

20-5986

ORIGINAL

No. 16-08952-MI

Supreme Court, U.S.

FILED

JUL 17 2020

OFFICE OF THE CLERK

17th judicial circuit court (KENT)

IN THE

SUPREME COURT OF THE UNITED STATES

342477 MISC NO 159930

ROMEO WILSON

— PETITIONER

(Your Name)

vs.

JORDAN GABITES, / DEBRA SUE GABITES,

— RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Michigan Court of Appeals Case NO 342477

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

ROMEO WILSON

(Your Name)

RANSOM NE. AVE. - APT 301

(Address)

GRAND RAPIDS MI, 49503

(City, State, Zip Code)

616-655-6400

(Phone Number)

QUESTION(S) PRESENTED

DO I HAVE ANY RIGHTS/THE LIGHT WAS BLINKING!

DO I HAVE ANY RIGHT/I HAD TWO LAWYER, MR. JESSIE A. NASH (79465)  
AND ~~MR. JARED~~ I, SHOUHEY (75877) WAS THEIR TO HELP MR. NASH  
WITH HIS FIRST LAW ~~SUIT~~ CASE. MR. SHOUHEY DID NOT SHOW UP  
THE SECOND DAY TO HELP MR. NASH AND MR. NASH LOST ON THE  
SECOND DAY ON A TECHNICALITY.

DO I HAVE ANY RIGHT TO HAVE MY WITNESS TESTIFY IN COURT.  
before ~~CLOSING~~ MY CASE.

DID I NOT HAVE THE RIGHT TO HAVE BOTH LAWYERS IN COURT ROOM.

## LIST OF PARTIES

- ☒ All parties appear in the caption of the case on the cover page.
- ☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

file no.16-08952-ni

romeo wilson plaintiff,      defendant. debra sue gabites  
jordan gabites

m

## RELATED CASES

17 circuit court no. ~~16-0~~08952-ni  
state appeal court no.342477  
state supreme sc.159938

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CONCLUSION	I came down on my head - broke my neck and my Lawyer did not show it. This was my Lawyer first Lausail case!	

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- I STATE 17#CIRCUIT COURT RULE JAN.30-2018
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- III STATE SUPREME COURT RULE MARCH 30-2020

### OTHER

IN COURT MY LAWYER IN COURT AFTER LOSING MY CASE I  
WENT AND STOOD BY THE DEFENDANT TABLE AND JUST LOOK  
AT ME.IT ON COURT ROOM TAPE!  
TALKING ABOUT A MAN IN QUICKING I"VE SUCK PRETTY LOW.  
THIS WAY HIS FIRST LAWYER SUIT CASE,ALL I ASH FOR,  
COULD SOME ONE HELP ME.

(24)

IN THE  
SUPREME COURT OF THE UNITED STATES  
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix \_\_\_\_\_ to the petition and is

- ☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the United States district court appears at Appendix \_\_\_\_\_ to the petition and is

- ☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix Table A to the petition and is

- ☒ reported at State 12<sup>th</sup> circuit court; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the State High court appears at Appendix Table B to the petition and is

- ☒ reported at Appeal Court; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

## JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was \_\_\_\_\_.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. \_\_\_\_ A \_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was Jan-30-2015  
A copy of that decision appears at Appendix Table A.

☒ A timely petition for rehearing was thereafter denied on the following date: June-18-2019, and a copy of the order denying rehearing appears at Appendix Table B.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. \_\_\_\_ A \_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The accident in question took place on September 23-2015 at the intersection of Jefferson in Grand Rapids. At trial, I testified that I walking my bike from my apartment on Ransom to the intersection of Fulton and Jefferson, when I got to the pedestrian traffic signal said "walk" so I started walking across the crosswalk. The signal started blinking, so I hopped on my bike and started peddling across the crosswalk. Since the signal was blinking and a big utility truck was obstructing traffic view, I hurried and tried to be extra careful. The signal was still blinking when I passed the utility truck, As soon as my front tire went up on the sidewalk/curb, Ms. Gabites, car struck the back end of my bike. pedal, which caused me to flip over my bike handlebar, causing me to come down on my head.

APPENDIX=TRANSCRIPT (11)  
PAGS(16)LINE 12/25 about bike pedal  
page (17)LINE 17/25 about crossing street  
page (69)line 1/25 about utility truck



RAP ( ~~XX~~ )

## STATEMENT OF THE CASE

The Grand Rapids Police responded to the scene of the accident and conducted an investigation. Officer Sean Lahuis's report indicates that Jordan Gabites was the driver of the vehicle which struck Mr. Wilson and that the "hazardous action" committed by Jordan Gabites was that she "failed to yield." Officer Lahuis reported that our client, Mr. Wilson, landed face down on the street and was unresponsive with a head injury and was transported to the hospital. Officer Lahuis reported that Mr. Wilson's condition was serious at the time the report was made and that Mr. Wilson sustained frontal skull injuries and a C4 neck fracture, as reported by Doctor Shanaver.

### **Injuries and Damages**

As a direct and proximate result of Jordan Gabites's negligence, Mr. Wilson suffered serious injuries, and will permanently suffer from mental and emotional anguish, and pain and suffering. Mr. Wilson sustained serious impact wounds and lacerations on his face and head, and other resulting serious injuries to his left ear, neck, and shoulder, due to the force of impact with the concrete road which resulted from Jordan Gabites striking him with the vehicle which resulted from Jordan Gabites's failure to yield. Mr. Wilson was transported to the hospital by ambulance. Because of Mr. Wilson's injuries and because Mr. Wilson is now unable to do many of the activities he used to do before the accident, Mr. Wilson meets the serious impairment threshold.

As a result of the accident, Mr. Wilson was hospitalized for 16 days and underwent intensive rehabilitation and therapy for months until Safeco Insurance's hired physician determined through a 20-minute appointment that Mr. Wilson had convalesced; (I was present). During Mr. Wilson's 16-day hospitalization, Mr. Wilson experienced severe head and neck pain and swelling in his face and head which rendered him unable to move independently or engage his normal daily activities. To counter this pain, the hospital physicians administered morphine and other pain medications which generally left him sedated, which further rendered him unable to move independently or engage his normal daily activities.

Before the accident on September 23, 2015, Mr. Wilson worked as a lawn-care and residential handyman subcontractor, which involved mowing picking up branches, raking, carrying and using a blower, removing trash, moving furniture. It also involved painting residential houses which included moving ladders and climbing up and down ladders. But because of the accident Mr. Wilson is now unable to accomplish many of these tasks. Before the accident, Mr. Wilson would regularly walk 2.8 miles twice in one day with a short break between the two stretches. But because of the accident Mr. Wilson is now unable to accomplish this task. Before the accident, Mr. Wilson lifted free weights as part of a daily exercise routine. But because of the accident Mr. Wilson is now unable to accomplish this

over

## REASONS FOR GRANTING THE PETITION

THIS WAS MR. JESSE A, NASH FIRST LAWYER SUIT CASE, AND HE NEEDED HELP, SO I ASK CAN I REPLACE HIM, AND I WAS TOLD (NO) SO I ASK CAN I GET HIM SOME HELP, AND I WAS TOLD (YES) MR. JARED I, SHOUHEY CAME TO COURT THE FIRST DAY, TO HELP MR. NASH IN COURT. AND MR. NASH STOOD UP IN COURT AND SAY MR. SHOUHEY WAS THERE TO HELP HIM BECAUSE THIS WAS HIS FIRST LAWSUIT CASE AND HE NEEDED HELP. BUT MR. SHOUHEY ONLY HELP MR. NASH WITH PICK OUT THE JURY ONLY, AND DID NOT SHOW ON THE SECOND DAY. AND MR. NASH LOST MY CASE ON THE SECOND DAY ON A TECHNICALITY. WHEN THE ONLY THING HE HAD TO SHOW WAS MY DOCTOR STATEMENT HE HAD ON THE TABLE IN FRONT OF HIM. MR. NASH CLOSE MY CASE BEFORE CALLING MY WITNESS TO THE STAND. THE DRUMPER DRIVER.

- (1) DID I NOT HAVE THE RIGHT TO REPLACE MR. NASH/?
- (2) DID I NOT HAVE THE RIGHT TO HAVE BOTH LAWYER IN COURT?
- (3) DID I NOT HAVE THE RIGHT TO HAVE MY WITNESS TESTIFY IN COURT?

BEFORE CLOSING MY CASE.

I THANK MR. NASH WAS MAD AT ME FOR TRYING TO REPLACE HIM, AND WHEN THE CASE WAS OVER, MR. NASH LEFT MY TABLE AND WALK OVER TO THE DEFENSIVE TABLE JUST LOOK BACK AT ME.

TO PROVE MY POINT I WOULD LIKE TO ASK SUPREME FOR RULE 6 22/80 video tape or the courtroom or me.

JESSE A. NASH(79465)

JARED I. SHOUHEY(75877)

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Romew W. G.

Date: Aug 18 2020