

March 2nd, 2020

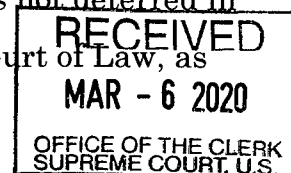
**MOTION TO DIRECT THE U.S. SUPREME COURT CLERK
TO FILE OUT OF TIME PETITION**

While acknowledging her inability to have complied with the 2/09/2020 extended deadline for submission of her Petition for Certiorari, No. 19A681, this petitioner asks the Clerk of Justice Brett Kavanaugh to consider her extenuating circumstances, the need for justice, not only for her son, but for those whom his situation mirrors, **and to accept her plea for an out-of-time filing of her Petition for Certiorari.**

Petitioner's son Michael represents many other pre-trial detainees who suffer from mental illness and who are indefinitely detained in Cook County Jail and in other jails across the country, in constant danger of being pushed into wrongful convictions because of the aggravation of their mental illnesses caused by lack of treatment and by their constant potential and actual abuse by some undeterred state actors who are shielded in their inhumane practices by their state power, instead of being called to justice and deterred from beating up and assaulting with excessive force potentially innocent persons:

"In 2013, 539 inmates of the Cook County Jail had been held for more than two years while awaiting trial and forty have been held for more than five years. See Thomas, Burke Criticizes Pretrial Jailing, Extending Stays, Chicago Daily Law Bulletin, Dec. 11, 2015. "Mr. Thomas Dart, the Director of the Cook County Jail, repeatedly sounded the alarm that more than 40% of the jail's detainees suffer from chronic mental illness." This alarming statistic should cause a reasonable person concern that these detainees are incarcerated instead of being treated for their mental illnesses, and even more disturbing is the fact that many of them might be incarcerated because of their mental illnesses.

Because the undeterred practice of assaults with excessive force was not deterred in the deepest jails' segregation holes, it burst open even within the Court of Law, as



in the petitioner's son's, Michael's case, when the same state actor who led Michael's assault with excessive force and then pressed false charges of aggravated battery against him, only to keep him indefinitely incarcerated without treatment for his blunt head trauma, especially after he filed this civil case in the District Court, *O'Connor v. Sheriff Wright*, No. 1-15-cv-08066, the same state actor had lashed out unto other victims also, as he did to Ms. Marsha Clay. See *Marsha Clay v. Deputy Wright*, 10-cv-2953, and then he pressed aggravated battery charges against his victims, confident that his superiors and colleagues, even the District Court, will cover up for him - See *Sheriff Wright v. Sheahan*, 046499, 04-C-5499 (2005). If these assaults can take place in a Court of Law, one can only but fear for those who are assaulted in the darkness of a deep underground segregation cell, as in the Segregation cells within Maximum Security of the Cook County Jail, where petitioner's son, Michael, was held while unconditionally detained without a trial for nearly eight years, indefinitely incarcerated without Bond for an *ab initio* facially unconstitutional charge of cyberstalking. His "blunt head trauma" in 11 sites had been caused by the sport of undeterred state actors "having fun", playing soccer with petitioner's son's head and brain, in the pre-trial detainees' waiting area of the Bond Court, in the George Leighton Criminal Courts Building, Room 100, on 5/09/2014, while, as directed, petitioner was waiting in the hallway, denying her hearing the screams behind the door (her son shouting for help).

Please forgive this petitioner's weakness for having failed to comply with the 2/09/2020 deadline, and thus failing her son again, when his mental health - aggravated by over three years lack of medical and psychiatric treatment - had been aggravated not just to schizophrenia (from a highly functional professional with bipolar), but it had become permanent organic brain damage, with a change of personality that makes it impossible for our family - who love him - to recognize him any longer. "They were kicking me as if I were a hog, but if I were a hog, they would have been afraid to hurt me like that" - Michael's statement about his

5/09/2014 Bond Court assault. Yet he has been mocked in his search for justice, denied access to the video of his assault (which is still kept hidden), he had been treated like trash, unworthy of the Court's time, "He's not getting any jury trial, he's just a nut case" (Michael's Attorney Stephen Richards' words), and perpetually reincarcerated even under the eyes of the same District Court who exonerated Sheriff Wright in *Valentina O'Connor, as Next Friend and Guardian of Michael W. O'Connor*, 1-15-0866, again, after the case, *Sheriff Wright v. Sheahan*, 046499, 04-C-5499 (2005), reinstating Sheriff Wright to his job with back pay, and absolving him of his accountability for assaulting innocent persons in the Courtroom, like Ms. Marsha Clay or like Michael W. O'Connor.

While guilty of not abiding with the deadline for submission, this petitioner had been and continues to be, living under extenuating and most stressful circumstances, because her son has been hospitalized since January 23, 2020, and he continues to be hospitalized in State of Illinois Mental Health facilities for his aggravated mental illnesses.

Yet the only hope for petitioner's son's justice is your kindness to allow our hope for the Justices to review the petition. Because Michael, a published writer since he was 10 years old, cannot write anymore, this petitioner was endowed with the responsibility which transcends her abilities to write in English, and in a language of the Law made difficult because she does not natively speak English, her writing in English is poor, and as she is trying in her old age, to understand the Law, to self-teach herself a crash and informal "Law 101 class" to cram as much as possible of the knowledge of the law - which she has never studied before - at the same time as witnessing her son's suffering. This is what made her task of submitting the petition in the timely manner, impossible.

But even if this petitioner is unworthy of latitude for her lateness, petitioner is convinced that her son Michael deserves your attentive compassion:

During his confinement, before his traumatic brain injury became chronic, he interviewed the detainees and wrote and shared with them their biographies in the worst deep underground segregation of the CCDOC - where he was detained for writing and posting in Craigslist and Facebook love poems for a young woman whom he genuinely loved and who, he believed, in his inability to conceive evil, that "she loves [him] very much" as he told the Cermak Cook County Jail Hospital psychiatrist Dr. Pitts who diagnosed Michael', based on this statement, with "delusional thinking".

Despite his delusional love and mental illnesses, Michael achieved in his 20 years of life what most people do not achieve until much later or never, in their life: he had earned 150 out of the 195 credits to graduate with a B.A. in Communications at De Paul University and, if it would not have been for the woman who mocked his love, posting in a text message to their acquaintances (intercepted by Attorney Shay T. Allen), "Mike didn't do anything to me, girl, I just wanna see his ass rot in jail", Michael would be a functional professional with bipolar young man, working for the Purina Dogfood Co., where he had secured a job during an interview with the company just a few weeks before he was arrested due to the young woman's father, who, upon information and belief, is a Cook County Jail Inspector, and his friend Officers of Orland Park police, under the guidance of an affiant prosecutor who declared him a "danger to society", and who "got mad" (Attorney Dalkin's words) when petitioner informed her office in 2012, that Michael suffers from bipolar disorder.

Please allow us to restore our hope that the injustice would be amended and that overcoming enormous fear would begin. Even the Attorneys we asked for help are seemingly afraid to take up Michael's case because of our local politics and unwritten practices. We ask that this be looked at by the brightest and most fair Justices to maintain hope for the most meek and most destitute that Justice is not buried forever. Please allow the cause of justice in the name of 'Just Mercy' and to serve a public interest of at least exposing a local practice - which by logical

inference – is not uncommon in places of where the mentally ill are segregated and incarcerated, “the canaries caught in the coal mines” of our nation’s less-attended-to-places of confinement (citing Justice Sonia Sotomayor citing J. Baldwin).

Petitioner appeals to your compassion for Michael, who read all Dostoevsky’s works in jail, and who understood humanity and its condition much deeper than most of us, when he explained to petitioner his “brothers” detainees’ conditions, that, “even if some of them committed horrible crimes, they are still human and need to tell their life stories, because no one ever asked them about their lives”. He read in jail Dante Alighieri’s “Inferno”, and chose as motto for his Life Stories, Dante’s Inscription on the entrance gate to Hell, “Leave any hope behind, you who enter here”. His testimony about the prisoners’ lives and suffering is worthy of your attention and of the United States Supreme Court Justices’ consideration, especially now, when, due to his inflicted and irremediable brain injuries followed by lack of treatment for over 3 years of unconstitutional incarceration, **Michael has lost his abilities to write and to tell his own life story.** Please allow this out-of-time petition for Michael. Petitioner is only a failed messenger of a brighter spirit of a once-gifted writer, more devoted to the cause of justice than petitioner will ever be able to be. In view of the above, petitioner implores you to forgive her weak representation of her son’s search for justice, and to grant her for her son the out-of-time submission of the Petition for Certiorari.

Gratefully and respectfully submitted,



Valentina O'Connor/for Michael W. O'Connor

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UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

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September 12, 2019

Before:

DIANE P. WOOD, *Chief Judge*

No. 19-1253	VALENTINA L. O'CONNOR, as next friend and guardian of Michael W. O'Connor, Plaintiff - Appellant v. ARTHUR WRIGHT, et al., Defendants - Appellees
Originating Case Information:	
District Court No: 1:15-cv-08066 Northern District of Illinois, Eastern Division District Judge Ruben Castillo	

The following is before the Court: **MOTION OF RENEWAL OF PLEA FOR DEADLINE EXTENSION - RESPONSE TO CHIEF JUDGE DIANE P. WOOD'S AUGUST 23, 2019 ORDER**, filed on September 9, 2019, by Pro Se Appellant Valentina L. O'Connor.

On August 2, 2019, this court granted appellant Valentina O'Connor's fourth request for a briefing extension, but warned that further extensions would not be allowed absent extraordinary circumstances. On August 23, this court denied O'Connor's fifth request for an extension and warned that failure to file an opening brief by September 9, 2019, would result in her appeal being dismissed for failure to prosecute. On September 9, O'Connor did not file a brief and instead moved for reconsideration of the August 23 order. Nothing in the current motion changes the court's earlier analysis or indicates that a temporary circumstance is preventing O'Connor from filing her brief. Accordingly,

IT IS ORDERED that the motion to reconsider is **DENIED** and this appeal is **DISMISSED** for failure to prosecute. See Cir. R. 31(c).

**Additional material
from this filing is
available in the
Clerk's Office.**