

THE SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC, 20543-0001

COVER LETTER No. 7 of January 12, 2021, TO THE
**PETITION FOR WRIT OF CERTIORARI TO THE SUPREME COURT OF
THE UNITED STATES**
(October 19, 2020)

TO:

Mr. Scott S. Harris, Clerk of the Supreme Court,
CC: Lisa Nesbitt, Jeffrey Atkins

From:

Dr. Nenad Markovic,
Petitioner Per Se
Rockville, MD
240-614-7128

SUBJECT:

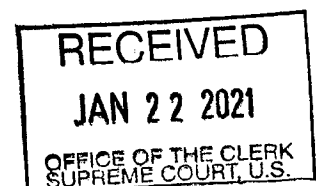
FOLLOWING THE CLERK'S OF THE SUPREME COURT
RECOMMENDATION IN THE LETTER OF JANUARY 10, 2021 (mailed on
JANUARY 5, 2021), PLEASE CONSIDER THIS SUBMISSION AS THE
MOTION FOR FILING WRIT FOR CERTIORARI BEFORE THE STATUS
IN FORMA PAUPERIS IS GRANTED.

Date: 1/12/2021 5:47:25 PM

MOTION TO FILE A WRIT OF CERTIORARI OUT OF TIME
(MOTION FEE = CHECK ON \$52.00 IS INCLUDED)

PREAMBLE

On January 10, 2021 (mailed on 1/05/2021), this petitioner received a letter
of the Clerk of the Supreme Court (Mr. Scott S. Harris, signed by Jeffrey
Atkins) with the following content:



"If you intend to submit a motion to direct the Clerk to file a petition for a writ of certiorari out of time, you must submit the motion with the petition for a writ of certiorari. "

In response to your letter, I am submitting this Motion on January 12, 2021, the check for Motion filing fee in the amount of \$52,00, the Petition on Writ of Certiorari completed with the Motion for Leave to proceed in *forma pauperis*, and the original Certificate of Service (one per package), and a flash drive with digital collection of appendices attached to the petition (102 pages of text – sent in digital format to save time and cost of printing 40 sets of same articles).

I am also pleading the Clerk to provide me with the Instructions which the Petitioner per Se must follow to complete the filing of this Petition for Writ of Certiorari, originally submitted on October 19, 2020.

NOTE:

This submission is addressed to the Clerk of the Supreme Court of the United States, in response to his instructions to the Petitioner on the way how a Petitioner Per Se to file the full Petition for Writ of Certiorari to the USSC. It contains the Cover Letter with this Motion, a motion filing fee (a check on \$52.00), and the examples of the contents of the full submission document: Petition for Writ of Certiorari originally submitted on October 19, 2020, Motion for leave to proceed *in forma pauperis*, certificate of service (copy of the original), and a USB flash drive with Appendix (instead of many paper copies of a document exceeding 100 pages).

SHORT HISTORY

This letter was preceded by the following events:

1. Disappointed by the obvious lack of equitability during the Hearing to Show Cause (for three ongoing litigations), led by judge Robert Greenberg on August 7, 2018 in the Circuit Court for Montgomery County (case #14926v, #14567v, and 9530d of February 2016), which was closed with a prejudiced judgment (based upon collection of malicious affidavits from the plaintiff's "substitute trustees") and resulted in a wrong foreclosure of my property at 18030, Chalet Drive in Germantown, MD 20874. The defendant objected the regularity of the Hearing to Shaw Cause in the Circuit Court

announcing further complaints and I immediately (August 9, 2018) filed an Interlocutory Appeal to the Special Court of Appeals of Maryland.

2. The Appeals were accepted and docketed under numbers CSA-REG-2251-2018 and CSA-REG-2252-2018. The normal procedures followed, and the Appellant Briefs were submitted together with *Extracts* of documents supporting the factual evidence.
3. On September 19, 2019, the CSA decided to make decision without prior hearing of arguments. That decision precluded the Applicant Per Se to present his case and limited the Court's ability to make an equitable judgment in this case.
4. Indeed, when the CSA Unreported Opinion appeared on Nov. 26, 2019, it was clearly influenced by the Briefs written by the Appellee's attorneys signed as the "substitute trustees" and having the same prejudiced opinion as the prior affidavits used in the Circuit Court to move the wrong foreclosure forward. Naturally, this Opinion, written in *ignoratio elenchi* format, sides with the Appellee confirming the Circuit Court's decision, but without answering to questions posted by the Appellant and with no opinion on the problems that caused this Appeal to be submitted. That was a serious CSA omission.
5. However, because the Briefs have opened many serious questions on the courts equitability and compliance with the law (see: Statement of the Case, Standards of Review, Points to Consider and the evidence supporting the statements said there), such insufficient CSA's Opinion was subject to Motions for reconsideration and Clarification, but both were denied, without any explanation, and the case was finally closed in December, 2019, but entered and reported on 2/02/2020. Another CSA procedural noncompliance with legal principles occurred
6. In response to such insolent treatment by CSA on March 15, 2020, the Appellant Per Se, has filed to the Court of Appeals for the State of Maryland, a Petition for a Writ for Certiorari, hoping that the superior court will read his documents, understand the problem, and make an equitable, transparent and accountable decision to vacate all prior wrong rulings, and bring the case to the proper resolution in accordance to USC and Amendment XIV.

7. Unfortunately, the Court of Appeals followed the same irrelevant conclusion (Ignoratio elenchi) pattern and without answering to the questions posted for answers, and without any more comprehensive explanation, dismissed the petition on basis of very disputable reason classified as lateness. It happened with an order signed by a senior judge Robert McDonald on May 22, 2020.

8. As expected, such orders were followed by motions for reconsideration and clarification, but they both were dismissed by the same judge. And, as it could be expected in a law noncompliance practice, the petitioner was not informed about those dismissals.

Consequently, when the legal period for Court response has passed, the petitioner asked the Clerk of the Court of Appeals for information, and the answer was that his case was closed on August 31, 2020.

9. This experience is difficult to understand or to accept by a citizen trying to protect his rights under the USC Amendment XIV. A question arises: QVO VADIS U.S. JURISDICTION? or what happened with the U.S. authority to interpret and apply the law? The only hope to see the principle LAW ABOVE ALL, to put the Legal principles of equitability, transparency and accountability in action, remained to be found from their guardian the Supreme Court of the United States.

This is the real reason for writing and submitting the Petition for Writ of Certiorari to the US Supreme Court. The hopes are that the legal practice will be returned to its original pattern of conduct, and the citizen rights to live and to pursue happiness will stay as it is.

10. On October 19, 2020, this petitioner filed a Request for the Writ of Certiorari with the Supreme Court of the United States, to resolve legal issues generated by the substandard legal practices he experienced working with the Court of Appeals of Maryland (case COA Pet No, 8 and No. 40 of March 15, 2020, finalized on August 31, 2020), Court of Special Appeals for Maryland (case CSA No. 2251 and No, 2252 of August 9, 2018, ended on 2/2/2020) and the Circuit Court for Montgomery County (case No. 14926v, 14157v and 9530d of February 2016, finalized on 8/7/2018), the history resulting in the extortion of his property and defamation of his name as being in the role of defendant (appellant/petitioner) *per se* while protecting his US citizen rights guaranteed in the Amendment XIV of the United

States Constitution. Too many violations of legal procedures, isn't it (?!?).

11. The negative decisions on petition in the COA were followed by the motion for reconsideration due to errors in information used to make wrong judgment. It was denied by COA (the same senior judge) finalizing the case on August 31, 2020. (Information provided by the Clerk of the Court of Appeals of Maryland).

12. My petition for Writ of Certiorari to the Supreme Court of the United States was submitted on October 19, 2020, or within the period of 48 days after I was informed about the final court decision.

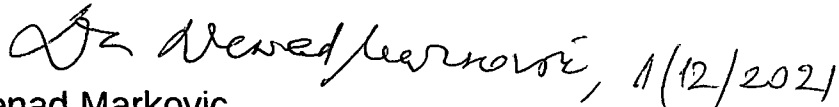
It was returned by the Clerk of Supreme Court because of technical problems and was not docketed until now.

Finally, on January 10, 2021, I received a letter from the Clerk of the Supreme Court of the United States, Ms. Clark Harris, signed by Mr. Jeffrey Atkins with clear instruction on how to submit the Writ for Certiorari to the Supreme Court, via a motion to the Clerk to inform the Supreme Court that this submission is out of time.

13. This is because the Court Rule 13.3 allows for an extended time of 150 days for submission of the Writ for Certiorari, giving my submissions a quality time for good preparation and timely submission. The current submission is dated January 15, 2021 which is a 147 days from the date when the litigation proceedings at COA was closed.

14. If the Supreme Court acknowledge the position of its Clerk on this issue, my submission will be accepted, docketed at a date of first submission 10,19, 2020, and I will be able to expect full protection of my US citizen rights pursuant to the Amendment XIV of the USC.

Respectfully submitted

 1/12/2021

Dr. Nenad Markovic,
Professor Emeritus of Oncology
Petitioner Per Se
14905 Forest landing Circle
Rockville, MD 20850

NENAD MARKOVIC

* IN THE
* COURT OF APPEALS
* OF MARYLAND
* Petition Docket No. 40
* September Term, 2020
* (No. 2251, Sept. Term, 2018
* Court of Special Appeals)
* (No. 414926V, Circuit Court
for Montgomery County)

JEREMY FISHMAN

ORDER

Upon consideration of the petition for a writ of certiorari to the Court of Special Appeals, the supplement, and the answers filed thereto, in the above-captioned case, it is this 22nd day of May, 2020

ORDERED, by the Court of Appeals of Maryland, that the petition and the supplement be, and they are hereby, **DISMISSED** on the grounds of lateness.

/s/ Robert N. McDonald
Senior Judge

-Chief Judge Barbera did not participate in the consideration of this matter.

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VENAD MARKOVIC

* IN THE
* COURT OF APPEALS
* OF MARYLAND
* Petition Docket No. 8
* September Term, 2020
* (No. 2252, Sept. Term, 2018
* Court of Special Appeals)
* (No. 415167V, Circuit Court
for Montgomery County)

MOHAMED Z. RAHAMAN

ORDER

Upon consideration of the amended petition for a writ of certiorari to the Court of Special Appeals, the supplement, and the answers filed thereto, in the above-captioned case, it is this 22nd day of May, 2020

ORDERED, by the Court of Appeals of Maryland, that the amended petition and the supplement be, and they are hereby, **DISMISSED** on the grounds of lateness.

s: Robert N. McDonald
Senior Judge

*Chief Judge Barbera did not participate in the consideration of this matter.

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