

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

Case No: 20-8396

Renee Denise Bell

Appellant,

v.

Fl. Highway Patrol, Larry Costanzo)

Et. al. & US Bancorp. Et-Al.)

Appellees.

Lower-Court

Eleventh Cir. Case No:

18-12956; 18-13227

Lt:6:05-cv-1806-DAB-Orl

Lt: 6:05-cv-00193-GAP

Appellants Motion for-

Reconsideration /ON THE

Alternative/ IF Not Granted-

**Brief Explanation-On Grounds Upon
which decision rest.**

Comes now, the undersign proceeding Pro Se', at all times premise on clearly-establish law, pursuant to Article (1) § 5,21,22 Florida Constitution, and United States Constitution, Title 28 USC § 1654, Federal Statute, hereby file the following:

THE FOLLOWING: IS THIS COURTS DECISION:

Appellants, Motion to proceed in Forma Pauperism is denied, and the Petition, for a Writ-of Certiorari, is dismiss, based on Rule 39.8. As Petitioner, has repeatedly abused this Courts process, the Clerk is directed not to accept any further petitions in Non-criminal matters from petitioner unless the docketing fee required by Rule 38(a) is paid and the Petition is submitted in compliance with Rule 33.1. See *Martin v. District of Columbia Court of Appeals*, 506 U.S. 1 (1992) per curiam).

SUPREME COURT RULE 39.8

39.8: If satisfied that a petition for a writ of certiorari, jurisdictional statement, or petition for an extraordinary writ is frivolous or malicious, the Court may deny leave to proceed in forma pauperis.

SUPREME COURT RULE 38(a).

38(a). FEES, for docketing case on Petition.

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SUPREME COURT, U.S.**

BELOW: IS APPELLANT GROUNDS FOR RECONSIDERATION

1. The statutory provision for litigation in [in-forma pauperis] in federal courts, is made by **28 U.S.C. § 1915** authorizing any court of the United States, to allow indigent persons to prosecute, defend, or appeal suits without prepayment of costs. The sole statutory language by which District Court is guided-in passing upon the application, provides **an appeal may not be taken** in forma pauperis, if the trial court certifies in writing that it is not taken in good faith. 28 U.S.C. 1915 (a). *Although*, the “Eleventh Cir. taken the appeal, that Court was notified-and notation to docket- record, that the Court response was to “wrong-complaint” that an ‘Amended complaint’ was file, that is not reviewed by the Court-Eleventh Circuit-Court-Appeals.

The District Court, did-certify the appeal not taken in good-faith*.**

SEE: The following, Under Title 28 U.S.C. **1915(e)**).

1. **The Allegation of poverty is Untrue**,
 - a. Appellant, file Motion, for leave, along with notarized affidavit, and or declaration in compliance with Title 28 U.S.C. §1746, in Form prescribed by, Title 28 U.S.C. §1915 [Fed. R. of App. P].
2. **Aforemention, Court decision imply that the action or appeal could be Frivolous, or Malicious, under Rule 39.8.**
 - a. The federal in forma pauperis statute enacted ‘1892, presently codified as Title 28 U.S.C. § 1915, is design to ensure that indigent litigants have meaningful access to federal courts. §**1915(a)** allows demonstration by good-faith affidavit that he/she is not able to pay cost of the lawsuit, and to prevent such abuse, §1915 (d) authorize, federal courts to dismiss in forma- pauperis complaint , “if the allegation of poverty is un-true, or if satisfied that the action is frivolous or malicious. Dismissal on these grounds, are normally prior issuance of process***, to spare inconvenience of answering complaint. **(b).** The District Court abuse discretion that issuance of process is already served*. All parties to suit, are process serve on original complaint. Amended complaints, same*. The latter **(2)** amendments, prior appeal-[FHP-agent] Costanzo, is-not served. Motion file for extension, denied by District Court*. (FHP) known info. though conceal. Discovery, Docs: 105-107. Case: 6:05-cv-1806-Orl-DAB.

THE Appellant will not attempt to demonstrate complete case.
However, state relevant FACTS.**

1. District Court dismiss as frivolous under Title 28 U.S.C. 1915 (d) on an In Forma Pauperis complaint, and based on (FHP) motion for failure to state a claimgranted Under Fed. Rule of Civ.P. Rule 12(b)6. Appellants-claims are premise on denial of -Constitutional rights, with deliberate indifference to medical need, in an emergency 911-action under Estelle v Gamble, 429 U.S. 97, 104 (1976). Appellant, states a valid substantive due process claim, which had a valid "property interest" in a benefit entitled to constitutional--- protection, at time appellant, was deprived of that benefit. Board of Regents v. Roth, 408 US 564, 576-77, (1972). The mere violation of state law, does not automatically give rise to violation of federal-constitutional rights. The conduct of FHP- violations of state law, infringed upon appellants state property interest. The Appellant , a state government public employee-under civil-service employment, [Not-at-will]. [FHP] had a duty, owed to appellant. The conduct on the part of defendants violate appellants, Fifth Amendment right, to procedural Due Process, and has deprived appellant of his/her constitutionally protected liberty interest in employment, within the law enforcement arena. Moreover, the conduct violate First-Amend., and Fourteenth Amend. rights, related to injuries, from the aforesaid incident. [Equal protection of law, equality of opportunity, freedom of speech and expression, freedom to assemble peacefully, rights to equality, freedom. [property interest, with legitimate claim of entitlement]. Common law claims, for emotional distress, and other claims under Title VII- and Const. Amendments. Further, violation Sec. 504; private right of action under federal law. See: Three Rivers Center for Independent Living, Inc. v. Housing Authority of Pittsburgh, 382 F.3d 412, 425-426 (3d Cir. 2004). The Equal Protection Clause to 14th Amend. to U.S. Constitution, is essentially a direction that all persons similarly situated, should be treated alike. **Citing: Plyler v. Doe**, 457 US 202, 216 (1982).

2. (1).The appellant, is Compared with others similarly situated is selectively treated, by defendants [FHP] (2) the selective treatment motivated by an intention to discriminate on basis of impermissible considerations, such as race, to punish or inhibit the exercise of constitutional rights, and by malicious , and bad faith with intent to injure the person. See: *Terminate Control Corp. v. Horowitz* 28 F.3d 1335, 1352, (1994). Defamation, Whistleblower, and Race-Discrimination, are claims, on earlier-origination Petition. The U.S. Constitution, is clearly established prior actions.
- a. The frivolous standard that authorize Sua Sponte dismissal of an In Forma Pauperis Complaint, **“only if the Petitioner cannot make a rational argument in law, or fact which would entitle to relief.”** Appellants complaints, premise on a Mandate, at Doc:69 Eleventh Cir. April 15, 2009- and those same Post-Appeal claims on return after the appeal. Therefore, the case is not absent factual legal basis, for wrongs committed. The error is pro se’ appellants, deficient complaint, after post-appeal without opportunity to amend, before dismissal, and case closure.
- b. District Ct., dismissed plaintiffs claims with prejudice, and without leave to amend, the court may have assumed reference the procedure mandated by PLRA., Sec. 804(a) 5.,which require dismissal. This is not Informa pauperis case, Pro Se appellant, assert, pauperism- based on indigency.

GROUND FOR REVERSAL

- c. District Court, argue objections are not file: **Doc: 19-Case: 6:18-cv-00193-GAP-** this cause dismissal. Appellant did not receive the Recommendation-Motions-by the Court, to timely respond***. Further on receipt, objections, are filed under wrong case, that Clerk U.S. District Court, change case number, while appellants, case on appeal, which was Unknown. [dismissal error]. Why is record not verified** copy of objections attach, to appeal.

As a result, see: below:

1. The Article III Judge, issued an “**Order**” that “**Objections**” are--not receive, and that case is without response on the docket, on - rebuttal to Magistrate Judge recommendations. Moreover, given fact case is complex, and on docket extensive amount of time, with the exception of appeals, the District III judge, implied abuse of the system occur, which there is nothing from plaintiff, **OR** rebuttal to Motions of defendants, or Magistrate, **SEE: [Doc:19]** Wherefore, case dismiss-with prejudice. 6:18-cv-00193-GAP.

- a. The Federal Magistrate Act, provide upon consent of the parties, a full-time U.S. Magistrate Judge...may conduct all proceedings in a jury, or non-jury civil matter, and order an entry of judgment in the case, when designated to enter a judgment by the District Court. *Roell v. Withrow*, 538 US 580, 585 (2003).. *Id* at 587, consent of the parties allows a final appealable judgement of the District Court.
The issue: Appellant never signed form for a magistrate judge, neither, an agreement on file representing same. The original case, December 05, 2005 Magistrate is assign. 28 USC 636 ((c))1-with consent of the parties. 636 ((c))1. As long as parties have voluntarily consented. Consent, is touchstone of the magistrates jurisdiction. See: *Anderson v. Woodcreek Venture, Ltd.* 351 F.3d 911, 915, (9th Cir. 2003). [appellants-Consent not possible that U.S. District Court, deny court access and right to redress].
Aforesaid, is a minor procedural defect, premise on consent. 636 (c))(2) Fed. R. Civ. P. Rule, 73 (b)1. Although, minor remove Constitutional privilege-Article VI Section-2, fundamental rights of a individual citizen.

- b. Consent by “failure to object”, is not sufficient to clothe an Hon. magistrate with §636 (c))) powers. Grant of judicial powers to magistrates would infringe on the constitutional rights guaranteed to litigants by Article III. *Pacemaker Diagnostic Clinic of America, Inc. v. Instromedix, Inc.*, 725 F.2d 537, 541-43 (9th Cir. 1984) (En-Banc). §636 (c)))..consent must be explicit. Therefore, that District Court premise its decision on the magistrates recommended order. The same should be reversed -in respect to the aforesaid.**

3. Moreover, is **caveat 12(b)6 Motion** by defendant-**FHP**—and other named-defendants: [**US Bancorp**] whom did-not file a dismissal-Motion. Appellant, is not notified on Magistrate-recommendations, and **NOT**-forwarded by the Court. This Recommendation—[provides a ten-day grace period to respond]. Therefore, District Court, anger against appellant, for improper filing, and assume plaintiff, fail to object. [From the position of trier-of fact] understandable. **However**, the allegations are not correct. The case- is complex- before Federal Court, for years.--- The District III Judge, in response and recommendation denied in forma pauperis, because of aforesaid. Further, assume appellant, not cooperative, in an already- stressful case, and somehow deserve case closure with prejudice, in using the courts time inefficiently, although , above stated never received, to respond. The harm cause is denial-of the right-to-an Un-bias appeal, in this court, and opportunity to be heard. **
4. **caveat, 12(b)6**- The District Courts Order, and Magistrate-recommendations weigh heavy on the decisions of the next level-of courts, reference an appeal. Further, that U.S. District Court recommend dismissal with- prejudice, cause great harm which decision, is again on the merits. Moreover, case closure, closes out the case and controversy that is continuously on the docket where justice has not been served. The conduct is -prejudicial in denial of constitutional rights. Moreover, to add insult to injury, is the U.S. District Court delayed case [years], in the institution of the proceedings.
 - a. The defendants, (FHP) dismissal- include comment on statute of limitations, **on its face**-on a case timely filed. Defendants process-serve. Case: Title VII-from EEOC-to District Court. Mandatory prerequisite met/Right-to Suit-letters attach*. The case receive mandate-on second-amended-complaint. why should there be delay in proceeding. Discovery is prior, latter- appeals) though, **not complete***. “The completion of”, - does-not warrant, denial of Motion to Amend. DCD Programs, Ltd. v. Leighton, 833 F.2d 183 (1987). A complaint dismiss on statute of limitations grounds, based on the face of the complaint, the dismissal is

only----- appropriate, if complaint is conclusively time barred. Jones v. Rogers Memorial Hosp. 442 F.2d 773,775 (1971). The complaint was not conclusively timed barred, the case is filed timely before the statute matured. Further, demonstrated above this is not a case Un-tainted by fraudulent concealment. Riddell v. Riddell, 866 F.2d 1491, (1989). Firestone v. Firestone, 76 F.3d 1205, (1996).

Further, that the complaint fail to plead particularity, does not support dismissal with prejudice. Richards v. Mileski, 662 F.2d 65,73 (1981). Jones v. Rogers Memorial Hosp. 442 F.2d 773,775 (1971).

- b. There-no prejudice. The Supreme Court, instruct the lower federal courts, heed carefully the command of Rule 15, Fed. R. Civ. P...freely granting leave as justice requires ----
Gabrielson v. Montgomery, Ward & Co. 785 F.2d 762, 765 (9th Cir. 1986). See: Citing: Rosenburg Brothers & Co. v. Arnold, 283 F.2d 406 (9th Cir. 1960) (per curiam)). The Motion to make an amendment is to be granted liberally,...that plaintiff, may be able to state a claim. McCartin v. Norton, 674 F.2d 1317,1321, (9th Cir 1982).
- c. Appellant, is entitled to-Equitable Tolling **F.S. §95.051(2)** toll- the limitation period for an administrative appeal of a public employees' discharge. Equitable tolling of time limits have been permitted in federal actions where "active deception" took place. Cottrell v. Newspaper Agency Corp. 590 F.2d 836, 838-839, (1979). The plaintiff, was "lulled into inaction by past employer, state or federal agencies, or the court". Miller v. Marsh, 766 F. 2d 490,493 (1985).; Martinez v. Orr, 738, F.2d 1107,1112, (1984), and where plaintiff has been "actively misled" or "has in some extraordinary way been prevented from asserting his or her rights."-U.S. District Court-Middle Dist. Court deny court access]. The denial of court access, is a procedural default. Wilkerson v. Siegfried Insurance Agency, Inc., 683 F.2d 344, 348, (1982).

Moreover, diligence required for equitable tolling purposes is "reasonable diligence," e.g. Lonchar. 517 U.S. at 326 (1996) Moore v Knight, 368 F.3d 936,940, (C.A.7 2004). Case: tolled : Statute of Limitation "FL. Stat. §95.051 (1) a, c, f, g, h.

District Court, erroneously relied on lack of diligence in this case, and appeals court, erroneously relied upon mis-information based on un-verified information by the magistrate- confirmed by the District -III Judge, which means no lower court has considered the details of the facts, of this case to determine whether they indeed constitute extraordinary circumstances**, sufficient to warrant equitable relief. *Adarand Constructors Inc. v. Mineta*, 534 U.S. 103, 110 (2001). *Gonzalez v. Crosby*, 545 US 524, 540 (2005). Facts in the record entitle appellant, to equitable tolling. The appellant, allegations would suffice to establish extraordinary circumstances, beyond her control in several filed Motions, appeals-on reversal of Mandate of the case, show forth reasonable efforts to continue, case, in hope of justice. The litigant cannot-or should-not be held accountable for conduct of court delay, beyond his/her control. Wherefore, it should not be said, appellant abuse-process. *Jones V. Morton*, 196 F.3d 153 (1999).

- d. Appellant, is entitled to “**Leave to Amend**” even if the District Court, properly dismiss complaint under the Fed.R.Civ.P. Rule 12(b)6. The Court should have provided leave to amend, this is an abuse of discretion. After, “**Post**” appeal return, if complaint is deficient, at least one- opportunity should be- provided. *Levitin v. PaineWebber, Inc.*, 159 F.3d 698, 700 (2d Cir.1998). See: *Bowles v. Reade*, 198 F.3d 752, 757 (9th Cir. 1999). The opportunity of “Leave” need not be provided “**IF**” (1). Prejudices opposing party. (a). action could not prejudice an opposing party, that provide wrongful- allegations to obtain dismissal. (2). Is sought in Bad-Faith. (b). whether defendants admit truth/or not, it is known appellants actions are not in bad faith, several unlawful wrongs are committed, primarily under constitutional amendments, where is the wrong committed for any citizen to seek redress of injuries, and harm caused him. Fed. R. Civ.P. Rule 15(a). The Supreme Court. “the grant, and opportunity to amend is within discretion of the District Court. Although, outright refusal to grant leave-without a justifying reason-appearing for the denial, is not an exercise of discretion, it is merely an abuse of that discretion and inconsistent with the spirit of the Federal Rules”. *Forman v. Davis*, 371 U.S. 178,182 (1962).

- e. Aforesaid, the opportunity to amend.. A denial without, the stated reasons, where the reasons are not readily apparent, constitutes an abuse of discretion. Forman v. Davis, 371 U.S. 178,182 (1962)
- 5. **After a District Court declare an appeal bad-faith**, this remove opportunity for an indigent individual to have court access, and a Un-bias appeal as any other US citizen, similarly situated. Further, waives the right to appellate review on the claims, because of incorrect-statement of fail to file timely objections, on a magistrate report with the District Court. United States v. Schronce, 727 F.2d 91, (1984). Id. at 94 Nettles v. Wainwright, 677 F.2d 404, 405, 410 (1982) (en banc).

The **Caveat:** required -NOTICE: A 10-day period allotted by the Magistrates Act, and Rule 72, that waive the right to appellate review on the claims, if not timely. This case*, appellant, did not receive the magistrate report- recommendation timely, to respond. Receive, **after*** the District Court, order is in effect.

- a. The aforementioned, is reason **Eleventh Circuits, last response***, is- affirmed. Aforesaid, it is based on Decision by the District Court, which is premise on the Magistrates- Recommendation, and that- information is provided by wrongful allegations of the defendants- (**FHP**) - Motion to Dismiss.

6. **Seeks monetary relief against a defendant, who is immune from such relief.**

- a. The qualified immunity defense shields government agents from liability from civil damages insofar as their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known. Harlow v. Fitzgerald, 457 U.S. 800 (1982). Citing, Procunier v. Navarette, 434 U.S. 555,565, (1978).
- b. In respect to aforesaid, the allegations are violations of clearly established law. Defendants are not entitled to qualified immunity. Although, the defendants would be* entitled to dismissal before the commencement of discovery. In this case “**Discovery**” began at: **Case No: 6:05-cv-1806 -Docs: 105-Doc:107.** **Middle District, Fl.

The appellants, Original-complaint, is dismiss. The Appellant, given "Leave to Amend" a Second-Complaint. The Second is dismiss. The case on appeal- standing on "Second-Complaint. On appeal, recv. favorable mandate-which became case guide.

- c. **The commencement of "Discovery"** though not- complete-is prior appeals. **Before**, the commencement of Discovery, even if the - appellants, complaint adequately allege the commission of acts, that violated clearly established law, defendants is entitle to summary judgment, if discovery fail to uncover evidence sufficient to create a genuine issue as to whether the defendants, in fact committed the acts. Mitchell v. Forsyth, 472 US at 526 (1985).
- d. The Eleventh Circuits mandate, Case: 6:05-cv-1806-determine "a cause of action" exist, that if proven, are grounds for relief. Though Post-appeal, **Unforeseen Circumstances**, are: Denial of Redress- Court Access. Therefore, appeals **after**, are reference, the improper dismissal of a Mandate. Appellant, should not be accused of Court abuse, that clearly denial of court access, and a detail-investigation of court records will verify**
- e. On the Merits of the appeals, the appellate -courts reject argument, that FHP enjoyed qualified immunity, this **IS** not address in District court, with exception of appearance on the recommendation of the Magistrates report, when case, is dismiss. Case No: 6:05-cv-1806. therefore, [FHP] responded on appeals, as ordered. The appellant, has a constitutionally protected property interest, related to FHP employment, which this cause arises, and is not properly before the Court, since the claims related specifically to discharge has been dismissed. [The District Court, applied an unduly- short limitation period- with respect to the claimed deprivation of post-FHP employment. The appeals court held that the numerous claims set out in appellants complaint, although complaint slightly-imperfect, if proven-relief could be granted. at Doc: 69-Case:6:05-cv-1806.

Wherefore, this United States Supreme Court,

Conclusion: At its core the right to Due Process reflects a fundamental value in our American Constitutional system. Due process requires at a minimum, that absent a counter-veiling state interest of overriding significance, persons forced to settle their claims of right, and duty through the judicial process, must be given meaningful opportunity to be heard. *Boddie v. Connecticut*, 401 U.S. 371, (1971). *Mullane v. Central Hanover Tr. Co.*, 339 U.S. 306 (1950)F. The appellant, over a decade on the United States District Court Docket-with exception of appeal have not had a trial, a conference, or any meaningful opportunity to be heard in the case. The case still hold controversy. Appellant, have not receive court- access in defense of her claims, by denial of the District Court. The theme that Due Process of Law signifies, is a right to be heard in one's own defense...the right to be heard is the duty of government, to follow fair process, the right to a hearing attach only to the deprivation of an interest encompassed within the fourteenth amendments protection. [This case originate-based on Title VII CRA 1964 42 USC§2000e-2.-ten days after, the EEOC-issued right-to-suit].

The deprivation of property is nonetheless, a deprivation in the terms of the Fourteenth Amendment. *Sniadach v. Family Finance Corp.*, 395 U.S. 337, (1969); *Bell v. Burson*, 402 US 535 (1971) any significant taking of property, is within the purview of the Due Process Clause. 14th Amend. The District Court, prejudiced this case, by refusing access to Court. The case-long received a favorable mandate. The District Courts delay in proceedings is the “**abuse in this case**”, Appellant-timely-filed case, denied for no apparent reason. The appellant, paid for this case, consecutive times,[[at onset]], and now currently without employment, and indigent. Therefore, proceeded by Informal-Pauperis. The appellants, financial status well below-poverty level. The appellant, aforesaid is required to pay fee, prior justice, this is unconstitutional prejudice, and disgrace to any citizen in the History, of the Court. Further, an allegation of abuse of the Courts process, one should look to the District Court, in un-explainable case delay. The appellant, is entitled to equitable tolling, to render latter petition timely. “ **Equitable Tolling**” is proper only when the principles of equity would make the rigid application of a limitation period unfair.” The Petitioners complaint, was not untimely, in this case. The denial of court access-in the District Court, delayed this case from proceedings. Wherefore, extraordinary circumstance exist.

A petitioner is entitled to Equitable Tolling, if he shows **(1)**. That he/she has been pursuing his rights diligently, and **(2)**. That some extraordinary circumstance stood in his way” and prevented timely filing. [[US District Court, denial to access, and redress, for which the appellant is entitled]. *Pace v. DiGuglielmo*, 544 US 418, 2005. The extra-ordinary circumstances are not limited to those that satisfy the Eleventh Circuits test. .. *Baggett v. Bullitt*, 377 U.S. 360, 375, (1964).

Demonstrating “flexibility”, and avoiding “mechanical rules”. The Appellant, understands pursuant, to this Court, demonstrated above, [p.1] required court fees, must be paid, and expenses as a condition precedent to obtaining court relief. However, this action is premise on aforesaid statement of US Dist. Court-Middle District of Florida. This conduct, of the US District Court, Middle District of Florida, is Un-Constitutional, as it is- applied to other indigent appellants, and other members of the class which they represent. *Holland v. Florida*, 560 US 631 (2010). The appellant, is entitled to judgment on the federal claims. Moreover, Bivens claims, have an implied damages remedy, under Due Process Clause of the Fifth Amend., *Davis v. Passman*, 442 U.S. 228 (1979)

Appellants, Bivens claims-should be decided prior dismissal. The aforementioned violation of the Eighth Amendment, gives rise to Bivens remedy. Bivens establish that victims of constitutional violations, are actionable under Bivens, despite the fact of a statute conferring such right. *Carlson v. Green*, 446 US 18, (1980).

The District Court, dismiss the appellants claims, and case under 12(b)6, failure--to state a claim, upon which relief can be granted. Review, for failure to state a claim, is De-Novo. A question of Law. *Alonzo v. ACF- Property Mgt., Inc.*, 643 F. 2d 578,579, (1981). A complaint should not be dismiss under Fed. R. Civ. P. Rule, 12 (b)6, Unless it appears beyond doubt, that plaintiff can prove no set of facts, in support of his claim, which would entitle him to relief. *Conley v. Gibson*, 355 US 41, 45-46, (1957). A complaint, may be dismissed as a matter of law, for one of two reasons, **(1)**. Lack of cognizable legal theory **(2)**. Insufficient facts under a cognizable legal claim. *2A J Moore, Moore's federal Practice, 12.08 at 2271 (2d ed.1982)*. The appellant, has not had opportunity in the US District Court, to show whether or not can prove no set of facts. A courts denial to a US Citizen as others similarity situated, even if cause is remand, case should be under Un-bias trier of fact, at this time it is Unknown whether it is possible.

- A complaint, filed in informal Pauperis, is not automatically frivolous, within the meaning of §1915d, because it fails to state a claim.

Prayer: Remand, to District Court, for further proceedings, grant court access,& **leave to amend**, a hearing for local state government-employee, premise on the allegations, which cause termination, that the right to suit, is provided by release of EEOC, [[[Right-to-suit-Letters]]] to the United States District Court, Middle District of Florida.

Rdb,

10/27/2021.

Renee D. Bell/Pro Se

P.O. Box 362

Winter Park, Fl. 32790

Email:China3anise@yahoo.com

CERTIFICATE OF SERVICE: Counsel, for FHP, and US Bancorp.

David Asti- Counsel [FHP]

The Office of the Att. General

501 East Kennedy Blvd, Suite.1100

Tampa, FL. 33602

Marinosci Law Group Counsel: US -Bank-US-Bancorp.

100 West Cypress Creek Rd, Suite 1045, Fort Lauderdale, Fl. 33309

Rdb,

10/27/2021.