

APPENDIX
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YVONNE REIGNAT-VODI

v.

MOTOR VEHICLE ADMINISTRATION

* IN THE

* COURT OF APPEALS

* OF MARYLAND

* Petition Docket No. 6
September Term, 2021

* (No. 2389, Sept. Term, 2019
Court of Special Appeals)

* (No. CAL19-18504, Circuit Court
for Prince George's County)

O R D E R

Upon consideration of the petition for a writ of certiorari to the Court of Special Appeals and the answers filed thereto, in the above-captioned case, it is this 23rd day of April, 2021

ORDERED, by the Court of Appeals of Maryland, that the petition be, and it is hereby, DENIED as there has been no showing that review by certiorari is desirable and in the public interest.

/s/ Mary Ellen Barbera

Chief Judge

YVONNE-REIGNAT-VODI * IN THE

Appellant, * COURT OF SPECIAL APPEALS
v. * OF MARYLAND
MOTOR VEHICLE ADMINISTRATION, * September Term 2019
Appellee. * Nos. 2389 & 2390

* * * * *

ORDER

In each of the captioned appeals the appellant has filed a “Third Motion to Extend Time for Filing Appellant’s Corrected Briefs.” The appellee has filed a Line in response to the appellant’s motions, in which the appellee “defer[s] to the Court.” The appellant has additionally filed in No. 2389, a “Motion on Order of 24 September 2020 on Appellants Extension to File Corrected Briefs.” and, in No. 2390, a “Motion on Order of 23 September 2020 on Appellants Extension to File Corrected Briefs on Case No. 2390.”

This Court’s Orders entered in each of the captioned appeals on September 24, 2020 provided, in bold type, that “[t]he Court will not grant the appellant any further extension of time and this appeal will be dismissed if the appellant does not file corrected briefs on or before September 30, 2020.”

Moreover, in each of her three requests for a filing extension the appellant has asserted that more time is necessary so that she can incorporate into her corrected briefs the agency record that was received in this Court on September 8, 2020. The appellant, however, is prohibited from making any such modifications to her corrected briefs. Three

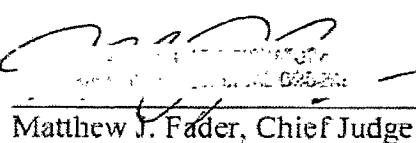
of this Court's prior orders have cautioned the appellant that "the corrected briefs shall not include any substantive alterations from the appellant's first briefs filed in these appeals."

Accordingly, it is this 13th day of October 2020,

ORDERED that the appellant's "Third Motion to Extend Time for Filing Appellant's Corrected Briefs," in each of the captioned appeals, are denied; and it is further

ORDERED that the appellant's "Motion on Order of 24 September 2020 on Appellants Extension to File Corrected Briefs" in No. 2389, and the appellant's "Motion on Order of 23 September 2020 on Appellants Extension to File Corrected Briefs on Case No. 2390" in No. 2390, are denied; and it is further

ORDERED that captioned appeals are dismissed for the appellant's failure to file a brief as directed by this Court's September 24, 2020 Orders in each of the captioned appeals.



Matthew J. Fader, Chief Judge

YVONNE REIGNAT-VODI,

Appellant,

v.

MOTOR VEHICLE
ADMINISTRATION,

Appellee.

IN THE

COURT OF SPECIAL APPEALS

OF MARYLAND

No. 2389, September Term, 2019

(Cir. Ct. No. CAL19-18504)

* * * * *

ORDER

After the appellant was ordered to correct her brief to conform to the Maryland Rules, she filed a brief that substantively modified her original brief. Rather than dismiss the appeal, as the appellee had requested, we permitted the appellant to file a corrected brief on or before September 3, 2020. In the order granting that relief, the appellant was admonished not to add any “issues, facts, or arguments not included in the original brief.” When the appellant later moved to extend time to file her corrected brief, the order granting the extension again warned the appellant not to make any substantive changes to her brief. Appellant was granted an additional extension of time and was warned, in bold faced type, that:

The Court will not grant the appellant any further extension of time and this appeal will be dismissed if the appellant does not file corrected briefs on or before September 30, 2020. The appellant is again cautioned that the corrected briefs shall not include any substantive alterations from the appellant’s first briefs . . .

When the appellant again requested an extension of time, we denied the motion and, because the corrected brief had not been filed, dismissed the appeal noting the warnings that had already been given to the appellant.¹

Appellant has now moved for reconsideration of our order dismissing the appeal. The appellee opposes that relief. Upon consideration of the motion for reconsideration, the opposition, the appellant's reply to the opposition, and the record, it is 30th day of October 2020, by the Court of Special Appeals,

ORDERED that the motion for reconsideration is denied.



FOR A PANEL OF THE COURT
consisting of Fader, C.J., Graeff, Leahy, JJ.

Chief Judge's Signature Appears on
the Original of this Document

Matthew J. Fader, Chief Judge

¹ The history of the briefing in this case is paralleled in *Yvonne Reignat-Vodi v. Motor Vehicle Administration*, No. 2390, Sept. Term, 2019, and also resulted in the dismissal of that appeal. The two appeals arise out of a common fact pattern, but the captioned case is an appeal from an action for judicial review of an agency action. No. 2390 is an appeal from the dismissal of a claim for damages against an employee of the Motor Vehicle Administration.

YVONNE REIGNAT-VODI * IN THE
Appellant, * COURT OF SPECIAL APPEALS
v. * OF MARYLAND
MOTOR VEHICLE ADMINISTRATION, * September Term 2019
Appellee. * Nos. 2389 & 2390
* * * * *

ORDER

In each of the captioned appeals the appellant has filed a "Second Motion to Extend Time for Filing Appellant's Corrected Briefs," and the appellee has filed oppositions to the appellant's motions.

Upon consideration of the foregoing, it is this 24 day of September 2020,

ORDERED that the appellant's "Second Motion to Extend Time for Filing Appellant's Corrected Briefs," is granted; and it is further

ORDERED that the appellant's corrected briefs in these appeals shall be filed on or before September 30, 2020. The Court will not grant the appellant any further extension of time and this appeal will be dismissed if the appellant does not file corrected briefs on or before September 30, 2020. The appellant is again cautioned that the corrected briefs shall not include any substantive alterations from the appellant's first briefs filed in these appeals; and it is further

ORDERED that the appellee's briefs shall be filed on or before October 30, 2020;
and it is further

ORDERED that the consideration of this appeal shall be postponed pending completion of briefing. Following the filing of the appellee's briefs, the Court will schedule the month for the consideration of this appeal for the next available session.

(CHIEF JUDGE'S SIGNATURE)
APPEARS ON ORIGINAL COPY

Matthew J. Fader, Chief Judge



YVONNE REIGNAT-VODI, * IN THE
Appellant, * COURT OF SPECIAL APPEALS
v. * OF MARYLAND
MOTOR VEHICLE ADMINISTRATION, * September Term 2019
Appellee. * No. 2389

* * * * *

ORDER

The appellant has filed a "Motion to Correct the Records From the Circuit Court of Prince George's County Maryland CAL 19-18504" and a "Motion to Transmit Agency Record to the Maryland Court of Special Appeals and to be Corrected by its Inclusion to the Records: CAL 19-18504" in which she requests the record in this appeal be corrected by the inclusion of the record of the Office of Administrative Hearings. The appellee has not responded to either motion.

Prior to the filing of the appellant's motions, this Court, on its own initiative, entered an order on August 11, 2020 directing the circuit court to transmit the agency record to this Court, and providing that upon receipt of the agency record in this Court, the record in this appeal would be corrected by its inclusion. This Court received the agency record on September 8, 2020.

Upon consideration of the foregoing, it is this 23 day of September, 2020,

ORDERED that the appellant's "Motion to Correct the Records From the Circuit Court of Prince George's County Maryland CAL 19-18504" and "Motion to Transmit

Agency Record to the Maryland Court of Special Appeals and to be Corrected by its
Inclusion to the Records: CAL 19-18504" are denied as moot.

(CHIEF JUDGE'S SIGNATURE
APPEARS ON ORIGINAL COPY)

Matthew J. Fader, Chief Judge



YVONNE REIGNAT-VODI, * IN THE
Appellant. * COURT OF SPECIAL APPEALS
v. * OF MARYLAND
MOTOR VEHICLE ADMINISTRATION. * September Term 2019
Appellee. * Nos. 2389 & 2390

* * * * *

ORDER

In each of the captioned appeals the appellant has filed a "Motion to Extend Time for Filing Appellant's Corrected Briefs," and the appellee has filed oppositions to the appellant's motions.

Upon consideration of the foregoing, it is this 47th day of September 2020.

ORDERED that the appellant's "Motion to Extend Time for Filing Appellant's Corrected Briefs," in each of the captioned appeals, is granted in part; and it is further

ORDERED that the appellant's brief in the captioned appeals shall be filed on or before September 8, 2020. The appellant is reminded that this Court's August 6, 2020 Order prohibits substantive modifications to the appellant's corrected briefs.



CHIEF JUDGE'S SIGNATURE
APPEARS ON ORIGINAL ORDER

Matthew J. Fader, Chief Judge

YVONNE REIGNAT-VODI. * IN THE
Appellant. * COURT OF SPECIAL APPEALS
V. * OF MARYLAND
MOTOR VEHICLE ADMINISTRATION. * September Term 2019
Appellee. * Nos. 2389 & 2390

* * * * *

ORDER

In each of the captioned appeals, the appellant has filed a "Motion on the Court of Special Appeals Decision" Without Oral Argument" in which the appellant asks "if Appellant may know the Court decision without oral argument on the above captioned case has been reached?" It appears that the appellant believes that the Court has already reached a decision in these appeals, which is incorrect. When the Court reaches a decision, its opinion(s) will be filed with the Clerk of the Court, who will promptly send notice of the decision(s) to both parties. See Md. Rule 1-324(a).

Accordingly, it is this 3 day of September 2020, by the Court of Special Appeals.

ORDERED that the appellant's "Motion on the Court of Special Appeals Decision Without Oral Argument" is denied as moot.



Matthew J. Fader, Chief Judge

—YVONNE REIGNAT—VODI

Appellant,

V

MOTOR VEHICLE ADMINISTRATION.

Appellee.

* IN THE

* COURT OF SPECIAL APPEALS

* OF MARYLAND

* No. 2389, September Term, 2019

RECEIVED APPEALS

Because the agency record was not transmitted with the
this 11th day of August 2020, by the Court of Special Appeals.

ORDERED that the Clerk of the Circuit Court for Prince George's County shall forthwith transmit the agency record to this Court; upon receipt of the agency record in this Court, the record will be corrected by its inclusion.



By direction of the Chief Judge

Gregor Hiltner

Gregory Hilton, Clerk

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YVONNE REIGNAT-VODI.

* IN THE

Appellant.

* COURT OF SPECIAL APPEALS

v.

* OF MARYLAND

MOTOR VEHICLE ADMINISTRATION,

* September Term 2019

Appellee.

* No. 2389

* * * * *

ORDER

Upon consideration of the "Appellee's Motion to Dismiss or in the Alternative to Strike Portions of Non-Compliant Brief," and no opposition thereto having been filed, it is this 7th day of August 2020.

ORDERED that the motion is granted in part, and denied in part; and it is further

ORDERED that the appellee's request for dismissal is denied; and it is further

ORDERED that the appellee's request to strike the appellant's corrected brief and record extract is granted; and it is further

ORDERED that the appellant is directed to file, on or before September 3, 2020, 15 copies of a corrected brief and, if filed as a separate volume, no fewer than ten copies of a corrected record extract in full compliance with the Maryland Rules, including but not limited to addressing the following:

8-501(c) (*corrected* record extract "shall contain all parts of the record that are reasonably necessary for the determination of the questions presented by the appeal." The corrected record extract shall not include materials that are not part of the record:

8-501(i) and 8-503(a) and (b) (consecutive numbering required for pages of brief; appendix and record extract – *record extract to be numbered consecutively from first page to last page as E. 1, E. 2, E. 3, etc.*):

8-503(b) (*corrected* references in the statement of facts and elsewhere in the brief of pages of the record extract shall be indicated as "E. ___");

And it is further ORDERED that the corrected brief shall not include any substantive changes from the *first* brief the appellant filed, including by adding issues, facts, or arguments not included in the original brief. Any such additions that were made from the appellant's first brief to the appellant's second brief shall not appear in the corrected brief that is due on September 3, 2020; and it is further

ORDERED that the appellee's brief shall be filed on or before October 5, 2020; and it is further

ORDERED that consideration of this appeal is rescheduled to the November 2020 session of this Court; and it is further

ORDERED that the appellee's "Motion for Extension of Time for Filing Respondent's Brief," filed on July 29, 2020, is denied as moot in light of this order's provision of a brief extension to the appellee.



CHIEF JUDGE'S SIGNATURE
APPEARS ON ORIGINAL ORDER

Matthew J. Fader, Chief Judge

YVONNE REIGNAT-VODI,

IN THE

Appellant, * COURT OF SPECIAL APPEALS
v. * OF MARYLAND
MOTOR VEHICLE ADMINISTRATION, * September Term 2019
Appellee. * Nos. 2389 & 2390

* * * * *

CORRECTED ORDER

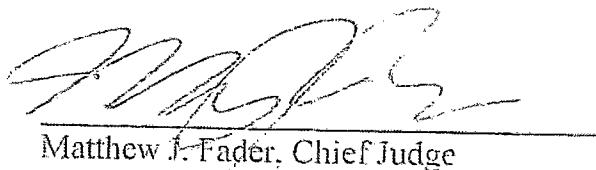
On May 28, 2020, this Court issued an Order directing the appellant to file 15 copies of a corrected brief on or before July 2, 2020 to remedy the deficiencies outlined in that Order. That same Order set August 3, 2020 as the appellee's brief deadline.

On June 10, 2020, this Court entered an order granting the appellee's "Motion for Extension of Time for Filing Petitioner's Brief" and extending the appellee's brief deadline to August 4, 2020. The Court's order mistakenly indicated that no opposition to the motion had been filed. The appellant filed an opposition to the appellee's motion on June 8, 2020, and then filed another opposition on June 15, 2020.¹

Upon consideration of the appellee's "Motion for Extension of Time for Filing Petitioner's Brief" and the appellant's oppositions thereto, it is this 23 day of June 2020.

¹. The appellant's oppositions fail to mention the May 28, 2020 Order or to acknowledge that, in light of the need for appellant to file corrected briefs, the deadline for appellee's opposition briefs was already extended to August 3, 2020. We therefore take this opportunity to remind the appellant of her obligation to file corrected briefs on or before July 2, 2020, as set forth in the May 28, 2020 Order.

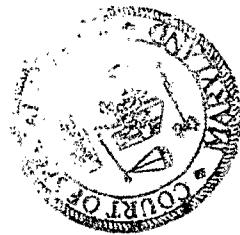
ORDERED that this Court's June 10, 2020 Order is rescinded; and it is further
ORDERED that the "Motion for Extension of Time for Filing Petitioner's Brief" is
granted and the appellee's brief shall be filed on or before August 4, 2020.



Matthew J. Fader, Chief Judge



Rachel Domrowski, Clerk of Deputy Clerk
PAUL V. MICHAEL



By direction of the Chief Judge

before August 4, 2020.

ORDINED that the motion is granted and the appellee's brief shall be filed on or

June 2020, by the Court of Special Appeals.

Petitioner's Brief" and no opposition thereto having been filed, it is this 10 day of

Upon consideration of the appellee's "Motion for Extension of Time for Filing

ORDER

| | | |
|--------------------------|---|---------------------|
| Appellant | * | IN THE |
| COURT OF SPECIAL APPEALS | * | |
| MOTOR VEHICLE | * | ADMINISTRATION |
| OF MARYLANCE | * | September Term 2019 |
| Appellee | * | No. 2389 |

Appellee

v.

ADMINISTRATION

*

September Term 2019

No. 2389

OF MARYLANCE

*

MOTOR VEHICLE

*

COURT OF SPECIAL APPEALS

*

IN THE

*

Appellant

Appellee

Y

Yvonne Reignat-Vodi
Appellant

v.

Motor Vehicle Administration
Appellee

* IN THE
COURT OF SPECIAL APPEALS
OF MARYLAND
* No. 2389, SEPTEMBER TERM, 2019
* MDEC: CSA-REG-2389-2019

* * * * *

ORDER

On May 12, 2020, Appellant filed 15 copies of a brief that does not conform to all applicable Maryland Rules. Specifically, the brief did not comply with the following:

8-501(h) (*corrected* table of contents required for record extract);

8-501(i) and 8-503(a) and (b) (consecutive numbering required for pages of brief, appendix, and record extract- *record extract to be numbered consecutively from first page to last page as E1, E2, E3, etc.*); and

8-503(b) (*corrected* references in the statement of facts and elsewhere in the brief to pages of the record extract shall be indicated as E ____);

It is therefore this 28th day of May, 2020, by the Court of Special Appeals, on its own initiative,

ORDERED that the brief, as filed, may be stricken and the appeal dismissed unless Appellant files, on or before July 2, 2020, fifteen (15) copies of a corrected brief and, if

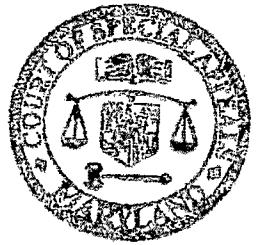
filed as a separate volume, no fewer than ten (10) copies of a corrected record extract in full-compliance-with-the-Maryland-Rules.¹

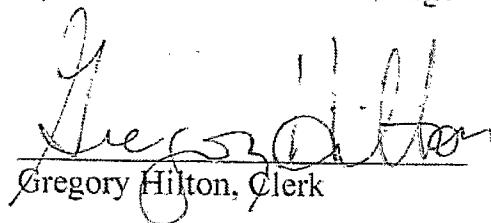
ORDERED that in fixing the deficiencies identified above, appellant shall not make any substantive changes to the brief, including but not limited to by adding issues, facts, or arguments not included in the original brief; and it is further

ORDERED that, subject to further order of this Court, appellee's brief shall be filed on or before August 3, 2020; and it is further

ORDERED that the case is to remain scheduled to the September, 2020, session of the Court.

By direction of the Chief Judge





Gregory Hilton, Clerk

¹ Appellant may obtain a copy of the Court's *Guide to Self Representation* from the Clerk's Office of this Court or online at www.mdcourts.gov. The *Guide* contains a sample appellant brief and record extract at pages 20-49.

YVONNE REIGNAT-VODI

* IN THE

Appellant.

* COURT OF SPECIAL APPEALS

v.

* OF MARYLAND

MOTOR VEHICLE
ADMINISTRATION.

* September Term 2019

Appellee.

* Nos. 2389

* * * * *

ORDER

Upon consideration of the appellant's "Motion to Change Dates on the Scheduling Order for Oral Argument," and no opposition thereto having been filed, this 20 day of May 2020, by the Court of Special Appeals,

ORDERED that the appellant's "Motion to Change Dates on the Scheduling Order for Oral Argument" is granted in part; and it is further

ORDERED that the above-captioned appeal shall be considered in the September 2020 session of this Court on the same date and by the same panel as in Case No. 2390, September Term 2019.



Matthew J. Fader, Chief Judge

YVONNE REIGNAT-VODI,

IN THE

Appellant,

* COURT OF SPECIAL APPEALS

v.

* OF MARYLAND

MOTOR VEHICLE ADMINISTRATION,

* September Term 2019

Appellee.

* Nos. 2389

* * * * *

ORDER

This appeal was dismissed on October 13, 2020. The appellant thereafter filed a motion for reconsideration, which was denied on October 30, 2020. The mandate, which was issued on February 5, 2021, incorrectly reflected the date of the dismissal of this appeal as October 13, 2021 (rather than October 13, 2020), and the date of the Court's denial of the appellant's motion for reconsideration as October 30, 2021 (rather than October 30, 2020). The appellant filed an objection to the February 5, 2021 mandate. On March 11, 2021, the Court issued a corrected mandate containing correct dates.

The appellant has now filed an "Objection to Corrected Mandate by the Court of Special Appeals Dated 03/11/2021," in which she requests that the Court rescind the March 11, 2021 mandate and reinstate the appeal.¹

Considering the appellant's "Objection to Corrected Mandate by the Court of Special Appeals Dated 03/11/2021," as a motion to rescind the mandate and reinstate the

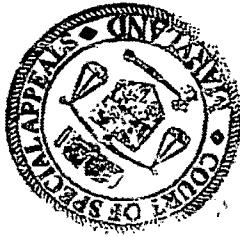
¹ To the extent the appellant intended her objection to constitute an additional motion for reconsideration of the dismissal of her appeal, Rule 8-602(e)(5) does not permit further reconsideration after denial of an initial motion for reconsideration of dismissal.

appeal, to which no opposition has been filed, it is this 28 day of April
2021,

ORDERED that the appellant's "Objection to Corrected Mandate by the Court of Special Appeals Dated 03/11/2021," considered as a motion to rescind the mandate and reinstate the appeal, is denied.

THE CHIEF JUDGE'S SIGNATURE
APPEARS ON THE ORIGINAL OF
THIS DOCUMENT

Matthew J. Fader, Chief Judge



L19-18504

IN THE COURT OF SPECIAL APPEALS OF MARYLAND

YVONNE REIGNAT-VODI,

Appellant

v.

MOTOR VEHICLE
ADMINISTRATION,

Appellee

*

* No. 2389, September Term 2019

* CSA-REG-2389-2019

* Circuit Court No. CAL1918504

*

*

* * * * *

ORDER

It is this the 24th day of February, 2020, by the Court of Special Appeals,

ORDERED that pursuant to Maryland Rule 8-206(c), the above-captioned appeal proceed without a Prehearing Conference or Alternative Dispute Resolution.

By direction of the Chief Judge


Gregory Hilton
Gregory Hilton, Clerk

Clerk of the
Circuit Court

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Date 2/16/2020
Filed 2/7/2020

186

PPM: 4/24/2020

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

PETITION OF

Yvonne Reignat-Vodi
D/B/A Shephard's Driving School, Inc.

FOR JUDICIAL REVIEW OF THE
DECISION OF THE

Case No.: **CAL19-18504**

Motor Vehicle Administration
6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062

IN THE CASE OF

Yvonne Reignat-Vodi
D/B/A Shephard's Driving School, Inc.
Office of Administrative Hearings
Case No. MDOT-MVA-15-19-07115
Administrative Law Judge Michael J. Wallace

ORDER

The above entitled matter having come before and having been considered by this
Honorable Court, it is this *9th pm* day of *January* 2019, by the Circuit Court for Prince
George's County,

ORDERED, that the action of June 6, 2019, by the Motor Vehicle Administration
through the Office of Administration Hearings be and hereby is AFFIRMED for reasons
advanced in the Memorandum of Law filed on behalf of the Motor Vehicle Administration,
with costs to be paid by the Petitioner.

Case closed statutorily.

Michael J. Wallace
JUDGE

ENTERED 1-16-2020

14e

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

PETITION OF

Yvonne Reignat Vodi
D/B/A Shephard's Driving School, Inc.

FOR JUDICIAL REVIEW OF THE
DECISION OF THE

Case No.: CAL19-18504

Motor Vehicle Administration
6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062

IN THE CASE OF

Yvonne Reignat-Vodi
D/B/A Shephard's Driving School, Inc.
Office of Administrative Hearings
Case No. MDOT-MVA-15-19-07115

ORDER

The Petitioner's Motion to Stay and the MVA's Opposition thereto having been
considered by the Court, it is this 24 ~~16~~ day of June, 2019, by the Circuit Court
for Prince George's County,

ORDERED, that the Petitioner's Motion to Stay is hereby DENIED.


JUDGE
Judge Sean D. Wallace

ENTERED: 6/25/19

CONCLUSIONS OF LAW

Based upon the Findings of Fact and Discussion above, I conclude as a matter of law that:

- The Licensee employed an individual who was not licensed as a driving instructor to provide any driving instruction for compensation, in violation of section 15-709 and section 15-710 of the Maryland Transportation Article and COMAR 11.23.01.12 and 11.23.02.08.
- The Licensee failed to make operation and student records available for inspection by the Administration during the schools business hours, in violation of COMAR 11.23.01.07 and 08 and COMAR 11.23.02.09.
- The Licensee is subject to revocation of its driving school license and its certificate to provide driver education programs in Maryland. Md. Code Ann., Transp. § 15-109(1), (2), and (3), § 15-710, and § 16-506 (2012).

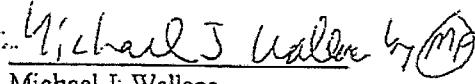
ORDER

I ORDER that the Licensee's driving school license, issued on May 24, 2017, be and hereby is REVOKED; and I further;

ORDER that the Licensee's certification to provide Maryland driver education program courses be and hereby is REVOKED; and I further;

ORDER that the records and publications of the Maryland Motor Vehicle Administration reflect this decision.

June 6, 2019
Date Amended Decision Mailed


Michael J. Wallace
Administrative Law Judge

MJW/ds
#180305

CONCLUSIONS OF LAW

Based upon the Findings of Fact and Discussion above, I conclude as a matter of law that:

- The Licensee employed an individual who was not licensed as a driving instructor to provide any driving instruction for compensation, in violation of section 15-709 and section 15-710 of the Maryland Transportation Article and COMAR 11.23.01.12 and 11.23.02.08.
- The Licensee failed to make operation and student records available for inspection by the Administration during the schools business hours, in violation of COMAR 11.23.01.07 and 08 and COMAR 11.23.02.09.
- The Licensee is subject to revocation of its driving school license and its certificate to provide driver education programs in Maryland. Md. Code Ann., Transp. § 15-109(1), (2), and (3), § 15-710, and § 16-506 (2012).

ORDER

I ORDER that the Licensee's driving instructor license, issued on May 24, 2017, be and hereby is REVOKED; and I further;

ORDER that the Licensee's certification to provide Maryland driver education program courses be and hereby is REVOKED; and I further;

ORDER that the records and publications of the Maryland Motor Vehicle Administration reflect this decision.

May 20, 2019
Date Decision Mailed

MIW/da
#179235

Michael J. Wallace
Administrative Law Judge

A. That ALJ Wallace revise the Administrative Decision of May 20, 2019 pursuant to COMAR 28.02.01.27 (C) for clerical mistake and correct the ORDER on page 17 to read:

"I ORDER that the Licensee's driving school license, issued on May 24, 2017, be and hereby is REVOKED; and I further; ..."; and,

B. In the alternative, that That ALJ Wallace revise the Administrative Decision of May 20, 2019 pursuant to COMAR 28.02.01.27 (B) due to mistake and/or irregularity and correct the ORDER on page 17 to read:

"I ORDER that the Licensee's driving school license, issued on May 24, 2017, be and hereby is REVOKED; and I further; ..."; and,

C. For such other relief as the nature of its cause may require.

Respectfully Submitted,

BRIAN E. FROSH
Attorney General of Maryland



D'AVID C. MERKIN
Assistant Attorney General
Office of the Attorney General
Motor Vehicle Administration
6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062
(410) 768-7415
(410) 768-7414 (Facsimile)
dmerkin@oag.state.md.us

Counsel for the Motor Vehicle Administration

STATE OF MARYLAND
OFFICE OF ADMINISTRATIVE HEARINGS
ADMINISTRATIVE LAW BUILDING
11101 GILROY ROAD
HUNT VALLEY, MARYLAND 21031

Shepherds Driving School

NOTICE DATE:

SOUNDEX:

CASE NO.: MDOT-MVA-15-19-07115

FINDINGS OF FACT AND DECISION

The Licensee appeared before me on 3/26/19. A hearing was conducted in compliance with MD. CODE ANN., STATE GOVT §§ 10-201 thru 10-214 inclusive and MD. CODE ANN., TRANSP. II §§ 12-202 thru 12-208 inclusive, and COMAR 11.11.02 (and, if applicable, 11.11.03).

After considering the evidence, I find by a preponderance of the evidence the following facts:

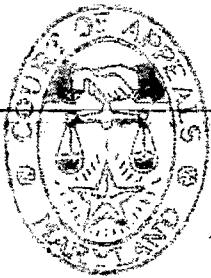
MVA ISSUED NOTICES OF SUSPENSION & RESTRICTION ON 3/7/19
ON 3/20/19, MVA PRESENTED EVIDENCE OF ALLEGATIONS
THAT LICENSEE PROVIDED DRIVERS EDUCATION SERVICES WITH
AN UNLICENSED INSTRUCTOR AS WELL AS OTHER VIOLATIONS
WHICH, IN BEING, TO PUT AT RISK THE HEALTH AND SAFETY OF
STUDENTS AT RISK. CONTINUING THESE SERVICES BY THE
LICENSEE PENDING A FINAL INVESTIGATION AND TERMINATION
 WOULD PLACE HEALTH AND SAFETY OF STUDENTS/ PUBLIC AT RISK.
 The Licensee failed to appear after due Notice to address of record.

And I conclude that Licensee is subject to the provisions of MD. CODE ANN., TRANSP. II § 16-506

IT IS ORDERED THAT: UP TO 12 MONTHS EMERGENCY SUSPENSION
OF LICENSE.

SIGNATURE OF ADMINISTRATIVE LAW JUDGE

PRINTED NAME OF ADMINISTRATIVE LAW JUDGE



**Court of Appeals
of Maryland**

~~Robert C. Murphy Courts of Appeal Building
361 Rose Boulevard
Annapolis, Maryland 21401-1599~~

Suzanne C. Johnson
Clerk

410-260-1500
1-800-926-2583

Lauren M. Vint
Chief Deputy

Marie Y. Randall
Doneice Burnette
Rachael Spicknall
Kisha Taylor-Wallace
Alison Gray
Deputies

Sara Rice
Senior Recorder

Sandra Belt
Administrative Support

June 8, 2021

Yvonne Reignat-Vodi
1810 Metzerott Rd., #47
Adelphi, MD 20783

Re: Yvonne Reignat-Vodi v. Motor Vehicle Administration
Petition Docket Nos. 5 & 6, September Term, 2021

Dear Ms. Reignat-Vodi:

I am in receipt of your "Petitioning the Chief Judge to Order a Motion for Reconsideration and Correct the Order of April 23rd 2021" in the above-captioned cases.

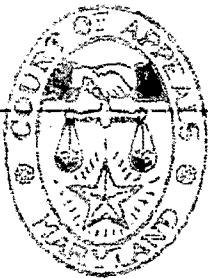
Please be advised your cases in this Court are now closed. If you wish to appeal this Court's decision, you would file an appeal with the United States Supreme Court at 1 First Street, N.E., Washington, DC 20543.

Sincerely,

Suzanne C. Johnson
Clerk

SCJ:rls

CTY FOR DEAU 410-260-1554



**Court of Appeals
of Maryland**

~~Robert C. Murphy Courts of Appeal Building
361 Rowe Boulevard
Annapolis, Maryland 21401-1699~~

Lauren M. Vini
Chief Deputy

Maria Y. Randall
Doneice Burnette
Rachael Spicknall
Kisha Taylor-Wallace
Alison Gray
Deputies

Sara Rice
Senior Recorder

Sandra Bell
Administrative Support

Suzanne C. Johnson
Clerk

410-260-1500
1-800-926-2583

May 25, 2021

Yvonne Reignat-Vodi
1810 Metzerott Rd., #47
Adelphi, MD 20783

Re: Yvonne Reignat-Vodi v. Motor Vehicle Administration
Petition Docket Nos. 5 & 6, September Term, 2021

Dear Ms. Reignat-Vodi:

I am in receipt of your "Petitioner's Inquiry on the Court of Appeals Decision Before Filing a Motion for Reconsideration," dated May 20, 2021.

In response to your inquiry regarding the "reason why the Writ of Certiorari was denied," as stated in the April 23, 2021 Order issued by this Court, your petition for writ of certiorari was denied on the basis that "there has been no showing that review by certiorari is desirable and in the public interest."

Following the denial of your petition, you submitted, on May 10, 2021, an "Objection to the Chief Judge Mary Ellen Barbera's Order on April 23rd 2021 on Denial of Petitioner Petition for Writ of Certiorari filed on March 1, 2021." As your petition had already been denied, as a courtesy to you, we treated your May 10, 2021 pleading as a motion for reconsideration. If you would like the Court to reconsider your petition, please submit the \$61.00 filing fee and seven additional copies of the "Objection" so that it can be properly docketed, as requested in our May 13, 2021 letter to you. If you would not like your "Objection" to be considered as a motion for reconsideration, please be advised that your case in this Court is now closed.

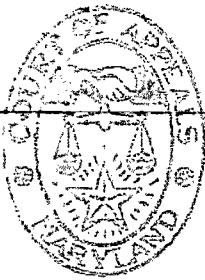
If you wish to appeal further, you will need to contact the United States Supreme Court.

Sincerely,

Suzanne C. Johnson
Clerk

TTM:zjw/2021-05-25 10:51

SCJ:rls



**Court of Appeals
of Maryland**

**Robert C. Murphy Courts of Appeal Building
361 Rose Boulevard
Annapolis, Maryland 21401-1699**

Lauren M. Vint
Chief Deputy

Marie Y. Randall
Doneice Burnette
Rachael Spicknall
Kisha Taylor-Wallace
Allison Gray
Deputies

Sara Rice
Senior Recorder

Sandra Belt
Administrative Support

Suzanne C. Johnson
Clerk

410-260-1500
1-800-926-2583

May 13, 2021

Yvonne Reignat-Vodi
1810 Metzerott Rd., #47
Adelphi, MD 20783

Re: Yvonne Reignat-Vodi v. Motor Vehicle Administration
Petition Docket No. 5, September Term, 2021

Dear Ms. Reignat-Vodi:

We are in receipt of your "Objection to the Chief Judge Mary Ellen Barbera's Order on April 23rd 2021 on Denial of Petitioner Petition for Writ of Certiorari on March 1, 2021" filed in the above-captioned case. We are treating your pleading as a motion for reconsideration. Please be advised we require a \$61.00 filing fee as well as seven additional copies of your motion.

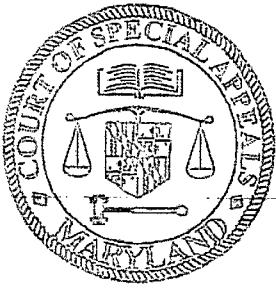
Please send the required \$61.00 filing fee and seven additional copies of your motion so that your motion can be properly docketed.

Sincerely,

Suzanne C. Johnson
Clerk

SCJ:rls

TTY FOR DEAF: 410-260-1554



Gregory Hilton
Clerk

February 25, 2021
Re: *Yvonne Reignat-Vodi v. Motor Vehicle Administration*
No. 2389, September Term, 2019
No. 2390, September Term, 2019

(410) 260-1450
WASHINGTON AREA 1-800-300-7246

February 25, 2021

Yvonne Reignat-Vodi
1810 Metzerott Road #47
Adelphi, MD 207923

Re: *Yvonne Reignat-Vodi v. Motor Vehicle Administration*
No. 2389, September Term, 2019
No. 2390, September Term, 2019

Dear Ms. Reignat-Vodi:

The date stamp on your recently filed motions in the above referenced cases have been corrected. I have enclosed the corrected copies of the cover pages for your reference.

Sincerely,


Gregory Hilton
Clerk

IN THE COURT OF SPECIAL APPEALS OF MARYLAND

MANDATE

Ordered and adjudged by the Court of Special Appeals:

10/13/2021 -Third Motion to Extend Time for Filing Corrected Brief denied.
Motion on Order to File Corrected Brief denied. Appeal dismissed.

10/30/2021 - Motion for reconsideration denied

STATE OF MARYLAND Sct:

I do hereby certify that the foregoing is truly taken from the records and proceedings of the said Court of Special Appeals. In testimony whereof, I have hereunto set my hand as Clerk and affixed the seal of the Court of Special Appeals, this 5th day of February, 2021.



Gregory Hilton

Gregory Hilton, Clerk
Court of Special Appeals



MANDATE - STATEMENT OF COSTS

Court of Special Appeals of Maryland

CSA-REG-2389-2019

Yvonne Reignat-Vodi v. Motor Vehicle Administration

Appellant

| | | |
|---------------------|-------------------------------|---------------|
| Yvonne Reignat-Vodi | Notice of Appeal | 50.00 |
| | Motion for Reconsideration | 50.00 |
| | Filing Fee - Lower Court | 60.00 |
| | Transcript/Stenographer Costs | 207.25 |
| | RPIF | 11.00 |
| | RPIF | 11.00 |
| | Appellant Total | 389.25 |
| | Total Costs | 389.25 |

STATE OF MARYLAND, ss:

I do hereby certify that the foregoing is truly taken from the records and proceedings of the said Court of Special Appeals.

In testimony whereof, I have hereunto set my hand as Clerk and affixed the seal of the Court of Special Appeals this 5th day of February, 2021.

*Greg Hilton
Clerk of the Court of Special Appeals of Maryland*

Costs shown on this Mandate are to be settled between counsel and NOT THROUGH THIS OFFICE.

IN THE COURT OF SPECIAL APPEALS OF MARYLAND

MANDATE

On the 13th day of October, 2020: Order of Court, on its own initiative, dismissing appeal.

On the 30th day of October, 2020: Motion for Reconsideration denied

STATE OF MARYLAND, Set.:

I do hereby certify that the foregoing is truly taken from the records and proceedings of the said Court of Special Appeals. In testimony whereof, I have hereunto set my hand as Clerk and affixed the seal of the Court of Special Appeals, this 11th day of March, 2021.

Gregory Hilton
Gregory Hilton, Clerk
Court of Special Appeals



Court of Special Appeals
Robert C. Murphy Courts of Appeal Building
361 Rowe Boulevard
Annapolis, Maryland 21401-1699
(410)260-1450 WASHINGTON AREA 1-888-200-7444

GREGORY HILTON,
CLERK

Yvonne Reignat-vodi
1810 Metzerott Rd
Unit 47
Adelphi Md 20783

SUMMARY NOTICE

Yvonne Reignat-Vodi v. Motor Vehicle Administration
Case Number: CSA-REG-2389-2019
Circuit Court Number:
Circuit Court:
Date: 7/20/2020

Dear Yvonne Reignat-vodi:

Pursuant to Maryland Rule 8-523(b)(1), the above referenced case shall be decided without oral argument.

Gregory Hilton

Gregory Hilton, Clerk



Court of Special Appeals
Robert C. Murphy Courts of Appeal Building
361 Rowe Boulevard
Annapolis, Maryland 21401-1699

(410)260-1450 WASHINGTON AREA 1-888-200-7444

GREGORY HILTON,
CLERK

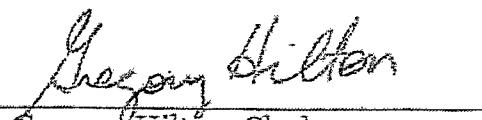
Yvonne Reignat-vodi
1810 Metzerott Rd
Unit 47
Adelphi Md 20783

SUMMARY NOTICE

Yvonne Reignat-Vodi v. Motor Vehicle Administration
Case Number: CSA-REG-2390-2019
Circuit Court Number: CSA-REG-2389-2019
Circuit Court: Court of Special Appeals
Date: 9/21/2020

Dear Yvonne Reignat-vodi:

Pursuant to Maryland Rule 8-523(b)(1), the above referenced case shall be decided without oral argument.



Gregory Hilton, Clerk

IN THE COURT OF APPEALS OF MARYLAND

*

| | | |
|-----------------------------|---|--------------------------------------|
| YVONNE REIGNAT-VODI (D/B/A) | * | IN THE |
| SHEPHERDS DRIVING SCHOOL | * | COURT OF APPEALS |
| PETITIONER | * | OF MARYLAND |
| | * | SEPTEMBER TERM, 2019 |
| | * | |
| MOTOR VEHICLE | * | Case No. CAL19-18504 |
| ADMINISTRATION | * | CAL-REG-2389-2019 |
| RESPONDENTS | * | Petition Docket No.COA-PET-0005-2021 |

* * * * *

Dear Chief Judge Mary Ellen Barbera,

**PETITIONER'S INQUIRY ON THE COURT OF APPEALS DECISION BEFORE
FILING A MOTION FOR RECONSIDERATION**

I, Yvonne O. Reignat-Vodi is in receipt of Clerk Susanne C. Johnson's letter dated May 13, 2021 requesting Petitioner file a Motion for Reconsideration with the Court of Appeals on the above case. Petitioner has not received the reason why the Writ of Certiorari was denied and still need the reason for Petitioner to answer accordingly to the filing for a Motion for Reconsideration with the Court of Appeals.

First, as indicated on the Clerk Suzanne C. Johnson's letter dated May 13, 2021 that "We are treating your pleading as a motion for reconsideration" Please know that

Petitioner did NOT make a PLEA to Chief Judge Mary Ellen Barbera in the Objection dated May 10th 2021. Petitioner OBJECTED to the Chief Judge's Order dated May 23rd 2021 denying Petitioner's Writ of Certiorari. As such, there were no reasons attached by the Chief Judge to the denial.

Again, there was no plea in the Objection dated May 10th 2021. It is Petitioner's advised that Clerk Suzanne C. Johnson to go back and read the objection from Petitioner dated May 10th 2021. There were no reasons stated on the order as to why Petitioner Writ of Certiorari was denied. Inasmuch the request for filing a motion for reconsideration should come from one of the judges Maryland Rule 8-605 (Reconsideration) and not the Clerk.

¹ Maryland Rule 8-605. RECONSIDERATION; states, (a)(1)(2) Motion: Response, No Oral Argument; The motion shall be filed (before issuance of the mandate or (2) within days after the filing of the opinion of the Court, whichever is earlier. A response to a motion for reconsideration may not be file unless requested on behalf of the Court by at least one judge who concurred in the opinion or order.

Second, the Maryland Motor Vehicle has done a major damage to Petitioner's driving school, business career and wrongfully repossessed Petitioner's Driver Instructional Badge Certification. Petitioner is requesting for true justice on the above mentioned case were due process was not applied. Petitioner fully understood the next step in the case of Shepherds Driving School and will exhaust all its remedies before she can move forward with the case of the driving school and driver instructional badge certification.

Petitioner is requesting that the Court of Appeals SUSTAIN Petitioner Petition for Writ of Certiorari filed on March 1, 2021 as there is no reason to deny the review of both cases as filed neither file a Motion for Reconsideration. As such, Motion of Reconsideration can not be file until there is a reason given by the Court of Appeals. If a decision was reached by the Court of Appeals, Petitioner will need to know the reasons and answer accordingly to the order before a Motion for Reconsideration can be filed.

Petitioner have a strong ground for the Court of Appeals to review the above case because the Circuit Court of Prince Georges County and the Court of Special Appeals did not make the right decision in the case rather keep denying and dismissing the case of Shepherds driving school from one Court to another.

Again, it's unfair for the Court of Appeals to deny both cases as it is clear and has a strong proof that Petitioner has a case, and that both the Circuit Court and the Court of

Special Appeals failed to act accordingly. The Administrative action by the Maryland Motor Vehicle Administration was wrong in the first place bringing a small business to court on something minor that could have been resolve through a conference, mediation or a simple phone call, and this is a clear indication that the Maryland Motor Vehicle Administration did not discharge its duties accordingly or its incompetent in handling issues. The case of Shepherds driving school has been ongoing for the past twenty six (26) months. Therefore, the Court should correct the order, sustain the Write of Certiorari and hold the Maryland Motor Vehicle Administration accountable of how they handle issues without following due process.

CONCLUSION

For this reasons set forth above, Petitioner Yvonne Reignat-Vodi D/B/A Shepherds Driving School Inc. ask the Court of Appeals to grant its Petition seeking a Writ of Certiorari in order to answer the question raised herein, and to protect Petitioner's rights vis-à-vis a flawed legislative enactment and an overzealous and unwarranted enforcement action by the Maryland Motor Vehicle Administration.

The COMAR Code of the Maryland Agency regulations (11.23.01) of the Motor Vehicle's Administration for driving school's were not followed. Petitioner finds it very difficult to start over again without any compensation from the Maryland Motor Vehicle Administration as the driving school was the only source of income that supported their families and Ministry. The Maryland Motor Vehicle Administration claimed to be a giant State agency but failed to use its power to solve minor problems with a small business owner but rather destroy a small business like Shepherds driving school with its power. This is an abuse of power or a malfeasance in office by the Maryland Motor Vehicle Administration. The Court of Appeals should look into this matter immediately. The Maryland Motor Vehicle Administration failed to apply the due process to this case is the reason why the Court of Appeal has to make a proper decision by making the necessary corrections.

Dated: May 20th, 2021

Respectfully Submitted,



Yvonne O. Reignat Vodi
Petitioner
1810 Metzerott Road #47
Adelphi, MD 20783
240-475-186
pastor@shepherdsofzion.org

Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2021, a copy of the foregoing Petitioner's Inquiry on the Court of Appeals Decision before filing a Motion for Reconsideration were delivered via pre-paid overnight deliver to Chief Judge Mary Ellen Barbera Court of Appeals case Nos. CAL-19-18504/COA-PET-0005-2021 & CAL-19-29298/COA-PET-0006-2021 were delivered via pre-paid, overnight delivery service to:

David C. Merkin, Motor Vehicle Administration, 6601, Ritchie Highway, N.E., Rm200
Glen Burnie, MD, 21062



Yvonne O. Reignat-Vodi
Petitioner

IN THE COURT OF APPEALS OF MARYLAND

*
YVONNE REIGNAT-VODI (D/B/A) * IN THE
SHEPHERDS DRIVING SCHOOL * COURT OF APPEALS
PETITIONER * OF MARYLAND
* SEPTEMBER TERM, 2019
*
v *
MOTOR VEHICLE * Case No. CAL19-18504
ADMINISTRATION * CAL-REG-2389-2019
RESPONDENTS * Petition Docket No.COA-PET-0005-2021

* * * * *

ORDER

Upon careful consideration the Court of Appeals order dated May 23rd 2021 denying Petitioner's Writ of Certiorari, and failure to provide petitioner with reasons why the Writ of Certiorari was denied. The Maryland Motor Vehicle Administration failure to apply due process in resolving the case of the driving school at the early stage. The delay on the side of the Prince Georges Circuit Court of Maryland failing to transfer Agency Records from the start of the case filed with the Court of Special Appeals on February 7, 2020 for Petitioner to file corrected brief with its inclusion on time. I hereby OBJECT the Court of Appeals decision to deny Petitioner's Writ of Certiorari; ORDERED the Maryland Court of Appeal to SUSTAIN Petitioner's Petition for Writ of

business Shepherds Driving School Inc. the sum of FIVE MILLION

DOLLARS (\$5,000,000.00) for all the damages caused by the Motor Vehicle Administration it is this _____ day of _____, 2021, by the Court Appeals of Maryland.

ORDERED, that the Petitioner's request is hereby GRANTED for the LOST OF INCOME, WAGES, TIME, AND MONEY WASTED, BUSINESS CREDIBILITY, DEFAMATION OF CHARACTERS, and the PREJUDICE AND DISCRIMINATORY act by the Maryland Motor Vehicle Administration against a black owned business. It is also ORDERED to Reinstate Shepherds Driving School located at 7100 Baltimore Avenue, Suite 100, College Park, MD 20740 and Petitioner Instructor's license and Certification. ORDERED that all Instructional Licenses and Certification belonging to Petitioner's husband Mr. Smith Kwame Oliver Vodi be Reinstated.

JUDGE

IN THE COURT OF APPEALS OF MARYLAND

YVONNE REIGNAT-VODI (D/B/A) *
SHEPHERDS DRIVING SCHOOL *
PETITIONER *

v
MOTOR VEHICLE
ADMINISTRATION
RESPONDENTS *

IN THE
COURT OF APPEALS
OF MARYLAND
SEPTEMBER TERM, 2019

Case No. CAL19-18504
CAL-REG-2389-2019
Petition Docket No.COA-PET-0005-2021

* * * * *

Dear Chief Judge Mary Ellen Barbera,

**PETITIONING THE CHIEF JUDGE TO ORDER A MOTION FOR
RECONSIDERATION AND CORRECT THE ORDER OF APRIL 23RD 2021**

I, Yvonne O. Reignat-Vodi is in receipt of Clerk Susanne C. Johnson's letter dated May 25, 2021 indicating that my petition for writ of certiorari was denied on the basis that "there has been no showing that review by certiorari is desirable and in the public interest". How could Shepherds Driving School, which is in a good standing with the State of Maryland, paid both State and Federal taxes not be desirable in the public interest? The case of Shepherds Driving School is desirable in the eyes of public interest because the services of the driving school provided to the public was a thirty six (36) hours driver's education program that involved students in the State of Maryland.

Shepherds driving school is a reputable institution approved by the Maryland Motor Vehicle Administration. All instructors are certified by the Maryland Motor Vehicle Administration. As such, Shepherds driving school paid both State and Federal taxes since the commencement to the closure of the driving school. That's make Shepherds driving school desirable and in the public interest. Petitioner wants the Court of Appeal to know that Shepherds driving school was licensed, insured, and bonded by the State of Maryland, therefore the driving school is desirable and in the public interest.

Here is a list of instructor's and staffs who worked in the best interest of the Shepherds driving school as follows:

- (i) Yvonne O. Reignat-Vodi – Owner/CEO – Instructors ID - 35488
- (ii) Smith Kwame Oliver Vodi – General Manager
- (iii) Azubuike Nwaolu – Instructor – Instructor's ID – 35195
- (iv) Earl Gary Garner – Instructor – Instructor's ID - 11389
- (v) Eddy Marilyn Ramirez – Instructor – Instructor's ID – 15916
- (vi) Leonard A. Davis – Instructor – Instructor's ID – 16047
- (vii) Wilfred Sahr Pearce – Instructor – Instructor's ID – 14660
- (viii) Kenneth Lee Seivers – Instructor – Instructor's ID – 35534
- (ix) Tamba Dunyakor Esseh-Kaminjah – Instructor's ID – 11779
- (x) Samuel Torres Quinoga – Instructor - Instructor's ID – 13805
- (xi) Jessica Michaca Contreras – Secretary 1
- (xii) Estella Vadasfane – Secretary 2
- (xiii) Glenda Lisbeth Mejia Mena – Secretary 3

(xiv) Jennifer A. Cruz – Secretary 4

(xv) Volunteers/Church/SOZMIC – Substituting Receptionist

The name of instructors and staffs mentioned above was hired by Petitioner and worked for Shepherds driving school during the year May 2017 – March 7, 2019. Therefore, how can a business that was licensed, bonded and insured, as such rendering services to the public not be desirable and in the public interest?. Shepherds driving school provided services to the public since May 2017 through March 7, 2019.

First, there was an error on the Court of Appeals order dated April 23, 2021 stating that Petitioner filed Writ of Certiorari “to the Court of Special Appeals”. Petitioner has never filed Writ of certiorari with the Court of Special Appeals. All filing was done with the Court of Appeals on March 1, 2021. It is very manipulative for the Court of Appeals to indicate in the order dated April 23rd 2021 that Petitioner filed Writ of Certiorari with the Court of Special Appeals. On May 10, 2021 Petitioner objected the Chief Judge’s order based on the error indicated above.

On the Court of Appeals letter dated May 13, 2021 the Court of Appeals indicated that “We are treating your pleading as a motion for reconsideration”. Please know that Petitioner did not make a plea on the objection to the Chief Judge Mary Ellen Barbera dated April 23rd 2021. The Court of Appeals indicated on the order that petitioner filed a Writ of Certiorari with the Court of Special Appeals. This is incorrect as Petitioner has never filed a Writ of Certiorari with the Court of Special Appeals. Again, Petitioner filed

a Writ of Certiorari with the Court of Appeals on March 1, 2021. This is an error on the path of the Court of Appeals.

Second, as a Citizen of the United States, Petitioner has the right to a fair trial and not a plea when the case of the driving school was not treated with any due process or basic standard operation procedures. There was nothing as pleading indicated on petitioner's objection to the Chief Judge. The Court of Appeals should have thoroughly looked into petitioner writ of certiorari before making it decision denying the case.

Third, On the Court of Appeals letter dated May 25, 2021 the Court of Appeal indicated that "as a courtesy to you, we treated your May 10, 2021 pleading as a motion for reconsideration". This is totally incorrect. Petitioner OBJECTED to Chief Judge Mary Ellen Barbera's Order of April 23rd. There was no plea in the objection by Petitioner. An OBJECTION is different from a PLEA. It's as if the Court of Appeals is imposing wrong initiative of a "plea" on Petitioner and this petitioner find not legally correct. However, it is one of the judge's decisions to request for a motion for reconsideration and not the Chief Clerk. Except otherwise Maryland Rule 8-605..

¹ Maryland Rule 8-605. RECONSIDERATION; states, (a)(1)(2) Motion; Response, No Oral Argument; The motion shall be filed (before issuance of the mandate or (2) within days after the filing of the opinion of the Court, whichever is earlier. A response to a motion for reconsideration may not be file unless requested on behalf of the Court by at least one judge who concurred in the opinion or order.

Again, there was no plea on Petitioner's Objection to Chief Judge Ellen Barbera on May 10th 2021. Please find attached a copy of Petitioner's Objection to the Chief Judge.

Until the order is correct, Petitioner would not file for a motion for reconsideration. The error needs to be corrected by the Chief Judge. As such, the request for filing a motion for reconsideration should come from one of the Judges decision and not the Clerk.

Petitioner is requesting that the Court of Appeals SUSTAIN Petitioner Petition for Writ of Certiorari filed on March 1, 2021 as there is no reason to deny the review of both cases as filed neither file a Motion for Reconsideration. Due to inconsistencies and irregularities by the Court of Appeals. Petitioner sees no need to file a motion for reconsideration and the following needs to be corrected:-

- (i) The error of April 23rd 2021. stating that "Petitioner filed Writ of Certiorari with the Court of Special Appeals was incorrect.
- (ii) The error of May 13, 2021 that "We are treating your pleading as a motion for reconsideration. Petitioner did not make a plea on the objection to Chief Judge Ellen Barbera, Petitioner Objected. This is incorrect.
- (iii) The error on the Court of Appeals letter dated May 25, stating "As your petition had already been denied, as a courtesy to you, we treated your May 10, 2021 pleading as a motion for reconsideration". Again.

Petitioner did not make a plea rather made an Objection to the Chief
Judge decision of April 23rd, 2021.

- (iv) It is in petitioner's request that the Court of Appeals correct its mistakes for the appeal to be docketed by the appellate court, and thereafter with leave of the appellate court and not vise versa. Maryland Rule 2-535 (d). Clerical Mistakes.
- (v) How could Petitioner's Writ Certiorari be denied when the Court of Appeals falsely claimed that petitioner filed a Writ of Certiorari with the Court of Special Appeals?. Again, Petitioner filed Writ of Certiorari with the Court of Appeals on March 1, 2021 and not Court of Special Appeals. This is incorrect. Maryland Rule 2-535 (b).

Please know that Petitioner have a strong ground for the Court of Appeals to denying the case of Shepherds driving school. Therefore, the Court should correct the order and letters mailed to Petitioner, sustain Writ of Certiorari and hold the Maryland Motor Vehicle Administration accountable of how they handle the case of Shepherds driving school without following due process.

¹Maryland Rule 2-535 (b) provides that "at anytime, the court may exercise revisory power and control over the judgment in case of fraud, mistake, irregularity".

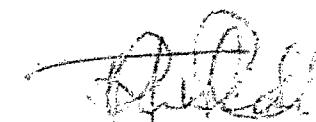
CONCLUSION

For this reasons set forth above, Petitioner Yvonne Reignat-Vodi D/B/A Shepherds Driving School Inc. ask the Court of Appeals to grant its Petition seeking a Writ of Certiorari in order to answer the question raised herein, and to protect Petitioner's rights vis-à-vis a flawed legislative enactment and an overzealous and unwarranted enforcement action by the Maryland Motor Vehicle Administration. The case of Shepherds driving school is desirable in the eyes of public interest since the services were offered to the public of which taxes were filed both State and Federal. Shepherds driving school provided Driver's Education to the public and was license, insured and bonded by the State of Maryland.

The COMAR Code of the Maryland Agency regulations (11.23.01) of the Motor Vehicle's Administration for driving school's were not followed. Petitioner finds it very difficult to start over again without any compensation from the Maryland Motor Vehicle Administration as the driving school was the only source of income that supported their families and Ministry. The Maryland Motor Vehicle Administration claimed to be a giant State agency but failed to use its power to solve minor problems with a small business owner but rather destroy a small business like Shepherds driving school with its power. This is an abuse of power or a malfeasance in office by the Maryland Motor Vehicle Administration. The Court of Appeals should look into this matter immediately. The Maryland Motor Vehicle Administration failed to apply the due process to this case is the reason why the Court of Appeal has to make a proper decision by making the necessary corrections.

Dated: June 4th, 2021

Respectfully Submitted,



Yvonne O. Reignat Vodi
Petitioner
1810 Metzerott Road #47
Adelphi, MD 20783
240-475-186
pastor@shepherdsofzion.org

Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2021, a copy of the foregoing Petitioner's petitioning the Chief Judge Mary Ellen Barbera to order a motion for reconsideration and to correct the order of April 23rd 2021 were delivered via pre-paid overnight deliver to Chief Judge Mary Ellen Barbera Court of Appeals case Nos. CAL-19-18504/COA-PET-0005-2021 & CAL-19-29298/COA-PET-0006-2021 were delivered via pre-paid, overnight delivery service to:

David C. Merkin, Motor Vehicle Administration, 6601, Ritchie Highway, N.E., Rm200
Glen Burnie, MD, 21062



Yvonne O. Reignat-Vodi
Petitioner

IN THE COURT OF APPEALS OF MARYLAND

YVONNE REIGNAT-VODI (D/B/A) * IN THE
SHEPHERDS DRIVING SCHOOL * COURT OF APPEALS
PETITIONER * OF MARYLAND
* SEPTEMBER TERM, 2019
v *
MOTOR VEHICLE * Case No. CAL19-18504
ADMINISTRATION * CAL-REG-2389-2019
RESPONDENTS * Petition Docket No.COA-PET-0005-2021

* * * * *

ORDER

Upon careful consideration the errors of the Court of Appeals order dated April 23rd 2021 of Petitioner filing its Writ of Certiorari to the Court of Special Appeals, Errors on the Court of Appeals letter dated May 25, 2021 denying Petitioner's Writ of Certiorari, forcefully imposing a courtesy to petitioner and falsely claimed that petitioner's pleading of May 10, 2021 as a motion for reconsideration. ORDERED May 23rd 2021 denying Petitioner's Writ of Certiorari, and failure to accept the fact that the case of Shepherds driving school is desirable in the eyes of public interest, since the driving school offered driver's education to the public. Petitioner paid taxes for both State and Federal. Shepherds driving school was licensed, insured and bonded and

Certiorari: It is this _____ day of _____, 2020, by the Court of Appeals of Maryland.

ORDERED that Petitioner has LOST INCOME, WAGES, TIME, AND MONEY WASTED, including the Petitioner BUSINESS CREDIBILITY, DEFAMATION OF CHARACTER as a result of the discriminatory act of the Maryland Motor Vehicle Administration against a black owned business. Also, this act has affected the progress of Shepherds of Zion Ministries International Church financially. I hereby ORDERED the Court of Appeals to PROCEED with a DECISION in FAVOUR of the Petitioner. I therefore ORDERED the Maryland Motor Vehicle Administration to compensate the Petitioner and her business Shepherds Driving School Inc. the sum of FIVE MILLION DOLLARS (\$5,000,000.00) for all the damages caused by the Motor Vehicle Administration it is this _____ day of _____, 2021, by the Court Appeals of Maryland.

ORDERED, that the Petitioner's request is hereby GRANTED for the LOST OF INCOME, WAGES, TIME, AND MONEY WASTED, BUSINESS CREDIBILITY, DEFAMATION OF CHARACTERS, and the PREJUDICE AND DISCRIMINATORY act by the Maryland Motor Vehicle Administration against a black owned business. It is also ORDERED to

Reinstate Shepherds Driving School located at 7100 Baltimore Avenue, Suite 100, College Park, MD 20740 and Petitioner Instructor's license and Certification. ORDERED that all Instructional Licenses and Certification belonging to Petitioner's husband Mr. Smith Kwame Oliver Vodi be Reinstated.

JUDGE

IN THE COURT OF APPEALS OF MARYLAND

*
YVONNE REIGNAT-VODI (D/B/A) * IN THE
SHEPHERDS DRIVING SCHOOL * COURT OF APPEALS
PETITIONER * OF MARYLAND
* SEPTEMBER TERM, 2019
v *
MOTOR VEHICLE * Case No. CAL19-18504
ADMINISTRATION * CAL-REG-2389-2019
RESPONDENTS * Petition Docket No. COA-PET-0005-2021

* * * * *

Dear Judge Mary Ellen Barbera,

**OBJECTION TO THE CHIEF JUDGE MARY ELLEN BARBERA'S ORDER ON
APRIL 23RD 2021 ON DENIAL OF PETITIONER PETITION FOR WRIT OF
CERTIORARI FILED ON MARCH 1, 2021**

I, Yvonne O. Reignat-Vodi is in receipt of your ORDER dated April 23rd 2021, received via mail on May 30th 2021, on the denial of Petitioner's Petition for Writ of Certiorari on the above subject dated March 1, 2021. Please know that the Petitioner did not file a Writ of Certiorari with the Court of Special Appeals as indicated on your order dated April 23rd 2021. This is in error on your part and it needs to be corrected. Petitioner's Writ of Certiorari was filed with the Court of Appeals on March 1st 2021.

Second, a copy of Petitioner's OBJECTION to the corrected mandate by the Court of Special Appeals dated 03/11/2021 was requested to be forwarded from the Court of Special Appeals to the Court of Appeals as both cases are currently with the Court of Appeals.

The Court of Appeals should SUSTAIN Petitioner Petition for Writ of Certiorari submitted on March 1, 2021 as there is no reason to deny the review of both cases as filed.

On March 1, 2021, Petitioner filed a Writ of Certiorari stating the reason why the Writ of Certiorari should be granted to Shepherds driving school and not be denied. Petitioner request that the Court of Appeals SUSTAIN and grant petitioner's Writ of Certiorari.

Petitioner have a strong ground for the Court of Appeals to review the above case because the Circuit of Prince Georges County and the Court of Special Appeals did not make the right decision in the case rather keep denying the case form one Court to another.

Maryland Rule 12-201 states that reasons for the denial of Petitioner's Writ of Certiorari shall be in writing. But, Petitioner has not received any reasons for the denial to respond accordingly.

Again, it's unfair for the Court of Appeals to deny both cases are clear and it is a strong proof that I have a case and that both the Circuit Court and the Court of Special Appeals failed to act accordingly. The Administrative action by the Maryland Motor Vehicle Administration was wrong in the first place bringing a small business to court on something minor that could have been resolve through a conference or a simple phone call, and this is a clear indication that the Maryland Motor Vehicle Administration did not discharge its duties accordingly or its incompetent in handling issues. Therefore, the Court should correct the matter and hold the Maryland Motor Vehicle Administration accountable of how they handle issues without following due process.

¹Maryland Rule 12-201 states that, reasons for the denial of the Writ of Certiorari shall be in writing “.

CONCLUSION

For this reasons set forth above, Petitioner Yvonne Reignat-Vodi D/B/A Shepherds Driving School Inc. ask the Court of Appeals to grant its Petition seeking a Writ of Certiorari in order to answer the question raised herein, and to protect Petitioner's rights vis-à-vis a flawed legislative enactment and an overzealous and unwarranted enforcement action by the Maryland Motor Vehicle Administration.

The COMAR Code of the Maryland Agency regulations (11.23.01) of the Motor Vehicle's Administration for driving school's were not followed. Petitioner finds it very difficult to start over again without any compensation from the Maryland Motor Vehicle Administration as the driving school was the only source of income that supported their families and Ministry. The Maryland Motor Vehicle claimed to be a giant State agency but failed to use its power to solve minor problems with a small business owner but rather destroy a small business like Shepherds driving school with its power. This is an abuse of power or a malfeasance in office by the Maryland Motor Vehicle Administration. The Court of Appeals should look into this matter immediately. The Maryland Motor Vehicle Administration failed to apply the due process to this case is the reason why the Court of Appeal has to make a proper decision by making the necessary corrections.

Dated: May 10th, 2021

Respectfully Submitted,



Yvonne O. Reignat Vodi
Petitioner
1810 Metzerott Road #47
Adelphi, MD 20783
240-475-186
pastor@shepherdsofzion.org

Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May, 2021, a copy of the foregoing OBJECTION to Judge Mary Ellen Barbera of Petitioner's Petition For A Writ Of Certiorari of case Nos. CAL-19-18504/COA-PET-0005-2021 & CAL-19-29298/COA-PET-0006-2021 were delivered via pre-paid, overnight delivery service to:

David C. Merkin

Motor Vehicle Administration

6601, Ritchie Highway, N.E., Rm200

Glen Burnie, MD, 21062



Yvonne O. Reignat-Vodi
Petitioner

IN THE COURT OF APPEALS OF MARYLAND

*
YVONNE REIGNAT-VODI (D/B/A) * IN THE
SHEPHERDS DRIVING SCHOOL * COURT OF APPEALS
PETITIONER * OF MARYLAND
* SEPTEMBER TERM, 2019
v *
MOTOR VEHICLE * Case No. CAL19-18504
ADMINISTRATION * CAL-REG-2389-2019
RESPONDENTS * Petition Docket No.COA-PET-0005-2021

* * * * *

ORDER

Upon careful consideration the delay on the side of the Prince Georges Circuit Court of Maryland failing to transfer Agency Records from the start of the case filed with the Court of Special Appeals on February 7, 2020 for Petitioner to file corrected brief with its inclusion on time. I hereby OBJECT the Court of Appeals decision to deny Petitioner's Writ of Certiorari; ORDERED the Maryland Court of Appeal to SUSTAIN Petitioner's Petition for Writ of Certiorari. It is this _____ day of _____, 2021, by the Court of Appeals of Maryland,

ORDERED, that the Chief Judges decision of the Court of Special Appeals be CORRECTED at the Court of Appeals as this was a result of non submission of the Agency records not been transferred from the Circuit Court of Prince Georges to the Court of Special Appeals.

ORDERED, that the decision of the Administrative Agency including irregularities and inconsistencies must be CORRECTED at the Court of Appeals. Petitioner is hereby GRANTED the Petition to SUSTAIN the Writ of Certiorari: It is this _____ day of _____, 2020, by the Court of Appeals of Maryland.

ORDERED that Petitioner has LOST INCOME, WAGES, TIME, AND MONEY WASTED, including the Petitioner BUSINESS CREDIBILITY, DEFAMATION OF CHARACTER as a result of the discriminatory act of the Maryland Motor Vehicle Administration against a black owned business. Also, this act has affected the progress of Shepherds of Zion Ministries International Church financially. I hereby ORDERED the Court of Appeals to PROCEED with a DECISION in FAVOUR of the Petitioner. I therefore ORDERED the Maryland Motor Vehicle Administration to compensate the Petitioner and her business Shepherds Driving School Inc. the sum of FIVE MILLION DOLLARS (\$5,000,000.00) for all the damages caused by the Motor Vehicle

Administration it is this _____ day of _____, 2021, by the Court
Appeals of Maryland.

ORDERED, that the Petitioner's request is hereby GRANTED for the LOST OF INCOME, WAGES, TIME, AND MONEY WASTED, BUSINESS CREDIBILITY, DEFAMATION OF CHARACTERS, and the PREJUDICE AND DISCRIMINATORY act by the Maryland Motor Vehicle Administration against a black owned business. It is also ORDERED to Reinstate Shepherds Driving School located at 7100 Baltimore Avenue, Suite 100, College Park, MD 20740 and Petitioner Instructor's license and Certification. ORDERED that all Instructional Licenses and Certification belonging to Petitioner's husband Mr. Smith Kwame Oliver Vodi be Reinstated.

JUDGE



COURT OF APPEALS OF MARYLAND
Clerk's Office
Robert C. Murphy Courts of Appeal Building
361 Rowe Boulevard
Annapolis, Maryland 21401-1699
410-260-1500
1-800-926-2583

PETITION DOCKET RECEIPT
No. 0005, September Term, 2021
COA-PET-0005-2021

YVONNE REIGNAT-VODI
v.
MOTOR VEHICLE ADMINISTRATION

Yvonne Reignat-Vodi

Petitioner

David C. Merkin, Esquire

Attorney(s) for the Respondent

File Date: March 01, 2021

STATE OF MARYLAND, SS:

Receipt is hereby acknowledged of a petition for writ of certiorari filed in the above entitled case.

/s/ Suzanne Johnson
Clerk
Court of Appeals of Maryland

OFFICIAL RECEIPT
Maryland Court of Appeals

Payor
Reignat-Vodi, Yvonne
1810 Metzerott Rd., #47
HYATTSVILLE, MD 20783

Receipt No.
COA-2021-01189

Transaction Date
03/02/2021

| Description | Amount Paid |
|--|-------------|
| Reignat-Vodi, Yvonne COA-PET-0005-2021 Yvonne Reignat-Vodi v. Motor Vehicle Administration | |
| Filing Fee - Petition for Writ of Certiorari | 61.00 |
| SUBTOTAL | 61.00 |
| Remaining Balance Due: \$0.00 | |

PAYMENT TOTAL **61.00**

| | |
|-----------------------------------|-------|
| Check (Ref #27246678456) Tendered | 61.00 |
| Total Tendered | 61.00 |
| Change | 0.00 |

03/02/2021 Cashier RASP Audit
12:22 PM Station COA8 47871105

OFFICIAL RECEIPT

IN THE COURT OF APPEALS OF MARYLAND

4-2021-00000

MAR 01 2021

YVONNE REIGNAT-VODI (D/B/A) * IN THE Suzanne C. Johnson, Clerk,
SHEPHERDS DRIVING SCHOOL * COURT OF APPEALS Court of Appeals
PETITIONER * OF MARYLAND of Maryland
* SEPTEMBER TERM, 2019
v.
*
MOTOR VEHICLE * Case Nos. CAL19-29298
ADMINISTRATION * CAL 19-8504
RESPONDENTS * Petition Docket No.

* * * * *

Dear Clerk Suzanne Johnson,

SUBMISSION OF PETITIONER WRIT OF CERTIORARI 03/01/2021

CASE NOS: CAL 19-18504, CAL 19-29298 (2389 & 2390)

I Yvonne Reignat-Vodi submitted copies of Writ of Certiorari, on March 1, 2021.

Writ of Certiorari was finished on 02/26/2021 but due to the weekend Write of Certiorari was submitted today Monday March 1, 2021.

The submitted Writ of Certiorari and Appendices are as follows:

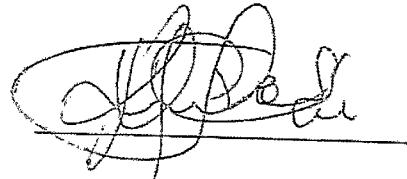
| | |
|---|--------------------|
| (A) WRIT OF CERTIORARI CASE NO. CAL:19-18504 (2389) - | 8 COPIES |
| (B) WRIT OF CERTIORARI CASE NO. CAL19-29298 (2390) - | 8 COPIES |
| TOTAL COPIES OF WRIT OF CERTIORARI | = 16 COPIES |

8 COPIES
8 COPIES
= 16 COPIES



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 01 day of March, 2021, two copies of the foregoing Writ of Certiorari was mailed to; David C. Merkin; Assistant Attorney General; Motor Vehicle Administration; 6601 Ritchie Highway, N.E., Room 200; Glen Burnie, MD 21062.



Yvonne O. Reignat-Vodi

1810 Metzerott Road #47

Adelphi, MD 20783

Civil Case Summary

Case No: CAL19-18504

Case Description: Reignat Vodi vs MVA
Case Status: CLOSED/DS
Case Type: Independent Proceedings
Case Type: Judicial Review
Filing Date: 06/04/2019

Docket Entries

CDCM Track: 1

Try By Date: 09/26/2020

Parties

Case Parties

Parties

| <u>Party</u> | <u>Party Name</u> | <u>Party Code</u> | <u>End Date</u> |
|--------------|-------------------------------|-------------------|-----------------|
| 1 | Motor Vehicle Administration | AGY | |
| 2 | Barron, Erek | ATT | |
| 3 | Merkin, David C | ATT | |
| 4 | Shepherd's Driving School Inc | DBA | |
| 5 | Mittelstaedt, Crystal D | JUD | |
| 6 | Reignat Vodi, Yvonne | PET | |
| 7 | Motor Vehicle Administration | RED | |

Comments

| | <u>Name</u> | <u>Filing Date</u> | <u>Status</u> | <u>Last Active Date</u> |
|--|-------------|--------------------|---------------|-------------------------|
| | | | | |

Events

| <u>Schedule Date</u> | <u>Schedule Event</u> | <u>Closing Docket</u> | <u>Docket Date</u> | <u>Judge</u> |
|----------------------|-----------------------|----------------------------|--------------------|------------------------|
| 01/10/2020 | Oral Arguments | Oral Arguments Held | 01/10/2020 | Crystal D Mittelstaedt |
| 06/04/2020 | Try By Date | Civil Try by Date Complied | 01/10/2020 | |

Civil Case Summary**Docket Activity**

| <u>Date</u> | <u>Docket Entry</u> | <u>User</u> |
|-------------|---|-------------|
| 06/04/2019 | Motion To Stay, fd. 002 Motion to Stay Orders Pending Judicial Review ag e 6/13/19 | AGE |
| 06/04/2019 | CaseType: Judicial Review | AGE |
| 06/04/2019 | Pet For Judicial Review, fd 001 OAH No.: MDOT-MVA-15-19-07115 ag e 6/13/19 CM on 6/14/19 7018-1830-0002-2497-7698 | AGE |
| 06/19/2019 | Notice, filed 004 Notice of Filing of Petition for Judicial Review pursuant to Maryland Rule 7-202(d)(3) (Judge Wallace) fd/djg e06-21-19 | DGO |
| 06/19/2019 | Opposition to Motion Stay, fd 005 Opposition to Petitioner's Motion to Stay (Tagged for Judge Wallace - No Hold) (Wallace) fd/djg e06-21-19 | DGO |
| 06/19/2019 | Response to Petition, fd 003 Response to Petition - Milton Chaffee, Administrator of the Motor Vehicle Administration intends to participate in the above action for judicial review. (Tagged for Assignment Office) (Judge Wallace) fd/djg e06-21-19 | DGO |
| 06/25/2019 | Order of Court, filed 006 Order dated 6/24/19, Judge Wallace, Ordered that the Petitioner's Motion to Stay is hereby Denied, fd, acc cc to E. Barron, D. Merkin and D. Bell | ACC |
| 07/08/2019 | Return Rcpt-Certified Mail, fd 007 fd kbp e 7/11/19 | KBP |
| 08/01/2019 | Letter, filed. | SFW |

Civil Case Summary

| | | |
|------------|--|-----|
| | 008 State of Maryland Office of the Attorney General with Record and CD's, fd./stw e - 8/6/19 | |
| 08/06/2019 | Left St Prst To Md RI 7-206 Fd 009 fd./stw (cc: E. Barron, Esq. and D. Merkin, Assistant Attorney General) | SFW |
| 09/03/2019 | Memorandum in Support, fd 010 Memorandum in support of petition for judicial review,fd.acc e 9/5/19 | ACC |
| 09/27/2019 | Memorandum of Law, fd 011 motion vehicle administration's memorandum of law fd./emt364 e 10-2-19 | EMT |
| 12/03/2019 | Letter To Judge, Fd. 012 Letter to Judge Mittelstaedt to request representation by an attorney through the Court, fd/djg (Mittelstaedt) e12-12-19 | DGO |
| 01/10/2020 | Oral Arguments Held | KPE |
| 01/10/2020 | Civil Try by Date Complied | KPE |
| 01/16/2020 | CaseDisp: Affirmed | AMK |
| 01/16/2020 | Civil Case Closure Form, Fd. 015 fd,amk | AMK |
| 01/16/2020 | Civil Daily Sheet, Filed 013 d/s 01/09/2020 Judge Mittelstaedt : CS M1410 Appeal Granted Decision Affirmed Ordered Signed and Attached Case Closed Statistically fd,amk | AMK |
| 01/16/2020 | Order of Court, filed | AMK |

Civil Case Summary

014

Order of Court dated 01/09/2020, Judge Mittelstaedt, Ordered, that the action of June 06, 2019, by the Motor Vehicle Administration through the Office of Administration Hearings be and hereby is AFFIRMED for reasons advanced in the Memorandum of Law filed on behalf of the Motor Vehicle Administration, with costs to be paid by the petitioner, case closed statistically, fd.amk
cc all parties

02/07/2020 Notice of Appeal, filed MMZ

016
notice of appeal filed by plaintiff
paid 121
date 2/16/2020
receipt 58210
mz e2/17/2020

02/17/2020 Copy of Clerks Letter MMZ

017
copy of clerk's letter regarding appeal
mz e2/17/2020

02/27/2020 Order to Proceed WO Pre Conf MMZ

018
No. 2389, Sept 2019
due to COSA 4/24/2020
mz e2/27/2020

03/17/2020 Rnd Mail By Post Office Fd. HMV

019
As to Yvonne Reignat-Vodi, Re: Copy of Clerks Letter for Appeals
fd/hmv
e.03-18-2020

04/09/2020 Transcript, filed MMZ

020
transcripts filed for proceedings dated 1/9/20 & 1/24/19 w/ cost sheet
mz e4/15/2020

IN THE COURT OF SPECIAL APPEALS OF MARYLAND

*

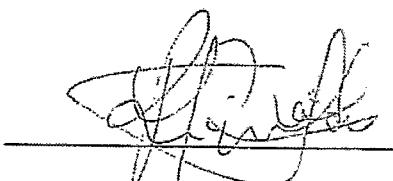
YVONNE REIGNAT-VODI (D/B/A) * IN THE
SHEPHERDS DRIVING SCHOOL * COURT OF SPECIAL APPEALS
Appellant * OF MARYLAND
* SEPTEMBER TERM, 2019
* CSA-REG-2389-2019
v. *
MOTOR VEHICLE
ADMINISTRATION
Appellee *

* * * * * *

Dear Mr. Gregory Hilton,

REQUEST FOR SIR SPEEDY TO PICK UP AGENCY RECORDS FROM
THE COURT OF SPECIAL APPEALS AND MAKE COPIES OF AGENCY
RECORDS

I, Yvonne Reignat-Vodi hereby request Sir Speedy to pick up Agency records from the Maryland Court of Special Appeals and make copies for Appellant to complete the corrected Briefs.



Yvonne Reignat-Vodi

Appellant

Shepherds Driving School

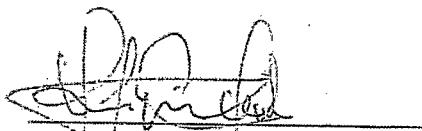
7100 Baltimore Avenue Suite 100
College Park, MD 20740

Dear Mr. Matt Franko,

A REQUEST TO PICK UP AGENCY RECORDS FROM THE COURT OF
SPECIAL APPEALS AND MAKE COPIES OF AGENCY RECORDS

I, Reignat-Vodi hereby request Sir Speedy to pick up Agency records from the Maryland Court of Special Appeals and make copies for Appellant to complete the corrected Briefs.

Thank you,


Yvonne Reignat-Vodi

Customer 09/29/2020

From: sirspeedyannapolis@gmail.com
Sent: Tuesday, February 16, 2021 10:36 AM
To: APOSTLE REV. SMITH KWAME OLIVER VODI
Subject: From Sir Speedy Annapolis per Request

| | | | |
|--------------------|--|--------------|----------|
| 10/01/2020 1:18 PM | POS by "admin" (Refund CASH: \$ 4.85) | Tax: \$ 4.25 | \$ 75.15 |
| | Dept: 1 SS Copy 634x\$ 0.10 (Maryland) | \$ 63.40 | |
| | Dept: 5 Other 1x\$ 7.50 (Maryland) | \$ 7.50 | |
| | Payment - CASH (Maryland) | \$ 80.00 | |

779a

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of November, 2020, 15 (YELLOW) copies of Appellant **CORRECTED** briefs of case No. (2390) and 10 copies each of **RECORD EXTRACT** of case No. (2389) of **VOLUME 1 of 2 & Volume 2 of 2** of the foregoing case as follows: CAL:19-18504/CSA-REG-2389-2019/CAL-19-29298/CSA-REG-2390-2019.

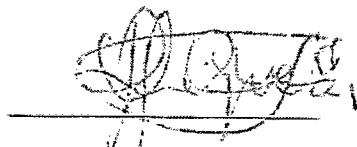
Was served by



Hand

- 2. First-class mail, postage paid;
- 3. Certified mail; or
- 4. Other _____

On the following: The Clerk's Office, Maryland Court of Special Appeals; 361 Rowe Blvd, Annapolis, MD 21401



Signature

Yvonne Reignat-Vodi

1810 Metzerott Road #47

Adelphi, MD, 20783

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of November, 2020, 2 (YELLOW) copies of Appellant **CORRECTED** briefs case No. (2389) (2390); 1 copy of **RECORD EXTRACT** of case No. (2390) and 2 copies of Appellant **RECORD EXTRACT** of **VOLUME 1 of 2 & Volume 2 of 2** for case No. (2389) of the foregoing case as follows: CAL:19-18504/CSA-REG-2389-2019/ CAL-19-29298/CSA-REG-2390-2019.

Was served by

- 1. Hand
- 2. First-class mail, postage paid;
- 3. Certified mail; or
- 4. Other _____

On the following: David C. Merkin; Motor Vehicle Administration; 6601 Ritchie Highway, N.E., Glen Burnie, MD 21062


Signature

Yvonne Reignat-Vodi

1810 Metzerott Road #47

Adelphi, MD, 20783

COPY

February 8, 2019

Demetrius Wright, Inspector
MVA Headquarters
6601 Ritchie Highway, NE Room 207
Glen Burnie, Maryland 21602

Re: Shepherd's Driving School

Dear Mr. Wright,

I represent Shepherd's Driving School with respect to the subpoena duces tecum which you had served on them on February 7, 2019. I am sure that you have learned by now that my client declines to honor the subpoena. I have reviewed the various documents attached to the subpoena, and it appears that, based upon the allegations of a disgruntled client, the MVA now wishes to investigate my client. I have advised my client not to turn over the records requested. The reason is that there are no alleged violations of any laws or regulations other than Ms. Mohammed's dissatisfaction with the school. The MVA's request for student records going back to September is overreaching and is a fishing expedition.

I request that any correspondence and/c. subpoenas be sent to me rather than to Shepherd's Driving School. I will accept service for any official documents. If you have any questions, please feel free to contact me.

Sincerely,

Bert W. Kapinus

INTERIM DOCUMENT

This Interim document expires on: 11/4/2018

Product: Non Commercial - Learners Permit (Type 1 GLS) Class: C
 Type: New Product Issued: 10/5/2018
 DL/ID: C000414016050 Product Expires: 10/5/2020
 JIPEI: CUI
 Address: 3854 STADIUM DR # 3132 # 3132
 COLLEGE PARK MD 20742
 Birth Date: 1/18/1988 Organ Donor: No
 Sex: M Height: 5-09 Weight: 163 lbs
 Special Code(s): NONE
 Restriction(s): 4 - Under 21 Alcohol Restricted
 5 - Corrective Lenses
 7 - Limited Term: Temporary

Product mailed to address on record with MVA. If you selected expedited services, signature will be required for delivery of product. Saturday processing of expedited service will be delivered on next business day. No mail delivery on Federal/State holidays.

To track your product, visit:
www.mva.maryland.gov/product-tracking

This Interim Document is intended for temporary use only, until you have received your Maryland product in the mail. Once you receive your new Maryland product you should immediately destroy this Interim Document. This document is valid for a maximum of 30 days from the transaction date.



TRANSACTION RECEIPT

| | | | | |
|----------------------------|------------|-----|---------|---|
| Transaction Receipt: | Unit Price | Qty | Amount | Transaction Date: 10/6/2018 |
| GLS Provisional Conversion | \$5.00 | 1 | \$5.00 | Branch: White Oak |
| GLS Learners Class C | \$45.00 | 1 | \$45.00 | 2121 Industrial Parkway, Silver Spring, MD 20904 |
| Total Due: | | | \$50.00 | Customer Copy, Printed on 10/6/2018 - 11:21:35 AM. |
| Payment: | | | \$50.00 | Operator: 12455 Thank You Very Much |
| Credit Card #: 16080 | | | | JIPEI: CUI |
| Authorization Code: 191667 | | | | DL / ID #: C000414016050 |
| Total Paid: | | | \$50.00 | |
| Change: | | | \$0.00 | |



395BB2550E

10/6/18
10/6/18

Reyes
3/22/19



7 Motor Vehicle Administration
6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062

DE-003B (12-13)

Behind the Wheel Student Record and Completion Form

Please complete all requested information and signatures in full.

Leena Gassim Mohamed 240-898-8020
First Name Middle Last Phone #
1000 Riverdale Rd

1100 Avenue Rd. Phone #

Verdale 9/27

County _____ State _____ Zip Code _____

Mr. Edward J. Vining School College Park
Name of Driving School Zip Code 300673

Branch Location School #

10 Years M-530-49-271-630
Age (at the time class started)

| Date | Start Time | End Time | Hours | Lesson | Lesson | TAG # | Inst. Initials | Inst. ID# | Lesson Grade * |
|----------|------------|----------|-------|------------|------------|---------|----------------|-----------|----------------|
| 10/20/10 | 12:30 | 2:30 | 2 | Lesson 182 | Lesson 182 | TCR2106 | ES21 | 11389 | 3 |
| 11/10/10 | 12:42 | 2:42 | 2 | Lesson 384 | Lesson 384 | TCR2106 | ESD | 16041 | 5 |
| 12/15/10 | 12:30 | 2:30 | 2 | Lesson 580 | Lesson 580 | TCR2106 | ES21 | 11389 | 5 |

Lesson Grade: S - Satisfactory U - Unsatisfactory

Swear under penalty of perjury, that the above information is true and correct to the best of my knowledge, information and belief.

卷之三

12/15/2018
Date

Shepherds Driving School Inc. Student In-Car Evaluation/Progress Record

Student: LEENA GRASIM MOHAMED

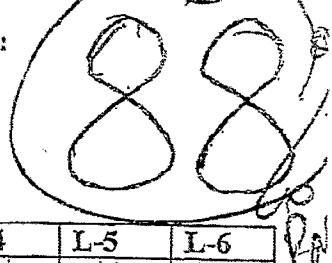
Instructor: MR EARL GARY GARNER #12389
LEONARD ALBERT DAVIS

Dates of Lesson (may be more than one date):

| | | | | | | | |
|---|------------|-------------------|---|--------|---|---|---|
| 1 | 10/26/2018 | 12:30PM - 2:30PM | 1 | Lesson | 1 | 8 | 2 |
| 2 | 11/10/2018 | 12:10PM - 1:10PM | 2 | Lesson | 3 | 2 | 4 |
| 3 | 12/15/2018 | 10:15AM - 12:15PM | 3 | Lesson | 5 | 4 | 6 |

In evaluating a driver's performance, use the following rating scale as a guide:

- 4 = Performs without any coaching
- 3 = Performs adequately but needs occasional coaching
- 2 = Performs but only with significant coaching



| | L-1 | L-2 | L-3 | L-4 | L-5 | L-6 |
|--|-----|-----|-----|-----|-----|-----|
| Pre-entry checks | 4 | 4 | 4 | 4 | 4 | 4 |
| Pre-start and starting (turn on accessories) | 4 | 4 | 4 | 4 | 4 | 4 |
| Moving forward | 4 | 4 | 4 | 4 | 4 | 4 |
| Moving backward | 4 | 4 | 4 | 4 | 4 | 4 |
| Entering traffic | 3 | 3 | 3 | 3 | 3 | 3 |
| Right Turns | 3 | 3 | 3 | 3 | 3 | 3 |
| Left Turns | 3 | 3 | 3 | 3 | 3 | 3 |
| Negotiating intersections | 3 | 3 | 3 | 3 | 3 | 3 |
| Changing lanes | 3 | 4 | 3 | 3 | 3 | 4 |
| Following and stopping Full stops (line) | 3 | 3 | 3 | 3 | 3 | 3 |
| Parking and securing | 3 | 3 | 3 | 3 | 3 | 3 |
| Parking on grades | 3 | 3 | — | — | — | — |
| Single parking | — | 3 | 3 | 3 | 3 | 3 |
| Parallel parking | — | — | 3 | 3 | — | 3 |
| Manoeuvres Reverse 2 point | — | 3 | 3 | 3 | 3 | 3 |
| Assessing highway conditions | 3 | 3 | 3 | 3 | 4 | 4 |
| Space management | 4 | 4 | 3 | 4 | 4 | 4 |
| Response to traffic controls | 4 | 4 | 3 | 3 | 2 | 3 |
| Response to other users | 4 | 4 | 3 | 4 | 4 | 4 |
| Passing | — | — | 3 | 3 | 3 | 3 |
| Commentary driving | 4 | 4 | — | — | 4 | 4 |
| Speed | 4 | 4 | 4 | 4 | 3 | 3 |
| Driving conditions when appropriate | 3 | 3 | 3 | 3 | 3 | 3 |
| Adverse weather (slower) | — | — | — | — | 3 | 3 |
| Night driving | — | — | — | — | — | — |

Final Evaluation

Pass

Fail

(circle one)

Instructor Signature and #:

Leena Mohamed

Driver Signature:

Leena Mohamed

411

INSTRUCTOR 1

State of Maryland
Driver Education Program
Certified
Driver Education Instructor
EARL GARY GARNER
S912
Instructor Number: 104443
Certified for: CLASSROOM & BTW
EXPIRES:
06-30-2018
Type: R
Page: 00000000000000000000000000000000

INSTRUCTOR 2

MARYLAND
Commercial Driver's License 

D-120-507-041-615

1201600VA

DAVIS

LEONARD ALBERT

4026 GELSTON DR
BALTIMORE MD 21220

08/06/1964 M 5-11¹/₂ 220 05/02/2022
B TPI 05/31/2018

Mr. G. T. Miller
MDOT
Commercial
Certified
Driver Education Instructor
Leonard Albert
24

MR. G. T. MILLER
MDOT
Commercial
Certified
Driver Education Instructor
Leonard Albert
24

STATE OF MARYLAND
MARYLAND MOTOR VEHICLE ADMINISTRATION
6601 Ritchie Highway, NE
Glen Burnie, Maryland 21062

SUBPOENA DUCES TECUM

DELIVERY METHOD: Hand Delivered

DIRECTED TO: Yvonne Reignat-Vodi, Owner, Shepherd's Driving School
7100 Baltimore Avenue #100
College Park, Maryland 20740

Pursuant to Section §12-108 (a) of the Transportation Article, Annotated Code of Maryland, YOU ARE HEREBY SUMMONED AND COMMANDED by the MARYLAND MOTOR VEHICLE ADMINISTRATION to deliver, IMMEDIATELY UPON SERVICE OF PROCESS, the following:

All student files dated September 1, 2018 through December 1, 2018

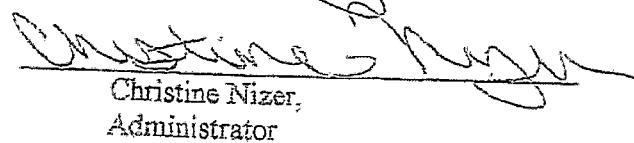
And by virtue of the MARYLAND MOTOR VEHICLE ADMINISTRATION, said documentation is hereby made available IMMEDIATELY upon presentation of said subpoena to:

Demetrius Wright, Inspector
MVA Headquarters
6601 Ritchie Highway, NE
Room 207
Glen Burnie, Maryland 21062
Telephone: (410) 424-3751

FAILURE TO OBEY, may result in the Motor Vehicle Administration petitioning a court of competent jurisdiction to compel obedience to the subpoena or to compel the production of relevant documents and other evidence under authority of §12-108 (b) of the Transportation Article of the Annotated Code of Maryland.

Questions regarding this subpoena should be referred to the above named MVA Inspector.

Given under my hand this 1st day of February 2019


Christine Nizer,
Administrator

Original: Case file
Copy: Recipient
Copy: Office of The Attorney General, MVA

Shepherds Driving School Investigation

Notes 12/21/18

12/19/18 The complaint was forwarded via email to Bill from our Customer Service Center. Bill forwarded the email to Demetrius/Natosha to investigate.

12/21/18 [e]Cheryl, Bill, Demetrius, and Natosha reviewed the complaint in detailed and discussed possible COMAR violations, previous actions taken by the Administration against Mr. Vodi, review of his case file and the direction of the investigation.

Identified the key roles of the parties involved:

- Yvonne Reignat-Vodi Cert# 35488 – Owner/Operated, SDS
- Smith Kwame Oliver Vodi – General Manager/Private Practice Mentor, SDS
- Brook Gardner – Driver Instructor, SDS
- (First name unk) Davis – Possible unlicensed Driver Instructor at SDS
- Omotayo Oyadepo – (Possible employee at SDS)
- Leena Mohamed – Complainant/student driver (Need to mother's name/contact info)
- Eve Matthew – Customer/student driver/possible witness

Efforts made up to date:

- John Poliks, Internal Investigations notified
- Complainant contacted, and a preliminary interview was conducted (over the phone) Demetrius did share highlights of the interview
- Located SDS Social media videos of Mr. Vodi providing BTW lessons to students. SDS website Mrs. Vodi is advertising private driving lessons
- DIWS search for (First name unk) Davis – Possible unlicensed Drivers Instructor at SDS

Plan of Action following this meeting:

- Obtain 90 days (beginning Sept. 1st) of SDS records including, all signed documents by parents/students, SDS policies and employee's records.
- Review records to determine possible witnesses who may have been in class at the time of the allegation(s)
- Create questions for interviews upon reviewing the records
- Schedule interviews
- Any interviews regarding minors will be conducted as discussed in the meeting

CORRECT FULL NAMES OF THE APPELLEE'S ADMINISTRATION COMILANCE INSPECTORS THAT CAME TO SHEPHERDS DRIVING SCHOOL IN MARCH 2019

1. DEMETRIUS WRIGHT - INSPECTOR
2. NATOSHA YOUNGER - INSPECTOR
3. LACHERYL JONES - INSPECTOR
4. JACK MEAKIN - INSPECTOR

CORRECT FULL NAMES OF THE STUDENTS THAT ARE INVOLVED IN THE CASE THE DRIVING SCHOOL 2019

1. MS. LEENA MOHAMED (STUDENT)
2. RIHAB OSMAN (MOTHER)
3. MS. MAHLI TATNAI HERNANDEZ (STUDENT)
4. MR. ABDY NAHIB HERNANDEZ (STUDENT)

CORRECT FULL NAMES OF THE INSTRUCTORS THAT ARE INVOLVED IN THE CASE THE DRIVING SCHOOL 2019

1. YVONNE REIGNAT-VODI (OWNER/INSTRUCTOR MVA)
2. MR. EARL GARNER (STATE TRAINER/INSTRUCTOR MVA)
3. LEONARD ALBERT DAVIS (INSTRUCTOR MVA)

CORRECT DATES OF APPELLEE'S ADMINISTRATION INSPECTORS VISIT SHEPHERDS DRIVING SCHOOL IN MARCH 2019

- ❖ Wednesday January 9th 2019 – Inspector Demetrius Wright and Inspector Natosha Younger
- ❖ February 7th 2019 - Inspector Demetrius Wright, Inspector Natosha Younger, Section Manager – LaCheryl Jones and a Maryland State Trooper
- ❖ March 6th 2019 – Inspector Jack Meakin and State Trooper
- ❖ March 12th 2019 – Inspector Jack Meakin and State Trooper

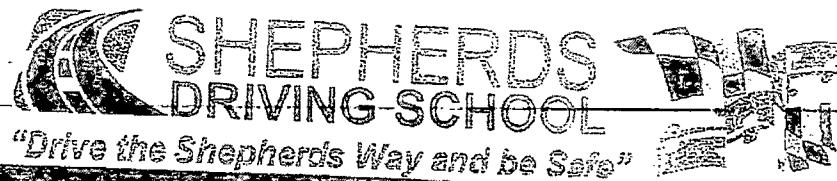
LIST OF SHEPHERDS DRIVING SCHOOL INC. STAFFS SINCE 2017 – 2019

1. YVONNE REIGNAT-VODI - OWNER/PRESIDENT/CEO
2. SMITH KWAME OLIVER VODI - GENERAL MANAGER
3. JESSICA MICHACA CONTRERAS - SECRETARY 1
4. ESTELLA VADAFANE - SECRETARY 2
5. GLENDA LISBETH MEJIA MENA - SECRETARY 3
6. JENNIFER A. CRUZ - SECRETARY 4
7. VOLUNTEERS/CHURCH/SOZMIC - SUBSTITUTING
a. RECEPTIONISTS

SHEPHERDS DRIVING SCHOOL
MVA CERTIFIED LICENSED TRAINER/INSTRUCTORS
PAST & PRESENT (2017-2019)

| <u>NAME</u> | <u>INSTRUCTOR'S ID</u> |
|----------------------------------|------------------------|
| 1. AZUBUIKE NWAOLU | - 35195 |
| 2. YVONNE REIGNAT-VODI | - 35488 |
| 3. EARL GARY GARNER | - 11389 |
| 4. EDDY MARILYN RAMIREZ | - 15916 |
| 5. LEONARD A. DAVIS | - 16047 |
| 6. WILFRED SAHR PEARCE | - 14660 |
| 7. KENNETH LEE SEIVERS | - 35534 |
| 8. TAMBA DUNYAKOR ESSEH-KAMINJAH | - 11779 |
| 9. SAMUEL TORRES QUINOGA | - 13805 |

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 106,
College Park, MD, 20740
Tel: 240-704-3329



7100 Baltimore Avenue | Suite 100
College Park, MD 20740
Tel. 240-704-3329 | Fax: 240-764-5802
info@shepherdsdrivingschool.com

Mr. Smith K. Oliver Vodi
1810 Metzerott Road Apt 47
Adelphi, MD, 20783

Date: 05/24/2017

SHEPHERDS DRIVING SCHOOL EMPLOYMENT AGREEMENT
MR. SMITH KWAME OLIVER VODI/GENERAL MANAGER

Dear Mr. S. K.O. Vodi,

This is an employment agreement, between Shepherds Driving and Mr. Smith Kwame Oliver Vodi under the terms and conditions below;

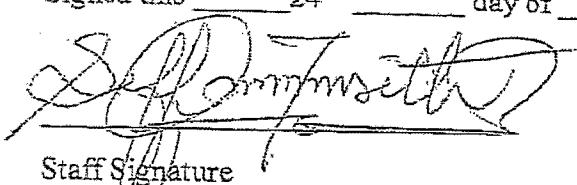
Shepherds Driving School considered your employment on the following terms and conditions:

- (a) The commencement of employment starting from May 24th 2017.
- (b) The company shall pay Mr. Smith Kwame Oliver Vodi a salary of \$25.00 dollars per hour for managing the project of the business at Shepherds Driving School.
- (c) Shepherds Driving School hires Mr. Smith Kwame Oliver Vodi in the capacity of a General Manager.
- (d) It is desired that Mr. Smith Kwame Oliver Vodi devote full time, attention, and energies towards his duties as a General Manager of the Driving School.
- (e) Shepherds Driving School did NOT hire Mr. Smith Kwame Oliver Vodi in the capacity of a Certified Instructor
- (f) Mr. Smith Kwame Oliver Vodi will NOT provide classroom, behind the wheel instruction, test or evaluate any of the students at Shepherds Driving School
- (g) Mr. Smith Kwame Oliver Vodi will NOT drive any of the school vehicles with the MVA LOGO, with the school's name on it to conduct training pertaining the six hours driving instruction required by the students for the driving school.

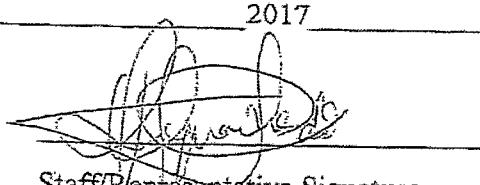
(h) During this term Mr. Smith Kwame Oliver Vodi will not reveal any confidential information to any person or companies outside Shepherds Driving School. If the information be shared to other companies Shepherds Driving School will consider the act as a breach of contract.

It is without cause that Shepherds Driving School may terminate this agreement at any time upon 2 weeks written notice to the employee. Otherwise, the Employee will continue to perform his duties and may be paid his regular salary up to the date of termination.

Signed this 24th day of May 2017



Staff Signature



Staff/Representative Signature

Name in Full: Smith K. O. Vodi

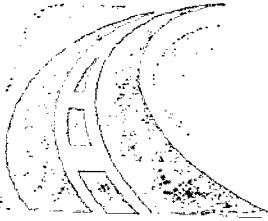
Position Held: General Manager

Date: May 24th 2017

Name in Full: Kwame Reimanat Vodi

Position Held: Oliver

Date: 05/24/2017



DRIVING SCHOOL

7100 Baltimore Avenue
Suite 100
College Park, MD 20740
Tel. 240-704-3329 Fax: 301-955-0906
Email: info@shepherdsdrivingschool.com

Mr. Smith Kwame Oliver Vodi
1810 Metzerott Road Apt 47
Adelphi, MD, 20783

Date: 05/24/2017,

SHEPHERDS DRIVING SCHOOL LETTER OF EMPLOYMENT
SMITH KWAME OLIVER VODI/GENERAL MANAGER

Mr. Smith K. O. Vodi,

It is with great pleasure that I am writing to you to offer you the position of a General Manager with Shepherds Driving School. After carefully reviewed your application, the team had agreed that your willingness, and enthusiasm will be an asset to the company.

Please know that you are on a full-time schedule, and your take home salary will be \$25.00 dollars (twenty five dollars) an hour. However, the criterial for your background check was met, and we have agreed that you work in the capacity of a General Manager.

We welcome you as part of the Shepherds Driving School Team.

Sincerely yours,



Young O. Reignau-Vodi

Owner/President/CEO

Shepherds Driving School

GENERAL MANAGER DUTIES & RESPONSIBILITIES

SMITH KWAME OLIVER VODI;

SHEPHERDS DRIVING SCHOOL

1. **OVERSEE** DAILY OPERATIONS FOR THE BUSINESS OR ORGANIZATION
2. **INSURE** THE CREATION AND IMPLEMENTATION OF A STRATEGY DESIGNED TO GROW THE BUSINESS
3. **COORDINATE** THE DEVELOPMENT OF KEY PERFORMANCE GOALS FOR THE FUNCTIONS AND DIRECT REPORTS
4. **PROVIDE** DIRECT MANAGEMENT OF KEY FUNCTIONAL MANAGERS AND EXECUTIVES IN THE BUSINESS
5. **INSURE** OVERALL DELIVERY AND QUALITY OF THE UNITS OFFERINGS TO CUSTOMERS
6. **ENGAGE** IN KEY OR TARGETED CUSTOMER ACTIVITIES
7. **OVERSEE** KEY HIRING AND TALENT DEVELOPMENT PROGRAMS
8. **EVALUATE** AND DECIDE UPON KEY INVESTMENTS IN EQUIPMENT, INFRASTRUCTURE AND TALENT
9. **COMMUNICATE** STRATEGY AND RESULTS TO THE DRIVING SCHOOL EMPLOYEES
10. **REPORT** KEY RESULTS TO THE OWNER/CEO OF THE DRIVING SCHOOL AND TEAM
11. **ENGAGE** WITH THE TEAM AT SHEPHERDS DRIVING SCHOOL IN A BROADER ORGANIZATION STRATEGY PLAN.
12. **DELEGATE** ADMINISTRATIVE TASKS; SUCH AS ACCOUNTING, PAPERWORK AND PAYROLL
13. **AIDE** IN SERVICES FOR SCHOOL VEHICLES. EXAMPLE. OIL CHANGE, MAINTENANCE, CAR WASH ERRANDS WITH COSCO, SCHOOL MATERIALS, AND THE OVERALL CLEANING OF SCHOOL VEHICLES

State of Maryland
Department of Public Safety and Correctional Services

175010016112-5

Larry Hogan
Governor

Boyd K. Rutherford
Lt. Governor

Stephen T. Moyer
Secretary

Information Technology and Communications Division

Criminal Justice Information System - Central Repository
Post Office Box 32708 - Pikesville, Maryland - 21282-2708
Main No: 410-764-4501 - Toll Free: 1-888-795-0011

William G. Stewart
Deputy Secretary Administration

J. Michael Zeigler
Deputy Secretary Operations

Rhea L. Harris
Assistant Secretary Programs And Services

David N. Bezanson
Assistant Secretary Capital Programs

C. Kevin Combs
Chief Information Officer

Arthur C. Ray, III
Deputy Chief Information Officer

www.dpscs.state.md.us

MARYLAND MOTOR VEHICLE ADMS.

WILLIAM KRAFT
3601 RITCHIE HWY. N.E. RM. 207,
GLEN BURNIE, MD 21062

Received : 07/20/2017

Reference: 175010016112

Originally printed: 2017-07-20

July 21, 2017

Your request for a criminal history record check has been conducted. Information from the Federal Bureau of Investigation (FBI), based upon the fingerprint supported identification information indicated below, has been reviewed.

Name: SMITH KWAME OLIVER VODI
Sex: M Race: B Date of Birth: 09/05/1970

The FBI criminal history investigation has been completed.
The covered individual is not the subject of any criminal charge/charges.

The Maryland Criminal Justice Information System is operated under the authority of the Secretary of the Department of Public Safety and Correctional Services and does not contain data prior to 1978.

Carole Shelton

Carole Shelton, Director
Criminal Justice Information Systems
Central Repository

State of Maryland
Department of Public Safety and Correctional Services

195050007213-4



William G. Stewart
Deputy Secretary Administration
J. Michael Zeigler
Deputy Secretary Operations
David N. Bezanson
Gary W. McLhinney
Rachel Sessa
Assistant Secretary
C. Kevin Combs
Chief Information Officer
Donna Rowlette
Director
www.dpscs.maryland.gov

Larry Hogan
Governor

Boyd K. Rutherford Information Technology and Communications Division
Lt. Governor Criminal Justice Information System - Central Repository
Robert L. Green Post Office Box 32708 - Pikesville, Maryland - 21282-2708
Secretary Main No.: 410-764-4501 - Toll Free: 1-888-795-0011

YVONNE ONIKEH REIGNAT-VODI
1810 METZEROTT RD 47,
ADELPHI, MD 20783

Received: 06/14/2019

June 14, 2019

Your request for a criminal history record check of Maryland's Criminal Justice Information System has been completed. This record check was based upon the identification information as follows:

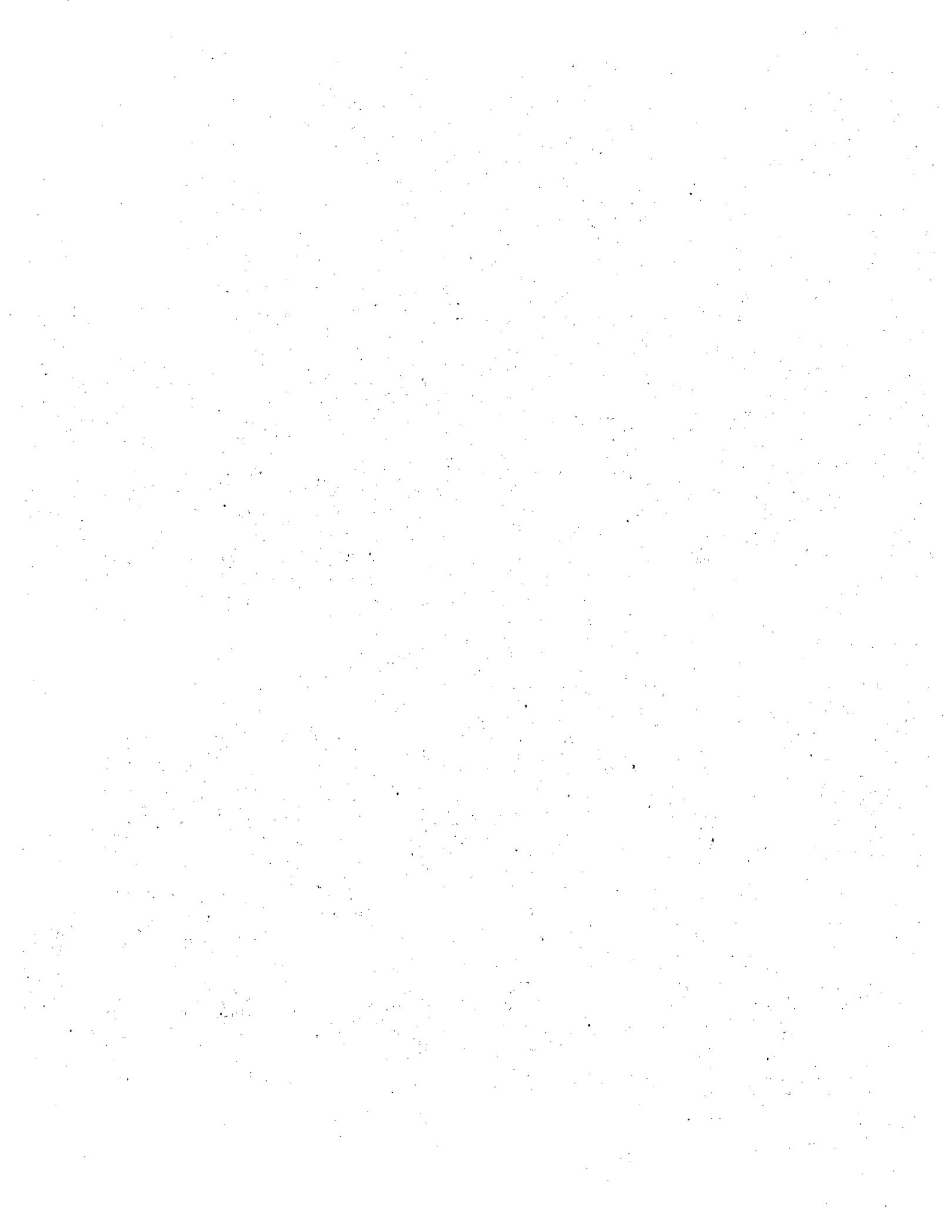
YVONNE ONIKEH REIGNAT-VODI
Sex: F Race: B Date of Birth: 03/24/1974

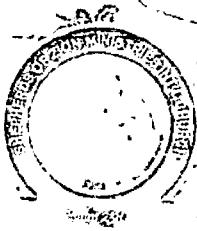
- No criminal history was found under the Maryland statute or regulation authorizing you to receive the information.
- A fingerprint supported national criminal history record check has been initiated. The results of that investigation will be sent to the requesting agency only.

The Maryland Criminal Justice Information System is operated under the authority of the Secretary of the Department of Public Safety and Correctional Services and may not contain data prior to 1978.

Donna Rowlette

Donna Rowlette, Director
Criminal Justice Information Systems
Central Repository





International Church

William Kraft, Section Manager

Division of Driver Instructional Services

Room 207, Motor Vehicle Administration

6601 Ritchie Highway, NE

Glen Burnie, Maryland 21062-0001

Smith Kwame Oliver Vodi

1810 Metzerott Road #47

Adelphi, MD, 20783

Date: 10/15/2019

Dear Mr. William Kraft,

**REQUESTING A HEARING: REINSTATEMENT OF
DRIVER EDUCATION INSTRUCTIONAL CERTIFICATION &
EXPUNGEMENT OF CONSENT ORDER OF 06/05/2012 &
NOTICE TO STAY OFF PROPERTIES OWNED AND/OR
OPERATED BY THE MVA**

I am hereby requesting a hearing at the office of the Administrative Hearing for reinstatement of my Instructor's certification for Driver Education Program.

Also, I am requesting an expungement of the consent order dated 06/05/2012 and a dismissal of notice to stay off properties owned and/or operated by the Maryland Motor Vehicle Administration served by Internal Investigator John C. Poliks on 04/30/2014.

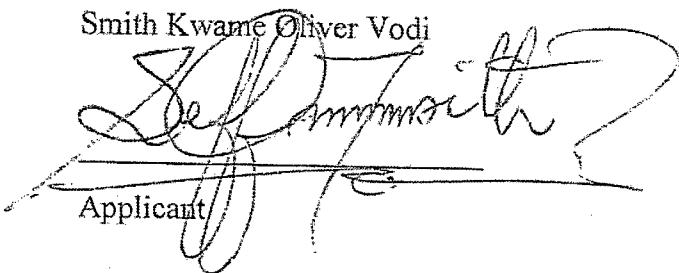
pastor@shepherdsofzion.org

Tel. 240-475-1876 | 240-393-9125 | Fax: 240-764-5802

Attached is a form filled out Counter #213 requesting an Administrative Hearing and a copy of the stay off properties notice owned and/or operated by the Maryland Motor Vehicle Administration.

Sincerely,

Smith Kwame Oliver Vodi


Applicant



Larry Hogan
Governor
Boyd K. Rutherford
Lt. Governor
Pete K. Rahn
Secretary
Christine Nizer
Administrator

October 16, 2019

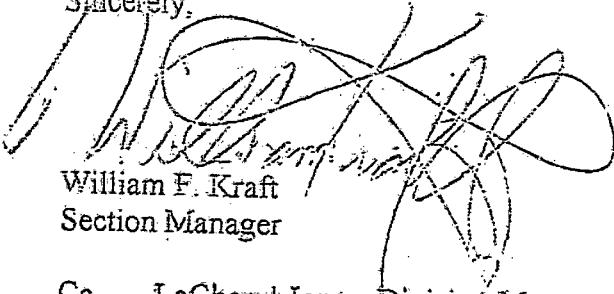
Smith Kwame Oliver Vodi
1810 Metzerott Road #47
Adelphi, Maryland 20783

Mr. Vodi:

The request for an Administrative hearing that you submitted at counter 213, at the Maryland Department of Transportation Motor Vehicle Administration (MDOTMVA) offices in Glen Burnie, Maryland, at 12:00 pm on October 15, 2019, was forwarded to our office.

A request for an administrative hearing must be submitted within 15 days of any action taken by the Administration regarding a license or application for a license. Your request for an administrative hearing is denied as there has been no recent action against any license or application for a license in your name.

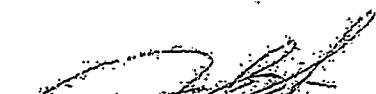
Sincerely,

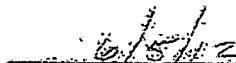


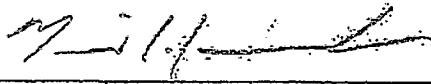
William F. Kraft
Section Manager

Cc LaCheryl Jones, Division Manager
Madison Lumpkin, Program Director
Damon Bell, Lead Counsel, Attorney General's Office
David Merkin, Assistant Attorney General
file

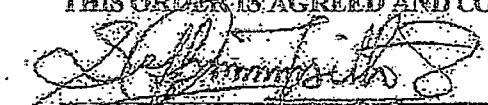
FOR THE MOTOR VEHICLE ADMINISTRATION:


JOHN C. ADMINISTRATOR
Motor Vehicle Administration
Room 200
6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062


Date


NEIL L. JACOBS
Assistant Attorney General
Office of the Attorney General
Motor Vehicle Administration
6601 Ritchie Highway, N.E., Room 200
Glen Burnie, Maryland 21062
(410) 768-7414
Counsel to the Motor Vehicle Administration

THIS ORDER IS AGREED AND CONSENTED TO:


SMITH, WATIE, OLIVER, VODI
329 University Boulevard, East
Silver Spring, Maryland 20901


Date

Kwami Owoukor

Tel: 240-590-9278

Date: 03/22/19

To whom this may concern: There was an incident that took place on Wednesday Jan, 9 2019, that had me and the whole class distracted from drivers education learning which involve safe driving by the MVA. There was two MVA officials including a young lady a state trooper walked into the driving school. They rushed into the classroom without Ms. YVONNE the owner's permission. Their behavior caused me to have short term memory of losing focus on the unit for that day. I was requesting Ms. YVONNE our instructor to repeat the unit again but manage to pass the unit at the end. The whole class was distracted by the MVA officials especially the lady that was talking so loud, she wasn't calm but aggressive demanding some folders from Ms. Yvonne. Ms. Yvonne told them to come back after class.

I suggest the MVA comes in a different time to get the folders and not when she is teaching a class. They got to give Ms. Yvonne some time to put those folders in place. This was absolutely wrong for me and the rest of the students. Also, they give us a wrong impression about my instructor Ms. YVONNE assuming she is a bad person when she is not. She is just a great instructor.

I will need a refund from the MVA for that day.

Thank You!

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-3326

Received
3/22/19

STATEMENT BY JOSEPH BRYSON

Joseph Bryson Wilder to Miss Yvonne:

The only thing I remember was after the instructions were given I wasn't really listening and a girl in front of me ripped her top sheet off

I noticed in the class some were doing it and some weren't so I asked the girl in front of me if she was certain she was supposed to do that

She said she was positive so I did it as well. A couple minutes later you (Miss Yvonne) asserted to us that this was incorrect.

If Ms. Leena Mohammad sat in the front or 2nd to front row in front of me (Joseph Bryson Wilder), then she perpetuated this happening. If not, then it was some random girl who thought she knew what to do and was incorrect.

Unfortunately I don't remember what the girl in front of me looked like as it was so long ago at this point. That is all I remember.

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-3325

Received
3/22/2019

From: Adedapo Adejonwo
Sent: Saturday, March 23, 2019 10:21 PM
To: SHEPHERDS DRIVING SCHOOL INC.
Subject: Re:

TESTIMONY ON LEENA MUHAMMED
Sept.10th - Sept 21st.

That I feel totally sad & appalled writing this is a mere understatement, a great citadel of learning & mastering different driving techniques doesn't deserve this treatment from an ill brought up teen. I do hope she get rewarded accordingly for her lies, actions & smear campaign against shepherd driving school.

Its really sad seeing a great establishment like Shepherds Driving School being sued by a teen whose major objective while in class was to disrupt & cause unnecessary chaos. My driving school experience would have been one for the books, but the nefarious character & actions of miss leena Muhammed would forever be a dent on a serene and peaceful environment Shepherds Driving School provided.

I could remember vividly that one of her rather dastardly actions is making other students tear up their mva answer sheet, it was one of many of her rather atrocious actions, i could write on & on, but the fact still is Shepherds driving School needs to be reopened as soon as possible because they have produced good drivers & better humans who are productive in the communities. Shepherds driving School Great Citadel of Learning.

On Sat, Mar 23, 2019, 21:41 Adedapo Adejonwo <adejonwoadedapo@gmail.com> wrote:

That I feel totally sad & appalled writing this is a mere understatement, a great citadel of learning & mastering different driving techniques doesn't deserve this treatment from an ill brought up teen. I do hope she get rewarded accordingly for her lies, actions & smear campaign against shepherd driving school.

Its really sad seeing a great establishment like Shepherd's Driving School being sued by a teen whose major objective while in class was to disrupt & cause unnecessary chaos. My driving school experience would have been one for the books, but the nefarious character & actions of miss leena Muhammed would forever be a dent on a serene and peaceful environment Shepherds Driving School provided.

I could remember vividly that one of her rather dastardly actions is making other students tear up their mva answer sheet, it was one of many of her rather atrocious actions, i could write on & on, but the fact still is Shepherds driving School needs to be reopened as soon as possible because they have produced good drivers & better humans who are productive in the communities. Shepherds driving School Great Citadel of Learning.

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-8328

3/23/2019

From: Sanai Harris
Sent: Monday, March 25, 2019 6:42 AM
To: SHEPHERDS DRIVING SCHOOL INC.
Subject: Sanai's Harris Statement

At the end of class one day, our instructor, Mrs. Yvonne, had everyone sign a paper that would be going to the MVA, as a record to show that we had taken and completed her driving class. Mrs. Yvonne told us to only sign the white part of the paper and then give it back to her. Other students in my class signed the paper and continued to rip off the top sheet and the second one as well. Mrs. Evyone specifically told us not to do that, so she collected the papers, put them on the ground and began to take pictures of the evidence to send to the MVA. While she was taking pictures, students were laughing and making disrespectful joke Not everyone in my class that day disobeyed her command but about 80% of the class was in the wrong. Mrs. Yvonne was a great driving instructor in my personal opinion and she was always respectful. I'm absolutely thankful that I was about to be one of her students.

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100, *D*
College Park, MD, 20740
Tel: 240-704-3229
Rec'd 3/25/19

From: Willow Shipperley
Sent: Thursday, June 13, 2019 2:59 PM
To: SHEPHERDS DRIVING SCHOOL INC.
Subject: Re: Driving Times

Sure!

This is the testimony (what I like about the class and how it helped me, why it's the best one for me etc): "I really want to finish my 6 hours of driving with Shepherds. I completed the class with them, and I feel safe competing the driving with them because they were very strict with the laws of the road, and I think it would be very useful to have that kind of aid while practicing. This school was professional, and took time to go over concepts multiple times if we were confused or had any questions. There was never any negativity or rudeness from the instructors, and they were very professional. No phones allowed, we went over all of the slides provided by the MVA, we used the provided workbooks and workbook discussion prompts, etc. In addition, when I paid for the school, it included the cost of the 6 hours (a discount deal for the in class instruction and driving, together). I would like to get what I paid for. This is the only school close enough that I can walk to. I am a senior in college at UMD college Park, so I don't have access to parents or friends who can drive me. In summary, this is the only school I can physically get to, the school that I paid for, and the school whose teachers I am comfortable with.

I would like to complete these six hours as soon as possible, so I can make that step into adulthood (albeit slightly behind my peers) and get my license. I hope that this school can get back on track and continue to teach students in Maryland of any age (above the legal minimum) how to drive safely and legally."

I hope that is helpful to you! Let me know if you need anything else!
-Willow

On Thu, Jun 13, 2019, 14:35 SHEPHERDS DRIVING SCHOOL INC. <info@shepherdsdrivingschool.com> wrote:

Thank you Willow. That's our hope too..We did not receive you testimony. Can you resend it back to this email address please.

Thank you!

Management Team

IDS

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-8820

The Executive Building UMD Campus

7100 Baltimore Ave Suite 100,

College Park,

MD 20740

Dear Shepherd's Driving school,

I am so sad to hear that you have been closed since March of this year. I enjoyed attending my driving classes there. The instructors were warm and welcoming and I felt comfortable. As a student at the University of Maryland, going to Driving school after my classes was not a burden too heavy for me. It was actually a nice break. The school always had food and drinks to offer the students and for that we are appreciative. I struggled with driving at first, but the owners and instructors showed so much patience with me. They offered me lessons which helped me improve greatly.

Overall, I had a positive experience with SDS and I am thankful for the team. I am now a confident licensed driver!

Sincerely,

Sonia Sarre

Former Student of SDS

Shepherds Driving School Inc.

7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-5329

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100
College Park, MD, 20740
Tel: 240-704-5329

From: Karen Carrillo
Sent: Friday, October 11, 2019 1:17 PM
To: SHEPHERDS OF ZION MINISTRIES INTERNATIONAL CHURCH INC.
Subject: Fwd: My experience

----- Forwarded message -----

From: Karen Carrillo <karencarrillo34@gmail.com>
Date: Fri, Oct 11, 2019, 1:14 PM
Subject: Fwd: My experience
To: <Info@shepherdsdrivingschool.com>

----- Forwarded message -----

From: Karen Carrillo <karencarrillo34@gmail.com>
Date: Fri, Oct 11, 2019, 4:57 AM
Subject: My experience
To: <Info@shepherdsdrivingschool.com>

Good Morning My name is Karen Carrillo Just wanted to share my experience with you about shepherds driving school. It's been a little over a year that i've attended shepherds .I am really greatful for the patience that ms.yvon had with me i think I wouldn't have done it without her. She did an excellent job at the classes explained to me and the class with alot of detail to make sure we were on the same place. Also Ms.Yvon did the behind the wheel with me did a fantastic job I went to pass my driving test on the first try.I am now really sad to know the school is out of business . I really hope everything gets fixed I've sent people to go sign up for driving school with shepherds driving school but I was told that they can't receive people til the problem gets fixed.So I really hope everything gets fixed and starts back to business.

Thank you.

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-6329

From: Hope Chidume <chidumehope@gmail.com>
To: info@shepherdsdrivingschool.com

Cc:

Bcc:

Date: Thu, 10 Oct 2019 14:56:18 -0400

Subject: Positive Reports of Shepherdsdrivingschool.

My name is Hope Chidume, i was a student of the above name driving school and my experience with the school is one of a kind, Ms Yvonne thought me in classroom and also took me behind the wheel and i can boldly say that she's very good at what she's doing and would always be happy to recommend new student drivers to Shepherdsdrivingschool.

2

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel 240-704-3329

From: Monique Thompson
Sent: Friday, October 11, 2019 1:30 PM
To: SHEPHERDS OF ZION MINISTRIES INTERNATIONAL CHURCH INC.
Subject: Fwd: Shepherd's Driving

Sent from my iPhone

Below is forwarded message:

From: Monique Thompson <sexymonique84@icloud.com>
Date: October 10, 2019 at 11:15:21 PM PDT
To: Info@shepherdsdrivingschool.com
Subject: Shepherd's Driving

I am writing this letter of reference in regards to Shepherds Driving School, I attended classes there last November in order to obtain my driver's license and I can wholeheartedly say that Ms Yevvon and her husband was always kind, professional, helpful administrators. If ever I needed any help with something I didn't understand in class she was always there willing to go the extra mill for me and my fellow classmates. With her help I passed my class and got my license the first try. I would recommend anyone to her school because she is dedicated to her students and she will go the extra mile to make sure they all succeed...

Yours sincerely

Monique Thompson
Sent from my iPhone

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-3329

From: amoyquest123@gmail.com
Date: Sun, Oct 27, 2019 at 12:09 AM
Subject: Reference
To: info@shepherdsdrivingschool.com

Good afternoon Sir/Madam

I'm writing to you this afternoon in regards to my experience at Shepherds Driving School. This was one of the most rewarding, informative, life changing experience of my life. My instructors were professional, patient and kind they took the time to make sure my needs were met and I was knowledgeable about everything that driving entails and for that I will always be grateful

Yours Truly
Amoy Quest

David Sutherland

7:34 PM (34 minutes ago)

I went to Shepherds Driving School to get my provisionals license and they're an excellent Driving School. Ms Yvonne made sure I was able to understand and learn about the rules of the road. I payed attention and stayed focused and passed all of my exams at the end of each class session. They also helped me with my behind the wheel sessions by making sure I was driving correctly and safely. I recommend this Driving School to anyone who is interested in getting their license!

Sent from my iPhone

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-3329

Leonard Albert Davis

On March 20, 2019 I was contacted by the general manager of Shepherd Driving School whom informed me of an amended complaint which included a former student whom has altered her statements made in a complaint to include some kind of inappropriate statements toward her allegedly made by me Mr. Davis on or about November 10th 2019 I was an employee of Shepherd Driving School in November of 2018 and I believe I was on a drive as an instructor with Miss. Leena Mohamed the student in question is a juvenile female still in high school whom was clearly upset with the owner of the school Mrs. Yvonne Reignat-Vodi whom she was engaged in a heated discussion that turn into a disagreement about her dive time which was settled by Mr. Smith Vodi in the favor of Miss. Mohamed whom was able to go on the drive instead of the student I was scheduled to instruct during the drive Miss Mohamed expressed her need for revenge several times as she spoke off the history of the ongoing feud she had with Mrs. Reignat-Vodi expressing how her mother and her were disrespected in a meeting while being recorded I as she to focus on her driving and eventually had her pull over at a nearby 711 parking lot and give her a few minutes to calm her mind I then got back into a driving routine in which the final stages are designed to check the students sense of direction when we are one turn or one block away from the spot we started at I lean my head to the right so the student can't see my eyes which are opened and my foot is covering the instructor's brake I intentionally make snoring noise to get the student to laugh and or feel a sense of confidence or panic to test their ability to stay focused on the driving task which most students recognize as a ruse of the second drive I can assure anyone this is a routine ruse I have used for many years without incident or complaint until now.

Declaration and to be clear I Leonard Davis under the penalties of perjury in the state of Maryland and in the watchful eyes of all might god do so solemnly swear I never made any comments or statements of a sexual nature toward the juvenile in question Miss. Leena Mohamed on that day or at any other time and I further swear I have use this same technique for years and that she was never in any type of danger I am also enclosing the original detailed complaint for the record in hope to shed some light on these latest outrageous allegations.

Leonard A. Davis

Formerly, of Shepherds Driving School

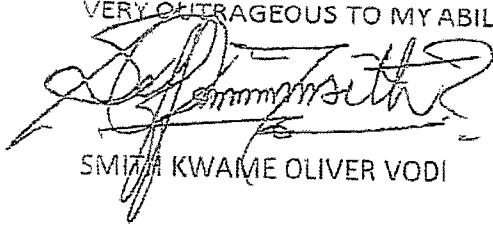
443-794-7188

TESTIMONY ON THE ALLEGATION MR. SMITH KWAME OLIVER VODI

I SMITH KWAME OLIVER VODI, DO SOLEMLY SWEAR THAT I HAVE NEVER DROVE A STUDENT AT SHEPHERDS DRIVING SCHOOL FOR COMPENSATION. I AM EMPLOYED AT SHEPHERDS DRIVING SCHOOL AS A GENERAL MANAGER AND NOT AN INSTRUCTOR.

I AFFIRMED THAT THESE ALLEGATIONS MADE BY THE MARYLAND MOTORVEHICLE ADMINISTRATION ARE TOTALLY FALSE.

DECLARATION: AND TO BE CLEAR: I SMITH KWAME OLIVER VODI UNDER THE PENALITIES OF PERJURY IN THE STATE OF MARYLAND AND UNDER THE ALMIGHTY GOD DO SOLEMLY SWEAR THAT I HAVE NEVER DRIVEN A STUDENT FOR COMPENSATION AT SHEPHERDS DRIVING SCHOOL. I FURTHER SOLEMELY SWEAR THAT I HAVE NEVER USED ANY OF THE DRIVNG SCHOOL VEHICLES IN THE PURPOSE OF CONDUCTING ANY UNLICENSED INSTRUCTORS BUSINESS AT SHEPHERDS DRIVING SCHOOL. IT'S CLEARLY STATED ON THE AGREEMENT AGREED SIGNED AND AGREED ON MY HIRING LETTER OF THE DRIVING SCHOOL BY MS. YVONNE REIGNAT-VODI "OWNER" SHEPHERDS DRIVING SCHOOL ON 2017. I THEREFORE, AFFIRMED THAT THESE ALLEGATIONS ARE VERY OUTRAGEOUS TO MY ABILITY AND THEY ARE NOT TRUE.



SMITH KWAME OLIVER VODI

GENERAL MANAGER

SHEPHERDS DRIVING SCHOOL

TEL: 240-393-9125

DATE: 06/10/2019

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-3328

TESTIMONY ON THE ALLEGATIONS SMITH K.O. VODI: YVONNE G.
REIGNAT-VODI OWNER: SHEPHERDS DRIVING SCHOOL

Driving School Vehicles: Mr. Smith was hired as a General Manager, and fully aware that he is not to perform any duties as an instructor. This was clearly indicated and signed on his hiring letter on 2017. However, during the opening of the school in 2017; I called Toyota 355 and requested for another vehicle so Mr. Smith can abstain from driving any of the driving school vehicles. Mr. Smith drives a Private Vehicle No. 9CX9188 (PV) at the driving school. The personal vehicle is used for other activities, like road/skills test with a certified instructor and a licensed driver Mr. Samuel Boateng to the MVA.

Also, it was indicated on the second verdict that Mr. Cui never attended Shepherds Driving School neither took private practice with the school. Copy of his learner's permit was handed over to Attorney Bert Kapinus and the judge in court on the day of the hearing. I obtained a copy of Mr. Cui's learners permit during the time of the investigation. These allegations are totally false as we have never conducted such business with him. I have gone through the business account for bank statement indicating that Mr. Cui paid for driving lessons. There are no statements found that Mr. Cui paid an unlicensed driver for driving purposes at Shepherds Driving School. Forward to your office are copies of the personal vehicle and insurance for verification for Mr. Smith Vodi.

Second, the MVA indicated that "I failed to make operation and student records available for inspection by the Administration during the school's business hours". This is so not true. I have never refused to make operation and student records to the MVA. Since, 2017 they always come in unannounced, and review the files on a regular basis. I was told by Mr. William Bill Kraft that they must notify me before coming to the driving school, but they failed to do so. The inspectors walked into the classroom during class times with no formal notification. Also, I had to make copies of the files before handing them over to the MVA officials. They failed to come back and pick up the files

I Yvonne Reignat-Vodi do solemnly swear that I have never refused to grant the MVA access to the files on any of their visits. I affirmed that these allegations are totally not true and are baseless.

Declaration: I Yvonne Reignat-Vodi under the penalties of perjury in the State of Maryland and under the almighty God do solemnly swear that Mr. Smith have never drove a student for compensation at Shepherds Driving School. I further solemnly swear that Mr. Smith Kwame Oliver Void has never drove any of my school vehicles as this is clearly stated on his hiring letter as the General Manager at Shepherds Driving School.


Yvonne Reignat-Vodi

Shepherds Driving School
Tel: 240-704-3329

Date: 25/10/2019

Shepherds Driving School Inc.
7100 Baltimore Avenue, Suite 100,
College Park, MD, 20740
Tel: 240-704-3329

SHEPHERDS DRIVING SCHOOL

VEHICLES LICENSED PLATES

- ❖ 4CP8279 (MVA LOGO)
- ❖ 7CR1706 (MVA LOGO)
- ❖ 5DN3561 (MVA LOGO)
- ❖ 9CX9188 (PRIVATE VEHICLE)

Management Team

SDS!

Shepherds Vehicle 1

Registration & Insurance



6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062

Motor Vehicle Administration

REGISTRATION CERTIFICATE



| TAG NUMBER 7CR1706 | | UNIT # | STICKER NUMBER 7CR1706 | |
|--|-----------------------|---|--|--|
| TITLE NUMBER 48570007 | | MAKE AND BODY STYLE OF VEHICLE TOYT 4S | | |
| YEAR 16 | CLASS A | EXCEPT N/A | VEHICLE IDENTIFICATION NUMBER 2T1BURHE9GC741233 | |
| GR. VSH. WT. -3700 | GR. COMB. WT 00N/A | SEE \$135.00 | EXPIRATION DATE 11/30/20 | |
| OWNER'S LICENSE SOUNDEX NO. Z975002550679 | | CO-OWNER'S LICENSE SOUNDEX NO. R253968662237 | | |

NAME(S) AND ADDRESS OF REGISTERED OWNER(S)

SHEPHERDS DRIVING SCHOOL INC
C/O YVONNE ONIKEH REIGNAT-VODI
1810 METZEROTT RD APT 47
ADELPHI MD 20783-5167

THIS CARD IS NOT A LICENSE TO DRIVE

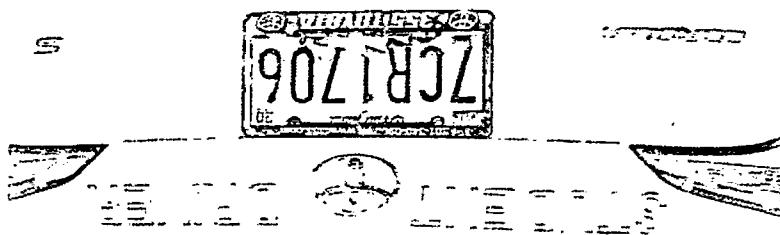
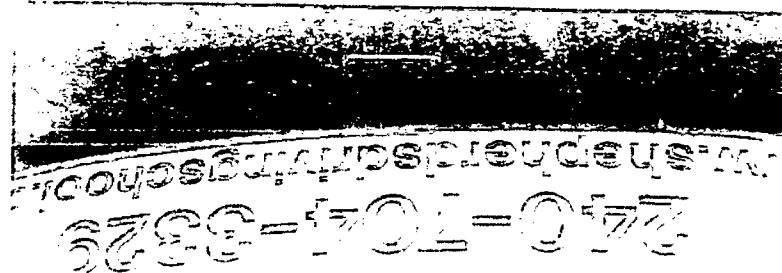
MARYLAND INSURANCE CARD

INSURED SHEPHERDS DRIVING SCHOOL

MULTL
VOL

POLICY NUMBER 259 5639-D20-20A EFFECTIVE
YR 2016 MAKE TOYOTA OCT 20 2016 to APR 20 2019
MODEL COROLLA VIN 2T1BURHE9GC741233
AGENT WILLIAM H CARVER INS AGCY INC 919E-AB6
PHONE (301)270-2800 NAIC 25178
A BODILY INJURY/PROPERTY DAMAGE LIABILITY
P1 PERSONAL INJURY PROTECTION
D 200 DEDUCT COMPREHENSIVE
G 500 DEDUCT COLLISION
U

SEE REVERSE SIDE FOR ADDITIONAL COVERAGE INFORMATION



Stevensville 4

Shepherds Vehicle 2

Registration & Insurance



6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062

Motor Vehicle Administration REGISTRATION CERTIFICATE



TAG NUMBER
4CP8279

UNIT #

STICKER NUMBER
4CP8279

TITLE NUMBER
48569727

MAKE AND BODY STYLE OF VEHICLE

TOYT 4S

YEAR

16

CLASS

A

EXCEPT.

N/A

VEHICLE IDENTIFICATION NUMBER

2T1BURHE9GC743449

GR. VEH. WT
-3700

GR. COMB. WT.
00N/A

FEES

\$135.00

EXPIRATION DATE
11/30/20

OWNER'S LICENSE SOUNDEX NO.
Z975002550651

CO-OWNER'S LICENSE SOUNDEX NO.
R253968662237

NAME(S) AND ADDRESS OF REGISTERED OWNER(S)

SHEPHERDS DRIVING SCHOOL INC
C/O YVONNE ONIKEH REIGNAT-VODI
1810 METZEROTT RD APT 47
ADELPHI MD 20783-5167

THIS CARD IS NOT A LICENSE TO DRIVE

MARYLAND INSURANCE CARD

INSURED SHEPHERDS DRIVING SCHOOL

MUTL
VOL

POLICY NUMBER 259 5637-D20-20A EFFECTIVE

YR 2016 MAKE TOYOTA OCT 20 2018 to APR 20 2019

MODEL COROLLA VIN 2T1BURHE9GC743449

AGENT WILLIAM H CARVER INS AGCY INC 919E-AB6

PHONE (301)270-2600 NAIC 25178

A BODILY INJURY/PROPERTY DAMAGE LIABILITY

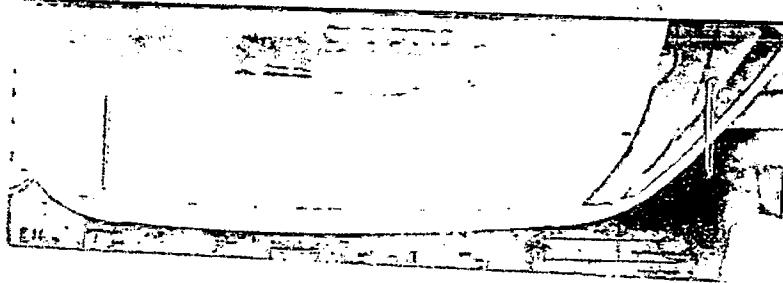
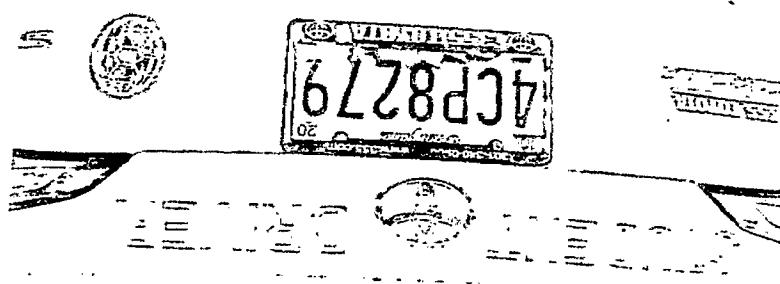
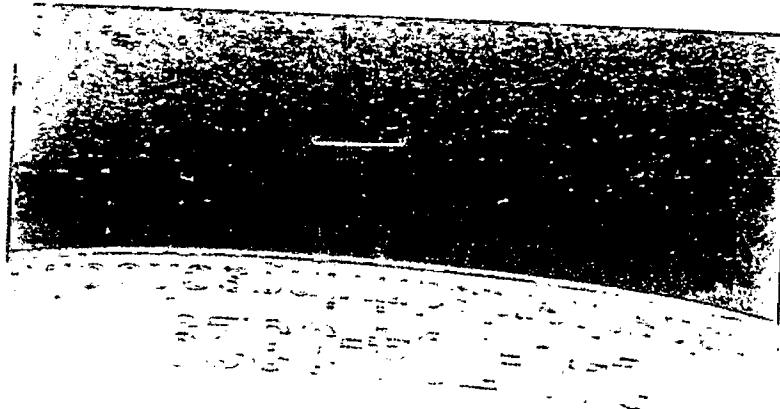
P1 PERSONAL INJURY PROTECTION

D 200 DEDUCT COMPREHENSIVE

G 500 DEDUCT COLLISION

U

SEE REVERSE SIDE FOR ADDITIONAL COVERAGE INFORMATION



Shoefields Vehicle 2

Shepherds Vehicle 3

Registration & Insurance



MOTOR VEHICLE ADMINISTRATION

Motor Vehicle Administration

6601 Ritchie Highway, N. E.
Glen Burnie, Maryland 21062

REGISTRATION CERTIFICATE



2020-1071641

| | | | |
|--|------------------------|---|--|
| TAG NUMBER 5DN3561 | | UNIT # TEC | STICKER NUMBER 1071641 |
| TITLE NUMBER 51000677 | | MAKE AND BODY STYLE OF VEHICLE TOYT 4H | |
| YEAR 2019 | CASE APD | EXCEPT N/A | VEHICLE IDENTIFICATION NUMBER 2T1BURHE9KC147363 |
| GR. VEH. WT. -3700 | GR. COMB. WT. 00N/A | FEES S 135.00 | EXPIRATION DATE 11/30/2020 |
| OWNER'S LICENSE SOUNDEX NO. Z975002920072 | | CO-OWNER'S LICENSE SOUNDEX NO. | |

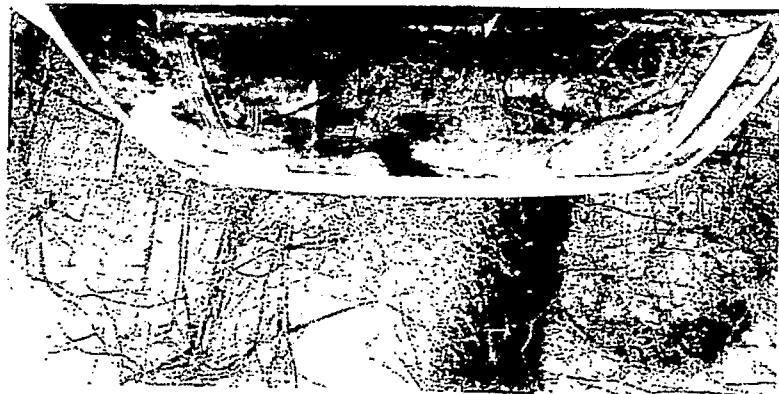
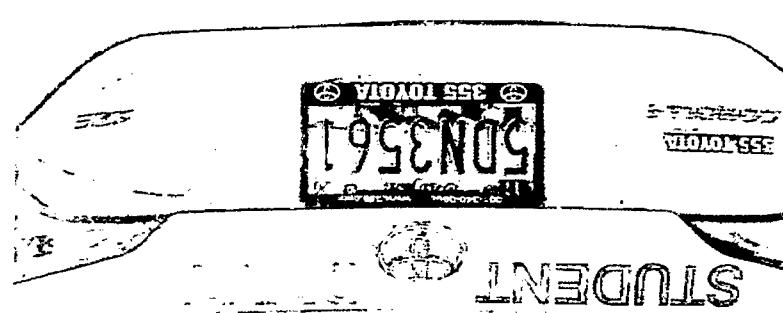
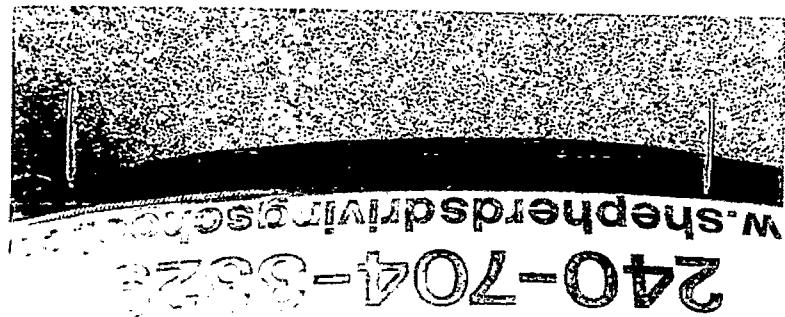
NAME(S) AND ADDRESS OF REGISTERED OWNER(S)
SHEPHERDS DRIVING SCHOOL INC
7100 BALTIMORE AVE STE 100
COLLEGE PARK, MD 20740

MARYLAND INSURANCE CARD

INSURED SHEPHERDS DRIVING SCHOOL

| | | |
|--|---|--------------|
| POLICY NUMBER 342 1401-D25-20 | EFFECTIVE OCT 25 2018 to APR 25 2019 | MULTL VOL |
| YR 2019 MAKE TOYOTA MODEL COROLLA | VIN 2T1BURHE9KC147363 | |
| AGENT WILLIAM H CARVER INS AGCY INC PHONE (301)270-2800 | NAIC 25176 | 919E-AB6 |
| A BODILY INJURY/PROPERTY DAMAGE LIABILITY | | |
| P1 PERSONAL INJURY PROTECTION | | |
| D 200 DEDUCT COMPREHENSIVE | | |
| G 500 DEDUCT COLLISION | | |
| U | | |

SEE REVERSE SIDE FOR ADDITIONAL COVERAGE INFORMATION



Shepheard's Vehicle 3

Personal Vehicle



6601 Ritchie Highway, N. E.
Glen Burnie, Maryland 21062

REGISTRATION CERTIFICATE

| | | | | | |
|--|------------------------|-----------------|--|---------------------------|--|
| TAG NUMBER 9CX9188 | | UNIT # | | STICKER NUMBER 0757873 | |
| TITLE NUMBER 49337356 | | | MAKE AND BODY STYLE OF VEHICLE TOYT 4S | | |
| YEAR 2017 | CLASS A | EXCEPT N/A | VEHICLE IDENTIFICATION NUMBER 2T1BURHE8HC846153 | | |
| GR. VEH. WT. -3700 | GR. COMB. WT. 00N/A | FEE \$135.00 | EXPIRATION DATE 0619 | | |
| OWNER'S LICENSE SOUNDEX NO. R253968662237 | | | CO-OWNER'S LICENSE SOUNDEX NO. | | |

NAME(S) AND ADDRESS OF REGISTERED OWNER(S)

YVONNE ONIKEH REIGNAT-VODI
1810 METZEROTT RD APT 47
ADELPHI MD 20783



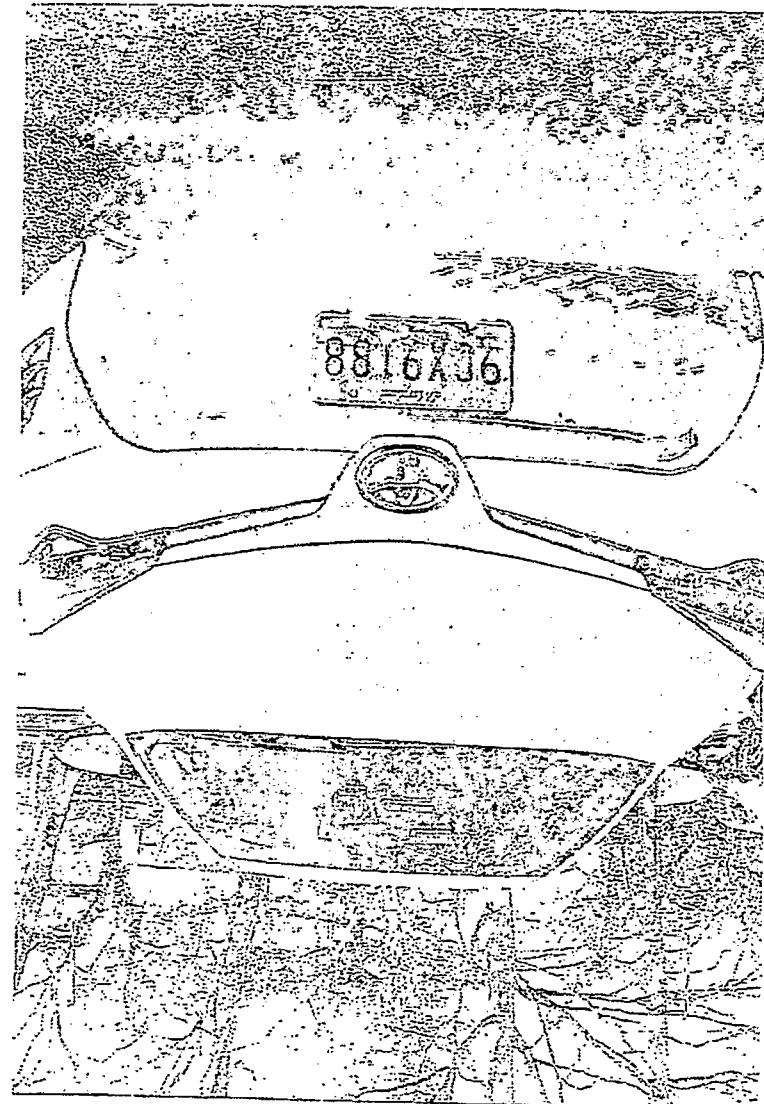
Maryland Insurance Identification Card
1-800-841-3000

GEICO CASUALTY COMPANY
One GEICO Boulevard • Fredericksburg, VA 22412-0003

Please keep this ID card in your vehicle at all times.
You may be required to produce it upon demand of law
enforcement.

| | | |
|--------------------------------|----------------------------|-------------------------------------|
| Policy Number 4329-38-92-01 | Effective Date 12-01-18 | Expiration Date 06-01-19 |
| Year 2017 | Make TOYOTA | Model COROLLA |
| | | Vehicle ID No. 2T1BURHE8HC846153 |

Insured:
Yvonne O Vodi
Smith K Vodi



Frontal Vehicle

Ms. LaCheryl Jones
Division Manager
Driver Instructional Services Room 207
Maryland Motor Vehicle Administration
6601 Ritchie Highway NE.
Glen Burnie, MD 21062

Date: 03/27/2019

REQUESTED FILES, CERTIFICATE AND LICENSE, MARYLAND
MOTOR VEHICLE ADMINISTRATION

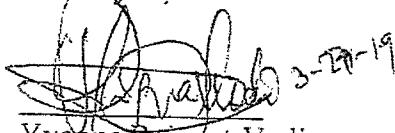
Dear Ms. LaCheryl Jones,

Forward to your office are files requested by the Maryland Motor Vehicle Administration during the time of investigation for Shepherds Driving School. Files forwarded to your office is between September 1st 2018 – December 31st 2018.

Due to my busy schedule at the office I have asked Mr. Smith Kwame Oliver Vodi, my husband to drop off the binders at your office. Enclosed are student completion records of both classroom and behind the wheel lessons.

If you need further information you can reach me on 240-704-3329/410-900-0543.

Thank you,



3-27-19

Yvonne Reignat-Vodi
Owner
Shepherds Driving School

Mr. William Kraft
Division Manager
Driver Instructional Services Room 207
Maryland Motor Vehicle Administration
6601 Ritchie Highway NE.
Glen Burnie, MD 21062

Date: 03/29/2019

**RE: REQUESTED FILES, CERTIFICATE AND LICENSE, MARYLAND
MOTOR VEHICLE ADMINISTRATION**

Dear Mr. William Kraft,

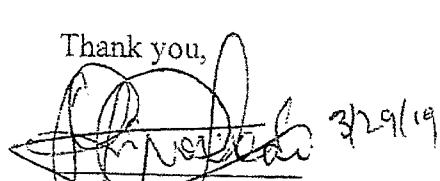
Forward to your office are files requested by the Maryland Motor Vehicle Administration during the time of investigation for Shepherds Driving School. Files forwarded to your office are from June 2017 – March 2019.

All student records were handed over to Counsellor Bert Kapinus in the month of February after receiving the Subpoena Duces Tecum. All student records were presented during the Administrative hearing but your Administration refused to accept the records.

Glad Mr. Smith Vodi, and I were able to drop off all student records at your office in person and in the presence of Assistant Attorney General David Merkin.

If you need further information you can reach me on 240-704-3329/410-900-0543.

Thank you,



3/29/19
Yvonne Reignat-Vodi
Owner
Shepherds Driving School

SHEPHERDS DRIVING SCHOOL
CLASSROOM & BEHIND THE
WHEEL COMPLETED STUDENTS
RECORDS 2018

SHEPHERDS DRIVING SCHOOL
CLASSROOM & BEHIND THE
WHEEL COMPLETED STUDENTS
RECORDS 2018

09/01/18 - 10/03/18

09/01/18 - 10/03/18

9/01/18 - 10/03/18

SDS CLASSROOM & BTW COMPLETED RECORDS

8-11/3/18

SDS CLASSROOM & BTW COMPLETED RECORDS

59 STUDENTS

56 STUDENTS

YVONNE REIGNAT-VODI, D/B/A * BEFORE MICHAEL J. WALLACE,
SHEPHERD'S DRIVING SCHOOL, INC. * AN ADMINISTRATIVE LAW JUDGE
LICENSEE * OF THE MARYLAND OFFICE
V. * OF ADMINISTRATIVE HEARINGS
MOTOR VEHICLE ADMINISTRATION * OAH NO.: MDOT-MVA-15-19-07115
* * * * *

MOTOR VEHICLE ADMINISTRATION'S MOTION FOR REVISION
OF FINAL DECISION

COMES NOW the Motor Vehicle Administration ("MVA") request pursuant to Code of Maryland Regulations ("COMAR") § 28.02.01.27, for revision of the Decision dated May 20, 2019, by Administrative Law Judge ("ALJ") Michael J. Wallace, and for reasons states as follows:

1. On March 7, 2019, the MVA issued a Statement of Charges (Charges) to Yvonne Reignat-Vodi, ("Appellant") and Shepherd's Driving School, Inc. ("Licensee") in which it alleged that she had conducted a drivers' school while using an unlicensed instructor, disseminating private information to the general public, and failed to make student and other operational records available for inspection upon request by the MVA. Md. Code Ann., Transp. §§ 15-109, 709, 710, and 16-506(a) (2012); COMAR 11.23.01.07, 11.23.01.08, 11.23.01.11, 11.23.01.12, 11.23.02.08, 11.23.02.09, and 11.23.02.13. The MVA sought to revoke the Licensee's driving school license as well as the certification as a driver education provider in Maryland.¹ (Decision of ALJ Wallace dated May 20, 2019 at p. 1); (emphasis added).

¹ "In addition, the MVA sought an emergency suspension of the Appellant's driving school license as well as her driver education program provider certification under Md. Code Ann., Transp. § 16-506(c)(1). The Appellant's license and certification were emergency suspended on the record after the hearing on the merits had concluded on March 26, 2019."

2. On May 20, 2019, ALJ Wallace issued a detailed Decision including: Statement of the Case; Issues; Summary of the Evidence; Findings of Fact; Discussion; Conclusions of Law; and, Order.

3. Throughout the Decision, it is made clear that the MVA sought to both emergency suspend and then revoke the driver's school license and driver's education certification held by the Licensee. (See, Issue No. 3, at p.2, "Should any licensee or certification for a drivers' school held by the Licensee be suspended or revoked, pursuant to ..."; See, Findings of Fact No. 16, at p. 5.

"At approximately 11:01 a.m. on March 11, 2019, the Licensee was served with formal notice that its driving school license as well as the certification as a driver education program provider in Maryland was immediately suspended."; See, Discussion part I, at p. 6, "The MVA seeks to revoke the Licensee's driving school license as well as its certification as a driver education program;" See, Discussion part I, at p. 7,

"Second, in addition to the grounds for discipline set out in section 15-109, the Legislature has given the MVA specific authority under section 15-710(a)(5), to refuse to grant or to renew, and to suspend or to revoke, a drivers' school license if the person holding that license has failed to comply with any of the provisions or any of the rules and regulations adopted under the Maryland Driver Education Program Act.

Finally, the MVA may suspend, revoke, or refuse to grant or renew certification under the driver education program if it finds that the drivers' school or driving instructor has failed to comply with any of the provisions of or any rule or regulation adopted under Subtitle 5 of Title 16, or Subtitles 7 or 8 of Title 15, or has been convicted of a crime of moral turpitude. Md. Code Ann, Transp. § 16-506(a).

See, Discussion part III., at p. 12, "The MVA may revoke a license if the person or entity fails to comply with any of the rules or regulations adopted under the Maryland Driver Education Program Act"; See, Discussion, pp. 14 and 16, part IV. "Penalty: Discipline and the Imposition of a Fine – In its Charges, the MVA proposes to revoke the Licensee's driving school license as well as driving school certification to provide driver education

programs in Maryland..."; and, "Based on this, I conclude that the MVA's proposal to revoke the Licensee's driving school license and certification to provide driver education programs in Maryland is both lawful and reasonable and it will be ordered as proposed.")

4. As seen throughout the Decision, the MVA sought and the ALJ agreed that the Licensee Shepherd's and the Appellant Vodi should have its/her driving school license as well as its/her driving school education certifications revoked.

5. Unfortunately, it appears that in the ORDER, that there was a clerical mistake when the Order states, "ORDER that the Licensee's 'driving instructor license', issued on May 24, 2017, be and hereby is REVOKED;" (p. 17.)

6. COMAR 28.02.01.27 (C) allows for corrections of a final decision based on a, "Clerical mistake in final decisions, orders, or other parts of the record may be corrected by a judge at any time on the judge's own initiative, or on motion of any party after such notice, if any, the judge orders."

7. It appears that this was a clerical mistake in stating "driving instructor license" as opposed to "driving school license" and this error should be corrected by this administrative tribunal.

8. In the alternative, COMAR 28.02.01.27 (B) allows for the judge to "exercise revisory power and control over a final decision in the event of fraud, mistake, or irregularity." It appears the mistake at page 17 of the Order stating that the "driving instructor license" instead of "driving school license" was either a mistake or irregularity and in the alternative should be corrected by this honorable judge.

WHEREFORE, the Motor Vehicle Administration hereby requests:

A. That ALJ Wallace revise the Administrative Decision of May 20, 2019 pursuant to COMAR 28.02.01.27 (C) for clerical mistake and correct the ORDER on page 17 to read:

"I ORDER that the Licensee's driving school license, issued on May 24, 2017, be and hereby is REVOKED; and I further; ..."; and,

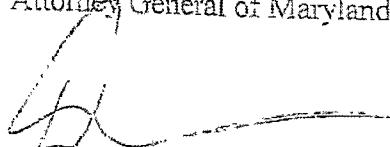
B. In the alternative, that That ALJ Wallace revise the Administrative Decision of May 20, 2019 pursuant to COMAR 28.02.01.27 (B) due to mistake and/or irregularity and correct the ORDER on page 17 to read:

"I ORDER that the Licensee's driving school license, issued on May 24, 2017, be and hereby is REVOKED; and I further; ..."; and,

C. For such other relief as the nature of its cause may require.

Respectfully Submitted,

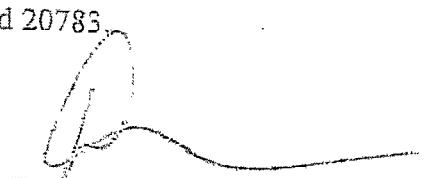
BRIAN E. FROSH
Attorney General of Maryland


DAVID C. MERKIN
Assistant Attorney General
Office of the Attorney General
Motor Vehicle Administration
6601 Ritchie Highway, N.E.
Glen Burnie, Maryland 21062
(410) 768-7415
(410) 768-7414 (Facsimile)
dmerkin@oag.state.md.us

Counsel for the Motor Vehicle Administration

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of May, 2019, a copy of the foregoing Motion to Revise Final Decision was mailed, postage prepaid, to Bert W. Kapinus, Esquire, 7100 Baltimore Avenue, Suite 102, College Park, Maryland 20740, counsel for Revoked Licensee and to Shepherd's Driving School and Yvonne Reignat-Vodi, c/o Yvonne Reignat-Vodi, Revoked Licensee, 1810 Metzerott Road, Apt 47, Adelphi, Maryland 20783.



David C. Merkin
Assistant Attorney General

COURT OF APPEALS
CASE SUMMARY
CASE NO. COA-PET-0006-2021

| | |
|------------|--|
| 04/23/2021 | <input checked="" type="checkbox"/> Petition Denied <i>Petition denied. (Order e-filed to counsel for respondent and mailed to petitioner)</i> |
| 04/23/2021 | Denied Comment (Petition denied.) |
| 05/13/2021 | <input checked="" type="checkbox"/> Correspondence <i>"Objection to the Chief Judge Mary Ellen Barbera's Order on April 23rd 2021 on Denial of Petitioner Petition for Writ of Certiorari on March 1, 2021" filed on 5/10/21.</i> |
| 05/13/2021 | <input checked="" type="checkbox"/> Correspondence <i>Letter to petitioner: Still need \$61.00 filing fee and seven copies of motion.</i> |
| 05/25/2021 | <input checked="" type="checkbox"/> Correspondence <i>"Petitioner's Inquiry on the Court of Appeals decision before filing a motion for reconsideration" filed on 5/20/21.</i> |
| 05/25/2021 | <input checked="" type="checkbox"/> Correspondence <i>Letter to petitioner in response to May 20, 2021 correspondence.</i> |
| 06/08/2021 | Correspondence <i>Received one additional copy of "Objection to the Chief Judge Mary Ellen Barbera's Order on April 23rd 2021 on Denial of Petitioner Petition for Writ of Certiorari on March 1, 2021" filed on 5/10/21.</i> |
| 06/08/2021 | <input checked="" type="checkbox"/> Correspondence <i>"Petitioning the Chief Judge to Order a Motion for Reconsideration and Correct the Order of April 23rd 2021"</i> |
| 06/08/2021 | <input checked="" type="checkbox"/> Correspondence <i>Letter to petitioner: Case closed. Contact United States Supreme Court.</i> |

| | |
|---------------------------------|-------|
| Petitioner Reignat-Vodi, Yvonne | |
| Total Charges | 61.00 |
| Total Payments and Credits | 61.00 |
| Balance Due as of 07/19/2021 | 0.00 |

Case Information

Court System: **Court of Special Appeals**
Case Number: **CSA-REG-2389-2019**
Title: **Yvonne Reignat-Vodi v. Motor Vehicle Administration**
Case Type: **Appeal of Civil Case**
Filing Date: **02/10/2020**
Case Status: **Closed**
Authoring Judge:
Tracking Number(s):

Other Reference Numbers

Circuit Court Case Number: **CAL1918504**
Related Case **CSA-REG-2390-2019**
Petition Filed **COA-PET-0006-2021**

Involved Parties Information

Appellant

Name: **Reignat-Vodi, Yvonne**
Address: **1810 Metzerott Rd
UNIT 47**
City: **Adelphi** State: **MD** Zip Code: **20783**

Appellee

Name: **Motor Vehicle Administration**
Address: **6601 Ritchie Highway, N.E.**
City: **Glen Burnie** State: **MD** Zip Code: **21062**

Attorney(s) for the Appellee

Name: **MERKIN, DAVID CHARLES**
Appearance Date: **02/10/2020**
Address Line 1: **Assistant Attorney General Motor Vehicle Administration**
Address Line 2: **6601 Ritchie Highway, N.E**
Address Line 3: **Room 200**
City: **GLEN BURNIE** State: **MD** Zip Code: **21062**

Clerk of the Lower Court

Name: **Amin, Mahasin El**
Address: **Clerk of Prince George's County Circuit Court
14735 Main Street**

City: **Upper Marlboro** State: **MD** Zip Code: **20772**

Judgment Information

Judgment:

Event **Dismissed Prior to Argument or Submission**

Date
02/05/2021

Comment: **10/13/2021 -Third Motion to Extend Time for Filing Corrected Brief denied. Motion on Order to File Corrected Brief denied. Appeal dismissed. 10/30/2021 - Motion for reconsideration denied.**

Court Scheduling Information

Event Type: **Session Month**

Event Date: **01/2021**

Result: **Scheduled for Argument**

Event Type: **Session Month**

Event Date: **09/2020**

Result: **Scheduled for Argument**

Event Type: **Submitted on Brief**

Event Date: **09/14/2020** Start Time: **09:00:00**

Result: **Motion Granted - Canceled**

Event Type: **Session Month**

Event Date: **11/2020**

Result: **Scheduled for Argument**

Event Type: **Submitted on Brief**

Event Date: **11/13/2020** Start Time: **09:00:00**

Result: **Motion Granted - Canceled**

Document Information

File Date: **02/07/2020**

Document Name: **Notice of Appeal - Civil**

File Date: **02/07/2020**

Document Name: **Civil Information Report**

File Date: **02/24/2020**

Document Name: **Order to Proceed**

File Date: **02/24/2020**

Document Name: **Civil Information Report**

File Date: **03/02/2020**

Document Name: **Motion for Extension of Time**

File Date: **04/23/2020**

Document Name: **Motion to Extend Time to File Brief**

File Date: **04/27/2020**

Document Name: **Record Received**

| | |
|----------------|-------------------------------------|
| File Date: | 04/28/2020 |
| Document Name: | Session Briefing Notice |
| File Date: | 05/06/2020 |
| Document Name: | Motion |
| File Date: | 05/12/2020 |
| Document Name: | Appellant Brief |
| File Date: | 05/20/2020 |
| Document Name: | Order on Motion |
| File Date: | 05/27/2020 |
| Document Name: | Motion for Extension of Time |
| File Date: | 05/28/2020 |
| Document Name: | Order |
| File Date: | 06/01/2020 |
| Document Name: | Correspondence |
| File Date: | 06/10/2020 |
| Document Name: | Order - Extension |
| File Date: | 06/15/2020 |
| Document Name: | Opposition to Motion |
| File Date: | 06/15/2020 |
| Document Name: | Opposition to Motion |
| File Date: | 06/23/2020 |
| Document Name: | Order on Motion |
| File Date: | 06/30/2020 |
| Document Name: | Appellant Brief |
| File Date: | 07/17/2020 |
| Document Name: | Motion to Dismiss |
| File Date: | 07/29/2020 |
| Document Name: | Motion for Extension of Time |
| File Date: | 08/07/2020 |
| Document Name: | Order on Motion |
| File Date: | 08/07/2020 |
| Document Name: | Motion |
| File Date: | 08/11/2020 |
| Document Name: | Opposition to Motion |
| File Date: | 08/11/2020 |
| Document Name: | Order |
| File Date: | 08/14/2020 |
| Document Name: | Motion to Correct the Record |
| File Date: | 08/20/2020 |

Document Name: **Motion**

File Date: **08/26/2020**

Document Name: **Motion to Extend Time to File Brief**

File Date: **08/28/2020**

Document Name: **Opposition to Motion**

File Date: **09/03/2020**

Document Name: **Order on Motion**

File Date: **09/04/2020**

Document Name: **Order on Motion**

File Date: **09/08/2020**

Document Name: **Record Received**

File Date: **09/14/2020**

Document Name: **Motion**

File Date: **09/14/2020**

Document Name: **Motion**

File Date: **09/16/2020**

Document Name: **Opposition to Motion**

File Date: **09/23/2020**

Document Name: **Order on Motion**

File Date: **09/24/2020**

Document Name: **Order on Motion**

File Date: **09/24/2020**

Document Name: **Motion to Extend Time to File Brief**

File Date: **09/29/2020**

Document Name: **Line**

File Date: **09/29/2020**

Document Name: **Motion**

File Date: **10/13/2020**

Document Name: **Order on Motion**

File Date: **10/16/2020**

Document Name: **Motion for Reconsideration**

File Date: **10/19/2020**

Document Name: **Opposition to Motion**

File Date: **10/19/2020**

Document Name: **Correspondence**

File Date: **10/23/2020**

Document Name: **Motion**

File Date: **10/29/2020**

Document Name: **Appellant Brief**

| | |
|----------------|-----------------------------|
| File Date: | 10/30/2020 |
| Document Name: | Order on Motion |
| File Date: | 11/02/2020 |
| Document Name: | Record Extract |
| File Date: | 11/04/2020 |
| Document Name: | Opposition to Motion |
| File Date: | 02/05/2021 |
| Document Name: | Mandate |
| File Date: | 02/16/2021 |
| Document Name: | Motion |
| File Date: | 02/25/2021 |
| Document Name: | Correspondence |
| File Date: | 03/01/2021 |
| Document Name: | Petition for Writ |
| File Date: | 03/10/2021 |
| Document Name: | Order on Motion |
| File Date: | 03/11/2021 |
| Document Name: | Mandate |
| File Date: | 03/27/2021 |
| Document Name: | Motion |
| File Date: | 04/23/2021 |
| Document Name: | Petition Denied |
| File Date: | 04/28/2021 |
| Document Name: | Order |

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