IN THE UNITED STATES SUPREME COURT OF AMERICA

Micah Lamb
Petitioner,

vs.

Mark S. Inch, Secretary,
Florida Department of
Corrections and Respondents
_____/

Time filed under (AEDPA)
Lamb vs. Crews, 133 S. Ct. 1318 (2013)
Lamb vs. Jones, 137 S. Ct. 19 (2016)

DIRECTED TO JUSTICE SONIA SOTOMAYOR:

"MOTION TO EXCEED PAGE COUNT AND WORD COUNT" ON WRIT OF CERTIORARI, DUE TO BAD FAITH ACTS' OF THE GOVERNMENT ATTORNEYS', WILL SHOCK THE CONSCIENCE OF THE COURT"

COMES NOW, the Petitioner Micah Lamb, pro se, hereby moves Justice Sonia Sotomayor and the Court pursuant to F.R.C.P. 60(b)(6); Buck v. Davis, 137 S. Ct. 759, N. [1-12] (2017) on this motion to exceed page count and word count on writ of certiorari verses the denial of previous filed writ of certiorari Lamb vs. Crews, 133 S, Ct. 1318 (2013); too (1) one new writ of certiorari, under F.R.C.P. 60(b)(6), see as follows:

(1). This court has Article III jurisdiction and Petitioner asserts that substantial prejudice and this sordid picture requires' greater elaboration[1] is the cause for this motion to exceed word count to 24,034 words on Petitioner's "Writ of Certiorari" which page count is 78 pages which Petitioner must and shall, be able too exceed to prevent any injustice and to expose the shocking misconduct too be able to proceed further. As a reminder, it is over 250 police officers and detectives involved see, Appendix 160A - 163A. The execution of (7) seven consecutive search

[1] (" The F. R. C. P. 12 (b) that a concise statement of facts and circumstances will not suffice due to the overwhelming prejudice of misconduct by police and state attorneys' in knowingly use of false falsified reconstruction evidence at the crime scene of the illegally / arrest of Petitioner's Lumina without a search warrant an probable cause")

warrants and affidavits on different dates and crime scenes, and one false jail house informant, see, Appendix 32A - 36A; two (2) allege non-testifying co-defendants Betty McDuffy , Aaron Lamb, whom police coerced and threatened them for their testimony to implicate Petitioner in their crimes in contravention to international law, and the 4th and 14th U.S. Constitutional Amendments, see, Santos v. Thomas, 830 F. 987, N. [1, 6, 7,10] (9th Cir. 2016); U.S. v. Karake, 443 F. Supp. 2d 8, 86 (D.C. Cir. 2009), **will shock the conscience of this Court,** proves the government had underwhelming evidence against Petitioner see, U.S. v. Marquez, 653 F. Supp. 2d 1, 17 (D.C. Cir. 2009) ("In this conspiracy case of underwhelming evidence").

(1)(B). The main feature of this cause also, is that when Lamb v. Crews, 133 S.Ct. 1318 (2013) was pending before this court the " Newly Discovered Evidence" received February 5th, 2019 was received at legal mail, from Florida Department of Law Enforcement ("FDLE") that **Head State Attorney Harry Shortstein** and his "first-on-the-scene" hitman Detective Samuel D. Koivisto (6396) in (**1996**) gave a retarded girl crack cocaine, lighter, and crack pipe, in a Jacksonville, Fla. police car while on surveillance audio/video tape told her to smoke it in contravention to Florida Statutes 893.147 (2)(b) ("Prohibited to manufacture or delivery of drugs paraphernalia. – it is unlawful for any person to deliver, possess with intent to deliver, or manufacture with intent to deliver drug paraphernalia, knowing, or under circumstances where one reasonably should know, that it will be used:

(b) to inject, ingest, inhale, or otherwise introduce into the human body a controlled substance in violation of this act. Any person who violates this subsection is guilty of a felony of the 3d degree, punishable as provided in F.S. 775.082, F.S. 775.083, F.S. 775.084, Carthan v. Snyder, Lexis 128989 (6th Cir. 2018) ("citing Bound v. Hanneman, Lexis 43947 (8th Cir. Minn.

2014) ("**Denying qualified immunity because a reasonable officer should have known that providing an illicit drug to a citizen where such provision was not required by the officers legitimate duties, violates clearly established law**"); Lesnik v. Public Industrial Corp., 144 F.2d 968, 973, 978 (2d Cir. 1944) ("Persons joining and participating in a conspiracy at any time before the accomplishments of it's ultimate objectives are equally liable with the originators"). The victim Allison Brauda, Public Defender Brain D. Morrissey, Bar Number 325627, filed a motion to dismiss, citing U.S. v. Russell, 93 S.Ct. 1637 (1973); State v. Glosson, 462 So.2d 1082 (Fla. 1985) which state trial judge Bill Parson asserted that both detective Sam Koivisto (6396) actions was unlawful and outrageous, which Koivisto (6396) was asked on the witness stand who ordered him to give the drugs to victim **he said head state attorney Harry Shortstein, (the same incident occurred with petitioner Micah Lamb, when his Chevy Lumina was parked on his aunt's 120 Cahoon curtilage/ property with her consent/permission to park vehicle is newly discovered evidence dated August 18th, 2018 see, Appendix 174A which the illegal seizure happened on Dec. 21st, 2001, and police and state went and got search warrants as also newly discovered evidence, received Oct. 19, 2018, see, Appendix 179A for $13.60, Dec. 27th, 2001 that's (6) days later, but the State Attorney's Office was on the crime scene as investigators drove 42 miles to the outskirts to the rural area of Jacksonville, Florida to Marietta, and thru head attorney Harry Shortstein directed Koivisto (6396) to seize Petitioner's Chevy Lumina is in the (same posture) of illegality that occurred in (1996), State of Florida v. Allison Brauda, see, Appendix 135A, received as "Newly Discovered Evidence," on, February 5th, 2019** also, in (2012) of the attached newspaper article and FBI Police Report at, see, Appendix 177A, when hitman S. Koivisto (6396) threatened to **[kill] U.S.**

President Obama, Michelle Obama, Malia Obama, Sasha Obama, and blowup[2] the entire east coast including the U.S. Supreme Court and the 11th Circuit Court not protected by the first amendment, see, U.S. v. Crews, 781 F.2d 826, N. [7] (10th Cir. 1986) **("Defendant making threat to [kill] President Ronald Regan instructed to appoint a psychiatrist to aid defendant in his preparation for a new trial, but Federal Law invoked to make one criminally liable"), Doe v. Pukaski County Special Sch. Dist., 306 F.3d 616, 624 (8th Cir. 2002) ("citing Hawaii v. Chung, 75 Haw. 398, 862 P.2d 1063, 1071-73 (Haw. 1993) ("Recognizing that a defendant's statement to other teachers that he would [kill] the principle were true threats entitled to no first amendment protection")**; is supported by new discovered evidence of the federal police report from the United States Secret Service received January 3d, 2019 see, Appendix 177A, which is supported by evidence that hitman Kovistio didn't quit, **JSO relieved him of duty**, see, Pipitone v. City of New York, 57 F.Supp.3d 173 (2d Cir. 2014) **("Denying summary judgment where jury could reasonably find that the gross failure to discipline corrupt officer for [prior] conduct was the moving force behind murders later committed by officer and associates on behalf of criminal organization")**; Vann v. City of New York, 72 F.3d 1040 (2d Cir. 1995) (same); Baynard v.Malone, 268 F.3d 228, 236 (4th Cir 2001); Smith v. Wade, 103 S.Ct. 1625 (1983); Milke v. Ryan, 711 F.3d 998 (9th Cir. 2013) **("State knew about...judicial findings thru prior court orders of (1996) see, Appendix 135A discovered February 5th, 2019) rather then mere allegations didn't disclose**

[2] ("On January 13th, 2021 an ex-police officer (Republican Trump voter) threatened to force Chief U.S. Justice Roberts' to resign (just like) Jacksonville, Florida Detective Samuel D. Koivisto (6396) see, Appendix 135A, 177A, Republican voter threatened to kill black U.S. President Obama, a democrat, (just like Petitioner, a democrat) further extended their violence/riot on the U.S. Capitol Janaury 6th, 2021, by killing 5 people, plus a Capitol Police Officer, and overthrow the Electoral vote and keep President Trump in office over Biden and vandalized the insides of the Capitol; when will it all stop, see, Wyzkowski v. Dept. of Fla. Corr., 226 F.3d 1213, 1217-1218 (11th Cir. 2000) ("Actual innocence, suspension clause invoked, court granted relief")?

police detectives long history of lying under oath [and other misconduct] even trial was essentially a swearing contest between detectives claim that accused had confessed and accused denial that unrecorded confession never took place") Beard v. Aguilar, 134 S.Ct. 1869 (2014) **("Prosecutor failure to disclose that a police dog had a [history] of mistaken identifications violates Brady v. Maryland, 83 S.Ct. 1194 (1963)**; Estate of Davis v. City of N. Richland Hills, 406 F.3d 375, 385 (FN5) (5th Cir. 2005) **("That the officer had a reputation for lewd and criminal behavior, and that the officer employment [history] identified him as [dysfunctional] and unfit for police work")**; Brown v. Bryan, 219 F.3d 450, 461, 462 (5th Cir. 2000) ("Single incident exception, was moving force behind injuries"); Woodward v. Corr. Med. Svcs. Of Ill., 368 F.3d 917, 927 (7th Cir. 2004) **("Inference of deliberate indifference may be supported by showing a series of [bad acts] and inviting the court to infer from the policy making level of government was bound to have noticed what was going on and by failing to do anything must have encourage or at least condoned the misconduct")**; Vasquez v. County of Los Angles, 349 F.3d 634, 655 (9th Cir. 2003) **("Noting in a Title VII case that where an employer tolerates misconduct it encourages [additional misconduct]")** citing, Faragher v. County of Los Angles, 524 U.S. 775, 779, 118 S.Ct. 2275 (1998); Gollomp v. Spitzer, 568 F.3d 355, 372 (2d Cir. 2009) ("**Commenting in the context of litigation sanctions that an overly lenient regime could embolden lawyers to make improper submissions to courts**") makes the government attorneys be guilty of misconduct by failing to timely turn over exculpatory evidence "Brady," evidence of hitman Detective Koivisto (6396) disciplinary/psychiatric records and Federal Police report from Untied States Secret Service, see, U.S. v. Rosner, 516 F.2d 269, N. [9] (2d Cir. 1975) cert. denied 115 S.Ct. 3198 (1976) **("Prosecution erred when it failed to notify defendant after trial about evidence relating to credibility of government**

witness, N. [10] failure to [specifically] tell U.S. Supreme Court hearing case on certiorari"); Demjanjuk v. Petrovsky, 10 F.3d 338 (6th Cir. 1993) cert. denied 115 S.Ct. 295 (1994); Falk v. General Motors, 496 F.Supp.2d 1088, N. [3, 4] (Cal. 2007); Douglas v. Workman, 560 F.3d 1156, 1189-90 (10th Cir. 2009); U.S. v. Williams, 790 F.3d 1059, N. [7] (10 Cir. 2016) cert. denied 136 S.Ct. 604 (2015); U.S. v. Brooks, 966 F.2d 1500 (D.C. Cir. 1993) ("Requires government to review the police department files for any exculpatory information due to the presence of a fellow officer"); see, also, Pennsylvania v. Ritchie, 107 S.Ct. 989 (1987) ("In which the court found that a state statute preventing disclosure of files concerning child abuse maintained by the Pennsylvania children and youth services could not trump the prosecution's "Brady Duties"); even this hitman Detective Koivistio (6396) action of misconduct is ongoing, see, U.S. v. Espinosa, 918 F.2d 911, N. [1, 2, 3] (11th Cir. 1990); Stephen v. Jones, Lexis 51029 (8th Cir. 2011) which the State of Florida could not have obtained petitioner's conviction and judgment without the illegal aid of Detective Koivistio (6396). The instant attached applications and writs go into greater detailed elaboration which will inform the court in the "interest of justice," of the **[criminal racial profiling]** being utilized by hitman veteran Jacksonville Detective Samuel D. Koivisto (6396) "first on the scene" responder who has a ongoing threat of wanting to [kill] black President Barack Obama, Malia Obama (daughter); Michelle Obama (wife); Sasha Obama (daughter); was "Newly Discovered Evidence" received from Homeland Security, Secret Service on January 3d, 2019, see, Appendix 177A, 135A: on 11/9/12, at approximately 1050 hrs., (b)(6); (b)(7)(c) Jacksonville Field Office (JSO) called the USSS Jacksonville Sheriffs Office via cell phone number (b)(6); (b)(7) requested that I respond to the JSO, internal investigations unit to meet with the detectives handling this incident. On this same date at approximately 1135 hrs. I responded to the Jacksonville Sheriff's Office, Internal

Investigations Unit, 501 East Bat Street, Jacksonville, FL 2202. I met with (b)(6); (b)(7)(c); see, Major tours v. Colorel **("Police")** 799 F.Supp.2d 376 (FN 3) (3d Cir. 2011) **("Racial profiling .... It allows recovery for [new acts] despite the plaintiff having learned of the [conspiracy] and its [effects] outside the statutory period see, West Penn Allegheny Health System, Inc., v. UPMC, 627 F.3d 85 (3d Cir. 2010); Vest v. Bossard, 700 F.2d 600 (10th Cir. 1983) ("Plaintiff victim was falsely charged with sodomizing a young boy, but he was unaware that the charge was the result of a [conspiracy] by defendant conspirators and he was unaware of their identity. The Conspiracy included a [cover-up] in order to utilize the statute of limitations as a defense. When plaintiff finally brought an action against defendants, the trial court dismissed the complaint as barred by the statute of limitations. The court reversed the trial court's decision holding that under state law, if defendants [concealed] the [conspiracy] until the statute had run, the statute was tolled. There had to be a full and complete factual hearing on whether the statute of limitations was tolled because of defendants conduct. Evidence in the record that suggested plaintiff had knowledge of the conspiracy was at best thin and legally inadequate until the boy revealed the [conspiracy] and explained that he had been forced to maintain [secrecy] until the statute of limitations had run, plaintiff did not have [full knowledge]. Any suspicions he might have had were not enough to have the statute run in favor of defendants. Outcome: the court reversed the decision below that dismissed plaintiff victims complaint against defendant conspirators as time barred, because the statute of limitations was tolled where defendants [concealed] the [conspiracy] as well as their identities until the statutory filing period had passed. The court remanded the case for an evidentiary hearing on the issue of defendants [concealment]")**; Limone v. Condon, 372 F.3d 39, N. [6] (1st Cir. 2004) **("The**

amended complaint [paint a sordid picture]. Although the misdeeds described therein are many and varied, the plaintiff claims may be distilled into (2) basic allegations: First, that the appellant purposefully suborned false testimony from a key witness; and second, that the appellant suppressed exculpatory evidence in an effort both to [cover up] their own malefactions and to shield the actual murders (one of whom was being groomed as an FBI informant). The complaint weave these allegations together from that platform the plaintiff asseverate that an individuals right not to be convicted by tawdry means – his right not to be [framed] by the government – is beyond doubt"); Burke v. Town of Walpole 405 F.3d 66, N. [18] (6th Cir. 2005) ("Intentional or reckless fabrication of inculpatory evidence or omission of material exculpatory evidence by a forensic examiner in support of probable cause may amount to a constitutional violation Galtrath v. City of Santa Claria, 307 F.3d 1119, 1126 (9th Cir. 2002); which Florida attorneys general office concealed the conspiracy of the players in their practice and patterns of racial profiling in this criminal case, see, Stano v. Dugger, 901 F.2d 898, 899 (11th Cir. 1990) **("court held that alleged facts of the [collusion] among the Detective Samuel D. Koivisto (6396) Defense Attorney (David Makokfa) and psychologist and "coercion" satisfied the "Brady" test and required an evidentiary hearing")**; Barrientes v. Johnson, 221 F.3d 741, 768-769 N. [28] (5th Cir. 2009) cert. denied 121 S.Ct. 902 (2001) warrants a full and proper relief , afforded too petitioner lacks any other available relief, justifies this court in allowing further investigation of material facts that's made petitioner a victim, compare, Major, 799 F.Supp.2d 376, 394 (3d Cir. 2011) **("Additionally, plaintiffs adduce evidence that Schulze (police) and Calorel (police) held racist attitudes. ACBIU inspector name Wilfred Grotz testified at his deposition that Schulze thought his secretary was a "lazy nigger" and instructed Grotz to watch her closely for any mistakes that could be used**

against her. (Grotz Sept. 17, 2009 Dep. 16:13-17:3) He testified that Calorel (police) would say "niggers run junk," referring specifically to black owned buses in Atlantic City. (Grotz Dep. 18:17-19:3) He also claims Calorel (police) said he moved his home because an African American family moved next to him (Grotz Dep. 19:15-20:12)")

(2). The State of Florida government attorney's on Petitioner's § 2254, § 2244, F.R.C.P. 60(b)(6) have filed **frivolous appeals'** not citing any legal case authorities', per se, each of Petitioner's grounds' showing any and all reviewing courts', that they have overwhelming evidence of Petitioner's guilt, see, In re Hendrix, 986 F.2d 195, 200, N. [10] (7th Cir. 1992) ("We recur in closing to the parties failure to cite Shondel. Although the cases are not identical, this appeal could not succeed unless we overruled Shondel. Nevertheless to say, the Appellant failed to make any argument for overruling Shondel, for it failed even to cite the case. The omission by the Atlanta Casualty Company (the Appellant) disturbs us because insurance company's are sophisticated enterprises in legal matters, Shondel, was an insurance case, and the law firm that handles this appeal for Atlanta is located in this circuit. The Pages Lawyer, a solo practitioner in a non-metropolitan area is less seriously at fault for having been a case of concealing adverse authority, because Shondel, supported his position. At all events by appealing in the face of dispositive contrary authority without making arguments for overruling it, Atlanta Casualty filed a **frivolous appeal**"); Jorgenson v. County of Volusia, 625 F.Supp. 1543, 1548-1549 (11th Cir. 1986) ("**The court imposed sanctions upon counsel for the corporation and owner, pursuant to Fed. R. Civ. P. 11, for failure to cite recent and controlling authority to support its contentions, which the court viewed as misleading, unethical, speculative, and in violation of U.S. District Ct. M.D. Fla. R. 405**"); Boca Burger Inc. v. Forum, 912 So. 2d 561, 571 (FN5, 6) (Fla. 2005) ("**Warns that zealous advocacy does not justify unprofessional**

conduct and that appellees should [concede error when there is no basis in law or fact to sustain a lower court's (4th Judicial Circuit Court, Duval County, State of Florida, case number:16-2002-Cf-000115-AXXXX-MA) ruling"); U.S. v. Cazares, 788 F.3d 956, 983 (9th Cir. 2012) ("**Failure to cite to valid legal authority waives a claim for appellate review**"); TBL Collectible Inc. v. Owners Inc. Co., 285 F. Supp. 3d 1170, 1184-1185 (FN13) (D. Colo. 2018) (same) ("**In which the court excluded an expert opinion because the expert report contained [no reference to legal authorities supporting the experts conclusions while Mr. Carver may be correct 285 F. Supp.3d 1186 Defendant bears the burden of establishing the admissibility of an experts opinion and Mr. Cravers opinion is mere ipse dixit. Accordingly, business record-keeping obligation [lack a sufficient basis to satisfy the requirements of Fed. R. Evidence 702 Testimony By Expert Witnesses**"); Land A . Contracting Co. v. Concrete Serv. Inc., 17 F.3d 106, 113 (FN27) (5th Cir. 1994); Estate of Barabin v. Asten Johnson, 740 F.3d 457, 460 (9th Cir. 2013); Nataren Escobar v. Holder, 398 Fed. Appx. 50, 56 (11th Cir. 2010) ("This court has previously held that failure to cite any authority in a brief constitute abandonment of an issue (FN24)"); shows that the reviewing federal courts' have illegally used a double-standard in denying Petitioner's F.R.C.P. 60(b)(6) motions for expansion of Petitioner's Certificate of Appealability, see, Buck v. Davis, 137 S. Ct. 759, N. [1-12] (2017); Christianson v. Colt Industries Operating Corp., 108 S. Ct. 2166 (1998); U.S. v. Alpine Land and Reservoir Co., 984 F.2d 1047, 1049 (9th Cir. 1996) cert. denied 114 S. Ct. 60 (1993); Appendix A, B, C, D, E.

Therefore, to get to the bottom of the U.S. Constitutional violations the "ends of justice," "Manifest of Injustice," and "Miscarriage of Justice" of good faith legal arguments will require the page counts and word counts of all pleadings to be superseded, to expose the additional

misconduct by the court officers that was previously fraudulently concealed from this court, as to perpetrate fraud-on-the-court, see, Buck v. Davis, 137 S. Ct. 759, N. [2,15] (2017); Woodward v. Corr. Med. Svcs. Of Ill., *supra*; Vasquez v. County of Los Angles, *supra*; Gollomp v. Spitzer, *supra*; shows this court should have no confidence in the outcome of Lamb v. Crews, 133 S.Ct. 1318 (2013), see, Chisum v. U.S., Lexis 18650 (9th Cir. 1991) (#4 Plaintiff motion exceed page limit (DOC# 53-1) is granted"); Jones v. Bradshaw, Lexis 10857 at 5 (6th Cir. 2020) ("**Grant enlargement of COA, plus enlargement to page limit too (15) fifteen pages");** Lopez v. U.S., Lexis 28222 (2d Cir. 2017); U.S. v. Esheiu, 863 F.3d 946, 958 (D.C. Cir. 2017); Rangel v. Schmidt, Lexis 132481 (7th Cir. 2011); Bragg v. Robertson, Lexus 22077 (4th Cir. 1998); Bitco Gen. Ins. Corp. v. Heartland Midwest LLC., Lexis 183162, at 17, (8th Cir. 2015) ("**Plaza views Defendant motion for leave to file documents under seal and to exceed page limit to 92 is granted**"); Neely v. Bar Harbor Bank-Shares, 270 F.Supp.2d 44 (1st Cir. 2003); Delvalle v. Kenyon, Lexis 49089 (1st Cir. 2009); Richardson v. D.C. Court Serv. and Offender Supervision Agency and D.C. Court of Appeals, Lexis 2469 (D.C. Cir. 2002); Lawrence v. Richman Miami Tribe of Okla v. Walden, Lexis 22388 (7th Cir. 2001), **when it is more likely than not that no reasonable jury or jurist hearing all the evidence would not convict petitioner beyond a reasonable doubt for the charged or convicted crimes of Armed Robbery of Educational Community Credit Union of December 07, 2001, Attempted First Degree Murder of Officer Simmon who was shot in the leg; Shooting and Throwing Deadly Missiles using a AK-47 Assault Rifle, Fleeing and Eluding in a (4) four door Chevy Lumina during crimes, Petitioner would be acquitted at retrial and/or jury trial, plus assertions cited in the pleadings alleging conflict-of-interest due to a Florida Bar Complaint against Trial Counsel David Makokfa Esq. caused him to be ineffective assistance of counsel for his failure to file**

a "Motion To Dismiss And Motion To Suppress" for lack of a search warrant, lack of probable cause, see, Rivera v. Thompson, 879 F.3d 7 (1st Cir. 2018) ("Failure to file motion to suppress"); Sanchey v. State, 141 So.3d 1281 (Fla. 2d DCA 2014); Durham v. U.S., 403 F.2d 190 (9th Cir. 1968); Michel v. State, 134 So.3d 509 (Fla. 4th DCA 2014); Workman v. Superintendent Albion, 908 F.3d 896 (3d Cir. 2018); Gentry v. Sever, 597 F.3d 838 (7 Cir. 2010); U.S. v. Williams, 615 F.2d 585 (3d Cir. 1980); Lambert v. State, 811 So.2d 805 (Fla. 2d DCA 2002); Rogers v. State, 788 So.2d 331 (Fla. 1st DCA 2001) (" IAC failure to file motion to dismiss"); Strickland v. Washington, 104 S.Ct. 2052 (1984); Heard v. Addison, 728 F.3d 1170 N. [10] (10 Cir. 2013); Flower v. Butt, 829 F.3d 788 (7th Cir. 2016); Wainwright v. Simpson, 360 F.2d 307 (5th Cir. 1966) **("Failed to perfect appeal, failed to move for new trial, [failed to advise appellee of such grounds] or the** jurisdiction time limitations within which a motion for new trial or notice of appeal might be filed"); Rhodes v. Dittman, 903 F.3d 646 (7th Cir. 2018) gives this court jurisdiction to grant relief, see, Leka v. Portuondo, 257 F.3d 89, 98 (2d Cir. 2001); Whitely v. Senkowski, 317 F.3d 223 (2d Cir. 2003) **("Court could not summarily dismiss petition asserting claim of actual innocence on ground that it was time barred"); Souter v. Jones, 395 F.3d 577, 597-602 (6th Cir. 2005) ("Habeas petition was time barred when brought within one year of newly discovered evidence; petitioner demonstrated credible claim of actual innocence, on issue of first impression, credible claim of claim of actual innocence will equitably toll limitations period, allowing consideration of Habeas claim of merits"); Majoy v. Roe, 296 F.3d 770, 776 (9th Cir. 2002) ("Dismissed petition as untimely. Petitioner appealed. The court of appeals trot, circuit judge held that remand was warranted to permit determination of whether petitioner could pass through actual innocence gateway and obtain review of otherwise time barred claims");** Baldazaque v. U.S., 338 F.3d 145, 153-

54 (2d Cir. 2003); McQuiggen v. Perkins, 133 S.Ct. 1924, N. [3] (2013); Kenley v. Armontrout, 937 F.2d 1298, 1304 (8th Cir. 1991); Group EMF, INC. v. Cowetta County, 131 F.Supp. 2d 1335 (4th Cir. 1999) would undoubtedly avert the workings of a "manifest of injustice" to a "miscarriage of justice," see, Finely v. Johnson, 243 F.3d 215, 221 (5th Cir. 2001); Quezada v. Smith, 624 F.3d 514, 518 - 522 (2d Cir. 2012) ("Worked a "manifest of injustice"); Harris v. Nelson, 89 Ct. 1082, N. [2, 3] (1969); Marshall vs. Jerrico, 100 S. Ct. 1610 (1980); Floyd vs. Vanndy, 887 F.3d 214 (5th Cir. 2018); requires Justice Sonia Sotomayor and the U.S. Supreme Court Justices to agree that the preserved/exhausted U.S. Constitutional violations has occurred, U.S. v. Maddox, 614 F.3d 1046, 1050 (9th Cir. 2010); U.S. v. Michael, 541 F.Supp. 956, 960 (4th Cir. 1982); U.S. v. Seidel, 794 F. Supp. 1098, 1102, 1106 (11th Cir. 1992); Buck v. Davis, 137 S. Ct. 759, 779 (2017); Milke v. Ryan, 711 F.3d 998, 1024 (10th Cir. 2013); Benjamin - Arnold, Lexis 192 (8th Cir. 1997); Hall v. Haws, 861 F. 3d 977, 987-990 (9th Cir. 2017); Collins v. Virginia, 138 S.Ct. 1663 (June 1st, 2018); pursuant to S. Ct. Rule 33 (1)(d) requires this Court to grant excessive word and page counts; had to be mailed together due to the cited too conspiracy with the attached, "Writ of Certiorari" demonstrates that Petitioner requires redress for the apparent injuries and collusion of the State Court officer's obstruction of justice of these proceedings, see, Berger v. U.S., 55 S. Ct. 629 (1935) ("Prosecutors' are prohibited from throwing foul blows") will shock the conscience of this court, see, Kammeyer v. City of Sharonville, Lexis 28990 (6th Cir. 2003).

CONCLUSION

(1) Article III jurisdiction exists' for the U.S. Justice Sonia Sotomayor and the Court to allow Petitioner's enclosed Writ of Certiorari to exceed page limits to 78 and word limits too 24,034 and allow Petitioner's new Writ of Certiorari to exceed page and word limits would

avert a "miscarriage of justice," and "manifest of injustice," see, Buck v. Davis, 137 S. Ct. 759, N. [1-12] (2017).

(2) Any other relief the court deems justified.

OATH

Under the penalties of perjury I do swear that the facts and circumstances are true and correct executed on February 24TH, 2021, see, Kafo vs. U.S., 467 F.3d 1063, 1068 (7th Cir. 2006).

/s/ _____
Micah Lamb, J23663

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that this instant pleading has been given to DOC officials to be U.S. mailed to: United States Supreme Court Justice Sonia Sotomayor, One First Street, N.E., Washington D.C., 20543; Attorney General Ashley Moody, The Capital, PL-01, Tallahassee, Florida 32399 filed on this date of February 24TH, 2021, see, Ray vs. Clements, 700 F.3d 993, [1] (7th Cir. 2012) ("Mailbox Rule").

/s/ _____
Micah Lamb, J23663
Marion Correctional Institution
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Lowell, Florida 32663-0158