

05/10/21  
MD

No. 20-1601

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**In The  
Supreme Court of the United States**

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THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, SERVANT:  
XIU JIAN SUN, THE SPIRITUAL ADAM  
Petitioner,

v.

Pharisees: DAVID B. COHEN, DAVID FRIEDMAN,  
JUDITH J. GISCHE, BARBARA R. KAPNICK, TROY K.  
WEBBER, ELLEN GESMER, SUSANNA MOLINA  
ROJAS, MARCY L. KAHN, CYNTHIA S. KERN,  
DONNA M. MILLS, ROSALYN H. RICHTER, PETER  
TOM, JEFFREY K. OING, PETER H. MOULTON,  
JOAN MADDEN, LIZBETH GONZÁLEZ, MARTIN  
SHULMAN, NANCY M. BANNON, BARBARA JAFFE,  
Respondents.

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**On Petition for Writ of Certiorari to the United  
States Court of Appeals for the Second Circuit**

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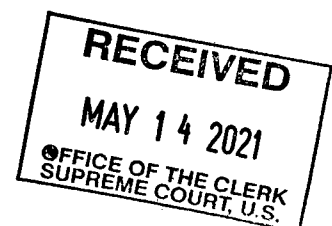
**BRIEF FOR PETITIONER**

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The Church of Jesus Christ of Latter-day saints  
Servant: Xiu Jian Sun, the spiritual Adam  
54-25 153rd St., Flushing, NY 11355  
646-675-0308

Counsel for Petitioner

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## QUESTION(S) PRESENTED

The complaint of the plaintiff, -god's servant, Xiu Jian Sun, the spiritual Adam respectfully shows and alleges as follows

1. To fulfill Jehovah, - the Lord god of Hosts, god sent the messenger said: "**Pharisees don't even open the door**".
2. A Book of Doctrine and Covenants Section 101
  - 81). Now, unto what shall I liken the children of Zion? I will liken them unto the parable of the woman and the unjust **judge**, for men ought always to pray and not to faint, which saith—
  - 82). There was in a city a **judge** which feared not God, neither regarded man.
  - 83). And there was a widow in that city, and she came unto him, saying: Avenge me of mine adversary.
  - 84). And he would not for a while, but afterward he said within himself: Though I fear not God, nor regard man, yet because this widow troubleth me I will avenge her, lest by her continual coming she weary me.
  - 85). Thus will I liken the children of Zion.

- 86). Let them importune at the feet of the judge;
- 87). And if he heed them not, let them importune at the feet of the governor;
- 88). And if the governor heed them not, let them importune at the feet of the president;
3. Jehovah, - the Lord god of host gives the words to servant (Plaintiff) in the temple he made, **"Trial with god's law. Apply for jury to prevent insult and unfair behavior."**

## LIST OF PARTIES

### **Petitioners:**

The Church of Jesus Christ of Latter-day saints

Servant: Xiu Jian Sun, the spiritual Adam

### **Respondents:**

#### **Pharisees:**

David B. Cohen, David Friedman, Judith J. Gische,  
Barbara R. Kapnick, Troy K. Webber, Ellen Gesmer,  
Susanna Molina Rojas, Marcy L. Kahn, Cynthia S.  
Kern, Donna M. Mills, Rosalyn H. Richter, Peter Tom,  
Jeffrey K. Oing, Peter H. Moulton, Joan Madden,  
Lizbeth González, Martin Shulman, Nancy M. Bannon,  
Barbara Jaffe,

**Apply for a Mandarin  
Chinese interpreter**

Clerk's Office:

I (Servant) Petitioner would like to request a  
Mandarin Chinese court interpreter for my appeal  
court day.

Thank you.

The Church of Jesus Christ of Latter-day saints

Servant:

Xiu Jian Sun, the spiritual Adam

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United States Court of Appeals for the Second Circuit: 21-435	
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**JURISDICTION**

**MANDATE**

Case 21-435, Document 18, 04/13/2021, 3075905,  
Page 1 of 1

**UNITED STATES COURT OF APPEALS FOR  
THE SECOND CIRCUIT**

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At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 24<sup>th</sup> day of February, two thousand and twenty-one,

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Xiu Jian Sun, The Church of Jesus  
Christ of Latter-Day Saints, Saints,  
The Spiritual Adam,

Petitioners, **ORDER**

v.

Docket No. 21-435

David B. Cohen, David Friedman,  
Judith J. Gische, Barbara R. Kapnick,  
Troy K. Webber, Ellen Gesmer,  
Susanna Molina Rojas, Marcy L.  
Kahn, Cynthia S. Kern, Donna M.  
Mills, Rosalyn H. Richter, Peter Tom,  
Jeffrey K. Oing, Peter H. Moulton,

Joan Madden, Lizbeth Gonzalez,  
Martin Shulman, Nancy M. Bannon,  
Barbara Jaffe,

Respondents.

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On December 17, 2021 this Court entered an order in Sun v. Dillon, 16-3557 requiring appellant to file a motion seeking leave of this Court prior to filing any future appeals.

A notice of appeal in the above referenced case was filed. The Court has no record that appellant sought the Court's permission to appeal prior to filing the notice of appeal.

IT IS HEREBY ORDERED that this case is dismissed effective March 17, 2021 unless a motion seeking leave of this Court is filed by that date.

For The Court:

Catherine O'Hagan Wolfe,

Clerk of Court

Catherine O'Hagan Wolfe

A True Copy

Catherine O' Hagan Wolfe Clerk

United States Court of Appeals, Second Circuit

Catherine O'Hagan Wolfe

**MANDATE ISSUED ON 04/13/2021**



## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

### 1. The Doctrine and Covenants Section 20

Revelation on Church organization and government, given through Joseph Smith the Prophet, at or near Fayette, New York. Portions of this revelation may have been given as early as summer 1829. The complete revelation, known at the time as the Articles and Covenants, was likely recorded soon after April 6, 1830 (the day the Church was organized). The Prophet wrote, "We obtained of Him [Jesus Christ] the following, by the spirit of prophecy and revelation; which not only gave us much information, but also pointed out to us the precise day upon which, according to His will and commandment, we should proceed to organize His Church once more here upon the earth."

- 1). The rise of the Church of Christ in these last days, being one thousand eight hundred and thirty years since the coming of our Lord and Savior Jesus Christ in the flesh, it being regularly organized and established agreeable to the laws of our country, by the will and commandments of God, in the fourth month, and on the sixth day of the month which is called April—

### 2. The Doctrine and Covenants Section 42

- 83). And thus ye shall do in all cases which shall come

before you.

84). And if a man or woman shall rob, he or she shall be delivered up unto the law of the land.

85). And if he or she shall steal, he or she shall be delivered up unto the law of the land.

86). And if he or she shall lie, he or she shall be delivered up unto the law of the land.

87). And if he or she do any manner of iniquity, he or she shall be delivered up unto the law, even that of God.

88). And if thy brother or sister offend thee, thou shalt take him or her between him or her and thee alone; and if he or she confess thou shalt be reconciled.

89). And if he or she confess not thou shalt deliver him or her up unto the church, not to the members, but to the elders. And it shall be done in a meeting, and that not before the world.

90). And if thy brother or sister offend many, he or she shall be chastened before many.

91). And if any one offend openly, he or she shall be rebuked openly, that he or she may be ashamed. And if he or she confess not, he or she shall be delivered up unto the law of God.

## STATEMENT OF THE CASE

1. The Lord god Jehovah sent the messenger, said to spiritual Adam through the angel, '**unjust judge.**'
2. Jehovah, the Lord god of host, sent the son of god, (the revived Messiah) from God's temple gave words to servant, said:' **Pharisees<sup>1</sup> not even move his one finger.**" <sup>2</sup>(法利赛的人一个手指头都不动)

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1 Civil Docket for Case #: 1:16-cv-01083- ENV-CLP, Court of Appeals Docket #: 16-950.

2 Civil Docket for Case #: 1:17-cv-1861-JDB, Court of Appeals Docket #:18-5313.  
USCADC No. 18-5313

## REASONS FOR GRANTING THE WRIT

After ruling by the Small Claim Court, these are the works given by Israeli God from Lord's temple, "The civil magistrate should restrain crime, but never control conscience, should punish guilt, but never suppress the freedom of the soul." (政府长官应该制止罪行, 但绝不可控制良心; 应该惩罚罪恶, 但绝不可压制灵魂的自由)

## CONCLUSION

The Doctrine and Covenants Section 42

92. If any shall offend in secret, he or she shall be rebuked in secret, that he or she may have opportunity to confess in secret to him or her whom he or she has offended, and to God, that the church may not speak reproachfully of him or her.
93. And thus shall ye conduct in all things.

Dated: Queens, New York  
May 10, 2021

The Church of Jesus Christ of Latter-day saints

Servant:

Xiu Jian Sun, the spiritual Adam  
54-25 153<sup>rd</sup> St.,  
Flushing, NY 11355  
(646) 675-0308  
Plaintiffs