

19-8620

No. 19-7381

ORIGINAL

6:19-cv-01619-tmc

IN THE

SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

APR 06 2020

OFFICE OF THE CLERK

Ashley T. Prior — PETITIONER
(Your Name)

vs.
casett defendants in all in — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

U.S. COURT OF APPEALS
FOR THE 4TH CIRCUIT, RICHMOND, VA 23219
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Ashley T. Prior

(Your Name)

KIRKLAND CORR. INST.
4344 Broad River Rd.

(Address)

Columbia, S.C. 29210

(City, State, Zip Code)

None

(Phone Number)

RECEIVED

JUN - 3 2020

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SUPREME COURT, U.S.

QUESTION(S) PRESENTED

whether the lower court
erred in denying plaintiff relief?

LIST OF PARTIES

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

[] 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:

state of S.C.; BRYAN P. STIRLING;
JOHN B. MCCREE; SHERIFF OF COLUMBIA; JOHN
and JANE 1-10 DOES; SCDC KIRKLAND STAFF;
JAMES and JOHN 1-10 DOE; DHHC and SCDC
INVESTIGATORS OF HEALTH SERVICES; etc.

RELATED CASES

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TABLE OF AUTHORITIES CITED

CASES

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Slakan

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Redman v. County of San Diego, 1942
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cert denied, 112 S.Ct. 972 (1992; Anela
v. City of Wildwood, 790 F.2d at 1066-67;

Martin v. Ezedanu, 816 F.Supp. 20, 25

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(D.D.C. 1993).

Estelle v. Gamble, 429 U.S. at 1042

Ellis v. Butler, 890 F.2d 1001, 8th Cir. (1989);

Young v. Meeting Street Piggly Wiggly,

Court of Appeals of South Carolina, April 14,
1986, 288 S.C. 508, 343 S.E.2d 636.

OTHER

Slakan, 737 F.2d at 376; Spel v. pg 4

McDaniel, 59 F.Supp. 1090, 1109-10 (E.D.N.C.
1984).

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 _____; 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☒ is unpublished.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

☐ reported at _____; 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.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was 1-30-2020.

☒ 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: 1-22-2020, 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**: NO RUNAWAYS FROM STATE COURTS

The date on which the highest state court decided my case was _____.
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

STATEMENT OF THE CASE

The Plaintiff fell in the Kirkland CI cafeteria on 6-14-19 by wet floor. There was water on the floor and I busted my behind when fell until a hole is in Plaintiff knee and was injured in fact and no wet signs / slippery when wet was up.

REASONS FOR GRANTING THE PETITION

plaintiff had a hole in his knee and
painful upon the fall in the cafeteria at
KCI on 6-14-19 and pursuant to ~~the court~~
Ellis v. Butler, 890 F.2d 1001, 1003 (9th Cir.
1989) swollen painful must be considered
serious.

CONCLUSION

The petition for a writ of certiorari should be granted. *for injury in fact and argument within and caselaw.*

Respectfully submitted,

Ashley Price

Date: 4-6-2020