

06/01/21  
MD

No. 20-1770

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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.  
NORTHWELL HEALTH, LONG ISLAND  
JEWISH MEDICAL CENTER,  
Respondent.

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**On Petition for Writ of Certiorari to the  
State of New York Court of Appeals**

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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  
54-25 153<sup>rd</sup> 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. The angel of the Lord Almighty, the Lord of Hosts, sent the messenger replied to the Defendant's accused by an angel saying, '**seeking for profit, gang organization.**'
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

**Respondent:**

Northwell Health, Long Island  
Jewish Medical Center

**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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### **Appendix A:**

Supreme Court of the State of New York  
Appellate Division: First Judicial  
Department: Index No. 101049/19,  
Motion No. 2021-00028, Case No. 2020-  
03564, Decision & Order February 2, 2021 ..... A1

Supreme Court of the State of New York  
Appellate Division: First Judicial

Department: Index No. 101049/19,  
Motion No. 2770, Case No. 2020-03564,  
Decision & Order October 08, 2020 ..... A3

Appendix B:

Supreme Court of the State of New York  
County (101049/2019, Decision &  
Order January 06 2020) ..... B1

**JURISDICTION**

**STATE OF NEW YORK COURT OF APPEALS**

**Decided and Entered on the  
twenty-ninth day of April, 2021**

**Present, Hon. Janet DiFiore, Chief Judge, Presiding**

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SSD 20

The Church of Jesus Christ of Latter- Day Saints,  
Plaintiff,  
Servant: Xiu Jian Sun, The Spiritual Adam  
Appellant,

v.  
Northwell Health, &c., et al.,  
Respondents.

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Appellant having appealed to the Court of Appeals  
in the above title;

Upon the papers filed and due deliberation, it is

ORDERED, that the appeal is dismissed without  
costs, by the Court sua sponte, upon the ground that  
the order appealed from does not finally determine the  
action within the meaning of the Constitution.

Heather Davis  
Heather Davis  
Deputy Clerk of the Court

## 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 27, 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