

No. **20-1387**

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

October Term, _____

Supreme Court, U.S.
FILED

MAR 25 2021

OFFICE OF THE CLERK

**Dr. Lakshmi Arunachalam,
Petitioner**

v.

**INTERNATIONAL BUSINESS MACHINES
CORPORATION,
SAP AMERICA, INC.,
JPMORGAN CHASE & CO.,
Respondents**

**On Petition for a Writ of Mandamus to the
United States Court of Appeals
For the Federal Circuit
Case No. 20-1493**

**EMERGENCY PETITION FOR
WRIT OF MANDAMUS**

Dr. Lakshmi Arunachalam
Self-Represented Petitioner
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March 25, 2021

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SUPREME COURT, U.S.

repudiating Government-issued patent grant contracts without just compensation to the inventor, as declared by Chief Justice Marshall in *Trustees of Dartmouth College v. Woodward* (1819), *Grant v. Raymond* (1832), *Fletcher v. Peck* (1810) — the Law of the Case.

My inventions are the backbone of the nation's economy, power national security and have enabled the nation to work remotely during COVID. Examples of my IoT machines are the millions of Web Apps in Apple's App Store in Apple's iPhone, in Google Play in Android devices, Web banking Web Apps, healthcare Web Apps, Fitbit, Zoom, Facebook, Twitter, social networking Web Apps, to name a few.

QUESTIONS PRESENTED

1. Whether denial of my fundamental right to protection provided by the law, denial of my rights to private property, personal security, health, reputation, and denial of access to the Court to seek redress for my rights, in violation of the 1st, 5th, 7th, 8th and 14th Amendments grounded in substantive Due Process, 42 U.S.C. § 1983, and 18 U.S.C. §§241, 245, 249, warrants this Court to provide the remedy long due to me, a disabled 73-year old female citizen of color.
2. Whether deprivation of rights of liberty, private property, and personal security (consisting of legal and uninterrupted enjoyment of life, limbs, body, health and reputation) of a disabled elder female

citizen of color, injured by direct denial of access to the courts by officers in breach of solemn oaths of office, and entitled to redress and a damages remedy for constitutional violations, warrants this Court hold those Corporations who conspired to injure and injured the citizen, liable for damages for constitutional violations grounded in Substantive Due Process of the 5th and 14th Amendments, Equal Protections of the Law Clause of the 14th Amendment, 42 U.S.C. § 1983, and 18 U.S.C. §§241, 245, 249, for their knowingly false and malicious destruction of the citizen's health, property and reputation, designed to hide their own misconduct.

3. Whether the Appellate Court entertaining an Answer on Appeal when the Defendants filed no Answer to the Complaint in the District Court, depriving me of my right to win by Default, violates the Equal Protection of the Laws Clause of the 14th Amendment.
4. Whether a reasonable person would find it abnormal for a court awarding \$148K in attorneys' fees to Defendants who failed to answer the Complaint and an Appellate court affirming it, and defaming the Plaintiff who won by default, pointing to something being hidden.
5. Whether defaming the Plaintiff in order to hide the failure to uphold the Supreme Law of the Land —

this Court's own *stare decisis* Mandated *Prohibition* from repudiating Government-issued patent grant contracts without just compensation to the inventor, as declared by Chief Justice Marshall in *Trustees of Dartmouth College v. Woodward* (1819), *Grant v. Raymond* (1832), *Fletcher v. Peck* (1810) — the Law of the Case, warrants this Supreme Court redress the injury to me by itself upholding *Trustees of Dartmouth College v. Woodward* (1819), *Grant v. Raymond* (1832), *Fletcher v. Peck* (1810), restoring my rights, reinstating my property, striking all Orders in my cases and awarding financial damages to remedy the injury to my property, finances, health and reputation.

6. Whether tampering with the record and denying access to the court upon the question of due process and oppressing me by defaming me and harassing me in hate crime to silence me to hide not upholding *Trustees of Dartmouth College v. Woodward* (1819), *Grant v. Raymond* (1832), *Fletcher v. Peck* (1810) – the Law of the Case and Law of the Land – is an acceptable standard for this Court to allow the inferior courts to aid and abet antitrust.

PREAMBLE

RES ACCIDENT LUMINA REBUS ***ONE THING THROWS LIGHT UPON OTHERS***

This is a Case, where the ONE THING is: there is NO Answer to my Complaint, NO Hearing, NO Trial, No Defendant, only an Order by a Judge, who voluntarily admitted to buying common stock in a Defendant, JPMorgan Chase & Co., dismissing my Case.

In my first Appeal Case 18-2105, the Federal Circuit did not find my fight for my constitutional rights and property rights sanctionable. The Federal Circuit denied Presidio Bank's Motion for sanctions against me for fighting for my constitutional rights and property rights in Case 19-1223 on 11/19/2019.

Respondents untimely moved for attorneys' fees two years after the case had been through the Supreme Court Case 19-5033, at the solicitation of the conflicted Judge, who granted the \$148K for no injury and for no Answer filed.

In my second Appeal Case 20-1493, the Federal Circuit affirmed, for the same facts, after frustrating the proceedings for 2 years and blocking me from their phones, email, and ECF filing, requiring me to get leave of court to file any papers, failed to docket my papers, struck my filings, altered the titles of my filings, lied that my valid credit cards did not work, made False Official Statements, called me names, ridiculed my disability. The Federal Circuit and Respondents committed twistifications of my 2 distinctly separate causes of action in Case 16-281-

RGA (D.Del.): (i) RICO for distribution of my code without payment or authorization, after signing Non-Disclosure Agreements with me in 1995; and (ii) patent infringement of one of my patents, and baselessly defamed me.

I have been denied the fundamental right to protection provided by the law, my right to private property, personal security, health, body, disability and reputation. I have been injured by the direct denial of access to the court upon the question of due process, in violation of the 1st, 5th, 7th, 8th and 14th Amendments. My 13 patented inventions of 1995 of the Internet of Things (IoT) — Web Apps displayed on a Web browser, were stolen and distributed by large Internet Corporations, after signing Non-Disclosure Agreements with me in 1995.

Any reasonable person would ask, why are they doing this to me, a 73-year old, disabled female citizen of color, a highly educated thought leader and visionary with pristine character and impeccable credentials and inventions that transformed the world? I have not had my day in court in over a 100 cases. Respondents and the Government unjustly enriched themselves by trillions of dollars by their continued, unlicensed use of my patents, and importing infringing products from China, hurting the domestic industry.

Why are they suppressing me to be silent? What are they hiding? The evidence they sought to deny has been material. All I asked is to do their ministerial duty and obey the Supreme Law of the Land — this Court's own *stare decisis Mandated Prohibition* from

**CERTIFICATE AS TO PARTIES, RULINGS,
AND RELATED CASES**

Pursuant to Supreme Court Rules, Self-Represented Petitioner Dr. Lakshmi Arunachalam makes the following certification:

(A) Parties.

Petitioner: Dr. Lakshmi Arunachalam

Respondents: International Business Machines
Corporation;

SAP America, Inc.;

JPMorgan Chase & Co.;

U.S. Court of Appeals for the Federal
Circuit.

(B) Ruling Under Review. The U.S. Court of Appeals for the Federal Circuit's Order dated 3/1/2021, affirming the lower Court's grant of \$148K to Respondents who were in Default and failed to answer the Complaint, and defaming me without an iota of evidence, when in my first Appeal Case 18-2105, the Federal Circuit did not find my fight for my constitutional rights and property rights sanctionable. The Federal Circuit denied Presidio Bank's Motion for sanctions against me for fighting for my constitutional rights and property rights in Case 19-1223 on 11/19/2019. I filed a combined petition for panel re-hearing and petition for *en banc* rehearing at the Federal Circuit on 3/11/2021, and a Motion to

Strike the Defamatory Orders ECF 63, 64 and 65, which the Federal Circuit has not docketed.

The Federal Circuit failed to grant me my protected rights to the benefits of the equal protection of the laws and freedom of speech and freedom to petition the Government for redress of grievance in violation of the 14th and 1st Amendments to the Constitution; oppressed me; injured my health, denying me my fundamental right to health and emergency medical care; and made it expensive, hazardous and burdensome for me to have access to the court and denied me a hearing, let alone a fair hearing and substantive and procedural due process on the question of due process itself, all in violation of the Constitutional provision. *See* ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141. With respect to Fundamental, Substantive, and Due Process Itself.

(C) Related Cases. Another Petition for Writ of Mandamus, Case No. 20-1145 is pending before this Court. This new emergency Petition for Writ of Mandamus is being filed, as I am the victim of hate crime and defamation.

Dated: March 25, 2021

Lakshmi Arunachalam

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SELF- REPRESENTED PETITIONER

RULE 29.6 STATEMENT

Pursuant to this Court's Rule 29.6, Dr. Lakshmi Arunachalam is an individual and has no parent company and no publicly held company owns 10% or more of its stock.

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EMERGENCY PETITION FOR A WRIT OF MANDAMUS

Petitioner Dr. Lakshmi Arunachalam, a 73-year old disabled ethnic female of color, thought leader and inventor of a dozen patents on the Internet of Things (IoT) – Web Apps displayed on a Web browser, with a priority date of 11/13/95, hereby files this Emergency Petition for a Writ of Mandamus to the Federal Circuit from its defamatory Orders dated, 3/1/21, and failure to docket Petitioner's Combined Petition for Panel Re-Hearing and Petition for *en banc* Rehearing, and Motion to Strike its Defamatory Orders ECF 63, 64 and 65, sent in by Petitioner on 3/11/21 and received by the Federal Circuit in a timely manner.

RELIEF SOUGHT

Petitioner respectfully requests that this Court order the U.S. Court of Appeals for the Federal Circuit to docket Petitioner's Combined Petition for Panel Re-Hearing and Petition for *en banc* Rehearing, and Motion to Strike its Defamatory Orders ECF 63, 64 and 65, and to grant me access to the courts to seek redress, restore my rights, reinstate my property, and do its ministerial duty to abide by their oaths of office to enforce the *Mandated Prohibition* declared in Supreme Court Precedents by Chief Justice Marshall and stop tampering with the public record and oppressing Petitioner and making her a victim of their violations of the law.

ISSUE PRESENTED

The courts and USPTO adversely dominated the process to prevent *Dartmouth College, Fletcher, et al*

Examinations of Petitioner's Patents Prove She Is Not "Frivolous" Or "Malicious."

See Appendix App. 5a.

3. The Chief Justice Marshall declared that Orders that impair the obligation of the contract within the meaning of the Constitution of the United States "are consequently unconstitutional and void."

Courts'/PTAB's rescinding act has the effect of an *ex post facto* law and forfeits Petitioner's estate "for a crime NOT committed by" her, "but by the Adjudicators" by their Orders which "unconstitutionally impaired" the contract with the inventor, which, "as in a conveyance of land, the court found a contract that the grant should not be revoked." All court Orders in Petitioner's cases violate the U.S. Constitution, inconsistent with the "faithful execution of the solemn promise made by the United States" with the inventor. See Appendix 5a Daniel Brune's *Amicus Curiae* Brief in Case 20-136. Chief Justice Marshall declared that war was actually levied under such circumstances in *U.S. v. Burr*, 25 F. Cas. 55, 161 (CCD, Va. No. 14693).

4. This Entire Case revolves around Avoiding Enforcing *Dartmouth College, Fletcher, et al* At All Costs. Why? — Because Enforcing It Exposes The Entire Patent System, Defrauding The Public, hurting inventors.

Courts have been demeaning and defaming Petitioner for no good reason and suppressing her to silence her

from exposing their culpability and have exhibited bias in a reckless manner.

5. Courts Cannot Determine That Petitioner's Action Was "Frivolous, Unreasonable, Or Without Foundation."

The courts have not proven bad faith or malice on Petitioner's part nor that any particular claim is frivolous, *nor can they.*

Judges' Orders of a false collateral estoppel without considering Patent Prosecution History and without applying *stare decisis* Supreme Court precedents are not legally sound and are *not* precedent. Cherrington v. Erie Ins. Property and Cas. Co., 75 S.E. 2d. 508, 513 (W. Va, 2013).

6. Special Circumstances Warrant Mandamus. Judges Did Not Find Actual Injury.

Courts made it unreasonably burdensome, downright dangerous, and expensive for Petitioner to have access to the Court on the question of due process itself. Defendants and the Government are unjustly enriched by trillions of dollars. Petitioner was injured by trillions of dollars in financial damages and personal injury to her health. Petitioner is the aggrieved party, entitled to damages, attorneys' fees, not the Defendants.

REASON WHY THE WRIT SHOULD ISSUE

Chief Justice Marshall declared a Government-issued "grant is a contract," and "The Law of this case is the law of all. ...is applicable to contracts of all descriptions...there is nothing for the court to act upon," save enforce the Constitution – the *Mandated Prohibition*, without impairing the obligation of contracts in accord with the Constitution.

In *TC Heartland LLC v. Kraft Foods Group Brands LLC*, 581 U.S. 16-341 (2017), 137 S. Ct. 1514, the Court ruled against the Federal Circuit not abiding by the Court's precedential rulings in *Fourco Glass Co. v. Transmirra Products Corp.*, 353 U.S. 222–226 (1957) for a century.

The Court must take Judicial Notice of its own *stare decisis* precedents in accord with the Contract Clause of the Constitution. Courts have been avoiding upholding the Law of the Land as declared by Chief Justice Marshall in *Dartmouth College, et al.* Why? To acknowledge *Dartmouth College* is to admit deceiving the public for decades in a collusive fraud between the Judiciary, USPTO, the Legislature and Corporate Infringers. So the courts manufactured a false reason, defaming Petitioner for falsely alleged “scandalous misconduct”, for the courts' own misconduct. The courts damaged Petitioner's pristine reputation and impeccable credentials.

II. Standard of Review

While, “[a] mandamus petitioner must demonstrate that its right to the writ is ‘clear and indisputable,’” *Fokker Servs.*, 818 F.3d at 749-750, “numerous decisions of the Supreme Court ... made clear that ... Mandamus serves as a check on ... ‘usurpation of judicial power.’ ...”. “The traditional use of the writ in aid of appellate jurisdiction ... has been to confine an inferior court to a lawful exercise of its prescribed jurisdiction or to compel it to exercise its authority when it is its duty to do so.” *Roche v. Evaporated Milk Ass'n*, 319 U.S. 21, 26 (1943).

While every mandamus petition must meet the familiar three-factor test, namely that (i) the petitioner has no adequate alternative remedy for obtaining the relief he desires; (ii) his right to relief is clear and indisputable; and (iii) he persuades the court that, in the exercise of its discretion, the writ is

appropriate under the circumstances, *Fokker Servs.*, 818 F.3d at 747, "[w]hen the writ of mandamus is sought from an appellate court to confine a trial court to a lawful exercise of its prescribed authority, the court should issue the writ almost as a matter of course." In *Re Reyes*, 814 F.2d 168, 170 (5th Cir. 1987). If there is "a threshold question concerning ... jurisdiction to review the district court's interlocutory order ... [this Court] first consider[s] whether the district court legally erred." *Fokker Servs.*, 818 F.3d at 740.

III. The Inferior Courts Legally Erred.

Binding Supreme Court and Federal Circuit precedents squarely foreclose the district and Circuit courts' determination by financially conflicted Judges (U.S. District Court Judge Andrews, PTAB Judges McNamara and Siu) to disparately deny Petitioner/Inventor her protected rights to the benefits of the Federal Circuit's *Arthrex* and *Virnetx* rulings that voided all PTAB rulings because the PTAB Administrative Patent Judges were appointed in violation of the Appointments Clause of the U.S. Constitution, U.S. Const., art. II, §2, cl. 2; the Federal Circuit's *Aqua Products*' ruling that reversed all court and PTAB rulings that did not consider "the entirety of the record" – Patent Prosecution History; the Supreme Court's *Festo Corp. v Shoketsu Kinzoku Kogyo Kabushiki Co.*, 535 U.S. 722 (2002) ruling that restrains the lower courts from disparately failing to consider Patent Prosecution History in Petitioner's cases; and the Supreme Court's *stare decisis* prohibition of the Constitution mandated by this Court against repudiating Government-issued contract grants of any kind — the Law of the Case and

the Supreme Law of the Land — declared by Chief Justice Marshall in *Fletcher v. Peck*, 10 U.S. 87 (1810), *Trustees of Dartmouth College v. Woodward*, 17 U.S. 518 (1819); *Ogden v. Saunders*, 25 U.S. 213 (1827); *Grant v. Raymond*, 31 U.S. 218 (1832); *U.S. v. American Bell Telephone Company*, 167 U.S. 224 (1897); and the courts continue in their persecution of the Petitioner/inventor in denying her substantive and procedural due process, denying her rights to a neutral judge, denying her property rights and constitutional rights, and making it expensive, hazardous and burdensome for her to have access to justice and to the courts on the question of due process itself all alike violate the Constitutional provision, ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141 and Petitioner is entitled to Constitutional Redress.

IV. This is the Rare Case Where Mandamus is warranted.

The Government misconduct by the Judiciary, the Agency (USPTO/PTAB) and Congress' unconstitutional America Invents Act violating the Appointments Clause of the U.S. Constitution, U.S. Const., art. II, §2, cl. 2., the Contract Clause and Separation of Powers Clause of the Constitution and *stare decisis* prohibition of the Constitution mandated by this Court against repudiating Government issued contract grants of any kind — the Law of the Case and the Supreme Law of the Land and suppressing material *prima facie* evidence — Patent Prosecution History that Petitioner's patent claims are neither invalid nor claim terms indefinite, provide a more-than sufficient basis for granting this Mandamus. An innocent Senior Citizen, single, disabled 73-year old female inventor of color of significant inventions of the

Internet of Things (IoT) — Web Apps displayed on a Web browser, that have enabled nation to function remotely during COVID, has been the target of elder abuse, fraud and obstruction of justice by financially conflicted Judges, who know that the Federal Circuit was created in 1982 to invalidate granted patents contrary to the *stare decisis* prohibition of the Constitution mandated by this Court against repudiating Government issued contract grants of any kind — the Law of the Case and the Supreme Law of the Land, the Contract Clause and Separation of Powers Clause of the Constitution. The egregious Government misconduct, and the decades-long abuse of elderly, disabled Petitioner, injuring her physical health, subjecting her to emotional duress, and theft of her intellectual property and patents by Corporate Infringers aided and abetted by the USPTO, Congress, clerks and financially conflicted Judges, cry out for ending this ordeal immediately and permanently.

The inferior Court's orders reveal their plan to obstruct justice in Petitioner's cases indefinitely, rubbing salt in Petitioner's open wound from the Government's misconduct and threatening her with sanctions and sanctioning her with cruel and unusual punishment, falsely dubbing her "frivolous and malicious" with all evidence pointing to the contrary, particularly for Dr. Arunachalam defending the Constitution and asking the Government, Congress, Judiciary and USPTO/PTAB to enforce the Constitution and the *Fletcher* Challenge.

Petitioner has no alternative avenue of relief, her right to relief is "clear and indisputable" and, in these extraordinary circumstances, issuance of the writ is

not just appropriate, it follows “as a matter of course.” In *Re Reyes*, 814 F.2d at 168. Petitioner’s cases require the courts to enforce the Constitution and the *stare decisis* prohibition of the Constitution mandated by this Court against repudiating Government issued contract grants of any kind — the Law of the Case and the Supreme Law of the Land, as declared by Chief Justice Marshall in *Fletcher v. Peck*, 10 U.S. 87 (1810), *Trustees of Dartmouth College v. Woodward*, 17 U.S. 518 (1819); *Ogden v. Saunders*, 25 U.S. 213 (1827); *Grant v. Raymond*, 31 U.S. 218 (1832); *U.S. v. American Bell Telephone Company*, 167 U.S. 224 (1897); and the Contract Clause and Separation of Powers Clause of the Constitution.

V. Petitioner’s Right to Relief is “Clear and Indisputable,” and She Has no Alternative Avenue of Relief.

Petitioner has already suffered an unimaginable ordeal at the hands of unscrupulous, lawless, financially conflicted Judges (Andrews, McNamara, Siu) who have failed to enforce the law of the Land, and a seven-year abuse of elderly, disabled female inventor Dr. Ms. Lakshmi Arunachalam, injuring her physical health, subjecting her to emotional duress, and theft of her intellectual property and patents by Corporate Infringers aided and abetted by the USPTO, Congress, judges, clerks and financially conflicted Judges. She has suffered from the defamation and libel by the courts and PTAB Judge McNamara and the Defendants and their attorneys engaged in unlawful Solicitations to Solicitees, the Judges, under color of privileged documents filed in Court. Petitioner has risked her life — financial ruin, and the mental anguish and physical injury caused by

clerks and financially conflicted Judges obstructing justice and hindering access to the court, for which she is entitled to Constitutional redress. All for no legitimate reason.

The failure to enforce *Fletcher* and *Dartmouth College* must end. Since the inferior courts refuse, Petitioner must ask this Court to order the inferior courts to comply with the controlling precedents of the Supreme Court and of the Federal Circuit. The Judiciary and USPTO/PTAB continuing in this fashion does not serve the interests of the public or the United States or inventors.

VI. Issuance of the Writ is Appropriate.

Petitioner, through no fault of her own, has been drawn into a nightmare of failure by the Courts to enforce the Law of the Land and this Court's *stare decisis* *Mandated Prohibition* from repudiating government issued patent contract grants. She has been subjected to deception, abuse, penury, obloquy, and humiliation. Having risked her life in service to her country and Constitution, she has found herself the target of elder abuse and obstruction of justice designed to strip her of her honor and savings, and to deprive her of her patent properties. She has been dragged through the mud and forced, through the artful withholding of information material *prima facie* evidence of Patent Prosecution History, crucial to the falsity of False Official Statements that falsely allege that her patent claims are indefinite and invalid. Equity demands an end to this nightmare and restoration of Petitioner's virgin patent properties and peace of mind.

This Court must put a swift end to this spectacle.

CONCLUSION

Wherefore, the Court must grant said mandamus.

Respectfully submitted, March 25, 2021

Lakshmi Arunachalam

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VERIFICATION

In accordance with 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

A handwritten signature in black ink that reads "Lakshmi Arunachalam". The script is cursive and fluid.

Dr. Lakshmi Arunachalam, a woman
Self-Represented Petitioner

Executed on March 25, 2021

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