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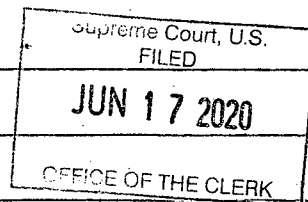
Charles Talbert

QA4727

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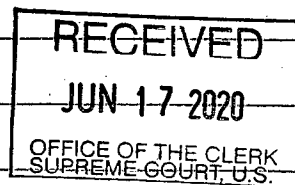
1200 Mokychic Drive

Collegeville, PA. 19426



June 7, 2020

Supreme Court of
the United States



Charles Talbert

v.

No. 19-8167

Blanche Carney

Terance Clark

Gerald May

Shaniqua Ford

Plaintiff Charles Talbert's Petition
For A Rehearing of His Petition For
Writ of Certiorari on the Merits

On or about April 2, 2020, your Petitioner filed in this Honorable Court, a petition for writ of certiorari, respectfully requesting that it remand civil action No. 18-1620 back to the Third Circuit for review due to a final judgment reached by eight jurors that relied on "perjured" testimony known both by the Defendants captioned above herein, and their counsel. This Court denied your Petitioners request, without opinion, on or about June 1, 2020.

Petitioner hereby respectfully requests this Court to re-hear his petition, with a sound, fair, and logical review. Plaintiff has been prejudiced by the Respondents acts, omissions, and perjury, to which, there is absolutely no other legal recourse to seek relief, except this Court. The issues regarding Petitioners

request, are essential elements, which demonstrate intervening circumstances, regarding a controlling effect, on both federal, and state levels:

- (1) acknowledgment of settlements (State Law)
- (2) judgments founded upon fraud (Federal Law)

Should this Court deny a rehearing on these two essential intervening circumstances of controlling effect, which is filed in good faith, and not for any unreasonable delay, then the ruling to this petition, unfortunately, will be in support of a fraudulent obtained judgment, to which has no further legal recourse from a fair, and impartial court system.

Petitioner amends his "questions presented" inquiries to these two (2) questions for review:

- (1) does counsel for the Respondents, have a legal duty, to acquire consent from them, before counsel settles a civil matter? and
- (2) if so, if counsel obtained consent to settle prior civil cases against Respondents, did Respondents knowingly, and willingly, intend to deceive the Jury, and the Court, by stating under oath, that they had absolutely no knowledge thereof?

These two questions, are essential, to this Honorable Court, intervening, to correct such fraud as it deems just.

The controlling effect behind these questions are supported by the following criterion:

(A) *Reitzel v. Douglas*, 582 PA. 149, 870 A.2d 787 (PA.S.Ct. 2005) ("The law in Pennsylvania is clear and well settled that an attorney must have express authority in order to bind a client to

as a settlement agreement. ... As such, a clients attorney may not settle a case without the clients grant of express authority, and such express authority can only exist where the principal specifically grants the agent the authority to perform a certain task on the principals behalf.") State Law (B) Bressman v. Bressman, 874 F.3d 142 (3d Cir. 2017) ("... Rule 60(b) authorizes relief from a final judgment for fraud, misrepresentation, or misconduct, and for any other reason that justifies it" ... "The concept that the inherent power of federal courts to vacate a fraudulently obtained judgment, even years after the judgment was entered, has long been recognized by the United States Supreme Court.")

Your Petitioner has survived the Respondents' Motion to Dismiss and/or Motion for Summary Judgment, to which the great Honorable Mark A. Kearney ruled against, specifically stating that Petitioner has stated a plausible claim against them. With the aforesaid civil matter going before a Jury, and not Honorable Judge Kearney, people with little knowledge of "contract law" was deceived into believing that Respondents had absolutely no knowledge of Petitioners "settled" cases against them, which had taken away from the Jury's mind "malicious intent" to which ultimately undermined Petitioners "retaliation claims". This fraud opened doors to more misleading false and fraudulent representations that undermined Petitioners "due process claims".

Petitioners unfortunate incarceration deprives him of obtaining the proof to which is necessary to prove knowledge of his settled cases against the Respondents, such as:

(1) Court orders that directed the City Solicitors Office of Philadelphia, Pennsylvania to obtain authority from the Respondents prior to settling cases.

(A) 17-4262;

(B) 17-4263; and

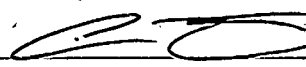
(C) 17-4266.

(2) the actual settlement agreements of these cases, that Respondents failed to present to Petitioner during discovery, with intent to use this non-disclosure, to their ability to commit fraud.

The aforementioned, is substantially more than enough to show intervening circumstances, of controlling effects, that make the merits, to Petitioners Petition for Rehearing, worthy of this Honorable Courts exercise of Supervisory Power.

WHEREFORE, Petitioner Charles Talbert, hereby respectfully requests that he receives a majority vote of the Justices and have his petition for rehearing of his petition for writ of certiorari be granted, and that it vacates the District Courts judgment that was made against him, and remand it back to the District Court for an Evidentiary Hearing to demonstrate knowledge of the aforesaid settled civil matters.

I hereby verify under penalty of perjury that the foregoing is true and correct. I furthermore certify that a true copy of this Petition was mailed to Jane Lovitch Istvan, Esq., counsel for Respondents this 8th day of June, 2020.

 Charles Talbert June 8, 2020