

APPENDIX A

Rule 14.1(b)(i)

Opinions in pages 1.a. to 20.a.

COMBINED SCV 191598

Promila Rajput

v.

1. Complaint - Tiffany Terrell, *Circuit # CL19-3415; GV19-9607*
2. Complaint - Sharon Wake, *Circuit # CL-19-3806; GV19-0050*
3. Injunction - Tiffany Terrell, and Amy Hensley on behalf and
for 9+ million Virginia Residents & Businesses, *Circuit # CL19-3415*

To The Circuit Court of City of Richmond, Virginia

Judgement entered February 5, 2021

FINAL ORDER
Pg 20.a

Appendix A - City of Richmond COMBINED SCV 191598

Promila Rajput v (1) Tiffany Terrell; (2) Sharon Wake 21

	<u>Page Numbers</u>
<i>Two GDC 6/5/19 disqualification order hon Judge Cann</i> 1.a. & 2.a.	
<i>Two GDC 6/5/19 Clerk Blount deceived Hon Justice Lemons</i> 3.a. & 4.a.	
<i>Two SCV 6/11/19 flawed orders extracted deceiving Hon Justice Lemons</i> ... 5.a.& 6.a.	
<i>GDC 6/24/19 receipt \$3 review, copy concealed request, 6/5&11/19 orders</i> ... 7.a.	
<i>GDC 7/1/19 procedurally flawed letter to hon judges to fix designation</i> ... 8.a.	
<i>CC 8/15/19 Recusal order of then chief judge Taylor - in Wake</i> 9.a	
<i>CC 8/20/19 Disqualification of hon judge Rupe - in Wake</i> 10.a.	
<u><i>CC 8/23/19 Injunctive Order in controversy</i></u> 11.a. to 12.a.	
<u><i>CC Deletes disclosure Pt.5 Amends 8/23/19 Order 9/3/19 in controversy</i></u> ... 13.a.&14.a.	
<i>Two CC 9/4/19 orders dismissing with prejudice</i> 15.a.	
<i>CC 9/25/19 recusal order of judge Jenkins</i> 16.a.	
<i>Two CC 9/30/19 orders dismissing rehearing</i> 17.a.	
<i>CC 10/15/19 disqualification order of all circuit court judges</i> 18.a.	
<i>SCV 10/1/20 Order refusing appeal</i> 19.a.	
<i>SCV 2/5/21 Order deny rehearing</i> ← <i>FINAL ORDER</i> <i>from Supreme</i> <i>Court of Va</i> 20.a.	

Concealed from me until I reviewed
the file on 27 June 2019, when I
requested a copy. Ex parte FRAUD.

Case No. GV19019607-00

General District Court

Juvenile & Domestic Relations District Court

RICHMOND GENERAL DISTRICT COURT - CIVIL

PROMILA RAJPUT

v. / In re:

T R TERRELL

ORDER OF DISQUALIFICATION

I, Judge L. B. CANN, CHIEF JUDGE, recuse myself from hearing this case for the following reasons:

THE DEFENDANT IS AN EMPLOYEE OF THIS COURT WHO IS BEING SUED BY A LITIGANT WHOM SHE ASSISTED AT THE PUBLIC COUNTER.

6-5-2019

S/

L. B. Cann

WAIVER OF DISQUALIFICATION

We, the undersigned parties and attorneys in this case, have been advised that the following situation exists which otherwise could require Judge to be recused from this case

Nevertheless, we waive the right to request the Judge's recusal and waive the disqualification of the Judge to hear this case.

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Concealed from me until I reviewed
the file on 27 June 2019, when I requested
a copy. EX PARTE FRAUD.

Case No.

GV19020050-00

RICHMOND GENERAL DISTRICT COURT - CIVIL

General District Court

Juvenile & Domestic Relations District Court

PROMILA RAJPUT

v./In re:

S D WAKE

ORDER OF DISQUALIFICATION

I, Judge L. B. CANN, CHIEF JUDGE , recuse myself from hearing this case for the following reasons:

THE DEFENDANT IS AN EMPLOYEE OF THIS COURT WH IS BEING SUED BY A LITIGANT WHOM SHE ASSISTED AT THE PUBLIC COUNTER.

6-5-2019

S/

L.B.Cann

WAIVER OF DISQUALIFICATION

We, the undersigned parties and attorneys in this case, have been advised that the following situation exists which otherwise could require Judge to be recused from this case.

Nevertheless, we waive the right to request the Judge's recusal and waive the disqualification of the Judge to hear this case.

S/

S/

S/

S/

*This waiver must be signed by all attorneys and all parties in the above-styled case in order for the waiver to become effective.

PAGE #2-a

**GENERAL DISTRICT COURT COVER SHEET
REQUEST FOR DESIGNATION – RECUSAL CASE**

City of Richmond - Civil Division

NAME OF COURT

General District Court

Case Style (Please provide complete style of case):

Promila Rajput

v. S. D. Wake

Case Number(s): GV19020050-00

Hearing/Trial Date(s) and time (if set):

July 11, 2019 at 10:00 General return docket

DATE AND TIME OF HEARING/TRIAL

Does this matter require a hearing within the next 30 days? Yes No

Recusal of Entire Court 

Recusal of Chief Judge

Please provide a statement as to the reason for recusal in order to assist in the assignment of the case:

Litigant has sued a deputy clerk who assisted her at the public counter

Type of case:

Traffic Civil Criminal

Brief summary of the nature of the case (Original Charge and Code Section or attach a copy of warrant/summons):

1) 18.2-472 falsified attached public record; 2) 18.2-22 conspired to fraud; 3) 8.01-195.1 to intimidate, insult me, humiliated me in public to cover up 3rd party slander

Disqualification Order Attached: Yes No

If disqualification order is not attached, please explain why.

Local Court Requesting:*

Bench Switch with another active judge
 Retired Judge (entire day)
 Retired Judge (recusal case only)

*Note: The Supreme Court will make the final determination regarding how this case is assigned.

Court Contact regarding this case:

Name/Title: Sandra Blount Clerk

Telephone number: 804-646-6478

E-mail address: sblount@vacourts.gov

GENERAL DISTRICT COURT COVER SHEET
REQUEST FOR DESIGNATION – RECUSAL CASE

City of Richmond _____ General District Court
NAME OF COURT

Case Style (Please provide complete style of case):

Promilla Raiput _____ v. T. R. Terrell _____

Case Number(s): GV19019607-00 _____

Hearing/Trial Date(s) and time (if set):

July 3, 2019. 10:00 General Return docket _____

DATE AND TIME OF HEARING/TRIAL

Does this matter require a hearing within the next 30 days? Yes No

Recusal of Entire Court ←

Recusal of Chief Judge

Please provide a statement as to the reason for recusal in order to assist in the assignment of the case:

Litigant has sued a deputy clerk who assisted her at the public counter. _____

Type of case:

Traffic Civil Criminal

Brief summary of the nature of the case (Original Charge and Code Section or attach a copy of warrant/summons):

Treason, conspiracy, due process, deprivation, illegal blanket permanent injunction per attached Bill of Particulars. _____

Disqualification Order Attached: Yes No

If disqualification order is not attached, please explain why.

Local Court Requesting:*

Bench Switch with another active judge

Retired Judge (entire day)

Retired Judge (recusal case only)

*Note: The Supreme Court will make the final determination regarding how this case is assigned.

Court Contact regarding this case:

Name/Title: Sandra Blount, Clerk

Telephone number: 804-646-6478

E-mail address: sblount@vacourts.gov

Supreme Court of Virginia

To All To Whom These Presents Shall Come — Greetings:

Know Ye, That I, DONALD W. LEMONS,

Chief Justice of the Supreme Court of Virginia, by virtue of authority vested in me by law, do hereby designate —

THE HONORABLE LUCRETIA A. CARRICO, RETIRED JUDGE
OF THE ELEVENTH JUDICIAL DISTRICT
TO PRESIDE IN THE GENERAL DISTRICT COURT
OF THE CITY OF RICHMOND

In the case of

Promila Rajput

v.

T.R. Terrell

GV19019607-00

To be heard on a date set by the Judge, and continuing
until the matters presented to her in this case
have been disposed of according to law.

only

Judge
Carrico

In the place of

THE GENERAL DISTRICT JUDGES OF THE THIRTEENTH JUDICIAL DISTRICT
who are so situated as to render it improper, in their opinion,
for them to preside at the trial of this case.

It is so Ordered. Given under my hand and seal this 11th day of June 2019.

Donald W. Lemons

(SEAL)

Chief Justice of the Supreme Court of Virginia

PAGE #5.a.

This is evidence
to my argument
that orders
are ineffectively
written. Trivial
Fraud 1:1

Please do not
move or remove
sequence of
evidence, T.R.
Relates to Pg 21
last para

Supreme Court of Virginia

To All To Whom These Presents Shall Come — Greetings:

Know Ye, That I, DONALD W. LEMONS,

Chief Justice of the Supreme Court of Virginia, by virtue of authority vested in me by law, do hereby designate —

THE HONORABLE LUCRETIA A. CARRICO, RETIRED JUDGE
OF THE ELEVENTH JUDICIAL DISTRICT
TO PRESIDE IN THE GENERAL DISTRICT COURT
OF THE CITY OF RICHMOND

In the case of

Promila Rajput
v.
S.D. Wake
GV19020050-00

This is evidence to
my argument that
orders below are
ineffective by
Mitche's Jurisprudence
Franel 1:1.
Plz do not move sephere

To be heard on a date set by the Judge, and continuing
until the matters presented to her in this case
have been disposed of according to law.

Relates to
Page 21 of
Petition,
last para

*ONLY
Judge
Can*
In the place of
THE GENERAL DISTRICT JUDGES OF THE THIRTEENTH JUDICIAL DISTRICT
who are so situated as to render it improper, in their opinion,
for them to preside at the trial of this case.

It is so Ordered. Given under my hand and seal this 11th day of June 2019.

Donald W. Lemons

(SEAL)

Chief Justice of the Supreme Court of Virginia

PAGE # 6.a



Reviewed files

OFFICIAL RECEIPT
RICHMOND CITY GENERAL DISTRICT COURT - CIVIL DIVISION
MISCELLANEOUS

19019607-00

DATE : 06/24/2019

TIME : 09:48:01

RECEIPT # : 19000006298

TRANSACTION # : 19062400002

CASHIER : DFP

REGISTER # : C353

Pridemore alias ACCOUNT OF : RAJPUT, PROMILA

Receiving RECEIVED OF : RAJPUT, PROMILA

CASH : \$5.00

DESCRIPTION 1 : COPIES

ACCOUNT CODE	DESCRIPTION	PAID
113	COMMONWEALTH COSTS	\$3.00

TENDERED : \$

5.00

AMOUNT PAID : \$

3.00

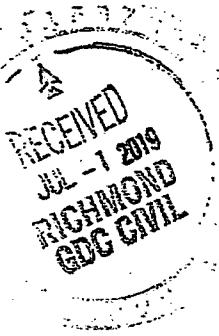
CHANGE AMOUNT : \$

2.00

Conceded from me

Photocopies of Judge Caw's recessional
Application for designation
Supreme Ct Order
Memo to reschedule week

URGENT



Fax: 804 7866249
For Sharon Rajput, Plaintiff

Promila Rajput
3404 S Street, Richmond, VA 23223
804 968 9026
promila.rajput.11@gmail.com

1 July 2019

To: The Honorable Chief Judge Cann
13th Judicial District Court
400 N, 9th Street
Richmond, VA 23223

To: Through The Honorable Chief Judge Carrico
The Honorable Designate Judge Carrico, Retired
11th Judicial District Court
Petersburg, VA

Dear Chief Judge Cann and Judge Carrico,

Attached is a self-explanatory letter to The Honorable Chief Justice Donald Wayne Lemons.

Brief:

1. The disqualification order of 5 June 2019 is for Honorable Chief Judge Cann only.
2. The improper, ex parte communication to Supreme Court by Ms. Blount is falsified, usurping court's authority adopting, modifying and implementing that the entire court is disqualified, considered fraudulent. Entire court would mean all judges, employees and physical location itself. This is not so. It may be all the judges but the orders are entered with specificity and not ambiguous. Certain procedural matters are bound by pre-requisites of waivers and consents, such as the disqualification order of 5 June 2019.
3. Disqualification order of one district judge and the communication to Supreme Court for entire court district judges, are contradictory in quantity and quality.
4. Thus, the 11 June 2019 improper ex parte order from Supreme Court entered by The Honorable Chief Justice Lemons renders itself ineffective, improper, and is considered fraudulent.
5. In addition, as of today there are 3 cases on defendant Terrell's matter. At the time improper ex parte communication by Ms. Blount was initiated to Supreme Court there were two cases with sub case number 00 WID and 01 Show Cause. But the order from Supreme Court was incomplete omitting the 2nd case with sub-case number 01 on Show Cause on purpose and with intent. As of today, there are 3 cases with sub-case numbers, to wit, 00 WID, 01 Show Cause and 02 Contempt. Currently it indicates only one sub-case number 00 WID.
5.1. These three sub-case numbers must be reflected for the designation order on defendant Terrell's case to be complete and properly effective. Until such time, the designation order with respect to defendant Terrell renders itself incomplete, improper, considered fraudulent.
6. Therefore, The Honorable Designate Judge Carrico's designation, most unfortunately renders itself ineffective and improper, until fixed.

You may call me anytime on my cell phone 804 968 9026 for any further assistance or clarification.

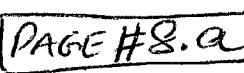
Respectfully submitted on 1 July 2019 by


Promila Rajput, Plaintiff

Cell: 804 968 9026

Add: 3404 S Street, Richmond, VA 23223

Email: promila.rajput.11@gmail.com


PAGE #8.a

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

PROMILA RAJPUT,

Plaintiff

vs.

Case No.: CL19-3806

SHARON D. WAKE,

Defendant.

RECUSAL ORDER

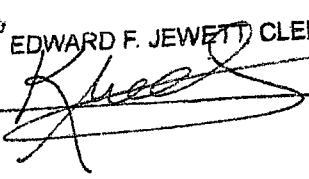
I, the Honorable Joi Jeter Taylor, am of the opinion that I am so situated in respect to the case as to render it improper for me to preside and therefore, I, as Chief Judge, designate Judge Gregory L. Rupe, the next judge in rotation, to preside over the above styled case(s).

The Clerk is directed to forward a certified copy of this Order to the parties.

ENTER: 8. 15. 19


Joi Jeter Taylor, Chief Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: 

D.C.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

DISQUALIFICATION ORDER

PROMILA RAJPUT,

Plaintiff,

v.

Case No.: CL19-3806

SHARON D. WAKE

Defendants.

I, Gregory L. Rupe, am of the opinion that I am so situated in respect to the above styled case as to render it improper for me to preside and therefore, I recuse myself.

A copy of this disqualification order has, this 20th day of August 2019, been sent to the Chief Judge of the circuit for designation of another judge to preside over this case.

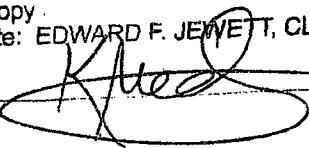
The Clerk is directed to send an attested copy of this Order to all parties of record.

ENTER: 8/20/19



Gregory L. Rupe, Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY:  D.C.

drf/c: film/Chief Judge/Counsel

PAGE # 10.a

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

PROMILA RAJPUT,

Plaintiff,

v.

Case No: CL19003415-00

TIFFANY TERRELL,

Defendant.

ORDER

CAME the plaintiff, Promila Rajput ("Rajput"), *pro se*, and defendant Tiffany Terrell, by counsel, on the defendant's Motion for Prefiling Injunction. For the reasons stated in the motion, the Court finds that a prefiling injunction is necessary to protect opposing parties and this Court from further frivolous litigation by Rajput.

Accordingly, it is hereby ORDERED that the Motion for Prefiling Injunction is granted, and:

1. Rajput is prohibited from filing any action in this Court without obtaining leave of Court to file any *pro se* pleading by submitting to the Clerk an Application for Leave to File Suit or motion along with a copy of this prefiling injunction order;
2. Rajput is required to attach a separate, notarized Affidavit attesting that the lawsuit is well-grounded in fact and existing law to her Application for Leave to File Suit; and
3. Rajput is required to file, along with her Application for Leave to File Suit, a Complaint setting forth each cause of action asserted and the facts supporting the cause of action.

The Clerk is directed to send a certified copy of this Order to counsel of record and the plaintiff. The Court waives endorsements pursuant to Va. Sup. Ct. Rule 1:13.

Entered this 23rd day of August, 2019.

HALASZ

Reporting & Video, LLC

Mary L. Rosser, RPR

m.rosser@verizon.net

23 Aug 19 PFI Circuit-Terrell

1011 E. Main Street, Suite 100
Richmond, VA 23219

Phone (804) 708-0025
www.HalaszReporting.com

C. M. JEWETT
Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: *[Signature]* D.C.

4. This order
applies
as of
August
9, 2019
to any and
all motions,
petitions,
& complaints
and other
pleadings.

5. Rajput is
required to seek
leave of Court
along with a
copy for
any and
all discovery
requests, including
subpoenas, before
commencing said
discovery.

SEEN AND AGREED:



Amy E. Hensley* (VSB No. 80470)
Assistant Attorney General
Office of the Attorney General
202 North 9th Street
Richmond, Virginia 23219
Telephone: (804) 371-2267
Facsimile: (804) 371-2087
ahensley@oag.state.va.us
*Counsel for Defendant

SEEN AND _____:

Ms. Promila Rajput
3404 S. Street
Richmond, Virginia 23224
pro se

VIRGINIA :

*FRAUD; I did NOT
petition myself against myself*

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

PROMILA RAJPUT,

Plaintiff,

v.

Case No: CL19003415-00

TIFFANY TERRELL,

Defendant.

AMENDED ORDER

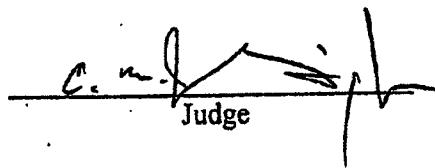
CAME the plaintiff, Promila Rajput ("Rajput"), *pro se*, and defendant Tiffany Terrell, by counsel, on the defendant's Motion for Prefiling Injunction. For the reasons stated in the motion, the Court finds that a prefiling injunction is necessary to protect opposing parties and this Court from further frivolous litigation by Rajput.

Accordingly, it is hereby ORDERED that the Motion for Prefiling Injunction is granted, and:

1. Rajput is prohibited from filing any action in this Court without obtaining leave of Court to file any *pro se* pleading by submitting to the Clerk an Application for Leave to File Suit or motion along with a copy of this prefiling injunction order;
2. Rajput is required to attach a separate, notarized Affidavit attesting that the lawsuit or pleading is well-grounded in fact and existing law to her Application for Leave to File Suit; and
3. Rajput is required to file, along with her Application for Leave to File Suit, a Complaint setting forth each cause of action asserted and the facts supporting the cause of action.
4. This order applies as of August 9, 2019 to any and all motions, petitions, complaints, and other pleadings.

The Clerk is directed to send a certified copy of this Order to counsel of record and the plaintiff. The Court waives endorsements pursuant to Va. Sup. Ct. Rule 1:13.

Entered this 3rd day of September, 2019.



C. m. J. Judge

SEEN AND AGREED:

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY:  D.C.

Amy E. Hensley* (VSB No. 80470)
Assistant Attorney General
Office of the Attorney General
202 North 9th Street
Richmond, Virginia 23219
Telephone: (804) 371-2267
Facsimile: (804) 371-2087
ahensley@oag.state.va.us
*Counsel for Defendant

SEEN AND _____:

Ms. Promila Rajput
3404 S. Street
Richmond, Virginia 23224
pro se

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

PROMILA RAJPUT,

Plaintiff,

v.

Case No: CL19003806-00

SHARON D. WAKE,

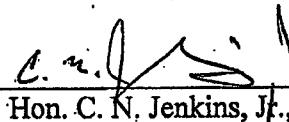
Defendant.

ORDER

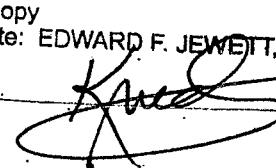
THIS DAY, came the parties, the plaintiff, Promila Rajput, *pro se*, and the defendant, Sharon Wake, by counsel, on Wake's Plea in Bar and Demurrer.

UPON consideration of the evidence presented and argument, the Court hereby GRANTS Wake's Plea in Bar and Demurrer and hereby dismisses this case with prejudice.

ENTER: 9/4/19


Hon. C. N. Jenkins, Jr., Presiding Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: 

D.C.

Virginia:
In the Circuit Court of the City of Richmond, John Marshall Courts Building

PROMILA RAJPUT,

Petitioner,

Case No.: CL19-4170-8

vs.

SANDRA BLOUNT,

Respondent.

RECUSAL ORDER

I, Clarence N. Jenkins, Jr., am of the opinion that I am so situated in respect to the above styled case as to render it improper for me to preside and therefore, I recuse myself.

A copy of this disqualification order has, this 25th day of September 2019, been sent to the Chief Judge of the circuit for designation of another judge to preside over this case.

The Clerk is directed to send an attested copy of this Order to all parties of record.

ENTER: 9/25/19


Clarence N. Jenkins, Jr.

PAGE
16-a.

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: 

D.C.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

Promila Rajput

)

)

Plaintiff,

)

)

Case No.: CL19-3806

v.

)

Sharon Wake

)

)

Defendant.

)

ORDER

On September 12, 2019, Promila Rajput ("Plaintiff") filed document beginning with "Objection to 4 September 2019 Order." Upon due consideration, it is hereby:

ORDERED that Plaintiff's Motion to Rehear is **DENIED**.

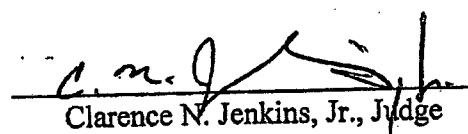
Plaintiff's further "Objection to 4 September 2019 Order" lacks an adequate basis in the law. Thus, this motion is **DISMISSED**.

Pursuant to Rule 1:13 of the Supreme Court of Virginia, the Court dispenses with the parties' endorsements of this Order.

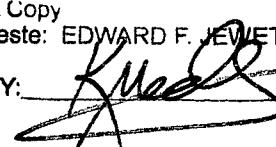
The Clerk is directed to forward a certified copy of this Order to the parties.

It is so **ORDERED**.

ENTER: 9/30/19


Clarence N. Jenkins, Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: 

D.C.

PAGE # 17.9.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

PROMILA RAJPUT,

Petitioner

vs.

Case No.: CL19-4170

SANDRA BLOUNT,

Defendants.

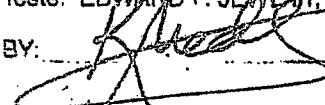
DISQUALIFICATION ORDER

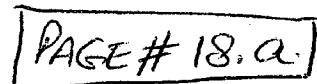
The Circuit Court Judges have found that they are so situated with respect to this case as to render it improper for them to preside. I, pursuant to §19.2-153, and as Chief Judge, refer the case to the Supreme Court of Virginia for the appointment of a judge designate to preside over the case.

It is ORDERED that the Clerk of this Court certify a copy of this Order to the Chief Justice of the Supreme Court of Virginia and all counsel of record.

ENTER: 10.15.19


Joe Jeter Taylor, Chief Judge

A Copy
Teste: EDWARD F. JEFFREY, CLERK
BY:  D.C.

 PAGE # 18.a.

VIRGINIA:

In the Supreme Court of Virginia held at the Supreme Court Building in the City of Richmond on Thursday the 1st day of October, 2020.

Promila Rajput, Appellant,

against Record No. 191598
Circuit Court Nos. CL19003415-00 and
CL19003806-00

Tiffany Terrell, et al., Appellees.

From the Circuit Court of the City of Richmond

Upon review of the record in this case and consideration of the argument submitted in support of and in opposition to the granting of an appeal, the Court is of the opinion there is no reversible error in the judgment complained of. Accordingly, the Court refuses the petition for appeal.

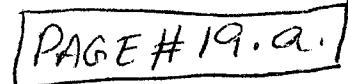
A Copy,

Teste:

Douglas B. Robelen, Clerk

By:


Deputy Clerk


PAGE #19.a.

VIRGINIA:

*In the Supreme Court of Virginia held at the Supreme Court Building in the
City of Richmond on Friday the 5th day of February, 2021.*

Promila Rajput,

Appellant,

against Record No. 191598
 Circuit Court Nos. CL19003415-00 and
 CL19003806-00

Tiffany Terrell, et al.,

Appellees.

Upon a Petition for Rehearing

On consideration of the corrected petition of the appellant to set aside the judgment rendered herein on October 1, 2020 and grant a rehearing thereof, the prayer of the said petition is denied.

A Copy,

Teste:

Douglas B. Robelen, Clerk

By:

D. Robelen

Deputy Clerk

FINAL
ORDER
from
Supreme
Court
of Va

PAGE # 20.a.

APPENDIX B

Rule 14.1(b)(i)

Opinions on pages 21.b. To 31.b.

COMBINED SCV 200081

Promila Rajput v. Ronald Irving Fogg

1. Appeal from general district court City of Richmond

GV #19-012875 [underlying all matters not addressed in GV180404332];

To The Circuit court of City of Richmond # CL-19-2573

2. Complaint - To the Circuit court of City of Richmond CL-19-3172

Judgement entered February 5, 2021

FINAL ORDER
from Supreme
Court of Va

<u>Opinions</u>		<u>Pages numbers</u>
<i>Two pages GDC 3/7/19 order</i>
<i>Five pages GDC 5/10/19 order</i>
<i>Two CC 8/7/19 orders continuing to 9/3/19</i>
<i>Two CC 10/17/19 dismissal orders</i>
<i>Two CC 11/25/19 denying rehearing</i>
<i>Two CC 12/9/19 orders to file Fogg's matter proves injunction applied</i>	...	29.b. & 29.1.b.
<i>SCV 10/5/20 order refusing appeal, Rajput v Fogg. SCV 200081</i>	...	30.b.
<i>SCV 2/5/21 order denying rehearing, Rajput v Fogg. SCV 200081</i>	...	31.b.

↑ Final Order
 215721 from
 Supreme
 Court of CA

WARRANT IN DEBT (CIVIL CLAIM FOR MONEY)

Commonwealth of Virginia VA. CODE § 16.1-79

CITY OF RICHMOND GENERAL DISTRICT COURT - CIVIL DIVISION (804) 646-6461, General District Court
CITY OR COUNTY
Second Floor John Marshall Courts Building
400 N. 9th Street - Suite 203, Richmond, VA 23219-1546
STREET ADDRESS OF COURT

TO ANY AUTHORIZED OFFICER: You are hereby commanded to summon the Defendant(s).

TO THE DEFENDANT(S): You are summoned to appear before this Court at the above address on
15 January 2019, 10 am to answer the Plaintiff(s)' civil claim (see below)

RETURN DATE AND TIME

DEC 14 2018

DATE ISSUED

CLERK DEPUTY CLERK MAGISTRATE

CLAIM: Plaintiff(s) claim that Defendant(s) owe Plaintiff(s) a debt in the sum of

\$ 7841.00 net of any credits, with interest at 6% from date of 170418 until paid.

\$ 58.00 costs and \$ N/A attorney's fees with the basis of this claim being

Open Account Contract. Note Other (EXPLAIN)

Per attached
Bill of Particulars

HOMESTEAD EXEMPTION WAIVED? YES NO cannot be demanded

12 DEC 18

DATE

Ramla Rajput, Resident Person

PLAINTIFF ATTORNEY DEFENDER ATTORNEY

CASE DISPOSITION

MENT against named Defendant(s)

for \$ 1,729.00 net of any credits, with interest at 6% from date

of 3.7.19 until paid, \$ 58.00 costs and \$ attorney's fees

HOMESTEAD EXEMPTION WAIVED? YES NO CANNOT BE DEMANDED

JUDGMENT FOR NAMED DEFENDANT(S)

NON-SUIT DISMISSED

Defendant(s) Present? YES

NO

3/7/19

DATE

JUDGE

PAGE # 21, b.

24

MU

31

15

CASE NO.

RAJPUT, PROMILA 18044332

Person (LAST NAME, FIRST NAME, MIDDLE INITIAL)

3404 S STREET

Richmond, VA 23223

Cell: 804 968 9026

FOGG, RONALD IRVING

Defendant(s) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

DBA Williams & Fogg

120 T-B School Street

Richmond, VA 23220

Cell: 804 437 7271

WARRANT IN DEBT

TO DEFENDANT: You are not required to appear; however, if you fail to appear, judgment may be entered against you. See the additional notice on the reverse about requesting a change of trial location.

To dispute this claim, you must appear on the return date to try this case.

To dispute this claim, you must appear on the return date for the judge to set another date for trial.

Bill of Particulars

ORDERED

filed

2/13/19

Grounds of Defense

ORDERED

ATTORNEY FOR PLAINTIFF(S)

FG

ATTORNEY FOR DEFENDANT(S)

HEARING DATE AND TIME

15 Jan 2019

@ 10 am

3/7/19, 1 pm

3/15

J. McClellan - aka

parties about how

civil claim; J. McC

need sum. met

JUDGMENT PAID OR
SATISFIED
PURSUANT TO
ATTACHED NOTICE
OF
SATISFACTION

DATE

CLERK

DISABILITY
ACCOMMODATIONS
for loss of hearing,
vision, mobility, etc.,
contact the court ahead
of time.

Exhibit 3, - 9 Day Motion Fogg

3.1. **Rajput's 1099's for:-**

01 June 2017 to 31 Dec 2017; and Quarters of 01 Jan 2018 to 16 Oct 2018.

~~IRS return~~
Despite requests since Jan 2018, I meet changing pretexts from Fogg that he will go to the county and get the form; could not go; will go next week. Fogg owes Rajput 1099's for portions of 2017 and 2018.

3.2. **Rajput's salary \$229 for 13 hours on 15th & 16th October 2018:-**

\$169 @ \$13 per hour for 13 hours + \$50 and \$10 for Gary Easter's HVAC install and review respectively. Fogg makes similar payments; validates agreement and admissibility. Fogg owes Rajput \$169 + \$50 + \$10 = \$229.

✓ A229

3.3. **Rajput's overtime pay \$702 for minimal 10 days:-**

~~Dates return~~
Richmond City's Tax Department notices Fogg for illegal business. Fogg walks into the hospital, tells me to transfer phone to my office cell. Another time Fogg calls me at 8 pm states he wants to admit himself in the hospital, that he wants to drop off his cell phone for me to attend to; he does at 10pm. He extacts \$50000, but never pays back his health insurance, conceals he was on the phone, contributes to the collision. A discoverable subrogation fraud. Fridays 2-hour-overtimes. Fogg starts writing checks after 3:30pm, then gets in heated arguments with techs, or call police and prolongs pay distribution. Despite considerable weekly income Fogg, under false pretense, goes to DSS; and churches for food, then turns around and purchases a \$147000 property in cash from company funds. Fogg charges customers \$142.50 per hour.

Fogg owes Rajput \$13 + \$6.5 = \$19.50 per hour overtime X 36 hours = \$702.

3.4. **Rajput's side job balance \$3000 for 60+ installs from 2017 to part of 2018:-**

~~Bank Statement~~
Fogg pays only portion of 2018 @ \$50 per HVAC install; and states that is why he pays low per hour rate and that female before me in 2017 made \$800-\$900 a week, advertises, validates agreement, retains benefit and admissibility.

Fogg owes Rajput for the rest of minimum 60 installs X \$50 = \$3000.

3.5. **Rajput's side job balance \$3910 on 3% of \$147,000 for 9410 Telstar Dr.**

Upon disclosure by Rajput, Fogg assigns Rajput to help Fog outside of licensure or any scope and hours, to draft and analyze company documents for Fogg's exclusive use, such as By Laws, Articles, Title information, Property Report and other clerical work. Fogg enrichs and retains benefit thereof. With passage of time, Fogg becomes greedy and demands work outside of scope. Fogg pays \$500, validates agreement, the benefit Fogg retains for admissibility. Fogg leverages Rajput for \$4410. Fogg owes Rajput balance \$3910.

Part \$1500

WARRANT IN DEBT (CIVIL CLAIM FOR MONEY)

Commonwealth of Virginia VA CODE § 16.1-79

CITY OF RICHMOND GENERAL DISTRICT COURT - CIVIL DIVISION (804) 646-6461, General District Court
 16TH DISTRICT COURT
 Second Floor John Marshall Courts Building
 400 N. 9th Street - Suite 203, Richmond, VA 23219-1546
 STREET ADDRESS OF COURT

TO ANY AUTHORIZED OFFICER: You are hereby commanded to summon the Defendant(s).

TO THE DEFENDANT(S): You are summoned to appear before this Court at the above address on

10 May, 2019, to answer the Plaintiff(s)' civil claim (see below)
 RETURN DATE AND TIME

APR 10 2019

DATE ISSUED:

CLERK

DEPUTY CLERK

JUDGE/JUDGE

A. J. Scott Brown

CLAIM: Plaintiff(s) claim that Defendant(s) owe Plaintiff(s) a debt in the sum of \$ 14,001.29 net of any credits, with interest at 6% from date of Judgement \$ 58.00, costs and \$ 750 attorney's fees with the basis of this claim being

Open Account Contract Note Other (EXPLAIN) ① severance
 allowance \$10,299.29; ② Overtime \$702.00;
 Miscellaneous on installs \$3000; ④ 1099 for 2017 & 18

HOMESTEAD EXEMPTION WAIVED? YES NO I cannot be demanded

4/9/19

Raminor Rayut, Person

 PLAINTIFF PLAINTIFF'S ATTORNEY PLAINTIFF'S EMPLOYEE/AGENT

CASE DISPOSITION

JUDGMENT against named Defendant(s) for \$ net of any credits, with interest at % from date of until paid, \$ costs and \$ attorney's fees. HOMESTEAD EXEMPTION WAIVED? YES NO I CANNOT BE DEMANDED

JUDGMENT FOR NAMED DEFENDANT(S) non-suit DISMISSED *with pre-termed affidavit (in Case No.*
 Defendant(s) Present? YES NO *18044325*

MAY 10 2019

DATE

JUDGE

18044325
inter 3
(7/19)3 5
CASE NO. 19012875RATPLUT, ROMILA
PLAINTIFF (LAST NAME, FIRST NAME, MIDDLE INITIAL)

3404A S STREET

RICHMOND, VA 23223

Cell: 804 968 9026

OS: 19

FOGG, RONALD, IRVING, DEA WILLIAMS

DEFENDANT(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

1207 B SCHOOL ST. 2 FO 66

Richmond, VA 23220

Cell: 804 437 7271

HEARING DATE
AND TIME

10 am on

10 MAY '19

WARRANT IN DEBT

TO DEFENDANT: You are not required to appear; however, if you fail to appear, judgment may be entered against you. See the additional notice on the reverse about requesting a change of trial location.

To dispute this claim, you must appear on the return date to try this case.

To dispute this claim, you must appear on the return date for the judge to set another date for trial.

Bill of Particulars ORDERED DUEGrounds of Defense ORDERED DUE

ATTORNEY FOR PLAINTIFF(S)

ATTORNEY FOR DEFENDANT(S)

judgment
(7/19)

JUDGMENT PAID OR
SATISFIED
PURSUANT TO
ATTACHED NOTICE
OF
SATISFACTION.

DATE

CLERK

DISABILITY
ACCOMMODATIONS
for loss of hearing,
vision, mobility, etc.,
contact the court ahead
of time.

✓ false & NOT addressed
 3/7/19 order VOID for
 - lack of Jurisdiction
 - continuation needed.

11/22

THIS JUSTIN..



YOU'RE AN IDIOT

(VSC 15-T-2020 - Pg. 24, Pt. 4 - X4)

[PAGE #22.1.b.]

24.6

Fogg tried to swindle his way out with Hon Judge McClenney telling her that Rajput is supposed to prepare it herself. This is so, but ONLY AFTER Fogg gets the blank 1099 forms from county and delivers to me. Rajput does not have business authority with county nor was Rajput a field staff. Rajput called IRS who state it is Fogg's responsibility.

SOCIO-ECONOMIC CAUSES OF ACTION

Left unattended Section 4 of 12Dec18 Notarized Bill of Particular

46. Framers confer dominant authority to this honorable court through judicial decision, to interpret common law, note past performance, with reasonable reliance admit socio-economic basis listed hereunder to justly and fairly compensate Rajput.

47. Fogg prolongs satisfaction of duties in entirety with a new pretext on different occasions, on the same matter, then asks me to follow-up on his intent, says: *I can hold payment for one month. I will write the check when I am in senses.* After 30 days Fogg asks Rajput the address to mail the check, Fogg writes the address over that phone call; Rajput follows up with an email, Fogg emails reply writing OK. On 26th Nov 2018 Fogg says: *What payment; I will not pay you.* Fogg defrauds Rajput and satisfies test thereof.

48. Fogg harasses Rajput to have to follow up as Foggs asks. Rajput has to listen to undesirable language before Rajput gets her answer, a trick to deflect attention and cause distress.

49. Fogg tells to me that he had to create unhealthy situations for Evelyn - lady prior to me to leave herself, now becomes admissible evidence of pattern of bad motive and tortious behavior.

50. Fogg conceals from Rajput that Fogg told Anderson to sit in the office - a mandatory disclosure, especially in a room where Rajput works alone. 10Oct18 Rajput questions Anderson's assignments, work hours and reason to hang out in the office for money without assignment. Fogg admits spying on Rajput, says: *I will pay for Anderson to just sit in the office and watch who comes in and listen to Rajput.* This proves discoverable bribery from timesheet and check written out to Anderson for that week of 12Oct18.

51. When asked not to use Fogg's desk, Anderson in malicious retaliation provokes Rajput and incites techs says: *She is here temporarily*, conceals channeling company lead to Tom bypassing data-entry procedure, lies Paul Manum's job is closed, steals timesheet record from keyboard, violates 10Oct18 notice from Fogg to not use company email and Fogg's desk. On 12Oct18 Anderson deletes company and Rajput's propriety email records, destroys database entry in line with plumber-Tom. Fogg remains indifferent, which further goes to prove Fogg's fraudulent claim to Detective O'Neal that he previous staff destroyed company records, when Fogg is ok with it.

52. Anderson LIES to Rajput THREE TIMES. 1st on 10Oct18 that Fogg asked Anderson to check emails. Rajput's inquiry found Fogg did not; 2nd on 11Oct18 on three phone calls; 3rd on 12Oct18 Anderson terrorizes Rajput : *Whether you like it or not, email is my job, deal with it.* Then deletes propriety emails. Anderson demonstrates he cannot be acting independently.

53. Anderson in conspiracy acts like a mob, breaches peace with inappropriate office demeanor and disorderly behavior violating VA Code 18.2-415 and starts abruptly ridiculing and name calling Rajput to said:- You are crazy; You are here temporarily; You are stupid; You are catching clouds; You are foolish; You are acting like a child; This an adult world.

54. On 11Oct18, Anderson in conflict of interest authors a defamatory letter to Fogg forcing demanding Rajput's immediate termination to benefit off of Rajput's right of employment admitted by Public Defender Seal on 21Dec18 to Hon Judge McClenney.

55. Tom tells me he talks about me to people outside office. Anderson as coached by Tom and third party not employee of Williams and Fogg, says: It is freedom of speech.

56. On the morning of Friday, 12Oct18, Christon Steed, an HVAC Tech, enters the office room spinning a football from one hand to another - a metaphoric message signalling a gesture of physical violence, in furtherance to Anderson's libel of day before. This put me in reasonable apprehension of harm.

57. At the end of the day on Friday, 12Oct18, Fogg instigates Thomas Jenkins a newly hired tech, in front of me says:- She is scared; don't get friendly with her. Fogg breaches peace and demonstrates malice and segregation. Fogg slanders me to Jenkins says:- Don't listen to her, Fogg sabotages workflow.

58. Fogg starts to harass and abuse Rajput that he won't pay Rajput if techs didn't perform, after sabotaging work flow admitted in Point 58 above.

59. Christon Steed, a tech, in proxy, outside of his authority, mobilizes others mob-like that Rajput should clean the community toilet, perform other janitorial duties in and around the office and attack Rajput's earnings.

60. In Sep'18 Lipscomb alias Tom, threatens Rajput says: We will blackmail you. Unrelated Tom says he will go to labor union and State Corporation Commission on Fogg. Another time, Fogg calls police on Tom and bars Tom from the property. Tom is a person who would go to a job site, remove bad parts from the toilet, go to neighboring store, lock himself in the bathroom, remove the working parts, replace the bad parts, go back to the job site, put working parts, and up-charge. Fogg says we will upsell. Tom causes damage at job site to extend the cost of job. Fogg harasses customers for defense. Tom says: I am a criminal, so it does not matter to me.

61. Fogg as a proxy, and trick to deflect from issue, habitually on his own started to inflict racial slurs to provoke Rajput, demean to make Rajput feel shameful, even when unprovoked says: You Indians are illiterate and slums; You Indians come here and make a mess, now you can't even go back; You Indians are crazy people; That picture is no God, to my bookmark in my personal diary; You Indians don't have a God, violates Title VII Civil Rights Act of 1964.

62. Fogg discriminates starts Rajput at \$9/hr despite my background with UNICEF and The World Bank Group, 7 years a piece; 9 year in Real Estate business, a Brand Ambassador/Event Specialist since 2003; but starts Anderson on 10th Oct 2018 at \$10 an hour, verbatim : *to just sit.*

63. David Smith brought in Tom for assistance, racially targets me on 12Oct18, slurs: We know where you are coming from, this is America. When questioned where Rajput comes from, David retaliates says: Hit the road, manifesting aggression and a racist demeanor, breach of peace and disorderly behavior, violating VA Code 18.2-415.

64. On Friday, 12Oct18, after everyone leaves, Tom walks close to me and says:- If you see me on the road, look at your feet and walk, otherwise, I will make you.

65. On 12Oct18 at the end of the day after Fogg fuels verbal abuse, Jenkins attacks me says: You leave; I can do your work. We need work.

66. On 27Sep18, in front of me, Fogg LIES to Mr. Matthew, City's Tax Inspector that the auto shop is for his personal use, in contradiction to my testimony to the City Inspectors, Anderson without auto certification or license from DPOR, repairs autos that could kill someone, as a side job for additional money, in addition to \$10 per hour. Fogg habitually falsifies testimony and induces others to falsify.

67. On 12Oct18 Jenkins brings Anderson as false witness that Jenkins had his sign-off sheet in his hand when Jenkins first entered office, when he did not, which is why Jenkins did not give me anything, captured under Fogg's surveillance. This way they LIE and induce each other to LIE.

68. **Rajput asks for:**

- (a) Relief as reflected in Warrant in Debt of 9th April 2019 regarding severance; overtime, miscellaneous payment on installs and 1099s.
- (b) Punitive damages as in Point 7 above.

Respectfully submitted on 5/10/19 by Promila Rajput

Promila Rajput
Cell: 804.968.9026
Add: 3404 S Street, Richmond, VA 23223

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

PROMILA RAJPUT,

Appellant,

) Case No.: CL19-2573-8

v.

RONALD I. FOGG
dba WILLIAMS and FOGG,

Appellee.

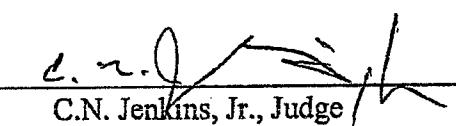
ORDER

On August 7, 2019, came the parties, *pro se*, on Appellant's appeal from a judgment entered by the General District Court. Appellee moved to continue the matter due to his recently having retained counsel. Appellant did not object. Accordingly, it is hereby ORDERED that the case is continued to docket call on September 3, 2019 at 11:00 a.m.

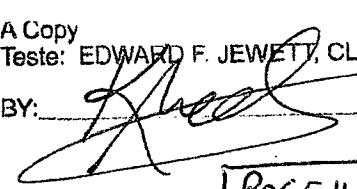
The Clerk is directed to forward a certified copy of this Order to the parties.

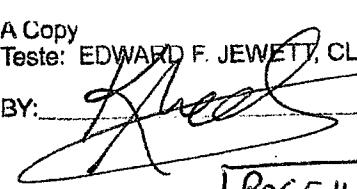
It is so ORDERED.

ENTER: 8/7/19


C.N. Jenkins, Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY:  D.C.


PAGE # 26.b.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

Promila Rajput

Appellant,

v.

Ronald Fogg

Appellee.

) Case No.: CL19-2573

ORDER

On October 15, 2019, Promila Rajput ("Plaintiff") and Ronald Fogg ("Appellee") appeared *pro se* on Appellant's appeal *de novo* of her Warrant in Debt originally filed in General District Court. Upon due consideration of the record and arguments of the parties, the Court **FINDS** that the current matter is barred by res judicata. It is **ORDERED** that Plaintiff's appeal is **DISMISSED** with prejudice. Additionally, the Court finds no factual or legal basis on which to grant Appellant's "Motion for Gatekeeper Order" concerning Appellee. Thus, it is **ORDERED** that this motion is **DISMISSED** with prejudice.

Pursuant to Rule 1:13 of the Supreme Court of Virginia, the Court dispenses with the parties' endorsements of this Order.

The Clerk is directed to forward a certified copy of this Order to the parties.

It is so **ORDERED**.

ENTER: 10/17/19


Clarence N. Jenkins, Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: Donna Cythner D.C.

PAGE # 27.b.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

Promila Rajput

Plaintiff,

v.

Ronald Fogg

Defendant.

)
Case No.: CL19-3172

ORDER

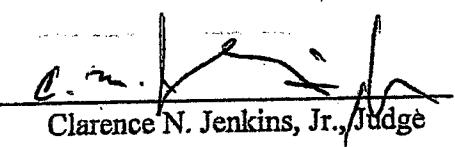
On October 15, 2019, Promila Rajput ("Plaintiff") and Ronald Fogg ("Defendant") appeared *pro se* on Plaintiff's Complaint which accuses Defendant of perjury and slander. Upon due consideration of the evidence and arguments of the parties, the Court FINDS that Plaintiff lacks standing to bring the claim of perjury that the claim of slander lacks an adequate basis in fact or law. It is ORDERED that Plaintiff's Complaint is DISMISSED with prejudice.

Pursuant to Rule 1:13 of the Supreme Court of Virginia, the Court dispenses with the parties' endorsements of this Order.

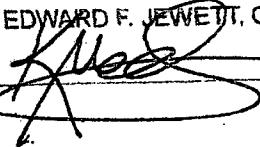
The Clerk is directed to forward a certified copy of this Order to the parties.

It is so ORDERED.

ENTER: 10/17/19


Clarence N. Jenkins, Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY:  D.C.

PAGE # 27. 1.b.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

PROMILA RAJPUT,

Plaintiff,

v.

Case No. CL19-2573

RONALD FOGG d/b/a WILLIAMS & FOGG,

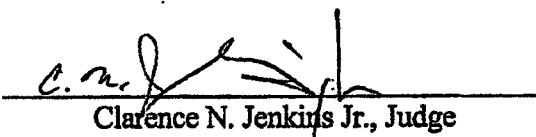
Defendant.

ORDER

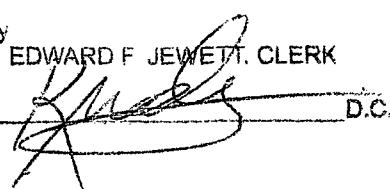
On the Plaintiff's Motion to Rehear after having reviewed the Motion to Rehear Without Bias and Motion to Rehear on Facts Without Bias Under Common Law, the Court hereby **DENIED** said motions.

Copies of this Order are hereby mailed this day to the Plaintiff, Promila Rajput and counsel of record.

ENTER: 11/25/19


Clarence N. Jenkins Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY:  D.C.

PAGE # 28.b.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

PROMILA RAJPUT,

Plaintiff,

v.

Case No. CL19-3172

RONALD FOGG d/b/a WILLIAMS & FOGG,

Defendant.

ORDER

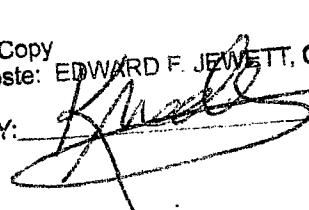
On the Plaintiff's Motion to Rehear after having reviewed the Motion to Rehear Without Bias and Motion to Rehear on Facts Without Bias Under Common Law, the Court hereby **DENIED** said motions.

Copies of this Order are hereby mailed this day to the Plaintiff, Promila Rajput and counsel of record.

ENTER: 11/25/19


Clarence N. Jenkins Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: 

D.C.

PAGE # 28.1.b

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

Promila Rajput

Plaintiff,

v.

Ronald Fogg

Defendant.

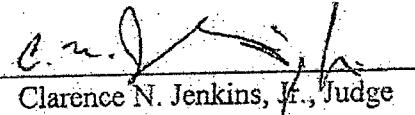
)
Case No.: CL19-2573

ORDER

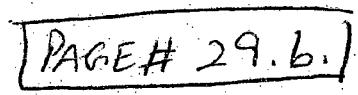
The Court directs the Clerk of Court to file the documents associated with Promila Rajput's Motion to Rehear without Bias. Clerk is directed to forward a certified copy of this Order to the parties.

It is so ORDERED.

ENTER: 12/9/19


Clarence N. Jenkins, Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK
BY:  D.C.

 PAGE # 29.6.

Virginia:

In the Circuit Court of the City of Richmond, John Marshall Courts Building

Promila Rajput

)

)

Plaintiff,

)

)

Case No.: CL19-3172

v.

)

)

Ronald Fogg

)

)

Defendant.

)

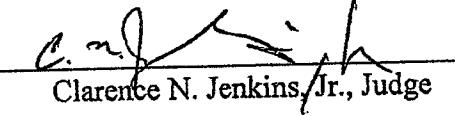
)

ORDER

The Court directs the Clerk of Court to file the documents associated with Promila Rajput's Motion to Rehear on Facts without Bias under Common Law. Clerk is directed to forward a certified copy of this Order to the parties.

It is so ORDERED.

ENTER: 10/9/19


Clarence N. Jenkins, Jr., Judge

A Copy
Teste: EDWARD F. JEWETT, CLERK

BY: Edward F. Jewett D.C.

PAGE # 29. 1. b.

VIRGINIA:

In the Supreme Court of Virginia held at the Supreme Court Building in the City of Richmond on Monday the 5th day of October, 2020.

Promila Rajput,

Appellant,

against Record No. 200081
 Circuit Court Nos. CL19-2573
 and CL19-3172

Ronald Irving Fogg,
d/b/a Williams & Fogg,

Appellee.

From the Circuit Court of the City of Richmond

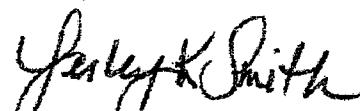
Upon review of the record in this case and consideration of the argument submitted in support of the granting of an appeal, the Court is of the opinion there is no reversible error in the judgment complained of. Accordingly, the Court refuses the petition for appeal.

A Copy,

Teste:

Douglas B. Robelen, Clerk

By:


Jennifer K. Smith
Deputy Clerk

PAGE # 30.b.

VIRGINIA:

In the Supreme Court of Virginia held at the Supreme Court Building in the City of Richmond on Friday the 5th day of February, 2021.

Promila Rajput,

Appellant,

against Record No. 200081
 Circuit Court Nos. CL19-2573
 and CL19-3172

Ronald Irving Fogg,
d/b/a Williams & Fogg,

Appellee.

Upon a Petition for Rehearing

On consideration of the replacement petition of the appellant to set aside the judgment rendered herein on October 5, 2020 and grant a rehearing thereof, the prayer of the said petition is denied.

A Copy,

Teste:

Douglas B. Robelen, Clerk

By: *[Signature]*

Deputy Clerk

APPENDIX C

Rule 14.1(b)(i)

Opinion on pages 32.c. and 33.c.

No number assigned

In Re: Promila Rajput

To The General District Court of City of Richmond, Virginia

Judgement 7/18/19

VIRGINIA:

IN THE CITY OF RICHMOND GENERAL DISTRICT COURT - CIVIL DIVISION

In Re: Promila Rajput,)
Litigant)
)
Serve: Promila Rajput)
 3404 S Street)
 Richmond, VA 23223)
)

PRE-FILING INJUNCTION ORDER

It appearing to the Court that in calendar year 2019, to date, Promila Rajput (Litigant) pro se has filed in this Court at least seven Warrants-in-Debt together with numerous related pleadings.

And it further appearing to the Court that a substantial number of the Warrants-in-Debt and other pleadings filed by Litigant are not well-grounded in fact or warranted under existing law; certain of the Warrants include, for example, claims referred to as "Gaslight" (sic), "cover up 3rd party slander," "treason" and "illegal blanket permanent injunction," among others;

And the Court being further advised that on April 4, 2016, the General District Court of Henrico County entered a Pre-filing Injunction Order "barr[ing] [Promila Rajput] from filing any further warrants in debt or similar actions [in that court] without complying with" certain pre-filing requirements;

And it further appearing to the Court that by letter dated July 15, 2019 the Clerk of this Court advised Litigant that, because Litigant has made excessive and, in certain cases,

unprofessional and intemperate demands on her staff, Litigant must submit all further requests for information from the staff of this Court in writing, until further notice.

And the Court otherwise deeming it just and proper so to do pursuant to its inherent authority to protect the integrity of the judicial process, see Opinion of the Attorney General of Virginia, 2010 Va. AG LEXIS 51 (2010).

It is ORDERED that Litigant is hereby barred from filing any further Warrants-in-Debt or other new actions in this Court without complying in advance with the following requirements:

1. Litigant must submit to the Clerk of Court an "Application for Leave to File Warrant-in-Debt or other new action in the General District Court of the City of Richmond," with a copy of the Warrant-in-Debt or new action attached.
2. In connection with any such Application, Litigant shall also file a separate, notarized Affidavit attesting that the Warrant-in-Debt or new action is well-grounded in fact and existing law, and
3. In connection with any such Application, Litigant shall file a Complaint or Bill of Particulars setting forth each cause of action asserted and the facts supporting the cause of action.

No Warrant-in-Debt or other new action shall be heard by a Judge of this Court without a prior review of the Application by the Chief Judge of the Court to assess the *prima facie* validity of the attached pleading. This Order shall remain in effect until further Order of the Court.

City of Richmond General District Court
Civil Division
I, the undersigned clerk or deputy clerk of the above-named court, authenticate pursuant to Va. Code §8.01-391(c) on this date that the document to which this authentication is affixed is a true copy of a record in the above-named case, made in the performance of my ethical duties.

71819 SCBlent
Date Clerk Deputy Clerk

ENTER: 71819
J. S. —

JUDGE

PAGE A 33.C.

APPENDIX D

Rule 14.1(b)(i)

Opinions in page 34.d.

no number assigned

In Re: Promila Rajput

To The General District Court of Henrico, Virginia

Judgement entered 4/4/16

VIRGINIA:

IN THE GENERAL DISTRICT COURT OF HENRICO COUNTY

In Re: Promila Rajput,
Litigant

PRE-FILING INJUNCTION ORDER

Litigant has filed numerous warrants in debt in this Court over the last year and seven of the eight were not well grounded in fact and warranted by existing law, even in a light most favorable to her;

Therefore, pursuant to Virginia Code 58.01-271.3, it is ORDERED that Litigant is hereby barred from filing any further warrants in debt or similar actions without complying with the following requirements:

1. Litigant must submit to the Clerk of the Court an "Application for Leave to File Suit or Motion in the General District Court of Henrico County" and no suit or motion for any other purpose shall be filed in this Court.
2. Accompanying said application, Litigant shall attach a separate and notarized Affidavit attesting that the suit or motion is well grounded in fact and existing law and
3. A Complaint or Bill of Particulars stating each cause of action asserted and the facts in support.

No suit or motion shall be heard without a review by this Court confirming the validity of Litigant's suit or motion.

ENTER: 4/4/16

PAGE # 34 d.



APPENDIX E

Rule 14.1(b)(i)

Opinions in pages 35.e. and 36.e.

CL16-388

UMFS v Promila Rajput

To The Circuit Court of Fredericksburg, Virginia

Judgement entered 7/20/15

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF FREDERICKSBURG

UNITED METHODIST FAMILY SERVICES, *et al*,

v.

CASE NO: CL15-388

PROMILA RAJPUT,

DEFENDANT.

PRE-FILING INJUNCTION ORDER

This matter came on to be heard July 13, 2015 upon Plaintiff's Motion for Pre-Filing Injunction and Defendant's Averment and Memorandum of Law in response thereto and the arguments heard in Court by Counsel for Plaintiff and Promila Rajput, *pro se*, who appeared in person; and,

The Court having found that Defendant was lawfully served process of this suit on June 25, 2015 and was notified by Counsel of the hearing on the Motion for Pre-Filing Injunction and appeared in person and filed written responses thereto; and, the Court having heard oral arguments made in open Court; and,

That Plaintiff's Motion for Pre-Filing Injunction Order is well taken; then,

It is ADJUDGED, ORDERED and DECREED that Defendant, Promila Rajput, is hereby barred from filing any further complaints, counterclaims, actions, motions, petitions or pleadings related to or arising out of her son's 2011 custody proceeding without first complying with the following requirements:

1. Promila Rajput shall first submit to the Clerk of the Court an "Application for Leave to File Suit, Pleading, or Motion in the Circuit Court of the City of Fredericksburg" accompanied by the proposed pleading; and,
2. Accompanying said application, Promila Rajput shall attach a separate and notarized affidavit attesting to the validity of the suit, pleading or motion and that it does not violate the terms of this Order.

No suit, pleading or motion shall be accepted for filing by the Clerk nor scheduled to be heard by the Court without review first by this court confirming compliance with this Order. This Order shall in no event prevent Promila Rajput from being allowed to respond to the allegations contained in this Complaint as any other action filed in this Court by demurrer, answer or otherwise, as long as her application under 1. and 2. above have been filed within the proper timeframe required of any and all pleadings.

ENTER this 20th day of July, 2015.



Judge

Endorsement Waived

ISLERDARE, P.C.
Zachary W. Kewer, Esquire
411 East Franklin Street, Suite 203
Richmond, Virginia 23219
Counsel for Plaintiff

Endorsement Waived

Promila Rajput, *pro se*

APPENDIX F

Rule 14.1(b)(i)

Opinions on pages 37.f. To 43.f.

RENEWED UNDER SCV 191598

Et al v. Promila Rajput

no number assigned in Arlington by altering party positions

To The General District Court of Arlington, Virginia

Arlington Judgement entered 2/6/12

Supreme Court of Virginia renewed judgement February 5, 2021

VIRGINIA:

IN THE GENERAL DISTRICT COURT OF ARLINGTON COUNTY

FRAUD; I did
NOT petition
against
myself

PROMILA RAJPUT,

Plaintiff,

v.

See last page

DELTRICH JOHNSON, et al.

Defendants.

) Civil Action Nos. GV11-6139;
) GV11-6140; GV11-6215;
) GV11-6216; GV11-6217;
) GV11-6218; GV11-6351;
) GV11-6352; GV11-6353;
) GV11-6354; GV11-6355;
) GV11-6754; GV11-6755;
) GV11-6756; GV11-6757
) GV11-6758; GV11-6759;
) GV12-0358; GV12-0420;
) GV12-0425; GV12-0426;
) GV12-0427; GV12-0428;
) GV12-0431; GV12-0432;
) GV12-0433; GV12-0434;
) GV12-0435; GV12-0436;
) GV12-0437; GV12-0438;
) GV12-0474; GV12-0475;
) GV12-0476; GV12-0477;
) GV12-0478; GV12-0479;
) GV12-0480; GV12-0481;
) GV12-0482; GV12-0483;
) GV12-0484; GV12-0485;
) GV12-0486; GV12-0487;
) GV12-0532; GV12-0533;
) GV12-0534; GV12-0535;
) GV12-0536; GV12-0537;
) GV12-0538; GV12-0539;
) GV12-0555; GV12-0556;
) GV12-0557; GV12-0558;
) GV12-0559; GV12-0560;
) GV12-0561; GV12-0582;
) GV12-0584; GV12-0585;
) GV12-0586; GV12-0587;
) GV12-0588; GV12-0589;
) GV12-0590; GV12-0591;
) GV12-0592; GV12-0593;
) GV12-0594; GV12-0595;
) GV12-0596; GV12-0597;
) GV12-0598; GV12-0599;
) GV12-0600; GV12-0601;
) GV12-0602; GV12-0603;
) GV12-0614; GV12-0615;

GV12-0702
GV12-0703
GV12-0704
GV12-0718-) - GV12-0616; GV12-0617;
GV12-0717) - GV12-0618; GV12-0619; -
GV12-0716) - GV12-0620; GV12-0621; -
GV12-0715) - GV12-0623; GV12-0624; -
GV12-0714) - GV12-0625; GV12-0626; -
GV12-0713) - GV12-0627; GV12-0628; -
GV12-0712) GV12-0657; GV12-0687;
GV13-0711) GV12-0688; GV12-0689;
GV12-0710) GV12-0690; GV12-0691;
GV12-0709) GV12-0692; GV12-0693;
GV12-0708) GV12-0694; GV12-0695;
GV12-0707) GV12-0696; and GV12-0699
GV12-0706
GV12-0705

10AM

ORDER

These matters were before the Court on February 6, 2012, on the Defendants' Motion for Pre-Filing Injunction and to Prohibit Filings Without Payment of Fees or Costs, and written and oral argument by counsel and the Plaintiff pro se; and

It appearing to the Court that the Plaintiff pro se has filed approximately one hundred twenty legal actions in this Court in the last ten weeks relating to proceedings in the Arlington County Juvenile and Domestic Relations District Court, which actions are frivolous, vexatious, harassing, and which include frequent profane and nonsensical filings by the Plaintiff pro se; and

It appearing to the Court that the Plaintiff pro se has paid the Court's filing fees and costs only in the following pending civil actions: Civil Action Nos. GV11-6139, GV11-6140, GV 11-6215, GV11-6216, GV11-2617, GV11-6218, GV11-6351, GV11-6352, GV11-6353, GV11-6354 and GV11-6355; and

It further appearing to the Court that the Plaintiff pro se has claimed indigent status and has not paid the Court's filing fees or costs in the following pending civil actions: GV11-6754; GV11-6755; GV11-6756; GV11-6757; GV11-6758; GV11-6759; GV12-0358; GV12-0420; GV12-0425; GV12-0426; GV12-0427; GV12-0428; GV12-0431; GV12-0432; GV12-0433;

GV12-0434; GV12-0435; GV12-0436; GV12-0437; GV12-0438; GV12-0474; GV12-0475; GV12-0476; GV12-0477; GV12-0478; GV12-0479; GV12-0480; GV12-0481; GV12-0482; GV12-0483; GV12-0484; GV12-0485; GV12-0486; GV12-0487; GV12-0532; GV12-0533; GV12-0534; GV12-0535; GV12-0536; GV12-0537; GV12-0538; GV12-0539; GV12-0555; GV12-0556; GV12-0557; GV12-0558; GV12-0559; GV12-0560; GV12-0561; GV12-0582; GV12-0584; GV12-0585; GV12-0586; GV12-0587; GV12-0588; GV12-0589; GV12-0590; GV12-0591; GV12-0592; GV12-0593; GV12-0594; GV12-0595; GV12-0596; GV12-0597; GV12-0598; GV12-0599; GV12-0600; GV12-0601; GV12-0602; GV12-0603; GV12-0614; GV12-0615; GV12-0616; GV12-0617; GV12-0618; GV12-0619; GV12-0620; GV12-0621; GV12-0623; GV12-0624; GV12-0625; GV12-0626; GV12-0627; GV12-0628; GV12-0657; GV12-0687; GV12-0688; GV12-0689; GV12-0690; GV12-0691; GV12-0692; GV12-0693; GV12-0694; GV12-0695; GV12-0696; and GV12-0699; and *GV12-702 through GV12-718*

It further appearing to the Court that the Plaintiff pro se has engaged in a pattern of frivolous filings and abuse of the legal process and this Court and that the Court should exercise its inherent power to protect Court from vexatious litigation and promote the efficient administration of justice; and

It further appearing to the Court that the Plaintiff pro se should either pay the filing fees and costs associated with the cases referenced above for which fees and costs have not been paid or have them dismissed with prejudice; and

It further appearing to the Court, given the above, that the Motions for Pre-Filing Injunction should be granted; therefore

It is ORDERED that, unless the Plaintiff pro se pays the filing fee and costs for the following cases by February 17, 2012, that they are dismissed with prejudice: GV11-6754;

GV11-6755; GV11-6756; GV11-6757; GV11-6758; GV11-6759; GV12-0358; GV12-0420; GV12-0425; GV12-0426; GV12-0427; GV12-0428; GV12-0431; GV12-0432; GV12-0433; GV12-0434; GV12-0435; GV12-0436; GV12-0437; GV12-0438; GV12-0474; GV12-0475; GV12-0476; GV12-0477; GV12-0478; GV12-0479; GV12-0480; GV12-0481; GV12-0482; GV12-0483; GV12-0484; GV12-0485; GV12-0486; GV12-0487; GV12-0532; GV12-0533; GV12-0534; GV12-0535; GV12-0536; GV12-0537; GV12-0538; GV12-0539; GV12-0555; GV12-0556; GV12-0557; GV12-0558; GV12-0559; GV12-0560; GV12-0561; GV12-0582; GV12-0584; GV12-0585; GV12-0586; GV12-0587; GV12-0588; GV12-0589; GV12-0590; GV12-0591; GV12-0592; GV12-0593; GV12-0594; GV12-0595; GV12-0596; GV12-0597; GV12-0598; GV12-0599; GV12-0600; GV12-0601; GV12-0602; GV12-0603; GV12-0614; GV12-0615; GV12-0616; GV12-0617; GV12-0618; GV12-0619; GV12-0620; GV12-0621; GV12-0623; GV12-0624; GV12-0625; GV12-0626; GV12-0627; GV12-0628; GV12-0657; GV12-0687; GV12-0688; GV12-0689; GV12-0690; GV12-0691; GV12-0692; GV12-0693; GV12-0694; GV12-0695; GV12-0696; and GV12-0699; and, *GV12-702 thru 6912-718.* 

It is further ORDERED that the following cases, for which fees and costs were paid,

Delhi Ward Sheriff
remain pending in this Court: Civil Action Nos. GV11-6139, GV11-6140, GV11-6215, GV11-
6216, GV11-2617, GV11-6218, GV11-6351, GV11-6352, GV11-6353, GV11-6354 and GV11-
6355; and

It is further ORDERED that Plaintiff Promila Rajput is prohibited from filing any further actions, motions, petitions or other pleadings in this Court relating to or arising out of her son's custody proceeding in Arlington Juvenile and Domestic Relations Court, Case No. JJ035964; and

IT IS FURTHER ORDERED that, should Ms. Rajput wish to initiate any civil litigation against any party in this Court, she must comply with the following requirements:

- a) She must submit to the Clerk of the Court an "Application for Leave to File Suit" along with a copy of this order; and
- b) Accompanying the "Application for Leave to File Suit" Ms. Rajput shall attach a separate and notarized declaration or affidavit certifying that the matters raised in the suit have never before been raised in this Court and are unrelated to her minor son's custody proceeding; and
- c) she must pay all filing and service fees and costs.

Should such an application be filed, the Clerk is directed to submit the application to the Court for consideration.

Ms. Rajput is cautioned that any violation of this order constitutes contempt of Court and may subject Ms. Rajput to civil and/or criminal penalties to be determined by the Court.

Entered February 6, 2012.

Karen A. Henenberger
General District Court Judge

We ask for this:

Ara L. Tramblian
Ara L. Tramblian, Deputy County Attorney
VSB #24350

Brian R. Charville, Assistant County Attorney
VSB#70884

2100 Clarendon Boulevard, #403
Arlington, Virginia 22201
(703) 228-3100 (voice)
(703) 228-7106 (fax)
Counsel for Defendants Brothers, McCandless,
Grice, Sharpe, Eisner, Buchanan and Tracey


Ryan F. Furgerson (VSB No. 72133)

Assistant Attorney General
Office of the Attorney General
900 East Main Street
Richmond, Virginia 23219
(804) 786-1586

Counsel for Defendants the Hon. Esther Wiggins, Olin and Johnson

Elizabeth M. EM

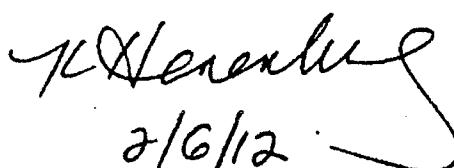
Elizabeth M. Ebanks, Esq.
VSB #72111
LECLAIRRYAN
2318 Mill Road, Suite 1100
Alexandria, Virginia 22314
(703) 647-5929

Counsel for Defendant Donah

Lee B. Warren

Lee B. Warren, Esq.
VSB #77446
Cook Kitts & Francuzenko, PLLC
3554 Chain Bridge Road, Suite 402
Fairfax, VA 22030
(703) 865-7480 phone
Counsel for Defendant Ward
703 434-3510 fax

Appeal noted to extent permitted
by law


2/6/12

Seen and _____

Defendant refused to sign 

Promila Rajput
746 N. Ashton Street
Alexandria, Virginia 22312
Plaintiff pro se

Promila Rajput, Plaintiff pro se
13324 Kirkdale Court
Dale City, VA 22193

Promila Rajput, Plaintiff pro se
7914 Caledonia Street
Alexandria, VA 22309

Note:

Evidence of fraud by
County Attorney Franklin,
Ab's civil lawyer

ALTERING positions in
the style of motion
for injunctive relief as

ME AGAINST ME
followed by Zevell & Heasly
on 8/9/19 & Order 8/23/19

CERTIFICATE OF COMPLIANCE

28 U.S.C. Section 1746

Number: _____

PROMILA RAJPUT, *Petitioner*

Versus

1. TIFFANY TERRELL,
 - i. 9+ million Virginia residents & businesses
 - ii. In re: Promila Rajput
 - iii. In re: Promila Rajput
 - iv. UMFS
 - v. *Et al*
2. SHARON WAKE,
3. RONALD IRVING FOGG,

Respondents

As required by *Supreme Court Rule 33.1(b)*, I certify that the petition in pages 1-24 for a writ of certiorari complies with the word limitation, and contains 6370 words.

In forma pauperis is attached for waiver of \$300 filing fee.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2021 by Promila Rajput
Promila Rajput
Self-represented Petitioner

Add: 3404 S Street, Richmond, VA 23223

Email: promila.rajput.11@gmail.com

CERTIFICATE OF SERVICE

Rule 29.5

The foregoing combined petition is being delivered as below:-

1. By USPS priority mail to The Clerk of The U.S. Supreme Court
at 1 First Street, N.E., Washington, DC 20543.
2. Served to respondents Tiffany Terrell & Sharon Wake through counsel Samuel
Towell via service@oag.state.va.us by Ms. Patricia Tyler, Paralegal Senior
Expert/Manager, Office of the Attorney General, 202 North 9th Street, Richmond,
Virginia 23219; Tel: (804) 786-8117.
3. By Chesterfield Sheriff's service to respondent Ronald Fogg.

Respectfully submitted on February 27, 2021 by



Promila Rajput
Self-represented Petitioner
Cell: 804 968 9026
Add: 3404 S Street, Richmond, VA 23223
Email: promila.rajput.11@gmail.com

DECLARATION

28 U.S.C. Section 1746(2) - Rule 29.5(c)

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted on February 27, 2021 by



Promila Rajput
Self-represented Petitioner
Cell: 804 968 9026
Add: 3404 S Street, Richmond, VA 23223
Email: promila.rajput.11@gmail.com