

20-6111

No. \_\_\_\_\_

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

Dorothy Moore — PETITIONER  
(Your Name)

Board of Review vs.  
NJ Dept of Labor — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

New Jersey Supreme Court  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

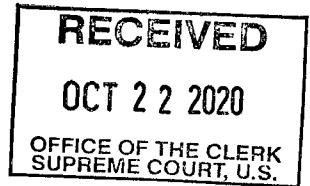
PETITION FOR WRIT OF CERTIORARI

Dorothy Moore  
(Your Name)

948 West Princess Apt 2  
(Address)

York, PA 17401  
(City, State, Zip Code)

717-693-4825  
(Phone Number)



QUESTION(S) PRESENTED

I Am Asking this Court to Please  
Review Why My Unemployment Benefits  
Were denied based on the True  
Information in the Motion I am  
Filing. I was forced to give up my  
home and my Job because of death  
threats made on my Life and  
my Family

Dorothy Moore

8/4/20

## 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:

## RELATED CASES

Bergen Regional Medical Center  
New Jersey Dept of Labor, Board of Review  
New Jersey Appellate Court  
New Jersey Supreme Court

Moore VS Bergen Regional Medical Center  
No. A-4382-17T4 12/9/15  
Moore VS NJ Appellate Court No. A4382-17T4 6/6/16  
Moore VS NJ Supreme Court No. A-004382-17 11/14/19

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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 is unpublished.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 is unpublished.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 A 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 \_\_\_\_\_ 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.

## **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 3/10/20.  
A copy of that decision appears at Appendix A.

[ ] A timely petition for rehearing was thereafter denied 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. § 1257(a).

## STATEMENT OF THE CASE

I am writing to appeal an opinion made by the Supreme Court of New Jersey on March 10, 2010 in regards to denial of unemployment benefits for the period of November 1, 2015 through February 6, 2016. I was living in Northern New Jersey, Bergen County (Westwood NJ) on the night of September 25, 2015 my 34 year old son and I starting receiving death threats via email. The Westwood NJ Police Dept was contacted (see police report attached), our home was watched overnight and we were notified by the police on Saturday, September 26 that they did not have the manpower to keep watch over our home, Sunday night we decided to leave our home in the middle of the night and run for our lives. We traveled through several states and ended up in an unknown location in the state of Pennsylvania on October 1, 2015. The day we arrived in Pennsylvania we were visited by the Pennsylvania Police and was advised to refrain from using our cell phones and computer for fear of being tracked, we were also told to remain inside and not venture out. My son and I both had great jobs in New Jersey which we had to give up. We both decided to apply for unemployment benefits. My 34 year old son benefits were granted immediately thereafter and he was able to collect. I applied with the same police report as my son but my benefits was denied as my leaving my job voluntarily. I appealed to The NJ Board of Review and the decision was upheld, after the decision of the Board of Review I applied to The Appellate Court of New Jersey. The Appellate Court reversed the Board's decision stating that i did have a legitimate reason for leaving my job because of

death threats. The Board of Review decided with the appellate Court but stated benefits would not be waived because i did not spend time looking for work when we arrived in Pennsylvania. We arrived in Pennsylvania and followed the advice of the police and did not go outside or use the phone or computer. January 2016 i was able to use the computer of another person and tried to find remote work to do but was not able to do so. I was really afraid to go out but all i could think about was being gunned down in the street. June 2016 we received notification that the young man who had been threatening us had previously lured two young men into a warehouse in Paterson NJ and shot and killed both of them, he had been sentenced to life without parole. I then started to venture out to look for work but circumstances beyond my control made it difficult. I am now in a place where i have never been, 69 years old, non licensed driver but i refused to give up the search, after numerous interviews i finally got a job in August 2017 doing medical billing and was employed until doctor retired December 2019. I am asking you to PLEASE review my case and perhaps you will understand why i did not look for work between 11/1/15 through 2/1/16. The only thing i could think of was staying alive. I applied for Unemployment because i thought it was the right thing to do. I got my first real job where taxes and unemployment insurance was taken at the age of 18. I worked for 50 years, never got fired and collected unemployment twice from two layoffs. We know we are living in a time where death threats can not be ignored. I feel based on the circumstances my benefits should have been granted the same as my son's benefits. I don't know what will happen after this review but I am GREATFUL at the age

of 73 i'm still HERE.



Dorothy Moore

August 4, 2020

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**REASONS FOR GRANTING THE PETITION**

I am praying The Supreme Court of The United States of America will grant my petition.

September 25, 2015 in Bergen County N.J. I was forced to give up my home and my job because of death threats on my life and my son. We were running for our lives and ended up in an unknown location in Pennsylvania. 10/1/2015 We were visited by The Pennsylvania Police and was told to stay inside of the place, refrain from using our cell phones and computers so we could not be tracked, because of the police instructions we decided to apply for unemployment. I filed for benefits November 2015 with a copy of the police report (attached) and my benefits were denied stated I did not have a valid reason for leaving my job. My 34 year old son file with the same police report as my self and his benefits was granted. December 8, 2015 I filed an appeal with the ~~State~~

N.J. Board of Review and the decision was upheld on May 3, 2016. I filed an Appeal with the Appellate Court 6/16/2016 they reversed the Board of Review decision and sent the claim back to the Board of Review. The Board of Review then decided that I did have a valid reason for leaving my job but my benefits would not be granted because I did not look for work when I arrived in Pennsylvania. It was impossible to look for work because we had been told by the police officer in Pennsylvania to stay in. I refiled an Appeal with the Appellate Court, they reversed their decision and agreed with the Board 10/31/19, November 14, 2019. I filed an Appeal with The N.J. Supreme Court and March 10, 2020 my petition was denied without an explanation (see attached) I contacted the Clerk of the Supreme Court to see if I could get an explanation as to why. I was told by the Clerk it was the

Judge's decision and there was no reason as to why. This has really bothered me. I am now 73 years old I got my first real job where taxes was taken when I was 18 years old, collected unemployment once in my 50 year work history.

June 2016 we were informed that the young men who had threaten our lives had been sentenced to life without parole because he had lured two young men to a warehouse in Paterson N.J. and shot and killed both of them, shortly thereafter I felt it would be ok to start looking for work. It wasn't easy because at the age of 70 it's not easy in Pennsylvania because of age discrimination.

I manage to find another medical billing job 8/18/17 and worked until the doctor retired 12/1/19. I don't feel I have been treated fairly because I feared for my life; I had a great job where I was an Executive Board UNION member, lived in a very nice quiet peaceful town in Bergen County N.J. and I had to leave it all behind

because I was afraid of being murdered.

Docky Moose  
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## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Dorothy Moore

Date: 8/4/20