

20-1638

No. 20-\_\_\_\_\_

In the  
Supreme Court of the United States

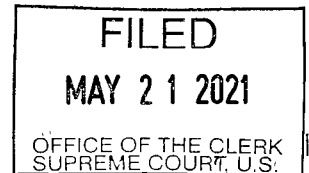
EMMANUEL EDOKOBI,

*Petitioner,*

v.

JUDGE PAUL W. GRIMM,

*Respondent.*



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

PETITION FOR A WRIT OF CERTIORARI

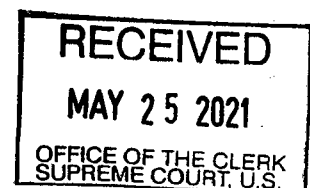
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MAY 21, 2021

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## QUESTIONS PRESENTED

When Reviewing a District Court's ruling to dismiss a civil case against Respondent Judge Paul W. Grimm should the Court of Appeals dishonor its own Unpublished Opinion Entered on March 3, 3015 In the previous civil case that, involves Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014.

### THE QUESTIONS PRESENTED ARE:

1. Whether the Fourth Circuit erred when, it dismissed Petitioner's appeal in dishonor to its own Unpublished Opinion Entered on March 3, 3015 regarding Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 for the proposed imposition of pre-filing injunction against Petitioner.

2. Whether the Fourth Circuit erred when, it dismissed Petitioner's appeal without considering Respondent Judge Paul W. Grimm's blatant violation of due process clause regarding Respondent Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER Entered on December 3, 2014 for the proposed imposition of pre-filing injunction against Petitioner.

3. Whether the Fourth Circuit erred when, it dismissed Petitioner's appeal without considering Respondent Judge Paul W. Grimm's blatant abuse of discretion regarding Judge Paul Grimm Refusal to Complete His LETTER ORDER Entered on December 3, 2014 for the proposed imposition of pre-filing injunction against Petitioner.

4. Whether the Fourth Circuit erred when, it dismissed Petitioner's appeal without considering Respondent Judge Paul W. Grimm's blatant disobedience to the Fourth Circuit Court's Unpublished Opinion Entered on March 3, 3015 regarding Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 3014 for the proposed imposition of pre-filing injunction against Petitioner.

5. Whether the Fourth Circuit erred when, it dismissed Petitioner's appeal without considering Respondent Judge Paul W. Grimm's blatant abuse of discretion regarding Judge Paul Grimm Refusal to Rescue himself from hearing Petitioner's Civil Case No. 8:19-Cv-00248-PWG And Civil Case No. 8:19-CV-01071-PWG.

## LIST OF PROCEEDINGS

### 2019-2021 PROCEEDINGS

United States Court of Appeals for the Fourth Circuit

No. 20-1271

*Emmanuel Edokobi Plaintiff-Appellant v. Judge Paul W. Grimm, Defendants-Appellee*

Date of Final Opinion: February 25, 2021

United States District Court for the District of  
Maryland Southern Division

No. GJH-19-905

*Emmanuel Edokobi Plaintiff v. Judge Paul W. Grimm, in his individual and official capacities Defendant*

Date of Final Opinion: March 4, 2020

Date of Final Order: March 5, 2020

### 2014-2015 PROCEEDINGS

United States Court of Appeals for the Fourth Circuit

No. 14-2204

*Emmanuel Edokobi Plaintiff-Appellant v. M & M Mortgage Services, Inc.; Juan Gonzalez; Mortgage Specialist, Inc., Defendants-Appellees*

Date of Final Opinion: March 19, 2015

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## PETITION FOR WRIT OF CERTIORARI

Petitioner Emmanuel Edokobi respectfully petition for writ of certiorari to review the judgment of the United States Court of Appeals for the Fourth Circuit.



## OPINIONS BELOW

The Fourth Circuit's unpublished per curiam opinion to dismiss Petitioner's Appeal entered on February 25, 2021 is included in the Appendix ("App.") at 1a.

The United States District Court Judge George J. Hazel's Memorandum Opinion Ruling in Granting Judge Paul W. Grimm's Motion for Summary Judgment entered March 5, 2020 is included at App.29a.

The United States District Court Judge George J. Hazel's Order in Denying Petitioner's Motion for Removal of Judge Grimm entered March 4, 2020 is included at App.3a.



## JURISDICTION

This Court has jurisdiction over this case under 28 U.S.C. § 1254(1). The Fourth Circuit issued its unpublished per curiam opinion and judgment entered on February 25, 2021. (App.1a)



## CONSTITUTIONAL PROVISIONS INVOLVED

### U.S. Const., amend. V

The DUE PROCESS CLAUSE of the Fifth Amendment asserts that no person shall "be deprived of life, liberty, or property, without due process of law".

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

### U.S. Const., amend. VIII

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

### U.S. Const., amend. XIV

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or 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, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was-unavailable.



## INTRODUCTION

Petitioner asserts that on December 3, 2014 Respondent Judge Paul W. Grimm issued a LETTER ORDER of imposition of pre-filing injunction against Petitioner "LETTER ORDER" Entered on December 3, 2014 for Civil Action Re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG with the United States Court of Appeals for the Fourth Circuit Appeal No. 14-2204. A true and accurate copy of Respondent Judge Paul W. Grimm's LETTER ORDER of imposition of pre-filing injunction against Petitioner is herein *Marked Petitioner's Exhibit Number 1*.

Petitioner asserts that, this civil action was filed under 42 U.S.C. 1983 and 8th Amendment Act and under due process and equal protection clauses of 5th and 14th Amendments to the United States constitutions against Respondent Judge Paul W. Grimm because Respondent Judge Grimm Has Refused to Issue a Final Order on the Proposed Imposition of Pre-Filing Injunction Against Petitioner as contained in Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 in (ECF No. 15)

of the Civil Case 8:13-cv-03707-PWG. (*See* Exhibit No. 1).

Petitioner asserts that, this civil action was filed under § 1 of The Civil Rights Act of 1871, as amended, 42 U.S.C. § 1983, against Respondent Judge Paul W. Grimm for committing acts, under color of law, with the intent and for the purpose of depriving Petitioner of his rights secured under the constitution and laws of the United States of America by Respondent Judge Paul W. Grimm's Refusal to Issue a Final Order on the Proposed Imposition of Pre-Filing Injunction Against Petitioner as contained in the Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 in (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG. (*See* Exhibit Number 1).

Petitioner asserts that, this civil action is a civil rights case which involves seeking redress for the violation of a person's constitutional rights. This type of claim is often brought under the Federal Statute, 42 U.S.C. § 1983. Under this law, a person who acts under color of state law to violate another's constitutional rights may be liable for damages.

Petitioner asserts that, Respondent Judge Paul W. Grimm acted under color of law to violate Petitioner's constitutional rights by Respondent Judge Paul W. Grimm's Refusal to Issue a Final Order on the Proposed Imposition of Pre-Filing Injunction Against Petitioner as contained in the Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 in (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG. (*See* Exhibit Number 1).

Petitioner asserts that, this civil action was filed to address Respondent Judge Paul W. Grimm's violation



of the Eighth Amendment by Inflicting Cruel and Unusual Punishments Upon Petitioner with the Respondent Judge Paul W. Grimm's LETTER ORDER which Respondent Judge Paul W. Grimm has Refused to Issue a Final Order on the Proposed Imposition of Pre-Filing Injunction Against Petitioner as contained in the Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 in (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG. (*See* Exhibit Number 1).

Petitioner asserts that, this Civil Action was filed On February 25, 2019 against Respondent Judge Paul W. Grimm because, Respondent Judge Paul W. Grimm's action of failure to complete his LETTER ORDER Entered since December 3, 2014, was committed under color of law with the intent and for the purpose of depriving Petitioner's constitutional right to Fifth Amendment (Amendment V) to the United States Constitution, which is part of the Bill of Rights, Ratified In 1791 and that Respondent Judge Paul W. Grimm has continued to Refuse to Provide Final Order on the Proposed Imposition of Pre-Filing Injunction Against Petitioner as contained in the Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 in (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG.

The Judge Grimm's LETTER ORDER Provides Hereunder As Follows:

December 3, 2014

*RE: Edokobi v. M & M Mortgage Services Inc.*  
PWG-13-3707

**LETTER ORDER**

1. "With regard to my October 22, 2014 dismissal of Plaintiff Emmanuel Edokobi's claims with prejudice and denial of Plaintiff's Motion to Enter Default Judgment as moot, ECF No. 19, Plaintiff has filed an "Opposition Motion to Court Order Granting Defendants' Motion to Dismiss Plaintiff's Complaint and Opposition to Court Proposed Imposition of Pre-Filing Injunction and Opposition to Court Order Dismissing Plaintiff's Motion for Default Judgment Against MSI," and sought "New Trial of Civil Action No. 8:13-CV-03707-PWG." ECF No. 22. Plaintiff also filed a Notice of Appeal of the October 22, 2014 Order to the Fourth Circuit. ECF No. 20. Insofar as Plaintiff asks me to reconsider the October 22, 2014 Order, Plaintiff's Notice of Appeal divested this Court of jurisdiction to consider his motion. *See Griggs v. Provident Discount Co.*, 459 U.S. 56, 58 (1982); *Panowicz v. Hancock*, No. DKC-11-2417, 2013 WL 5442959, at \*2 (D. Md. Sept. 27, 2013) (citing Griggs). Additionally, I will not take further action regarding the pre-filing injunction until the Fourth Circuit has issued its ruling". (*See Edokobi v. M & M Mortg. Servs., Inc.*, No. 8:13-cv-03707-PWG (D. Md. Oct. 22, 2014)).

/s/ Paul W. Grimm  
United States District Judge



### STATEMENT OF THE CASE

Petitioner asserts that on December 3, 2014 Respondent Judge Paul W. Grimm issued a LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner "LETTER ORDER" Entered on December 3, 2014 in the Civil Action RE: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG with the United States Court of Appeals for the Fourth Circuit Appeal No. 14-2204. (See Petitioner's Exhibit Number 1).

Petitioner asserts that on February 25, 2019 Petitioner filed a Civil Case Number 463628V against Respondent Judge Paul W. Grimm at the Circuit Court for Montgomery County Maryland Because Respondent Judge Paul W. Grimm's Failure to Complete His LETTER ORDER which Respondent Judge Paul W. Grimm Issued on December 3, 2014. A true and accurate copy of Petitioner's Bill Complaint filed against Respondent Judge Paul W. Grimm on February 25, 2019 is herein Marked Petitioner's Exhibit Number 2.

Petitioner asserts that on March 27, 2019 Petitioner's Civil Case Number 463628V was removed from the Circuit Court for Montgomery County Maryland by Respondent Judge Paul W. Grimm to the United States District for the District of Maryland at Greenbelt and the Civil Case was given a different Case Number Civil Case No. 8:19-cv-00905-GJH and the Civil Case was assigned to Honorable Judge George Jarrod Hazel.

Petitioner asserts that, on March 4, 2020 Honorable Judge George Jarrod Hazel by his Memo-

random Opinion Granted Respondent Judge Paul W. Grimm's Motion to Dismiss Petitioner's Civil Case Against Respondent Judge Paul W. Grimm. A true and accurate copy of Honorable Judge George Jarrod Hazel's Memorandum Opinion Entered On March 4, 2020 is herein Marked Petitioner's Exhibit Number 3.

Petitioner asserts that on appeal Petitioner argues that Honorable Judge George Jarrod Hazel's Memorandum Opinion contains Twenty-two (22) pages and that; Honorable Judge George Jarrod Hazel did not provide reason or reasons for Respondent Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER Entered on December 3, 2014. A true and accurate copy of Petitioner's Appeal at the Fourth Circuit with Appeal No. 20-1271 is herein Marked Petitioner's Exhibit Number 4.

Petitioner asserts that on appeal Petitioner argues that; U.S. District Court erred in granting Honorable Paul W. Grimm's Motion to Dismiss, ECF No. 12; for Civil Case *Emmanuel Edokobi v. Paul Grimm*; 8:19-cv-00905, because; U.S. District Court Provided Twenty-Two (22) pages of Memorandum Opinion in the closure of; Civil Case *Emmanuel Edokobi v. Paul Grimm*; 8:19-cv-00905-GJH; without providing any information on Respondent Judge Grimm's reason or reasons for Respondent Judge Grimm's Refusal to Complete His LETTER ORDER ECF No. 25; with Appeal No. 14-2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.*, "LETTER ORDER" was Entered on December 3, 2014; and It Has Lasted Five (5) Years. (See Petitioner's Exhibit Number 4.)

Petitioner asserts that on March 4, 2020 Honorable Judge George Jarrod Hazel by his order granted Respondent Judge Paul W. Grimm's Motion to Deny Petitioner's Motion to Remove Petitioner's Civil Case No. 8:19-Cv-00248-PWG and Civil Case No. 8:19-CV-01071-PWG from Respondent Judge Paul W. Grimm. A true and accurate copy of Honorable Judge George Jarrod Hazel Order is herein Marked Petitioner's Exhibit Number 5.

Petitioner asserts that on Appeal Petitioner argues that; the U.S. District Court erred in denying appellant's Motion for the Removal of the Civil Case No. 8:19-cv-00248-PWG; Appeal; No. 20-1243; *Edokobi v. Toyota Motor Credit Corporation et al*; and Civil Case No. 8:19-cv-01071-PWG; Appeal No. 20-1271 from Respondent Paul W. Grimm, because; Honorable Judge Paul W. Grimm was judicially disabled to hear those civil cases, due to; Petitioner's Civil Action against Honorable Judge Paul W. Grimm; *Emmanuel Edokobi v. Paul Grimm*.

Petitioner asserts that on appeal Petitioner argues that; U.S. District Court erred in denying Appellant's Motion for the Removal of the Civil Case No. 8:19-cv-00248-PWG; Appeal; No. 20-1243; *Edokobi v. Toyota Motor Credit Corporation et al*; And Civil Case No. 8:19-cv-01071-PWG; Appeal No. 20-1271; from Respondent Paul W. Grimm, because; Respondent Judge Paul W. Grimm was judicially disabled to hear these Civil Cases, because; Honorable Judge Paul W. Grimm Could Not in Good Conscience Provide an Unbiased Decision in the Civil Case No. 8:19-cv-00248-PWG; *Edokobi v. Toyota Motor Credit Corporation et al* and Civil Case No. 8:19-cv-01071-PWG; Appeal No. 20-1271; due to Petitioner's Civil Action against Respon-

dent Judge Paul W. Grimm with Civil Case No. 8:19-cv-00905-GJH; Emmanuel Edokobi v. Paul Grimm A true and accurate copy of Petitioner's Motion to Remove *Edokobi v. Toyota Motor Credit Corporation et al*; And Civil Case No. 8:19-cv-01071-PWG; Appeal No. 20-1796, *Emmanuel Edokobi v. SunTrust Bank, et al* From Respondent Paul W. Grimm is herein Marked Petitioner's Exhibit Number 6. Petitioner asserts that on February 25, 2021 the United States Court of Appeals for the Fourth Circuit by its unpublished opinion affirmed the District Court's Order denying Petitioner's Motion for Recusal and Granting Respondent's Motion to Dismiss Petitioner's Civil Action, *Edokobi v. Grimm*, No. 8:19-cv-00905-GJH With No. 20-1271. A true and accurate copy of Unpublished Opinion of the United States Court of Appeals for the Fourth Circuit Unpublished Opinion for Appeal 20-1271 Entered on February 25, 2021 is herein Marked Petitioner's Exhibit Number 7.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Fourth Circuit Unpublished Opinion in this Case is in Direct Conflict with the U.S. Fourth Circuit Unpublished Opinion Entered on March 3, 3015 Regarding Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 for the proposed imposition of pre-filing injunction against Petitioner.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Fourth Circuit Unpublished Opinion in this Case is in direct conflict with the U.S. Fourth Circuit Unpublished Opinion Entered on March 3, 3015 and that Respondent Judge Paul W. Grimm's Failure to

Adhere to Fourth Circuit Unpublished Opinion Entered on March 3, 2015 negates Fourth Circuit Local Rules and Internal Operating Procedures Rule 41.1 which provide hereunder as follows:

41.1. Issuance of the Mandate;

On the date of issuance of the mandate, the Clerk of the Court will issue written notice to the parties and the clerk of the lower court that the judgment of the Court of Appeals takes effect that day. The trial court record will be returned to the clerk of that court once the mandate has issued.

Petitioner asserts that on November 13, 2013 Petitioner filed a Civil Action at the U.S. District Court for the District of Maryland against M & M Mortgage Services, Inc.; Juan Gonzalez; and Mortgage Specialist, Inc., because M & M Mortgage Services, Inc., Deliberately and Willfully Destroyed those Conduits Pipes Inside Petitioner's House by using Unconventional Chemicals in their Unsolicited Winterization Activities that M and M Mortgage Services Inc., performed inside Petitioner's Private House at 2005 Stratton Drive Potomac, Maryland 20854 and the Civil Case was designed as *Edokobi v. M & M Mortgage Services, Inc., et al.*, with Civil Case No. PWG-13-3707 and the Civil Case was assigned to Respondent Judge Paul W. Grimm. A true and accurate copy of Petitioner's Civil Case Against *M & M Mortgage Services Inc., et al.*, is herein marked Petitioner's Exhibit Number 8.

Petitioner asserts that Plaintiff has spent well-over Thirty-two (\$32,000.00) in the repairs of those Conduit Pipes that, M and M Mortgage Services Inc.,

deliberately and willfully destroyed inside Petitioner's house by using Unconventional Chemicals in their Unsolicited Winterization Activities that M and M Mortgage Services Inc., performed inside Petitioner's Private House at 2005 Stratton Drive Potomac, Maryland 20854

Petitioner asserts that, after a Protracted Legal Action between Petitioner and Litton Loan Servicing LP that went to the United States Supreme Court that; Petitioner and Litton Loan Servicing LP Made Peace and Petitioner Accepted Litton Loan Servicing LP's Offer for the Short Sale of Petitioner's House and that Petitioner agreed with Litton Loan.

Petitioner Provides Petitioner's Certiorari with Conference of September 30, 2013 in the United States Supreme Court Reference to Petitioner's Certiorari Denied No. 12-1500, *Emmanuel Edokobi v. Litton Loan Servicing, LP* from the United States Court of Appeals for the Fourth Circuit on October 7, 2013.

Petitioner asserts that; Petitioner filed the Civil Action against M & M Mortgage Services, Inc.; Juan Gonzalez and Mortgage Specialist, Inc., Because; M and M Mortgage Services Inc., Deliberately and Willfully destroyed the Conduits Pipes in Petitioner's House by using Unconventional Chemicals in their Unsolicited Winterization Activities that M and M Mortgage Services Inc., performed inside Plaintiff's Private House at 2005 Stratton Drive Potomac, Maryland 20854.

Petitioner asserts that Petitioner's House was on the Market for Short Sale, and that; Petitioner went to work and upon returning from work that; M and M Mortgage Services Inc., entered Petitioner's



house to perform the Unsolicited Winterization Activities.

Petitioner asserts that, M and M Mortgage Services Inc., after performing the Unsolicited Winterization Activities that; M and M Mortgage Services Inc., lock Petitioner's House with different locks wherefore Petitioner was not able to enter Petitioner's house after returning from work.

Petitioner asserts that M and M Mortgage Services Inc., did not provide documents on the Winterization Activities that M and M Mortgage Services Inc., performed inside Petitioner's house, and that; M and M Mortgage Services Inc., did not leave their contact information.

Petitioner asserts that, Petitioner called Litton Loan Servicing LP who was Petitioner's Loan Servicer to obtain information on the Winterization, so that; Petitioner could provide the Winterization documents to the Would-Be-Buyers of Petitioner's house which was about Twenty-six (26) days in the Market for the Short Sale as Agreed with Litton Loan.

Petitioner asserts that Litton Loan Servicing LP Informed Petitioner that; Litton Loan Servicing LP did not order for the Winterization of the inside of Petitioner's house.

Petitioner asserts that attorneys for M & M Mortgage Services, Inc.; Juan Gonzalez and Mortgage Specialist, Inc., filed Motion for Sanction against Petitioner and that Respondent Paul W. Grimm Granted Motion for Sanction against Petitioner, after Respondent Paul W. Grimm dismissed Petitioner's Civil Action with prejudice. A true and accurate copy of Motion for Sanction filed by Attorneys for *M & M*

Mortgage Services Inc., is herein Marked Petitioner's Exhibit Number 9.

Petitioner asserts that Petitioner filed an Opposition Motion Opposing Motion for Sanction filed by attorneys for M & M Mortgage Services Inc., and, Petitioner by his Opposition Motion enumerated all those damages that M & M Mortgage Services Inc., caused inside Petitioner's house because; M and M Mortgage Services Inc., Deliberately and Willfully Destroyed the Conduits Pipes in Petitioner's House by using Unconventional Chemicals in their Unsolicited Winterization Activities that M and M Mortgage Services Inc., performed inside Petitioner's Private House at 2005 Stratton Drive Potomac, Maryland 20854. A true and accurate copy of Petitioner's Opposition Motion Opposing Motion for Sanction filed by attorneys for *M & M Mortgage Services Inc.*, is herein Marked Petitioner's Exhibit Number 10.

Petitioner asserts that, Petitioner's Civil Case against M & M Mortgage Services Inc., Civil Case 8:13-cv-03707-PWG was decided by the United States Court of Appeals for the Fourth Circuit Appeal No. 14-2204 and the Fourth Circuit Unpublished Opinion was Entered on March 3, 3015. A true and accurate copy of Unpublished Opinion of the United States Court of Appeals for the Fourth Circuit No. 14-2204 filed on March 19, 2015 is herein Marked Petitioner's Exhibit Number 11.

Petitioner asserts that, a part of the Unpublished Opinion of the Fourth Circuit with Appeal No. 14-2204 provides that, prefiling injunction determination remains pending in the District Court, a part of the Unpublished Opinion provides hereunder as follows:

Although the prefiling injunction determination remains pending in the district court, it appears that the district court has completed its consideration of the merits of this case based on its dismissal of Edokobi's claims. *See Ray Haluch Gravel Co. v. Cent. Pension Fund of the Int'l Union of Operating Eng'rs & Participating Emp'rs*, 134 S.Ct. 773, 779 (2014) (holding pending motion for attorney's fees collateral to merits for finality purposes). We therefore conclude that the district court's order dismissing Edokobi's complaint as barred by res judicata is final and appealable.

(*Per Curiam*). (See Petitioner's Exhibit Number 11).



### **REASONS FOR GRANTING THE PETITION**

There are almost eight compelling reasons for review of the Fourth Circuit Unpublished Opinion in this case, because Fourth Circuit Unpublished Opinion in this case is in direct conflict with Fourth Circuit Unpublished Opinion Entered On March 3, 3015 regarding Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 for the proposed imposition of pre-filing injunction against Petitioner. (*See* Petitioner's Exhibit Nos., 1, 7 and 11).

**I. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE IS IN CONFLICT WITH THE U.S. FOURTH CIRCUIT UNPUBLISHED OPINION ENTERED ON MARCH 3, 3015 REGARDING RESPONDENT JUDGE PAUL W. GRIMM'S LETTER ORDER ENTERED ON DECEMBER 3, 2014 FOR THE PROPOSED IMPOSITION OF PRE-FILING INJUNCTION AGAINST PETITIONER**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Fourth Circuit Unpublished Opinion in this case is in direct conflict with the U.S. Fourth Circuit Unpublished Opinion Entered On March 3, 3015 and that Respondent Judge Paul W. Grimm's Failure to Adhere to Fourth Circuit Unpublished Opinion Entered on March 3, 3015 Negates Fourth Circuit Local Rules and Internal Operating Procedures Rule 41.1 which provide hereunder as follows:

41.1. Issuance of the Mandate;

On the date of issuance of the mandate, the Clerk of the Court will issue written notice to the parties and the clerk of the lower court that the judgment of the Court of Appeals takes effect that day. The trial court record will be returned to the clerk of that court once the mandate has issued.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm is in Disobedience to Rule 41; Mandate of the Fourth Circuit Unpublished Opinion Entered on March 3, 2015 by Respondent Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER ECF No. 25 for Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.*, and that; Respondent Judge Grimm; Is Legally Required to Complete His LETTER ORDER ECF No. 25 Entered on December 3, 2014; Pursuance to Fourth Circuit's Mandate for Appeal No. 14-2204; Entered on Entered on March 3, 2015 which provides hereunder in pertinent part:

2 Although the prefiling injunction determination remains pending in the district court, it appears that the district court has completed its consideration of the merits of this case based on its dismissal of Edokobi's claims. *See Ray Haluch Gravel Co. v. Cent. Pension Fund of the Int'l Union of Operating Eng'rs & Participating Emp'rs*, 134 S.Ct. 773, 779 (2014) (holding pending motion for attorney's fees collateral to merits for finality purposes). We therefore conclude that the district court's order dismissing Edokobi's complaint

as barred by res judicata is final and appealable. (*See Unpublished United States Court of Appeals for the Fourth Circuit Mandate on Case No. 14-2204 (Per Curiam)*). (Petitioner's Exhibit No. 11).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm is in Absolute Disobedience to Rule 41; Mandate of the Fourth Circuit Unpublished Opinion Entered on March 3, 2015 by Respondent Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER ECF No. 25 for Civil Case No. 8:13-cv-03707-PWG; Appeal No. 14-2204; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.*, Entered on December 3, 2014; and that, Respondent Judge Paul W. Grimm's LETTER ORDER Still Remains Pending in the U.S District Court" and Respondent Judge Paul Grimm has not made any attempt to complete the prefiling injunction order against Petitioner and it is Now Over Five (5) Years. (*See* Petitioner's Exhibit Nos. 1 and 11).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm continues to disregard the Rule 41; Mandate of the Fourth Circuit Unpublished Opinion Entered on March 3, 2015; by Honorable Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER ECF No. 25 for Civil Case No. 8:13-cv-03707-PWG; Appeal No. 14-2204; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.*, Entered on December 3, 2014; and that; Respondent Judge Paul W. Grimm has not provided any reason or reasons for his Refusal to complete his LETTER ORDER

ECF No. 25; Appeal No. 14-2204; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.*, for Civil Case No. 8:13-cv-03707-PWG Entered on December 3, 2014; And It Has Lasted Five (5) Years.

**II. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE CONTAINS A VIOLATION OF FOURTEENTH AMENDMENT DUE PROCESS CLAUSE AND THAT 4TH CIRCUIT DISMISSAL OF THIS CASE INCREASINGLY UNDERMINES THIS COURT'S DUE PROCESS CLAUSE' JURISPRUDENCE ON FOURTEENTH AMENDMENT DUE PROCESS CLAUSE**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm by his Failure to Completed His A LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner "LETTER ORDER" Entered on December 3, 2014 for Civil Action RE: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 Violates Petitioner's protected due process rights as guaranteed in the 14th Amendment of the United States Constitution.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because a Judgment rendered in violation of due process is void in the rendering state and is not entitled to full faith and credit elsewhere. *See Pennoyer v. Neff*, 95 U.S. 714, 732-733 (1878), and *Mullane v. Central Hanover Trust Co.*, 339 U.S. 306, 313-314 (1950). In the present case, it is not contended that Respondent Judge Paul W. Grimm's Failure to Completed His A LETTER ORDER of Imposition of Pre-Filing Injunc-

tion Against Petitioner "LETTER ORDER" Entered on December 3, 2014 for Civil Action Re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 Violates Petitioner's protected due process rights as guaranteed in the 14th Amendment of the United States Constitution.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm is in violation of Petitioner's due process pursuant to the Civil Rights Act of 1871, as amended, 42 U.S.C. § 1983, by Respondent Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner "LETTER ORDER" Entered on December 3, 2014 for Civil Action Re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG with the United States Court of Appeals for the Fourth Circuit Appeal No. 14-2204 and that Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 is Pending; And It Has Lasted Five (5) Years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm is in violation of Petitioner's due process pursuant to The Civil Rights Act of 1871, as amended, 42 U.S.C. § 1983, by Respondent Judge Paul W. Grimm's Refusal To Complete His LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner "LETTER ORDER" Entered on December 3, 2014, Petitioner asserts that the touchstone of due process is protection of individual against arbitrary action of government. *See Wolff v. McDonnell* (1974) 418 U.S. 539,



L.Ed.2d 935, 94 S.Ct. 2963. Due process of law, within the meaning of Fourteenth Amendment is secured if laws operate on all alike, and do not subject individual to arbitrary exercise of powers of government. *See Missouri P. R. Co. v. Mackey* (1888) 127 U.S. 205, 32 L.Ed 107, 8 S.Ct. 1161. *See also Minneapolis & S.L.R. Co. v. Herrick* (1888), 127 U.S. 210, 8 S.Ct. 1176; *Leeper v. Texas* (1891) 139 U.S. 462, 11 S.Ct. 577; *Giozza v. Tiernan* (1893) 148 U.S. 657, 13 S.Ct. 721; and *Duncan v. Missouri* (1894) 152 U.S. 377, 14 S.Ct. 570.

**III. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE CONTAINS A VIOLATION OF FOURTEENTH AMENDMENT DUE PROCESS CLAUSE VIOLATION OF (42 U.S.C. § 1983) BY ACTING UNDER COLOR OF LAW TO DEPRIVE PETITIONER'S EIGHTH AMENDMENT CLAUSE OF PROTECTIONS.**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections of being subject to cruel and unusual punishments by Respondent Judge Paul W. Grimm's refusal to completed his a LETTER ORDER of imposition of pre-filing injunction against Petitioner "LETTER ORDER" entered on December 3, 2014 for civil action re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF no. 15) of the civil case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 "LETTER ORDER" is pending; and it has lasted five (5) years. (Petitioner's Exhibit nos. 1 and 11)

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections and that Respondent Judge Paul W. Grimm's cruel and unusual punishments are melted upon Petitioner by Respondent Judge Paul W. Grimm's refusal to completed his a LETTER ORDER of imposition of pre-filing injunction against Petitioner "LETTER ORDER" entered on December 3, 2014 for civil action re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF no. 15) of the civil case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 "LETTER ORDER" is pending; and it has lasted five (5) years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections by inflicting cruel and unusual punishments upon Petitioner by Respondent Judge Paul W. Grimm's refusal to completed his a LETTER ORDER of imposition of pre-filing injunction against Petitioner and that, Respondent Judge Paul W. Grimm intentionally did not want to complete his LETTER ORDER as punishments upon Petitioner whom Respondent Judge Paul W. Grimm considers as a troublemaker who must be controlled.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the

Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections by inflicting cruel and unusual punishments upon Petitioner by Respondent Judge Paul W. Grimm's refusal to issue his final order on the prefiling injunction against Petitioner pending in the district court since December 12, 2014 for civil case number case 8:13-cv-03707-PWG is designed to punish Petitioner severely.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections by inflicting cruel and unusual punishments upon Petitioner because, federal Defendants in their motion to consolidate Petitioner's actions cited Respondent Judge Paul W. Grimm's prefiling injunction against Petitioner.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections by inflicting cruel and unusual punishments upon Petitioner because, Defendants in the Petitioner's civil action against Mondo International LLC, Et Al., cited Respondent Judge Paul W. Grimm's prefiling injunction against Petitioner's in their motions.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted

because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections by inflicting cruel and unusual punishments upon Petitioner because, Defendant in the Petitioner's civil action against Toyota Motor Credit Corporation Et Al, cited Respondent Judge Paul W. Grimm's prefiling injunction against Petitioner in his motion.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment Due Process Clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Plaintiff's Eighth Amendment Clause of protections by inflicting cruel and unusual punishments upon Petitioner because, Petitioner is suffering and will continue to suffer irreparable harm because of Respondent Judge Paul W. Grimm's action of refusal to issue the final court order on the prefiling injunction against Petitioner pending in the district court since December 12, 2014 for civil case number case 8:13-cv-03707-PWG which is a blatant violation of Petitioner's due process.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates Eighth Amendment of Cruel and Unusual Punishments against Petitioner and that, the Civil Rights of 14th Amendments to the United States Constitution protects Petitioner from Respondent Judge Paul W. Grimm's cruel and unusual punishments. Petitioner asserts that Respondent Judge Paul W. Grimm's refusal to completed his a LETTER ORDER of im-

sition of pre-filing injunction against Petitioner entered on December 3, 2014 for civil action re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF no. 15) of the civil case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 is a grand design by Respondent Judge Paul W. Grimm to punish upon Petitioner whom Respondent Judge Paul W. Grimm considers as a troublemaker who must be controlled by every available tool of the law.

**IV. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE CONTAINS A VIOLATION OF FOURTEENTH AMENDMENT DUE PROCESS CLAUSE VIOLATION OF (42 U.S.C. § 1983) BY ACTING UNDER COLOR OF LAW TO DEPRIVE PETITIONER'S EQUAL PROTECTION CLAUSE**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment due process clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Petitioner's Equal Protection Clause by Respondent Judge Paul W. Grimm's unjustifiable discriminating application of law, by Respondent Judge Paul W. Grimm's Refusal to Completed His A LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner Entered on December 3, 2014 for Civil Action RE: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 and that Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 is Pending; And It Has Lasted Five (5) Years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment due process clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Petitioner's Equal Protection Clause by Respondent Judge Paul W. Grimm's unjustifiable discriminating application of law by Respondent Judge Paul W. Grimm's Refusal to Completed His A LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner Entered on December 3, 2014 for Civil Action Re: *Edokobi v. M & M Mortgage Services Inc.*, (ECF No. 15) of the Civil Case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204 and that there is No Other Respondent Judge Paul W. Grimm's Pending LETTER ORDER except Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 for the Imposition of Pre-Filing Injunction Against Petitioner.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm violates the Fourteenth Amendment due process clause violation of (42 U.S.C. § 1983) by acting under color of law to deprive Petitioner's equal protection clause by Respondent Judge Paul W. Grimm's unjustifiable discriminating application of law and that Respondent Judge Paul W. Grimm has completed all those LETTER ORDERS that Respondent Judge Paul W. Grimm has entered in different cases assigned to him with the exception to the Respondent Judge Paul W. Grimm's LETTER ORDER of Imposition of Pre-Filing Injunction Against Petitioner Entered on December 3, 2014 for Civil Action RE: *Edokobi v. M & M Mortgage Services Inc.*,

(ECF No. 15) of the Civil Case 8:13-cv-03707-PWG Fourth Circuit Appeal No. 14-2204, and that Respondent Judge Paul W. Grimm's LETTER ORDER Entered on December 3, 2014 is pending; And It Has Lasted Five (5) Years.

**V. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE CONTAINS AN ABUSE OF DISCRETION IN RESPONDENT JUDGE PAUL W. GRIMM'S REFUSAL TO COMPLETE HIS LETTER ORDER ENTERED ON DECEMBER 3, 2014**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case contains an abuse of discretion in Respondent Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER Entered On December 3, 2014 For Appeal No. 14-2204; Of Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.*

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because there is no contest in this case that Respondent Judge Paul W. Grimm exhibited abused of discretion in His Refusal to Complete His LETTER ORDER (ECF No. 25); For Appeal No. 14-2204; Of Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014 it is still pending and It Has Lasted Five (5) Years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because there is no contest in this case that Respondent Judge Paul W. Grimm exhibited abuse of discretion in His Refusal to Complete His LETTER ORDER (ECF

No. 25) for Appeal No. 14-2204; of Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014 *See Pashby v. Delia*, 709 F.3d 307, 319 (4th Cir.2013); *Koon v. United States*, 518 U.S. 81, 100 (1996) (explaining that a court “by definition abuses its discretion when it makes an error of law; *See Alvarez Lagos v. Barr*, 927 F.3d 236, 255 (4th Cir. 2019).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because there is no contest in this case that Respondent Judge Paul W. Grimm exhibited abuse of discretion in His Refusal to Complete His LETTER ORDER; and that Respondent Judge Paul W. Grimm did not provide his reason or reasons for his Refusal to Complete His LETTER ORDER for Appeal No. 14-2204; of Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; And It Has Lasted Five (5) Years. *See Rabkin v. Oregon Health Sciences Univ.*, 350 F.3d 967, 977 (9th Cir. 2003); *Gotthardt v. Nat’l R.R. Passenger Corp.*, 191 F.3d 1148, 1156 (9th Cir. 1999); *Cancellier v. Federated Dep’t Stores*, 672 F.2d 1312, 1319 (9th Cir. 1982); *United States v. Washington*, 157 F.3d 630, 642 (9th Cir. 1998); and *Int’l Jensen, Inc. v. Microsound U.S.A., Inc.*, 4 F.3d 819, 822 (9th Cir. 1993) (internal quotations and citation omitted).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because there is no contest in this case that Respondent Judge Paul W. Grimm exhibited abuse of discretion in His Refusal to Complete His LETTER ORDER for Appeal No. 14-2204; Of Civil Case No. 8:13-cv-03707-



PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014. See *Fusaro v. Cogan*, 930 F.3d 241, 248 (4th Cir. 2019) (explaining abuse of discretion standard); cf. *Henderson ex rel. NLRB v. Bluefield Hosp. Co.*, 902 F.3d 432, 439 (4th Cir. 2018); *Centro Tepeyac v. Montgomery Cty.*, 722 F.3d 184, 188 (4th Cir. 2013) (en banc); and *Quince Orchard Valley Citizens Ass'n v. Hodel*, 872 F.2d 75, 78 (4th Cir. 1989).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because there is no contest in this case that Respondent Judge Paul W. Grimm exhibited abuse of discretion in Refusal to Complete His LETTER ORDER for Appeal No. 14-2204; of Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; and appellant's arguments are supported by these cases mentioned herein as follows; *Hobby Lobby Stores, Inc. v. Sebelius*, 723 F.3d 1114, 1145 & n.21 (10th Cir. 2013) (en banc). We then evaluate the court's "ultimate decision" to deny injunctive relief for abuse of discretion; *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418, 428 (2006); and *Booth v. Wal-Mart Stores, Inc.*, 201 F.3d 335 (4th Cir. 2000) when deciding whether the administrator's denial of coverage was an abuse of discretion.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because there is no contest in this case that Respondent Judge Paul W. Grimm exhibited abuse of discretion in Refusal to Complete His LETTER ORDER ECF No. 25; for Appeal No. 14-2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services*

*Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; and Honorable Judge Paul W. Grimm's Refusal to Complete His LETTER ORDER. See *Fusaro v. Cogan*, 930 F.3d 241, 246 (4th Cir. 2019); *Centro Tepeyac v. Montgomery Cty.*, 722 F.3d 184, 188 (4th Cir. 2013) (en banc) and *Quince Orchard Valley Citizens Ass'n v. Hodel*, 872 F.2d 75, 78 (4th Cir. 1989).

**VI. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE INVOLVES JUDICIAL DISABILITY ACT OF 1980, 28 U.S.C. §§ 351-364 ("ACT") COMPLAINT AGAINST RESPONDENT JUDGE PAUL W. GRIMM**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves Judicial Disability Act of 1980, 28 U.S.C. §§ 351-364 ("ACT") Complaint against Respondent Judge Paul W. Grimm in that Respondent Judge Paul W. Grimm was judicially disabled to hear Civil Case 8:19-cv-00248-PWG; Appeal No. 20-1243; *Edokobi v. Toyota Motor Credit Corporation et al*; pursuant to Judicial Disability Act of 1980, 28 U.S.C. §§ 351-364 ("Act"), and pursuant to rules for Judicial-Conduct and Judicial-Disability proceedings, 248 F.R.D. 674 (2008).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm was judicially disabled to hear Civil Case 8:19-cv-00248-PWG; Appeal; No. 20-1243; *Edokobi v. Toyota Motor Credit Corporation et al*; and Civil Case No. 8:19-CV-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*, due to Petitioner's civil action

against Respondent Judge Paul W. Grimm styled: *Emmanuel Edokobi v. Paul Grimm* 8:19-cv-00905-GJH; Appeal No. No. 20-1271, which is the subject of this Certiorari, and that Petitioner's Motion To Remove *Edokobi v. Toyota Motor Credit Corporation et al*; And Civil Case No. 8:19-cv-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*. from Respondent Paul W. Grimm is part of this Certiorari. (See Petitioner's Exhibit Number 6).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm was judicially disabled to Civil Case 8:19-cv-00248-PWG; Appeal; No. 20-1243; *Edokobi v. Toyota Motor Credit Corporation et al*; and Civil Case No. 8:19-CV-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*, because Respondent Judge Paul W. Grimm could not in good conscience provide an unbiased decision in the Civil Case No. 8:19-cv-00248-PWG; *Edokobi v. Toyota Motor Credit Corporation et al* and Civil Case No. 8:19-CV-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*, due to Petitioner's Civil Action against Respondent Judge Paul W. Grimm Civil Case No. 8:19-cv-00905-GJH; *Emmanuel Edokobi v. Paul Grimm* which is subject of this Certiorari a copy of Petitioner's Motion to Remove those Civil Actions From Respondent Judge Paul W. Grimm is part of this Certiorari. (See Petitioner's Exhibit Number 6).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm was judicially disabled to hear Civil Case 8:19-cv-00248-PWG; Appeal; No. 20-1243; *Edokobi v. Toyota Motor*

*Credit Corporation et al*, and Civil Case No. 8:19-CV-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*, because Respondent Judge Paul W. Grimm was biased towards Petitioner as a result of Petitioner's Civil Action against Respondent Judge Paul W. Grimm With Civil Case No. 8:19-cv-00905-GJH; *Emmanuel Edokobi v. Paul Grimm* which is the subject of this Certiorari a copy of Petitioner's Motion to Remove Those Civil Actions from Respondent Judge Paul W. Grimm is part of this Certiorari. (See Petitioner's Exhibit Number 6).

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because Respondent Judge Paul W. Grimm was judicially disabled to hear Civil Case 8:19-cv-00248-PWG; Appeal; No. 20-1243; *Edokobi v. Toyota Motor Credit Corporation et al*, and Civil Case No. 8:19-CV-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*, because Respondent Judge Paul W. Grimm; could not in good conscience provide an unbiased decision in the Civil Case No. 8:19-cv-00248-PWG; *Edokobi v. Toyota Motor Credit Corporation et al*; And Civil Case No. 8:19-CV-01071-PWG; Appeal No. 20-1796 *Emmanuel Edokobi v. SunTrust Bank, et al*; due to Petitioner's Civil Action against Appeal No. 20-1271; *Emmanuel Edokobi v. Paul Grimm*; which is subject of this Certiorari and a copy of Petitioner's Motion to Remove Those Civil Actions from Respondent Judge Paul W. Grimm is part of this Certiorari. (See Petitioner's Exhibit Number 6).

**VII. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE INVOLVES JURISDICTION ISSUES**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves jurisdiction issues in that, Respondent Judge Paul W. Grimm claims that, the United States District Court for the District of Maryland Lacks Jurisdiction to hear this Civil Action.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves jurisdiction issues in that, The United States District Court for the District of Maryland Lacks Jurisdiction to Hear this Civil Action and on appeal Petitioner argues that, Respondent Judge Grimm's assertion of the U.S. District Court lacks jurisdiction; Is Not Admissible in this civil case; because, Respondent Judge Grimm Is Legally Required to Complete His LETTER ORDER (ECF No. 25); for Appeal No. 14-2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; And It Has Lasted Five (5) Years; and that; Respondent Judge Paul W. Grimm did not provide his reason or reasons for his Refusal to His LETTER ORDER ECF No. 25; Entered on December 3, 2014.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves jurisdiction issues in that, Respondent Judge Paul W. Grimm claims that, the United States District Court for the District of Maryland lacks jurisdiction to hear this Civil Action and on appeal Petitioner argues that Respondent Judge

Grimm's assertion of the court lacks jurisdiction; Is Not Admissible in this civil case; because, Respondent Judge Grimm had issued the LETTER ORDER (ECF No. 25); and that; Respondent Judge Grimm should complete his LETTER ORDER (ECF No. 25); and that Respondent Judge Grimm does not need the help of the court to complete his LETTER ORDER (ECF No. 25); Entered on December 3, 2014; And It Has Lasted Five (5) Years.

**VIII. THE PETITION FOR WRIT OF CERTIORARI SHOULD BE GRANTED BECAUSE THIS CASE INVOLVES JUDICIAL IMMUNITY ISSUES**

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves judicial immunity issues in that, Respondent Judge Paul W. Grimm claims of judicial immunity and on appeal Petitioner argues that Respondent Judge Paul W. Grimm claims of judicial immunity is not admissible in this civil case; because, Respondent Judge Grimm is legally responsible to complete his LETTER ORDER ECF No. 25; for Appeal No. 14-2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez, Mortgage Specialist, Inc.* Entered on December 3, 2014; And It Has Lasted Five (5) Years; and that; Respondent Judge Paul W. Grimm did not provide his reason or reasons for his Refusal to His LETTER ORDER (ECF No. 25); Entered on December 3, 2014; And It Has Lasted Five (5) Years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves judicial immunity issues in that, Respondent Judge Paul W. Grimm claims of

judicial immunity and on appeal Petitioner argues that Respondent Judge Paul W. Grimm claims of judicial immunity is not admissible in this civil case; because, Judicial Immunity is not proper defense to protect Honorable Judge Grimm from completing His LETTER ORDER (ECF No. 25); for Appeal No. 14-2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; And It Has Lasted Five (5) Years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves judicial immunity issues in that, Respondent Judge Paul W. Grimm claims of judicial immunity and on appeal Petitioner argues that Respondent Judge Paul W. Grimm claims of judicial immunity is not admissible in this civil case; because, judicial immunity cannot be used to cover Respondent Judge Grimm's unwillingness to complete his *LETTER ORDER (ECF No. 25)*; for Appeal No. 14-2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; And It Has Lasted Five (5) Years.

Petitioner asserts that Petition for Writ of Certiorari becomes crucial and should be granted because this case involves judicial immunity issues in that, Respondent Judge Paul W. Grimm claims of judicial immunity and on appeal Petitioner argues that Respondent Judge Paul W. Grimm claims of judicial immunity is not admissible in this civil case; because, judicial immunity is not available to protect Honorable Judge Grimm's Refusal to Complete His LETTER ORDER ECF No. 25; for Appeal No. 14-

2204; Civil Case No. 8:13-cv-03707-PWG; *Edokobi v. M & M Mortgage Services Inc., Juan Gonzalez; Mortgage Specialist, Inc.* Entered on December 3, 2014; And It Has Lasted Five (5) Years.

Therefore, to bring that circuit in line with this Court's jurisprudence and to resolve a direct conflict between the Fourth Circuit and other Circuits, this Court should grant the petition for writ of certiorari and overturn the decision below.

The Fourth Circuit's Unpublished Per Curiam Opinion to dismiss Petitioner's appeal Entered on February 25, 2021.

The United States District Court Judge George J. Hazel's Memorandum Opinion ruling in granting Judge Paul W. Grimm's Motion for Summary Judgment Entered March 4, 2020.

The United States District Court Judge George J. Hazel's Order in denying Petitioner's Motion for Removal of Judge Grimm Entered March 4, 2020.





### CONCLUSION

Petitioner, Emmanuel Edokobi prays that this Court grants his Writ of Certiorari.

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