

**IN THE  
SUPREME COURT OF THE UNITED STATES**

SAMUEL JACKSON, Plaintiff,	)	
	)	
V.	)	Cause No: 20-8385
	)	
STATE OF INDIANA,	)	
Defendants.	)	

**PETITIONER'S SUPPLEMENTAL BRIEF**

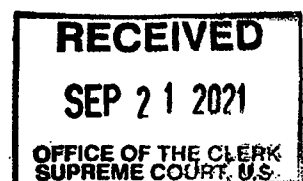
Comes now, the Petitioner, Samuel Jackson, *pro se*, respectfully calls attention to new cases and or other intervening matter not available at the time of the party's last filing pursuant to Rule 15.8 from which the Petitioner now request this Court to take in consideration with this case and cause from which has been served as required pursuant to Rule 29. Petitioner will state the following in support thereof:

1. On the 16<sup>th</sup> day of June, 2021, Petitioner has filed a *WRIT OF CERTIORARI* with this Court and has proceeded *in forma pauperis* under Rule 39, in that he is an inmate of an institution.
2. That this Court has yet to rule on these matters as of this date.
3. On the 16<sup>th</sup> day of August, 2021, the Petitioner requested this Curt to take judicial notice of a very similar case out of the same county court as the Petitioner.

***I. JUDICIAL NOTICE***

4. That Judicial Notice under Fed. R. Evid. 201 (b)(c)(2) states that "*The Court must take judicial notice if a party requests it and the court is supplied with the necessary information*".
5. That the information that the Petitioner is seeking for this Court to take judicial notice of is of:

- a. 7<sup>th</sup> Circuit case and cause of a Writ of Habeas Corpus, of Burt Ford, Cause Number: 1:20-cv-01639-RLY-TAB;



- b. 7<sup>th</sup> Circuits Order for the Indiana Attorney General's office to file a response to the allegations made; [dkt 16]
- c. Indiana Attorney General's office response filed on 17<sup>th</sup> day of August, 2021, [dkt 17];
- d. Petitioner's response filed on the 19<sup>th</sup> day of August 2021, [dkt 18].

6. Burt Ford is from the same County Court as the Petitioner, Allen County, Indiana, who was also denied any opportunity to:

- a. *an evidentiary hearing;*
- b. *subpoenas of counsel of record;*
- c. *Motions to Compel counsel to respond,*
- d. *Motions to depose, and*
- e. *Motion to Compel his attorneys to respond by affidavit when they failed to do so.*

## II. ARGUMENT

7. That although Ford was granted his motions to continue, *due to counsel failure to respond to the allegations made*, Fords was still not afforded that evidence and or any assistance from the PCR court, although requested, that would have met the constitutional requirement of due process.

8. Fords argument and position of Allen Counties unconstitutional practices, by taking a long-lasting position of *all pro se petitioners proceeding by affidavit* without an evidentiary hearing regardless of any situation, *who also are not afforded any assistance from their underlining counsel of submitting and or forwarding their responses to the allegations raised* whether it be by affidavit, interrogatories and or other methods of testimonial evidence violate prisoners due process from that county are also the same of Jacksons.

9. Petitioner believes his case is much like that which Judge Wyzanski stated: "While a criminal trial is not a game in which the participants are expected to enter the ring with near match in skills, neither is it a sacrifice of unarmed prisoners to gladiators." *Williams v. Twomey*, 510 F. 2d 634, 640 (CA7), cert denied sub nom *Sielaff v. Williams*, 423 U.S. 876, 46 L.Ed. 2d 109, 96 S. Ct. 148 (1975).

10. Petitioner could not have done anything more than he did to obtain evidence from his counsel from which if left unaddressed, will prejudice him with courts finding that it was the Petitioner's fault for not submitting that evidence when all the while, it was the PCR court and counsel of record who precluded that admission of evidence. Petitioner must be afforded a fair opportunity to present his case in chief without unfair and unconstitutional government preclusion.

11. Therefore, Jackson request this Court to consider this supplemental brief in conjunction with his original petition and take judicial notice of the Writ of Habeas Corpus of Petitioner Burt Ford, Cause Number: 1:20-cv-01639-RLY-TAB, [dkt 16, 17 and 18] and make it part of these proceedings in consideration of this case and cause pursuant to Fed. R. Evid. 201 (b)(c)(2) prior to any ruling denying and or granting of the Petition.

I, the undersigned, hereby swear or affirm under penalty for perjury that the above and foregoing representations are true and correct to the best of my personal knowledge and belief.

**Wherefore**, the Petitioner, Jackson, request this Court to consider this supplemental brief in conjunction with his original petition and take judicial notice of the Writ of Habeas Corpus of Petitioner Burt Ford, Cause Number: 1:20-cv-01639-RLY-TAB, [dkt 16, 17 and 18] and make it part of these proceedings in consideration of this case and cause pursuant to Fed. R. Evid. 201 (b)(c)(2) and for all other and proper relief.

Dated this 9<sup>th</sup> day of September, 2021,

  
Samuel Lee Jackson,  
Petitioner / *Pro se*