

No. 20-1580

SUPREME COURT OF THE UNITED STATES

Shenglin R Chen / Chaohua Chen(mother and son)

*Petitioners*

vs.

Alvin Turner /Jeannette Turner(husband and wife)

*Respondents*

FILED  
MAR 11 2021  
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SUPREME COURT, U.S.

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

**PETITION FOR A WRIT OF CERTIORARI**

Plaintiffs /Respondents:  
Alvin TURNER  
Jeannette TURNER  
(Wrong party ,quit dated  
Jan 13 2020)

Petitioners:  
Shenglin R CHEN  
Chaohua CHEN  
slinechn@yahoo.com  
6207 Central Ave ,  
Capitol Heights MD 20743  
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## QUESTION PRESENTED

- \*Case type: Forest fire/\*
- In *Turner V. Chen* CAE1822460, Due the Court of Prince George County violation operations from wrong register, used wrong plaintiff name\*, Judge barred petitioners from entry any evidence or testimony in defense this complaint, ordered petitioners to pay wrong party' attorney fee, set this case up as unilateral hearing, forced blocked petitioners via EMS exit -the right of way entry owned house, misapplication the law of trespassing. The COSA/ COA(the United States Court of Appeals-Fourth Circuit dismissed petitioner' appeal, denied petitioners' Motion for remove the roadblocks from fire exit(denied :March 1. 2021)without hearing, one judge decided all, violated the < Bill of Rights> 1st 10 Amendments.

Question 1. Is freedom of speech protected by the First Amendment?

Question 2. Whether complied/ substantially complied the equal rights?

Question 3: Why is it Important to Keep Emergency Exits Clear?

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\*Respondents ALVIN TURNER sold 401 Yolanda Ave property to 401 Yolanda Ave LLC on Jun 11 .2018 public record dated on Jul 16 2018, this case filed on Jun 28.2018 with fraud(Exhibit C1-8), due the judge doesn't care about who , when ,what , where and how, Petitioners tried the best we can filed 38 motions to explain what's wrong with the case and all denied, till today have not correct, according to law ,the judge in COSA , COA should dismiss this complaint, because plaintiff Turner quit this case Jan 13.2020, and blocked petitioners' exit , there's no reason dismissed petitioners' appeal by tampered this case' basic fact /legal documents, knowingly made a false statement

\*\* On Jan 7-8 2020 'court days , Petitioners' 9 International witnesses ,3 high quality experts and more than 200 evidences not allowed show up , witnesses and experts have to canceled the tickets.

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E. Lower Court' Judgments were Inconsistent	
Conflict -- INTERLOCUTORY APPEAL Order dated: Dec 23.2019 docket # 062....	(infra, A-6)

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V. Order dated May 11.2020 dismissing order..... (Exhibit -*infra*, A-12)

**Process Conflict:** Order dated March 16.2020 -Scheduling Order..... (appendix index)

V. March 17.2020 (false ) changed within 24 hours .....

(No exhibit due this mail have never mail out , witness from mailwoman-*infra*, A-6)

**Conflict between Judge** V front desk' of COSA.....10 mails proofed the Conflict

**Fact and time' Conflict:** from 3days changed 32days by judge

(Certified mail # 70120470000242252716 www.informeddelivery.com *infra*,  
App.13-16 exhibit-see appendix

F. The Orders from the Fourth Circuit are attached *infra*, App.17-19

G. Statement of Jurisdiction .....appendix *infra* ,app.20

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## TABLE OF AUTHORITIES

### FEDERAL CASES

DOWNEY v. SHARP Vol., 2011 Supp.

§ 3–201 et seq. of the Courts and Judicial Proceedings Article. More specifically, the issue is whether the Court of Special Appeals erred when it vacated the award, overturned the arbitrator's denial of an easement, and directed that an easement by necessity be located over the petitioners' land.

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No. 19 Sept. Term, 2011. Decided: August 23, 2012

Bell, C.J., Harrell, Battaglia, Greene, Adkins, Barbera, and John N C. Eldridge (Retired, Specially Assigned), JJ

This case concerns an arbitration award under the Maryland Uniform Arbitration Act, Maryland Code (2006 Repl. Vol., 2011 Supp.),

<https://casetext.com>..... Dec, 2018

Firefighters were able to contain six large fires, two in California and one each in Alabama, ...

Flash flooding and debris flows near burn scars remain possible. ...

2020 (1/1/20-1/29/20), Fires: 1,098, Acres: 16,767.

U.S. federal fire and forest policy: emphasizing resilience in dry forests

## **DOCKETED CASES**

Mar 24, 2011 - David C. Lennhoff, MAI, SRA, AI-GRS, Darnestown, Maryland.

Mark R. Linné, MAI,

After a bench trial, the court awarded, the court reversed the opinion of the appellate court and ... The trial court granted the appraiser's motion for

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summary ... the easement's necessity is "so clear and absolute.

## **CONSTITUTIONAL PROVISIONS**

U.S. Constitution amendment ..... 1

## **FEDERAL STATUTES**

Real Estate Deed--Deeds.comwww.deeds.com › real-estate-deed.....

In short, when real estate is sold or given to someone, it is done with a deed.

Real Estate Law -Exit options.....

Maryland Transportation Section § 21-1003, .....

Fire Laws of Maryland §.....

U.S. federal fire and forest policy: emphasizing resilience in dry forests

## **PETITION FOR A WRIT OF CERTIORARI**

Petitioners *Chen* (mother and son), respectfully petition this Court for a writ of certiorari to review that unreasonable judgments from P.G County and fourth Circuit Court of Appeals rejecting appeals allegations of < Bill of Rights> the 1st 10 Amendment violations, racism and prejudice.

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## OPINIONS BELOW

The published opinion of the United States Court of Appeals for the Fourth Circuit and COSA dismissing petitions appeal is reported at <http://casesearch.courts.state.md.us/casesearch/inquiryDetail.jis?caseId=CAE1822460&loc=65&detailLoc=PGV> and is attached *infra*, App.

## STATEMENT OF JURISDICTION

The Fourth Circuit's issued its decision affirming the COSA's denial of a dismissing on Dec 28.2020. This petition is timely. This Court has jurisdiction under 28 U.S.C. § 1254(1). and 28 U.S.C. Section 1331 (federal question)

This case was an INTERLOCUTORY APPEAL , On Dec 31, 2019, Order to Proceed WO Pre Conf -ordered to transfer the case to COSA by Chief judge of COSA ( Exhibit I, Docket 062) .According to law , the lower court can not dismissing the case.

Petitioners are seeking review the decision of Maryland Court of Special Appeals, for which review was denied in the Maryland Court of Appeals.

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The 1st Amendment to the United states Constitution:"Freedom of religion, speech, press, assembly, and petition., the 5th Amendment:"Right to due process of law; " the 6th Amendment:"Rights of accused persons, e.g., right to a speedy and public trial;" the 7th Amendment:"Right of trial by jury in civil cases".14th Amendment <bill of rights>

Title 42, section 1983, of the United States Code: "Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or

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Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress."

## **STATEMENT OF THE FACT**

A. PETITIONERS BURNT OUT PROPERTY ..... EXHIBIT .A1-4

Petitioners owned a Single Family House located 6207 Central Ave, Capitol Heights MD ,20743 , this property' right of way is 75ft away to Yolanda Ave, more particularly described as the N 84°03'00" E, Parcel 84 11.550 SF, N 79° 33' 10",174.50 (Exhibit-property line and site plan from P.G county gov)

Petitioners have been accessible via the 10 ft 'exit ( lot 43 )the adjacent Yolanda Ave, It's an existing EMS gravel exit that used by utilities companies , petitioners, and EMS exit since 1978,it rebuild/repair by petitioners 6 years ago , petitioners have been maintenance it every year , it is 30' distance away from neighbor 401 Yolanda Ave LLC' front gates and fence. this is only exit to nearest public road of petitioners. , (Exhibits the deed 39981 and 41138 of 401 Yolanda Ave, Capitol Heights MD ,the evidence from land record of Circuit Court in P.G.

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County with stamp of the notary office---Legal description) , there's another easement owned by church about 1.5ft by .3 miles ' dirt path through a forest can walk/ bicycle to petitioners' house.

On Jan 2018, Because the respondent Mr. and Mrs. *Turner* \*\*\* want to purchase Petitioners *Chen* ' property ,after denied by *Chen* , respondent hired an attorney who have long term relationship with Judges in P.G County, their attorney said "two choose , one is sell 6207 property to my client *Turner* or you will lose much more than your house(Exhibit -the email of petitioners' ex-lawyer). first block your exit , then.... ".

On Jan 19.2018 Respondent Mr. *Turner* towed petitioners' 4 large gates from Petitioners *Chen* ' inside yard without notice and permit(Exhibit G1-G10) till today have not return it back.

On April 10, 2019 Petitioners' house suddenly caught a fire(crown fire) , fire department' trucks were unable to access that 1.5 ' by 0 .3 miles dirt road easement to petitioners' house, about 30 fire trucks and 100 firefighters went to the Yolanda Ave with petitioners' EMS exit enter 6207 property to provide critical relief to the raging fire on 6207 ' property(Fire case#19-04100000167) because the delayed, petitioners lost all property , left with nothing after the fire , hundreds of thousands

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of property turned into ashes in just a few hours, Mrs. Shenglin' mother passed away on August 16, 2019, Petitioner Mr.Chaohua (son) was in Med Star Washington Hospital Center Burn Center after receiving severe 2nd and 3rd degree burns on the hands and arms. has undergone extensive skin grafting surgery and still in the hospital (Exhibit C 1-7)

On Nov 1, 2019 , the Judge William Snoddy in P.G County barred petitioners from entering any evidence or testimony in defense of this complaint;( Docket 042), and set this case up as unilateral hearing, ordered that the petitioners are directed to pay the sum of Five Hundred Dollars (\$500.00) to respondent in attorney's fees (Docket 043, Exhibit B)

B. BLOCKED FIRE EXIT OF PETITIONERS'.....EXHIBIT.....B1-10

On Jan 10, 2020, the Judge of P.G. County John P ,Davey ordered Petitioners trespassed, without review the 401 deed. (third paragraph)

On Nov 23, 2019 , Petitioners filed an INTERLOCUTORY APPEAL to COSA.

On Dec 31, 2019, Order to Proceed WO Pre Conf -ordered to transfer the case to COSA within 60 d ( Exhibit I, Docket 062)

C. FAMILY BROKEN AND GO AHEAD NO WAY .....C1-3

On Jan 13,. 2020, the respondent forcible detainer petitioners exit ,set

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roadblock up on EMS exit, there's 2 telephone pole#: 828382-1461; 828382-1453 blocked by respondent too. (E. 3) , Petitioners No power , water, and gas; mailman can't direct deliver mails ,the WSSC, Pepco. Verizon staff find no way in . Petitioners family broken and desperate , go ahead no way!

On Feb,21 2020 Petitioners' case moved to COSA by the order on Dec 31, 2019 '(Exhibit )

On March 16, 2020 Petitioners got a Scheduling order , scheduled court day around Dec 1-10 2020( Exhibit A);

On May 11,2020 this case immediate dismissed for failure to respond March 17, 2020 Order to Show Cause.( Exhibit F-Docket #077)

Due March 17, 2020 no mail come from COSA -(Witness from the mailwoman in 6089 Central Ave ,Capitol Heights, Post Office, 20743)

On May 15.2020 Petitioners proofed the mistake and asked the court double check, correct ,reconsider (Exhibit D within 3 days- attached the receipt of Certified mail and online checked the delivered information).

Petitioners filed " Motion for remove the roadblock from Petitioners' fire road "over 10 times , the first motion filed within 3 days by Certified mail( see the evidence) following the entry order of dismissal , second motion filed dated May 28 , then Jun 12, July 10, Aug 30 , Oct 2.2020. last one filed check# 1447 on Jan 10 2021and denied by Mar 1 .2021.

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Petitioners have no delayed , why 3 days became 32 days ,(May 15.2020 to Jun 17.2020 ), but the judge can't changed the stamp on the paper and post office delivered information ,the COSA front desk clerk' mails can proof , there's 10 records from the front clerk and judge inner conflicted included :legal procedure, legal docs, procedure fact are wrong. ( Exhibit C)

From May 11 2020 to now, Petitioners asked the COURT "Where is the March 17 ,2020 's dismissal come from ? Who made it ? why petitioner can't have a copy ?

During the 3 years, judgments disorder ,inside programming are conflict with each other , order sent out then invalid within 1 days .

### **REASONS FOR GRANTING THE WRIT OF CERTIORARI**

#### **A.THE FOURTH CIRCUIT DECISION HAS INVALIDATED FDERAL LAW**

This case have 108 violation operations, the Fourth Circuit ' decision has invalidated ten federal law(Federal Fire Prevention and Control Act, Real Estate Law, Traffic Laws-road symbol signs - FHWA MUTCD etc.)

#### **B.INVOLING A SPLIT DECISION INSIDE COURT**

This case involving a split decision in COSA(Exhibit 7-10) contradictory judgments , with wrong reason, time and fact , there's question of law, procedure incorrect.

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*\*\*there's a dirt road 1.5' by .3 miles easement owned by church with forest can walk to Petitioners property ,no wide enough for vehicle or fire trucks in*

*\*\*\* Turner is ex-owner of 401 Yolanda Ave , Capitol Heights MD 20743 , He sold his house on Jul 16.2018.*

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Petitioners did everything by lower court requested ,waiting for long time Petitioner mailed all documents to Respondent /ex-counsel (Exhibit G), by lower courts' requested, since Respondent *Turner* sold the property to 401 Yolanda Ave LLC, quit this case on Jan 13 .2020 , According to law, Petitioners have the rights to win the case .this is only exit for Petitioners', without the exit ,petitioners can't live with. and 401 Yolanda Ave LLC. have 3 exits to public road (Yolanda Ave, Elder St. Hanlon St. Exhibit- attached the Map of public road in this area)

As property taxpayer have raised legal challenges for blocked EMS exit to the owned house from court, First, the lower courts have treated petitioner as a shield, protecting state execution illegal protocols against any challenge.

This has enabled the states to engage in unconstrained judgments , changed this case basic fact 5 W by judge, heedless of evidence, no allowed petitioners' say or show anything, no witness ,and without any need to show that the truth whether is in the service of creating more humane trial.

Second, the lower courts have simultaneously treated petitioner-as a sword, knocking down challenges to the order's unconstitutionality whenever the state claims it cannot obtain any other exit, without any hearing inquiry into the

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constitutionality of the chosen formula.

Well know, the fire department have been noticed to everyone in this area with sign on each corner ---- 24 hours open this emergency exit, if there' s an ambulance /the.3 miles' forest fire ,gas, electric explode, the entire area will be speedily covered with fire.

In 2019, local fire departments responded to an estimated 1.3 million fires. These fires caused roughly 3,700 civilian fire deaths and 16,600 reported civilian fire injuries. Property damage was estimated at \$14.8 billion.

by reviewing Court in order to resolve a circuit split decision. the result of this design is a Court that prioritizes case selections that will enable them to enforce the uniformity of federal law throughout the country. this Court should take the opportunity this case presents to resolve the conflict .

Petitioners' burnt out house needs to repair and rebuilding , the mildew-growing everywhere, dirty water cause lot deer died inside forest . the utilities services find no way in , mails can't direct deliver ,electricity, water and gas needs to repair and rebuild, contractors unable to move the building materials in ,

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petitioners ' life situation are more worse than jail.

C. THIS COURT WILL PROVIDE URGENTLY NEEDED GUIDANCE

By granting review in this case, this Court will provide urgently needed guidance, both to local judges seeking safety exit to challenge the states' shook off the taint of corruption , and to the courts charged with reviewing such claims. Rulings without fact evidence, malicious abuse of , process obstruction of justice, falsifying court documents case will be go low.

D. KEEP FIRE EXITS CLEARAND AND SAVE PEOPLEOUT OF THE FIRE

All over the world, Nobody have the rights to block an emergency exit,. especial after fire. from ancient times to the present , never heard about trespassing for used a fire exit, most time the government will try any way to save people, fireman / rescue team went all out to save the people out of the fire, Petitioners strongly believe in and respect the U.S. of American Judicial system.

Forest fire can happen anytime again, reducing fire risk is more important than helped fire crews get a jump on the blaze. the lower court ' order unconstitutional is an issue of national importance.

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An emergency exit is a clear, safe way to get out of a building. It provides fast exit in case of emergency, keeping exit passageways clear of obstacles enables people to exit a building more quickly and safely. that's the reason why must be keep emergency exits clear.

## CONCLUSION

Hopefully this court review and reconsider this case , allow petitioners, witness show the fact and irrefutable evidences, save people from fire and water, remove roadblocks from the fire exit ASAP. For the reasons stated in the Petition ,this Court should grant the writ of certiorari and, on review, reverse the decision of the Court of Appeals for the fourth Circuit.

Respectfully submitted:

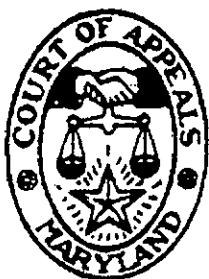
Mar 10 2021

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March 9, 2021

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Chief Deputy  
  
Marie Y. Randall  
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Kisha Taylor-Wallace  
Allison Gray  
Deputies

Sara Rice  
Senior Recorder

Sandra Belt  
Administrative Support

Shenglin Chen  
Chaochuä Chen  
6207 Old Central Ave.  
Capitol Heights, MD 20743

Re: Shenglin R. Chen, et al v. Alvin Turner, et al  
Petition Docket No. 325, September Term, 2020

Dear Petitioners:

I am in receipt of your "EMS for Motion for reconsideration Petitioners' motion for remove roadblocks of the fire exit," dated February 26, 2021, in the above-captioned case.

Please be advised your petition for writ of certiorari was dismissed on December 21, 2020, your motion for reconsideration was denied on March 1, 2021, and your case in this Court is closed.

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Sincerely,



Suzanne C. Johnson  
Clerk

SCJ:rls

a.

TTY FOR DEAF: 410-260-1554