

**IN THE
SUPREME COURT OF THE UNITED STATES**

Shane Bruce

Petitioner

v.

Great Britain, *et al.*,

Respondents

On Petition for a Writ of Certiorari to the United States
Court of Appeals for the Sixth Circuit

BRIEF IN OPPOSITION

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**COUNTER-STATEMENT OF
THE QUESTION PRESENTED**

Did the United States District Court for the Eastern District of Tennessee, and a unanimous panel of the United States Sixth Court of Appeals, commit reversible error by concluding, in reliance on 28 U.S.C. § 1915(e)(2)(B)(ii), that the Petitioner's Complaint (and proposed Amended Complaint) failed to state a claim upon which relief could be granted?

STATEMENT OF THE CASE

It would be difficult to improve upon the Honorable Harry S. Mattice, Jr.’s description of the case. According to Judge Mattice’s Order of dismissal with prejudice, the Petitioner, Shane Bruce (“Bruce”),¹ filed this action alleging the 2010 Deepwater Horizon explosion and subsequent oil leak “affected” him. Bruce claims the Deepwater Horizon incident was a deliberate attack, orchestrated as part of an international conspiracy. This alleged conspiracy involved numerous conspirators, including, but not limited to local Tennessee healthcare providers, national medical associations — such as the American Medical Association (AMA) and the American Association of Poison Control Centers (AAPCC)—and even the highest levels of the American and British governments, including Her Majesty Queen Elizabeth II and United States Secretary of Defense, James “Mad Dog” Mattis. Although concrete details are sparse, Bruce further concludes that “genetically modified bacteria” released during the Deepwater Horizon incident caused him to suffer from arsenic poisoning and undergo “an unwilling genetic transformation,” which is something he discovered seven years after the Deepwater Horizon incident. Bruce, acting pro se, brought a slew of federal claims, ranging from the Anti-Terrorism Act (18 U.S.C. § 2333) to maritime law, state tort law claims, and even a claim pursuant to the English Magna Carta. He sought an award of “\$1,136,000,” which he believes is enough to: pay “several specialists” to monitor his health indefinitely, relocate to a “very hot

¹ Mr. Bruce proceeded at the district court level *in forma pauperis*. Petitioner’s Appendix C, p. 2.

climate” with a “higher cost of living,” build medically necessary “saunas,” and maintain “emotional support animals.”

Bruce appealed to the Sixth Circuit Court of Appeals. The Sixth Circuit panel rejected the request for oral argument. After a de novo review, the Court of Appeals affirmed the district court’s decision, finding Bruce failed to establish any error in the district court’s dismissal of his complaint under § 1915(e)(2)(B)(ii) or rejection of his motion to amend the bizarre complaint as futile. The Sixth Circuit Panel found that Bruce’s complaint and his proposed amendment failed to satisfy the most basic pleading requirements.

ARGUMENT

There is no compelling reason to grant this petition for writ of certiorari.

The dismissal of Bruce’s Complaint does not create a conflict with the decision of another U.S. Court of Appeals on any matter, nevertheless an important matter; the dismissal does not impact an important federal question in a way that conflicts with a decision by a state court of last resort; and the dismissal does not depart 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.²

Likewise, in affirming the district court’s dismissal of Bruce’s Complaint, a United States Court of Appeals did not decide an important question of federal law

² U.S. Supreme Court Rule 10(a).

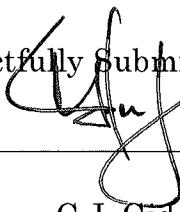
that has not been, but should be, settled by this Court, nor did it decide an important federal question in a way that conflicts with relevant decisions of this Court.

Instead, Mr. Bruce's fantastical petition simply confirms the accuracy of the decisions below. The district court dismissed Bruce's Complaint pursuant to 28 U.S.C. §1915(e)(2)(B), which requires the court to dismiss an *in forma pauperis* case "at any time" if it is determined that the action "fails to state a claim on which relief may be granted." Despite hundreds of pages of filings, Bruce never fashioned a recognizable claim. The "facts" Bruce alleges in this action are not entitled to an assumption of truth. The assertions against all Respondents are conclusory in nature, and do not put Respondents on notice of a viable claim. *Ashcroft v. Iqbal*, 556 U.S. 662, 680 (2009).

CONCLUSION

Respondents respectfully request that this Honorable court deny Petitioner's Petition for Writ of Certiorari.

Respectfully Submitted,


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CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT

1. I hereby certify that this document complies with the form and content requirements of Supreme Court Rule 33.1(h) because, excluding the parts of the document exempted by Supreme Court Rule 33.1(d), the document contains 632 words.

Respectfully submitted on July 23, 2020.



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