

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

Clara Lewis Brockington,

Plaintiff,

Vs

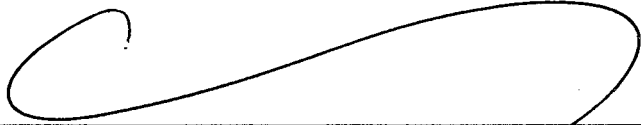
Salem United Methodist Church, et al.

Defendants.

Case No. 20-6595

APPEAL

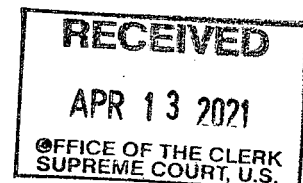
Pro Se Plaintiff is appealing to the COURT to CONTINUE PETITION FOR REHEARING and Accept Delayed Documents, due to the death of a brother, Sammie Lee Kelly and a nephew, Sammie Lee Kelly Jr., recently that has caused my depression, anger, stress and causing me to be on numerous medications and was dysfunctional daily, weekly and at present time, since their death. I trust that the attached documents will confirm my medical, psychological, etc., diagnosis at this time, and requesting the COURT to grant this MOTION To Accept the Delayed Documents (due to deaths and non-functional to think nor send documents) and Continue For Rehearing in favor of Pro Se Plaintiff. I would prefer to NOT utilize my medical file, due to my Medical Professionals were in depth concerning my medical and mental state, experiencing for the first time in life, the death of two family members at the same time. I look forward to the COURT granting this MOTION. Thanks in advance!



Clara Lewis Brockington, Pro Se Plaintiff
Post Office Box 3232, Florence, South Carolina 29502

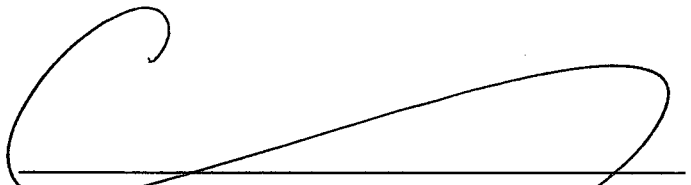
Florence, South Carolina

April 5, 2021



CERTIFICATE OF SERVICE

This is to certify that Salem United Methodist Church, et al, have received a copy of the **APPEAL To Accept Delayed Documents and Continue Petition For Rehearing** by the United States Postal Service mailed on April 5, 2021 at the addresses on record.



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

Florence, South Carolina

April 5, 2021

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

Clara Lewis Brockington,

Plaintiff,

Salem United Methodist Church, et al.

Defendants.)

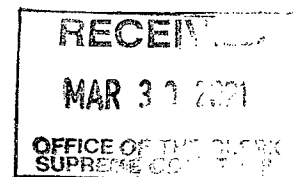
No. 20-6595

PETITION FOR REHEARING

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 the COURT to grant this Petition in Plaintiff's favor, due to the Defendants have caused Plaintiff's pain and suffering, stress, depression, anxiety, embarrassment, interaction with friends, family and church members, loss of worship, socialization, confusion at spouse's church, family quarrels, medical, psychological and therapy visits, etc. Pro Se Plaintiff is stating a claim for relief to settle this case in the amount of \$50,000 and/or requesting that this case is continued to settle a claim. I will always have continuous visits medical and psychologically for the remainder of my lifetime per my Professionals. Thanks in advance for granting this **PETITION FOR REHEARING** in the favor of the Plaintiff with this states claim of relief and/or continuing case.

Clara Lewis Brockington, Pro Se Plaintiff
P. O. Box 3232, Florence, SC 29502

March 13, 2021
Florence, South Carolina



FACTS

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 proper corrections could be made and resubmitted. I worked in a courtroom over 15 years and every JUDGE gave the individuals before them reasons why they were issuing a denial. It appears to me to be PROFESSIONAL AND WITHIN STANDARDS to inform the Plaintiff and/or the Defendants the reasons for denials.

Plaintiff will continue to state the facts that this case has been discussed with numerous other pastors, ministers and evangelists. They have all stated that: 1/No clergy has authority to remove anyone from **GOD's house**. The church does not belong to anyone. It is a place where we all go and worship, pay our tithes, renew our faith, be a pillow for other perishers' in the church who are crying out for help, etc. These other clergies (about 30) will testify in case there will be further legal action against Salem United Methodist Church, et al.

2/There will be about 50 or more members that will testify that they did not get baptized at Salem United Methodist Church, but is still a member. We have something called, "Watch Care Baptism" where a member can get baptized at another church since we do not baptize, join their spouse's church or prefer to get God's word from another denomination and remain a member of Salem United Methodist Church.

3/Plaintiff have been discriminated against and do not understand why the COURT cannot come to that conclusion when there are numerous other persons in the church that wanted to be baptized like **JESUS**, and go under water in the name of the Father, Son and Holy Ghost. Again, Salem United Methodist Church only sprinkle water on the top of your head and call that "baptism". If other

members and I chose to go to another church which is doing what the **BIBLE** tell us to do to be saved in Jesus's name, why does the COURT deny me of my rights? This is discrimination according to Amendment V – Rights of Persons. “No person shall be held to answer for a capital or otherwise infamous crime, unless on a presentation 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 offence 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.” Plaintiff has been deprived of life, liberty or property. I pay tithes and have lifetime rights to the church, gravesite, property, etc., at Salem United Methodist Church and all this have been taken from me, due to the COURTS won't apply the discrimination laws, etc.

4/According to Amendment IX – Unenumerated Rights, I have been discriminated against and rights have been violated. “The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.” All the churches in the United States belong to God. No Court, no man, no clergy, etc., have a right to deny membership or terminate membership. I have been a member of Salem United Methodist Church since I was 15 years old. My parents took me to this church since birth (65 years of attendance). When we get to heaven, which will stand before my GOD and tell GOD that the COURT rules come before GOD's rules? Who will stand before GOD and tell GOD that your decisions derived from a rule book when GOD has the Book of LIFE? I am asking the COURT to review this rehearing with God's Word and NOT man's word.

5/According to Amendment XIV – Rights Guaranteed, my rights have been violated and I have been discriminated against again. “Privileges and Immunities of Citizenship, Due Process and Equal Protection.

A/All persons born or naturalized in the United States, and subject to jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State 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.

6/Amendment I – **Freedom of expression and RELIGION.** Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof; or abridging the freedom of speech, of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances. If we disregard all the other Amendments, this one tells us everything we need to know about RELIGION, etc. I am requesting that the Supreme Court utilized all of these Amendments and know that my rights have been violated and I have been discriminated against when others in the Church have been baptized at other churches and remain a member of Salem United Methodist Church. I have a Paralegal Degree, Bachelor’s Degree, Master’s Degree and over 15 years working in the legal system and it does not take much knowledge to see violations, discrimination, etc., in this case. My experience working with the Attorney General Office gives me the knowledge I needed to see the violations, as well as the legal advisors, State Representatives, Clergies, Former Pastors of Salem United Methodist Church, etc. Due to my numerous disabilities and loss of employment due to injuries, I am not able to pursue cases in another perspective.

REASONS FOR GRANTING

6/Rev. Bryan Mungo, Pastor of Salem United Methodist Church, accused me of SIGNING his name to a form to send to our Conference Office to request assistance with medical bills. Gail Corn in Columbia, South Carolina will confirm and verify that I did NOT sign anyone's name. I have completed this form about five times for assistance. None of the former PASTORS have ever made any accusations of me completing the form illegally nor wrongfully. I worked in a legal system over 15 years and know the laws of the State. Rev. Mungo does not have any college education, no degrees and should NOT be at Salem United Methodist Church. He is violating the conference laws of the United Methodist Churches. No Pastors have ever been hired to preach at Salem United Methodist Church unless you had a Bachelor or Master's Degree. Who does it seem like breaking laws and preaching illegally according to the bylaws? I think I have a case when it comes to discrimination, violations, breaking the laws, etc. After my clarification of his error on the application, he decided that he wanted to look for anything so that he can terminate me from the church. Who in the right mind (child of God, head of the Church, etc.) will allow other clergies and pastors hear that you think you are bigger than GOD and terminate someone from GOD's HOUSE?

7/Rev. Mungo and refused to follow the instructions of Bishop Holston in the letter dated July 16, 2018. Rev. Terry Fleming, District Superintendent refused to follow the instructions of Bishop Holston in the letter dated, July 16, 2018. The FACT is that the two clergies refused to follow instructions and single me out as a "troublemaker" when I contacted the Bishop and decided to work against what the Bishop suggested and terminated my membership from Salem United Methodist Church. I have been discriminated and violated against, which

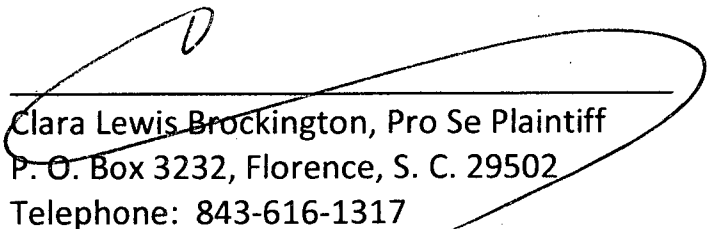
is against the laws in the State of South Carolina. The COURT has been presented the facts and now I am making this MOTION to approve this Rehearing and award Plaintiff the claim of relief in the amount of \$50,000. The COURT has a copy of Rev. Daniel McCowan, Pastor of Maxwell Baptist Church, who spoke with Rev. Joyce Chiles, who was the Pastor of Salem United Methodist Church and myself and we three agreed that I could get baptized at Maxwell Baptist Church under "Watch Care". My spouse is a member of Maxwell Baptist Church and my daughter, as well as other family members. Please note for the record also that all my siblings and parents got baptized at other churches and remain members of Salem United Methodist Church. Is this discrimination? Is this a violation of my Civil Rights? Is this a violation of my rights according to the First Amendment?

8/My civil rights have been violated and disrespected according to the Civil Rights Act of 1964. "An Act to enforce the constitutional right to vote, to confer jurisdiction upon the district courts of the United States of America to provide injunctive relief against discrimination in public accommodations, to authorize the Attorney General to institute suits to protect constitutional rights in public facilities and public education, to extend the Commission on Civil Rights, to prevent discrimination in federally assisted programs, to establish a Commission on Equal Employment Opportunity, and for other purposes." Again, this definitely shows that my rights have been violated and I have been discriminated against from 2018 to present time by Salem United Methodist Church, et al.

CONCLUSION

I beg the COURT to review this Petition for Rehearing and grant in favor of Plaintiff, due to Salem United Methodist Church has discriminated against me by terminating my membership due to baptism, when others in the church have

been baptized and remain a member of Salem United Methodist Church, as well as violated the laws of the State of South Carolina. Defendants have also violated my Civil Rights when I was discriminated against in public accommodations, etc. Plaintiff is also asking the COURT to grant relief of claim in the amount of \$50,000 for all the violations, discrimination, pain and suffering, medical, mental and psychological abuse, damages from embarrassment, socialization, mental distress, stress, depression, anxiety, punitive damages, lifetime medications, lifetime therapy, etc. Again, this **PETITION FOR REHEARING** is being presented in good faith, not for delay and in a timely manner. Plaintiff has MOTION before the COURT to grant Motion in favor of Plaintiff and approve settlement of Relief Claim in the amount of \$50,000. Thanks in advance for all of your hard work.



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

Florence, South Carolina

March 13, 2021

**Additional material
from this filing is
available in the
Clerk's Office.**