

21-501  
No.

IN THE SUPREME COURT OF THE UNITED STATES

ORIGINAL

JAMES VINCENT LIOTT,

Petitioner

U.S. BANK NATIONAL ASSOCIATION  
AS TRUSTEE FOR CVI LCF MORTGAGE  
LOAN TRUST 1,

Respondent

FILED  
MAR 01 2021

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

On Petition For Writ Of Certiorari

To The Supreme Court of Pennsylvania  
Docket No. 600 MAL 2019

\* PETITION FOR WRIT OF CERTIORARI \*

James Vincent Liott  
778 Waterway Road  
Oxford, PA 19363



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SUPREME COURT, U.S.

**QUESTIONS PRESENTED**

Did the trial court properly rule on Petitioner's Preliminary Objections to the Ejectment Action;

**Answer: NO**

The trial court did not consider the Petitioner's Concise Statements of Errors Complained of on Appeal.

Should the trial court have considered the Petitioner's Concise Statements of Errors Complained of on Appeal;

**Answer: YES**

**See: Appendix-D and Appendix-E**

**LIST OF PARTIES**

All parties appear in the caption of the case on the cover page.

**JAMES VINCENT LIOTT**

**Petitioner**

**U.S. BANK NATIONAL ASSOCIATION  
AS TRUSTEE FOR CVI LCF MORTGAGE  
LOAN TRUST 1,**

**Respondent**

**RELATED CASE**

**NO. 2015-09793-RC**

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APPENDIX A	Trial Court Order dated March 20, 2019.
APPENDIX B	Supreme Court of Pennsylvania Order dated October 1, 2020.
APPENDIX C	Trial Court Opinion dated June 11, 2019.
APPENDIX D	Trial Court Order dated November 9, 2017.
APPENDIX E	Concise Statements Of Errors Complained Of On Appeal.
APPENDIX F	Supreme Court of the United States letter dated July 30, 2021.
APPENDIX G	Supreme Court of Pennsylvania Order dated March 11, 2020.
APPENDIX H	Superior Court of Pennsylvania dated June 19, 2019.

STATUTES AND RULES  
TABLE OF AUTHORITIES  
CITATIONS OF THE OFFICIAL AND UNOFFICIAL REPORTS  
OF OPINIONS AND ORDERS ENTERED IN THE CASE

Pa.R.A.P. 1701 and 1702.

See: Appendix A,B,C, and D

**OPINIONS BELOW**

The Opinion of the trial court appears at **Appendix A** to the petition.

**JURISDICTION**

The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a).

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

Due process rights under the Fourteenth Amendment of the United States Constitution.

## **STATEMENT OF THE CASE**

Petitioner raised three Preliminary Objections to the Civil Action-Ejectment at Docket No. 2018-04083-RC.

The trial court ignored the Preliminary Objections.

The trial court also ignored the Concise Statements of Errors Complained of on Appeal.

The forty four (44) errors complained of were absolutely necessary in order to present to the trial court the necessary facts.

The trial court had no jurisdiction to go forward with the ejectment action.

**See: Appendix-D and Appendix-E**

#### **REASONS FOR GRANTING THE PETITION**

A compelling reason for this Court to grant this Petition for a Writ of Certiorari is that the trial court **conflicts** with the decision of its own court.

It is clear in the trial court order dated November 9, 2017, that the trial court had no jurisdiction.

**See: Appendix-D and Appendix-E**

## CONCLUSION

The petition for a writ of certioari should be granted.

Respectfully submitted,

  
\_\_\_\_\_  
Petitioner

Date: September 28, 2021