

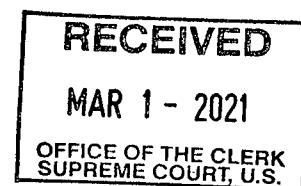
**SUPREME COURT OF THE UNITED STATES  
WASHINGTON, D.C.**

Clara Lewis Brockington, ) No. 20-6158  
 )  
 Plaintiff, ) USCA 4 No. 19-1705  
 Vs. )  
 ) PETITION FOR REHEARING  
 South Carolina Department of Social )  
 Services, et al., )  
 Defendants. )

Pro Se Plaintiff is presenting before the COURT this **PETITION FOR REHEARING** to be granted by the Supreme Court of the United States. This **PETITION FOR REHEARING** is being presented in a timely manner, in good faith and not for delay. Pro Se Plaintiff is asking that the COURT grant this **PETITION FOR REHEARING**, due to the pain and suffering, stress, depression, anxiety, loss of income, inability to walk, sit, stand, kneel, exercise, drive, interact with family, friends, worship services, work, socialize, etc. for the past five years or more, due to the negligence of South Carolina Department of Social Services. Pro Se Plaintiff has stated a claim for relief and requesting that this case is continued to settle the claim. I will have to continue seeing Medical Professionals for the remainder of my lifetime. Thanks in advance for granting this **PETITION FOR REHEARING** and/or settling the claim for relief expedited!

Clara Lewis Brockington, Pro Se Plaintiff  
P. O. Box 3232, Florence, S. C. 29502  
Telephone: (843) 616-1317

February 1, 2021  
Florence, South Carolina



**SUPREME COURT OF THE UNITED STATES  
WASHINGTON, DC**

Clara Lewis Brockington,	)	No. 20-6158
	)	
Plaintiff,	)	USCA 4 No. 19-1707
	)	
South Carolina Department of Social Services, et al.,	)	<b>PETITION FOR REHEARING</b>
Defendants.	)	
	)	

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I, Clara Lewis Brockington, Plaintiff is filing a **PETITION for Rehearing** to the court due to denial of Petition for a Writ of Certiorari. This **PETITION for Rehearing** is presented in good faith and not for delay. Pro Se Plaintiff is appealing to the Supreme Court for a rehearing due to numerous reasons.

Please note for the record that the COURT did not list any reasons why the Petition for a Writ of Certiorari was denied, in order that the proper corrections could be made and resubmitted. This case has been reviewed by a Paralegal who has over 20 years working in the legal system. After working in the courtroom myself for numerous years, before receiving a permanent injury at South Carolina Department of Social Services, where Pro Se Plaintiff was employed, Pro Se Plaintiff consulted numerous legal teams, that this is a due to be paid worker's compensation case. Pro Se Plaintiff is requesting what did you received from South Carolina Department of Social Services that outweighed Pro Se Plaintiff's facts. Pro Se Plaintiff always request the advice of legal teams before submitting to Court. Pro Se Plaintiff has been indigent since the injury and no compensation.

## **FACTS**

Pro Se Plaintiff is an indigent, single parent that received a Paralegal Degree from a two year college and worked in the legal field for some years after graduation from this college. Pro Se Plaintiff's parents continued to assist me to continue my education to a four year college where I changed my major to Sociology, while I attempted to work and attend college at the same time. However, Pro Se Plaintiff was able to continue college only two years, instead of four years, due to lack of funds. Pro Se Plaintiff continued to work for numerous years and had the determination to apply for a school loan and continue my education to receive another degree. After attending another four year college and changing major to Social Work, Pro Se Plaintiff was successful in two years to receive a Bachelor's Degree. Pro Se Plaintiff worked in numerous capacities for years successfully. Pro Se Plaintiff became challenging and wanted to seek another degree in a more supervisory role and applied to another prestige university and was accepted. Pro Se Plaintiff had two children, working a full time job and decided to challenge furthering my education. After three long years of attending school every weekend and not being able to continue my spouse's duties, mother's duties, religious duties, socialization, family values, etc., Pro Se Plaintiff graduated cum laude and later began my legal career in the courtroom for numerous years, until I fell at South Carolina Department of Social Services on Two Notch Road, Columbia, South Carolina approximately June 24, 2015.

Pro Se Plaintiff had never received a verbal nor written documentation from Supervisor or any other Supervisory Personnel at South Carolina Department of Social Services. Pro Se Plaintiff had good work ethics, a team player, over 10 years of work experience, had supervisory skills, excellent computer skills, hired

as a Foster Care Manager, knowledgeable of the Columbia area, due to travelling with other employment, management skills, training experience, own transportation, family member in college and family member living in the Columbia area, great family support, etc. I stayed late at work most every day to complete assignments before departing for home. I came in early every morning to prepare for the start of the day. I worked on-call on weekends as needed. I knew all of my foster parents and children on a personal basis. I never received a complaint from my superiors from agencies, courts, families, co-workers, etc. Pro Se Plaintiff attended all meetings, conferences, trainings (by unqualified, uneducated and unlicensed trainers).

### **INJURY**

As Pro Se Plaintiff attempted to depart from my desk to my car after work on or approximately June 24, 2015, Pro Se Plaintiff fell in the parking lot at work. Pro Se Plaintiff's Supervisor, Ms. Goodson was walking beside me and assisted me on getting up from the pavement. Ms. Goodson asked that I go to receive medical care from a hospital or doctor's office and call her back and let her know whether there was an injury to my body parts. Pro Se Plaintiff followed all the instructions given concerning my injury. Pro Se Plaintiff went to the Emergency Room to get medical attention and called Ms. Goodson back and gave her all instructions from the Medical Personnel with recommendations. Ms. Goodson informed me that I needed to call the Human Resources Office and discussed my injury and that office will direct me on what to do next. All the instructions were followed by Pro Se Plaintiff; however, when the Medical Professionals requested worker's compensation paperwork, South Carolina Department of Social Services refused to give me paperwork and refused to follow the Medical Professionals

recommendations. I stated to my supervisor, Ms. Goodson that I will have to consult with Advisors if South Carolina Department of Social Services were not going to be responsible for my injury, worker's compensation, etc. South Carolina Department of Social Services violated my **Fifth Amendment – Rights of Persons** which states, **"No person shall be held to answer for a capital or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty or property, without due process of law; nor shall private property be taken for public use, without just compensation."**

As the COURT, can see per my ADVISORS, lots of my rights were broken here. A crime was committed and I was put in jeopardy as I committed the crime, but the crime was committed by South Carolina Department of Social Services knowingly, without showing concerns and cares for an employee that they hired to do a job as a Foster Care Manager. When they refused to allow me to express my injury to the correct person(s) at South Carolina Department of Social Services Department Human Resources Office, this violated my **First Amendment – Freedom of Expression and Religion**. This amendment states, **"Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances."** When I contacted Human Resources by phone and went to the office in person, everyone refused to give the correct paperwork to return

to Medical Professionals so that I may continue my treatment, because I was unable to walk, stand, kneel, bend, stand, etc., on this leg. I presented the Human Resources Department, as well as Ms. Gooden, my supervisor, a copy of the Emergency Room Medical Professionals' evaluation and recommendations. I now am in pain, distress, stressed, depressed and had lots of anxiety for a long period of time. After speaking with my personal physicians, they advised me to seek further advice so that I can receive the necessary medical treatment. To this date, I continue to need medical treatment, medications, unable to walk, stand, bend, kneel, and sit, etc., for long periods of time, due to the injury I received at South Carolina Department of Social Services.

Pro Se Plaintiff has presented this case in numerous COURTS, which denied my cases (without any reasons). Pro Se Plaintiff has allowed a Paralegal and possibly her team to review all of my cases before submitting them to COURT, and there has not been concerns from these teams (who are certified, degreed and licensed in this field) that reviewed these cases and declared that they do NOT see any reasons why they were NOT approved. **Amendment 7 – Civil Trials** have also been violated by South Carolina Department of Social Services. The Amendment states, **“In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.”** Pro Se Plaintiff feels that this case being tried in numerous courts violates the 7<sup>th</sup> Amendment. Pro Se Plaintiff can assure the Supreme Court that this case continues to be retried over and over again, also by this Court, which is against the laws of the Constitution.

Pro Se Plaintiff also had **Amendment 9 rights violated also which include other rights that are implied by existing laws such as in the written constitutions but are not themselves expressly coded or enumerated among the explicit writ of the law. Alternative terminology sometimes used are: implied rights, natural rights, background rights and fundamental rights."** My enumerated rights were violated by South Carolina Department of Social Services when my supervisor, Ms. Gooden admitted that she saw me fall on South Carolina Department of Social Service's property, helped me get up from the pavement and informed me to go seek medical attention and report that information back to her. My rights were violated as a citizen, employee and person of knowledge and individual that was without expression or instance of articulation. Pro Se Plaintiff is presenting this case in good faith and not for delay. I continue to suffer today and should be granted the rights to go to South Carolina Department of Social Services at this time after five years and receive full compensation and Relief Claim requested.

Pro Se Plaintiff further had **Amendment 14 – Rights Guaranteed: Privilege and Immunities of Citizenship, Due Process and Equal Protection.** Pro Se Plaintiff is aware of numerous other persons receiving compensation from injuries at South Carolina Department of Social Services that were White and of younger age. This is a form of discrimination per South Carolina Human Affairs Commission and Equal Employment Opportunity Commission, if this case is referred to these agencies for complaints. (All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No States shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any

State deprive any person of life, liberty or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws).

Please note for your records that Pro Se Plaintiff has not been treated equal, with justice for all, correctly, and protected by the equal protection of the laws. Pro Se Plaintiff is asking the Supreme Court to review and reconsider that every COURT has looked over discrimination, according to Human Affairs guidelines and Equal Opportunity guidelines. Pro Se Plaintiff is in a protected class that will testify in this COURT. ADVISORS have pointed out all of the mistreatment, refusing to admit discrimination, age, color, gender, race, etc. As the highest Court in the Land, please review this and all documents and you will find that all rulings should be in favor of Pro Se Plaintiff on granting this Appeal.

#### **REASONS FOR GRANTING**

Why was I terminated from South Carolina Department of Social Services? Per Human Resources, Mr. Reese Palmer, County Director was terminated immediately for wrongful termination after receiving Pro Se Plaintiff's complaint.

Why was Pro Se Plaintiff and other former employees of South Carolina Department of Social Services terminated after testing when the University of South Carolina (my alumni) contractual staff were NOT QUALIFIED when administering the test. Pro Se Plaintiff have former employees that will be witnesses, as well as present employees of the University of South Carolina.

Why I was NOT paid any compensation from the fall and injury, as well as continued treatment for this injury, when Ms. Gooden, Supervisor confirmed that Pro Se Plaintiff fell while we were on the property of the South Carolina Department of Social Services after work on my last day of employment? Ms. Gooden and several other employees and former employees of the University of

South Carolina and South Carolina Department of Social Services have been set up to testify on this case effective immediately.

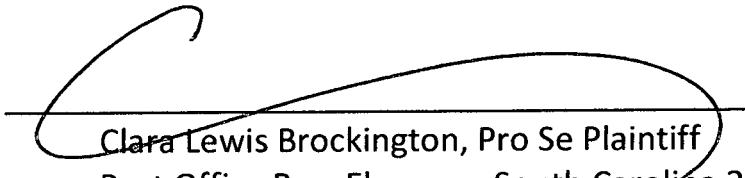
When Pro Se Plaintiff did a group interview and completed paperwork for hiring, there were numerous employees and former employees in this interview and meeting. Question: Why the Supreme Court of the United States have not called any of us to testify, so that you will have BOTH sides of the case?

Did the Supreme Court of the United States contact the South Carolina Human Affairs Commission for the results of their investigation? Pro Se Plaintiff feels that she should have been contacted to discuss the results of the entire case on reasons why it was deny, along with the S. C. Human Affairs findings.

### **CONCLUSION**

Pro Se Plaintiff was wrongfully terminated from South Carolina Department of Social Services on or about June 24, 2015. Pro Se Plaintiff fell at South Carolina Department of Social Services on this same date and received an injury that I never received compensation and requesting compensation in the amount of \$50,000 for medical bills, medications, etc., as well as \$30,000 annual salary X 5 years for financial compensation. Due to Pro Se Plaintiff having witnesses from South Carolina Department of Social Services, as well as the University of South Carolina in Columbia, South Carolina, Pro Se Plaintiff has a MOTION before he COURT, requesting a Relief Claim from South Carolina Department of Social Services, Defendants for \$30,000 x 5 years (\$150,000) and \$50,000 for medical, pain and suffering, distress, disability, indecency, stress, depression, therapy, anxiety, etc., from the fall and injury received on or about June 24, 2015. If this **PETITION FOR REHEARING** is denied, please list all reasons for denial and the next legal step. Pro Se Plaintiff is requesting that the COURT consider, Pro Se Plaintiff

is a citizen of the United States, would like to be treated as you would want your child to be treated, indigent, disabled and have lost almost everything, due to this fall and injury received at South Carolina Department of Social Services, with no compensation, relief claim, etc. Please consider at this time that I recently lost my companion to death (Congestive Heart Failure) and this past weekend, I lost my nephew to dying in the park from a seizure with temperatures of 20 degree weather. Today, I lost my brother in the nursing home from abnormal breathing. However, I was working on this **PETITION** since I received it recently, and pushed forth the effort to get it to the Supreme Court in a timely manner. Thanks in advance for your consideration that I made this effort, even though I am dealing with two (2) deaths at this time. Please grant this PETITION FOR REHEARING, effective immediately. Again, thanks for working, even there is a PANDIMIC!



Clara Lewis Brockington, Pro Se Plaintiff  
Post Office Box, Florence, South Carolina 29502  
Telephone: (843) 616-1317

February 1, 2021

Florence, South Carolina