{TENN.} rights, I was entitled to, but was denied by persons working under color of Tennessee state law, Tennessee Code Annotated 29-20-205.

CONCLUSION

The petition for a writ of certiorari should be granted.

The lower courts abused their discretion in my case rulings and allowed the defendants to violate my constitutional rights I was entitled to. Therefore the rulings should be overturned.

Respectfully submitted,

Vaughn L. Harris

Date: 2-2-2020