

DOCKET NO. 21-5832

Supreme Court, U.S.

FILED

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OFFICE OF THE CLERK

In The

Supreme Court of the United States

On Petition for Rehearing on Emergency Petition for Writ of Mandamus to PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC")

IN RE: PETITION OF LESLIE WILLIS FOR REHEARING ON EMERGENCY
PETITION FOR WRIT OF MANDAMUS

Leslie Willis

P.O. Box 1153, Bowie, MD

Maryland 20718¹

lwillis222@Yahoo.Com

RECEIVED

JAN - 4 2022

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SUPREME COURT, U.S.

¹ Petitioner's last legal address. At this time, Petitioner is in Pittsburgh, PA. Petitioner is domiciled in Prince George's County, Maryland.

QUESTION PRESENTED

1. Whether the Court should Rehear the 'Emergency Petition for Writ of Mandamus to PNC Bank, N.A. and The PNC Financial Services Group, Inc.' ("PNC") to consider the circumstances surrounding an Extrajudicial Factor in the proceedings for a Fed.R.Civ.P. 27 'Petition to Perpetuate Evidence Pertaining to the Trust for Annie Pearl (White) Willis' held by PNC Bank, N.A. and The PNC Financial Services Group, Inc.²
2. Whether the Court should intervene by issuing a WRIT OF MANDAMUS to PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC") to disclose, *to Petitioner*, the Trust Instrument, Beneficiary Designation, and Safe Deposit Records of 'The Trust for Annie Pearl White Willis' ("Trust"), held by PNC Bank, N.A./The PNC Financial Service Group, Inc.

² District Court for the Western District of Pennsylvania Docket #20-1833, ECF No. 162; and ECF No. 175).

LIST OF PARTIES

1. Leslie Willis, Petitioner³
2. PNC Bank, N.A./The PNC Financial Services Group, Inc. (“PNC”),⁴
Respondents

RELATED CASES

1. ‘Petition for Rehearing on Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit (Docket #20-8176) is currently pending a January 7, 2022 Conference in this Court. The Petition for Writ of Certiorari involves fundamental, substantive, Constitutional rights to property (‘Due Process Clause’ and ‘Petition Clause’).
2. Petition for Rehearing on Emergency Petition for Writ of Prohibition to the District Court for the Western District of Pennsylvania’ (Docket #21-5833)
3. Fed.R.Civ.P. 27 Petition to Perpetuate Evidence Pertaining to the Trust for Annie Pearl (White) Willis, District Court for the Western District of Pennsylvania (Distr. Ct. Docket #20-1833).

³ Petitioner is proceeding pro se and in forma pauperis in this Court.

⁴ William S. Demchak, President, Chairman, and Chief Executive Officer.

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⁵ Reference to Documents can be found on the Record, online, in the District Court for the Western District of Pennsylvania, Petitioner's Fed.R.Civ.P. 27 'Petition to Perpetuate Evidence of the 'Trust for Annie Pearl (White) Willis' (Distr. Ct. Docket #20-1833). Petitioner, proceeding pro se, in forma pauperis, does not have financial resources to print and mail documents.

IN THE SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF MANDAMUS

Petitioner respectfully prays that a Writ of Mandamus issue to PNC Bank, N.A./The PNC Financial Services Group, Inc. ("PNC").

OPINIONS BELOW

This Petition for Writ of Mandamus to PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC"),⁶ is not a review of an Opinion below (But See: Petitioner's Petition for Rehearing on Petition for Writ of Prohibition to the District Court for the Western District of Pennsylvania' filed in this Court (S. Ct. Docket #21-5833); and Petitioner's Fed.R.Civ.P. 27 Petition to Perpetuate Evidence of the 'Trust for Annie Pearl (White) Willis (Distr. Ct. Docket #20-1833) in the District Court for the Western District of Pennsylvania' filed in this Court).

⁶ William S. Demchak, President, Chairman, and Chief Executive Officer.

JURISDICTION

The Supreme Court jurisdiction is invoked, herein, pursuant to Fed.R. App.P Rule 21, 28 U.S. Code § 1651 – Writs.⁷ The Court's relevant equity powers are invoked.

This 'Petition for Rehearing on Emergency Petition for Writ of Mandamus To: PNC Bank, N.A./The PNC Financial Services Group, Inc.' ("PNC") is filed in support of the 'Petition for Rehearing on the Petition for Writ of Certiorari (Docket #20-8176);' and the the post-judgment Motions that Petitioner intends to file in the Court of Appeals for the Third Circuit (i.e. To Recall a December 10, 2020 Mandate, and to Reopen the Appeal) (Docket #19-2094); and in the event of further proceedings in the District Court for the Western District of Pennsylvania (Docket #18-290).

⁷ 28 U.S. Code § 1651 - "(a) The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law."

CONSTITUTIONAL PROVISIONS

This Petition for Rehearing on Emergency Petition for Writ of Mandamus To: PNC Bank, N.A./The PNC Financial Services Group, Inc. ("PNC") is filed in support of Petitioner's Actions in Federal Court, which involve the following Constitutional provisions pertaining to real estate property:

U.S.C.A. Const. Amend. Xiv, § 1- Due Process Clause;

U.S.C.A. Const. Amend. I – Petition Clause - right to Petition the government for redress of grievances;

U.S.C.A. Const. Amend. Xiv, § 1- Equal Protection Clause of the Fourteenth Amendment (Section 1) of the United States Constitution;

STATUTORY PROVISIONS

28 U.S. Code § 1651 - “(a) The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law...”

42 Pa. C.S. § 7533 - Any person interested under a deed, will, written contract, or other writings constituting a contract, or whose rights, status, or other legal relations are affected by a statute, municipal ordinance, contract, or franchise, may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract, or franchise, and obtain a declaration of rights, status, or other legal relations thereunder.

U.S. Code 28 U.S. Code § 455 - Disqualification of justice, judge, or magistrate judge: (a) Any justice, judge, or magistrate judge of the United States shall disqualify [herself] in any proceeding in which [her] impartiality might reasonably be questioned. (b) [She] shall also disqualify [herself] in the following circumstances: (1) Where [she] has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;

BACKGROUND

Annie Pearl (White) Willis⁸ died on November 20, 2010, more than eleven (11) years ago. The Internal Revenue Service (IRS) identified a ‘Trust for Annie Pearl (White) Willis’ (“Trust”) (See: ‘Petition of Leslie Willis to Perpetuate Evidence of the Trust for Annie Pearl (White) Willis,’ filed in the District Court for the Western District of Pennsylvania, Docket # 20-01833, ECF No. 32.7 - Internal Revenue Service (IRS) letter indicating “The Trust for Annie Pearl (White) Willis”). The Trust is a substantial Indian-Military Land Trust, involving substantial monetary funds and real estate assets.

Over the course of more than eleven (11) years, PNC Bank, N.A. and The PNC Financial Services Group, Inc. (“PNC”) has held the ‘Trust for Annie Pearl (White) Willis,’ (“Trust”) collecting fees on the Trust, while refusing to disclose the to Petitioner. Petitioner is an Heir, Legacy, Beneficiary and devisee under the will and the Estate of Annie Pearl Willis, and has a *legal right* to a determination of Rights to the Trust, pursuant to 42 Pa. C.S. § 7533 - Construction of documents⁹ (See: **Appendix C** – Declaration of Leslie Willis as Heir Legacy, Beneficiary and

⁸ Also, Annie Pearl Willis; or Annie P. Willis.

⁹ 42 Pa. C.S. § 7533 - Any person interested under a deed, will, written contract, or other writings constituting a contract, or whose rights, status, or other legal relations are affected by a statute, municipal ordinance, contract, or franchise, may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract, or franchise, and obtain a declaration of rights, status, or other legal relations thereunder.

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devisee under the will and the Estate of Annie Pearl Willis (District Court Docket #20-1833, ECF No. 160).

In preparation for Petitioner's federal appellate Court Actions, including Petitioner's May 3, 2021 Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit (S. Ct. Docket #20-8176), and the post-judgment motions that Petitioner intended to file in the Court of Appeals for the Third Circuit (Docket #19-2094) (i.e. Motion to Recall December 10, 2020 Mandate; to Reopen the Appeal), Petitioner filed, in the District Court for the Western District of Pennsylvania, a Fed.R.Civ.P. 27 'Petition to Perpetuate Evidence Pertaining to the 'Trust for Annie Pearl (White) Willis,' ("Trust") so that certain Trust documents would be available in support of Petitioner's federal Court Actions, including in this Court. The Trust is a substantial Indian-Military Land Trust, involving substantial monetary funds and several hundred acres of real estate assets, held by PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC"). Petitioner initially filed the Fed.R.Civ.P. 27 'Petition to Perpetuate Evidence' on November 25, 2020, more than a year ago. However, the 'Fed.R.Civ.P. 27 Petition to Perpetuate Evidence' was delayed due to a Magistrate Judge (and District Judge affirming) refusal to direct the U.S. Marshal to perform its ministerial duty of service of process upon Interested Parties, the heirs of the Estate of Annie Pearl Willis, and upon Dolores Willis, the Executrix for the Estate of Annie Pearl Willis, who is the "authorized signer" for the Trust, having custody, control, and possession of the Trust

documents. Moreover, the Hon. Magistrate Judge, Lisa Pupo-Lenihan, presiding¹⁰ in the Fed.R.Civ.P. 27 Petition has engaged in a persistent effort to thwart the perpetuation of evidence (i.e. Trust documents), and to obstruct the appeal and appellate process in Petitioner's federal Court Actions. Consequently, the Trust documents have been undisclosed to Petitioner and unavailable for Petitioner's federal Court Actions, including Petitioner's Actions filed in this Court.

Petitioner discovered that there were misappropriated bank funds in the Accounting for the Estate of her Grandmother, Annie Pearl Willis (See: ECF Document No. 28.6 - Accounting Showing Estate Assets Sufficient and Showing Misappropriated Bank Funds; ECF Document No. 14.1 - Joint Account Schedule 'F' PNC Checking Account showing funds misappropriated; ECF Document No. 28.10 - Supporting Documentation For Accounting Showing Assets Sufficient; ECF Document No. 28.7 - Estate First And Final Account, incl. Cover Page W/Estate Attorney Names) (See Also: ECF Document No. 15.0 - Attorney Disciplinary Action – Misappropriated Bank Funds in other unrelated accounts). Petitioner avers that the Trust was undisclosed to Petitioner, so that Petitioner would not be in a position to purchase the real estate¹¹ of the Estate, so that the real estate could be sold to other persons. The Trust disclosed, would provide evidence that the Trust exists, and evidence of the Trust Beneficiary; as well as evidence relating to the

¹⁰ Petitioner did not consent to a Magistrate Judge in the Fed.R.Civ.P. 27 Petition, and Particularly made a Request that the Magistrate Judge, Lisa Pupo-Lenihan Recuse herself, citing an extrajudicial factor and the Magistrate Judge's personal bias and antagonism against Petitioner and Petitioner's Court Actions (See: Distr. Ct. Docket #20-1833, ECF No. 10, ECF No. 22, January 20, 2021).

¹¹ Real estate located in Allegheny County, Pennsylvania, 267 William Street, Pittsburgh, PA. 15203 (Block/Lot/Parcel ID # 4-H-229).

circumstances of the sale of the real estate (e.g. evidence that the Trust funds were withheld from Petitioner at the time of sale of the real estate; evidence of breach of fiduciary duty; and evidence pertaining to aiding and abetting a breach of fiduciary duty as to the real estate).

In the Fed.R.Civ.P. 27 Petition, Petitioner has sought an immediate determination of rights to the Trust ('[T]he right to this relief [Fed.R.Civ.P. 27] ... does not depend upon the condition of the [Respondent], but upon the situation of the party [petitioner], and her power to bring her rights to an immediate investigation.' ")." *In re Application of Checkosky*, 142 F.R.D. 4, 8 n.2 (D.D.C. 1992). However, the District Court intends to dismiss the Fed.R.Civ.P. 27 Petition, *with prejudice*, effectively precluding a perpetuation of the Trust documents as evidence, precluding a *legal right* to a determination of rights to the Trust, and precluding a right to *an immediate* determination of rights to the Trust.

STATEMENT OF THE CASE

Substantial Grounds Not Previously Presented – Extrajudicial Factor

Petitioner prays that this Court will take judicial notice of the Hon. Magistrate Judge, Lisa Pupo-Lenihan's extrajudicial association, the Fed.R.Civ.P. 27 proceedings, and the circumstances surrounding the proceedings, which have exemplified a pervasive bias and antagonism against Petitioner's Fed.R.Civ.P. 27 Petition to perpetuate the Trust documents, and which ultimately denies Petitioner due process in Petitioner's federal Court Actions, including within this Court.

Petitioner's 'Motion for Disqualification of the Magistrate Judge,' filed in Petitioner's Fed.R. Civ.P 27 Petition, is incorporated by reference (**See: Appendix A - Petitioner's Fed.R.Civ.P. 27 'Petition to Perpetuate Evidence of the 'Trust for Annie Pearl (White) Willis' in the District Court for the Western District of Pennsylvania,' Distr. Ct. Docket #20-1833, ECF No. 162, ECF No. 166, ECF No. 168, and ECF No. 175 – Motion for Magistrate Judge Disqualification**).

Very briefly stated here, the Hon. Magistrate Judge, Lisa Pupo-Lenihan, has been unable to preside with impartiality and fair judgment in Petitioner's federal Court Actions, due to the Magistrate judge's personal bias and extrajudicial social-political antagonism against ("targeting") Petitioner and Petitioner's Court Actions (See: Exhibit A for the Motion for Disqualification). According to a biography previously posted on the District Court website, the Magistrate Judge, Lisa Pupo-Lenihan, has an extrajudicial association (See: **Appendix B – Extrajudicial Factor Exhibits A-1**) with an organization that supports homosexual/same-sex gender relationships, and has held, or previously held, a membership and/or political position on the Committee or Board of the organization.¹² Thus, the Magistrate Judge, Lisa Pupo-Lenihan, had a duty to disqualify/recuse herself from Petitioner's Court Actions in accordance with 28 U.S. Code § 455(a) and § 455(b)(1). In Liteky, a pervasive personal bias, deep-seated antagonism and extrajudicial factor, representing an inability to render fair judgment calls for a duty to disqualify.

¹² There may also be at least one individual involved, within the District Court Judge's Chambers, working alongside of the Magistrate Judge, Lisa Pupo-Lenihan, who is homosexual. Also, Petitioner previously spoke by telephone to a male law clerk in the judge's chambers who was hostile against Petitioner's Court Actions.

Judicial Officials Sanctioning Extrajudicial Bias and Antagonism

Additionally, and respectfully, certain Hon. Judges within the Court of Appeals for the Third Circuit have engaged in similar conduct, targeting Petitioner with extrajudicial social-political antagonism in support of gay community social-political agenda. For instance, the date of the March 2, 2020 Order and Opinion, granting a Summary Action of Affirmance in Petitioner's Appeal from the District Court (COA3 Docket #19-2094), was intentionally aligned with the date of a homosexual, Democratic Party candidate's decision to withdraw from the 2020 Presidential race. Also, the December 2, 2020 Order affirming, and the December 10, 2020 Mandate, Certifying, and stating "issued in lieu of a formal mandate, and is to be treated in all respects as a mandate," was intentionally aligned with the political events surrounding the Certification of the 2020 Presidential vote, in furtherance of extra-judicial social-political antagonism in support of homosexuality and gay community social-political agenda.



REASONS FOR GRANTING THE WRIT

1. Petitioner has a right to an unbiased tribunal. However, the proceedings in the Fed.R.Civ.P. 27 Petition as well as in a prior proceeding (**See: ECF No. 162-1, Exhibit 'A' Bias III Will**), have been a pervasive bias and antagonism against Petitioner and Petitioner's Court Actions.
2. Petitioner is an Heir, Legacy, Beneficiary, and Devisee of the Estate of Annie Pearl Willis', and has a legal right pursuant to 42 Pa. C.S. § 7533¹³ to a determination of rights to 'The Trust for Annie Pearl White Willis' ("Trust") (See: District Court Docket # 20-01833, ECF No. 160 – Petitioner's Declaration as Heir, Legacy, Beneficiary, and Devisee of the Estate of Annie Pearl Willis').¹⁴
3. In the Fed.R.Civ.P. 27 Petition, Petitioner has a right to an immediate determination of rights to the Trust "[T]he right to this relief [Fed.R.Civ.P. 27] ... does not depend upon the condition of the [Respondent], but upon the situation of the party [petitioner], and her power to bring her rights to an immediate investigation')." *In re Application of Checkosky*, 142 F.R.D. 4, 8 n.2.

¹³ 42 Pa. C.S. § 7533 - Any person interested under a deed, will, written contract, or other writings constituting a contract, or whose rights, status, or other legal relations are affected by a statute, municipal ordinance, contract, or franchise, may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract, or franchise, and obtain a declaration of rights, status, or other legal relations thereunder.

¹⁴ Petitioner believes that she is the sole beneficiary of the Trust.

4. Petitioner is proceeding in form pauperis in federal Court Actions. A dismissal of the Fed.R.Civ.P. 27 Petition, and a dismissal *with prejudice*, effectively precludes Petitioner's immediate right to a determination of rights to the Trust, after eleven (11) years of the Trust concealed. Additionally, Petitioner would be without the financial resources available to bring an Appeal from an Order denying the Fed.R.Civ.P. 27 Petition.¹⁵
5. A dismissal *with prejudice* of the Fed.R.Civ.P. 27 Petition unlawfully denies Petitioner's right to the Trust documents, and a right to financial information from PNC Bank, N.A. and The PNC Financial Services Group, Inc. regarding the Trust.
6. Disclosure of the Trust in the Fed.R.Civ.P. 27 Petition, where there has been a summary judgment motion, would subject private, financial information to public access.
7. PNC has held the Trust for over eleven (11) years, collecting fees on the Trust, and without disclosure of the Trust to Annie Pearl (White) Willis's Beneficiary.
8. The situs of the Trust is in Pittsburgh, Pennsylvania.¹⁶ Therefore, PNC would not be burdened in compliance with a request for disclosure of the *Trust Instrument* and the *Beneficiary Designation* of the Trust nor of the

¹⁵ The Magistrate Judge is seeking a Dismissal to effectuated the 'Three-Strikes' rule, so that Petitioner is 'Put out of Court.'

¹⁶ At this time, Petitioner is in Pittsburgh, PA. The PNC Financial Services Group is incorporated in Pennsylvania, and is based in Pittsburgh, Pennsylvania. PNC Bank, National Association is a banking subsidiary of The PNC Financial Services Group with its principal place of business in Pittsburgh, Pennsylvania.

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Safe Deposit Records of the Trust *to Petitioner* at PNC or at the office of the PNC attorney.

WHEREFORE, Petitioner, Leslie Willis, respectfully, prays that this Court direct PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC") to disclose the ***Trust Instrument*** and ***Beneficiary Designation*** of 'The Trust for Annie Pearl White Willis' ("Trust") to Petitioner at the office of the Attorney for PNC, Jordan Webster, on January 31, 2022 at 1:35 p.m.; OR at the location of The PNC Financial Services Group, Inc., at 300 Fifth Ave., The Tower at PNC Plaza, Pittsburgh, PA 15222-2401 on January 31, 2022 at 1:35p.m.

WHEREFORE, Petitioner, Leslie Willis, respectfully, prays that this Court issue a **WRIT OF MANDAMUS** to PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC") to disclose the **Safe Deposit Records** of 'The Trust for Annie Pearl White Willis' ("Trust"), held by PNC Bank, N.A./The PNC Financial Service Group, Inc., *to Petitioner* at the office of the Associate Attorney for PNC, Jordan Webster, on January 31, 2022 at 1:35 p.m.; OR at the location of The PNC Financial Services Group, Inc., at 300 Fifth Ave. The Tower at PNC Plaza, Pittsburgh, PA 15222-2401 on January 31, 2022 at 1:35 p.m.

WHEREFORE, Petitioner, Leslie Willis, respectfully, moves the Court to **SEAL** the Trust documents, if filed in this Court; and requests that the Court caution, instruct, and **DIRECT** or **ORDER** all Parties and their Counsel not to disclose to anyone the contents of the Trust; not to use the Trust documents or information for any purpose other than in connection with the Actions for

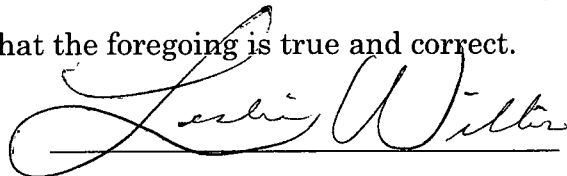
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Declaration of Rights; and upon termination of the Actions for Declaration of Rights, return all Trust documents and information as appropriate.

WHEREFORE, Petitioner, Leslie Willis, respectfully, prays that if this Petition/Motion is Denied by the Clerk, by a single Judge, or by limited Panel, that the Petition/Motion is considered by the Court En banc; and that, in any event, under the circumstances, the Motion is not Denied with prejudice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 20, 2021

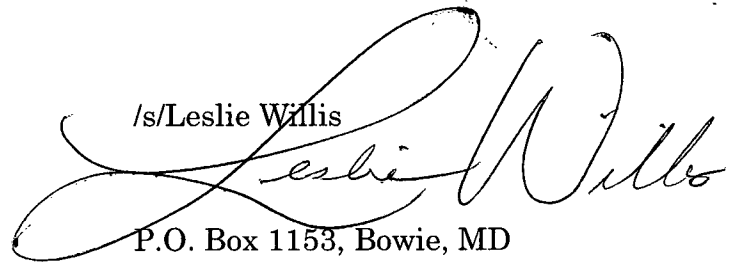
A handwritten signature in cursive script, reading "Leslie Willis", written over a horizontal line.

/s/Leslie Willis, Petitioner

S. CT. RULE 44.2 CERTIFICATION

I, Petitioner, Leslie Willis, proceeding pro se, in forma pauperis, hereby, certify that, pursuant to S. Ct. Rule 44.2, this '**Petition for Rehearing**' is limited to intervening circumstances of substantial or controlling effect, or other substantial grounds not previously presented; and that this Petition for Rehearing is filed in good faith, and not for delay.

/s/Leslie Willis

A large, stylized handwritten signature in black ink, appearing to read 'Leslie Willis', is written over the typed name and address.

P.O. Box 1153, Bowie, MD

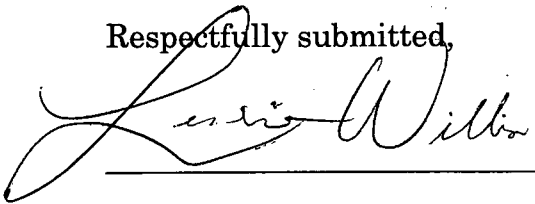
Maryland 20718

lwillis222@Yahoo.Com

CONCLUSION

The Petition for Rehearing on the Petition for Writ of Mandamus to PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC") should be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Leslie Willis", is written over a horizontal line.

/s/Leslie Willis, Petitioner

Date: December 20, 2021

DECEMBER 20, 2021

PROOF OF SERVICE

I, Leslie Willis, do swear or declare that on this date, December 20, 2021, as required by Supreme Court Rule 29 I have served the enclosed **Petition for Rehearing on the Petition for Writ of Mandamus to PNC Bank, N.A. and The PNC Financial Services Group, Inc. ("PNC")** on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Jordan Webster, (Email)

Associate, Buchanan Ingersoll & Rooney, PC

For William S. Demchak, President and Chief Executive Officer,

PNC Bank, The PNC Financial Services Group, Inc.

Union Trust Building, 501 Grant Street, Suite 200, Pittsburgh, PA 15219-4413

412 562 8304 (o); 814 931 4875 (c)

Dolores Willis (First Class Mail)

206 Everglade Drive

Pittsburgh, PA. 15235

DECEMBER 20, 2021

DOCKET NO. 21-5832

In The

Supreme Court of the United States

On Petition for Rehearing on Petition for Writ of Mandamus to PNC Bank, N.A. and
The PNC Financial Services Group, Inc. ("PNC")

ORDER

The Emergency Petition for Writ of Mandamus To: PNC Bank, N.A./The PNC
Financial Services Group, Inc. ("PNC") is, hereby, **GRANTED**.

A WRIT OF MANDAMUS is, hereby, issued that the **TRUST INSTRUMENT** and
the **BENEFICIARY DESIGNATION** of 'The Trust for Annie Pearl White Willis' ("Trust"),
held by PNC Bank, N.A./The PNC Financial Service Group, Inc., shall be disclosed *to*
Petitioner, Leslie Willis, at the office of Associate Attorney for PNC, Jordan Webster, on
January 31, 2022 at 1:35 p.m.' OR at the location of The PNC Financial Services Group,
Inc., at 300 Fifth Ave. The Tower at PNC Plaza, Pittsburgh, PA 15222-2401 on January 31,
2022 at 1:35 p.m.

IT IS FURTHER ORDERED that the Trust documents shall be **SEALED**, and under
protective Order, if filed in this Court.

BY THE COURT _____, J

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On Petition for Rehearing on Petition for Writ of Mandamus to PNC Bank, N.A. and
The PNC Financial Services Group, Inc. ("PNC")

ORDER

The Emergency Petition for Writ of Mandamus To: PNC Bank, N.A./The PNC
Financial Services Group, Inc. ("PNC") is, hereby, **GRANTED**.

A WRIT OF MANDAMUS is, hereby, issued that the **SAFE DEPOSIT RECORDS** of
'The Trust for Annie Pearl White Willis' ("Trust"), held by PNC Bank, N.A./The PNC
Financial Service Group, Inc., shall be disclosed *to Petitioner, Leslie Willis*, at the office of
Associate Attorney for PNC, Jordan Webster, on January 31, 2022 at 1:35 p.m.' OR at the
location of The PNC Financial Services Group, Inc., at 300 Fifth Ave. The Tower at PNC
Plaza, Pittsburgh, PA 15222-2401 on January 31, 2022 at 1:35 p.m.

IT IS FURTHER ORDERED that the Trust documents shall be **SEALED**, and under
protective Order, if filed in this Court.

BY THE COURT _____, J

ORIGINAL

21-5832

No. _____

Supreme Court, U.S.
FILED

AUG 27 2021

OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATESLeslie Willis — PETITIONER
(Your Name)

VS.

Hon. Judge O'Toole et al. — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

☒ Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):Third Circuit Court of Appeals; Supreme Court U.S.;
District Court Western District of Pennsylvania☐ Petitioner has not previously been granted leave to proceed *in forma pauperis* in any other court.☒ Petitioner's affidavit or declaration in support of this motion is attached hereto.☐ Petitioner's affidavit or declaration is not attached because the court below appointed counsel in the current proceeding, and:☐ The appointment was made under the following provision of law: _____

or

☐ a copy of the order of appointment is appended.Leslie Willis
12/20/2021
Leslie Willis
(Signature) LW

— Petitioner Requests a Waiver of the 3 (or Ten) Copies. Petitioner does not have funds, at this time, to print and mail

AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERISI, Leslie Willis, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): <u>none</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>

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2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>NONE</u>	<u>N/A</u>	<u>N/A</u>	<u>\$ N/A</u>

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.) Single.

Employer	Address	Dates of Employment	Gross monthly pay
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>\$ N/A</u>

4. How much cash do you and your spouse have? \$ 500
Below, state any money you or your spouse have in bank accounts or in any other financial institution. Single.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
<u>NONE</u>	<u>\$ N/A</u>	<u>\$ N/A</u>

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☐ Home
Value N/A

☒ Other real estate In Litigation
Value SEE DOCKET # 20-8176

☒ Motor Vehicle #1 Stolen over 10 years ago
Year, make & model
Value

☐ Motor Vehicle #2 N/A
Year, make & model
Value

☐ Other assets
Description All Assets are in Litigation. None Available.
Value SEE: DOCKET # 20-8176 S.C.T.
SEE: DISTRICT COURT DOCKET # 20-1833

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
<u>NONE</u>	<u>\$ N/A</u>	<u>\$ N/A</u>

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
<u>NONE at this time</u>	<u>N/A</u>	<u>N/A</u>

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate. Single.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	<u>\$ 0</u>	<u>\$ N/A</u>
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	<u>\$ 0</u>	<u>\$ /</u>
Home maintenance (repairs and upkeep)	<u>\$ 0</u>	<u>\$ /</u>
Food	<u>(VARIES) \$ 5-20</u>	<u>\$ /</u>
Clothing	<u>\$ 0</u>	<u>\$ /</u>
Laundry and dry-cleaning	<u>\$ 5.00</u>	<u>\$ /</u>
Medical and dental expenses	<u>\$ 0</u>	<u>\$ /</u>

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ <u>/</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>/</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>/</u>
Life	\$ <u>0</u>	\$ <u>/</u>
Health	\$ <u>0</u>	\$ <u>/</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>/</u>
Other: <u>N/A</u>	\$ <u>0</u>	\$ <u>/</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>NOT REQUIRED TO FILE TAXES.</u>	\$ <u>0</u>	\$ <u>/</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>/</u>
Credit card(s)	\$ <u>0</u>	\$ <u>/</u>
Department store(s)	\$ <u>0</u>	\$ <u>/</u>
Other: <u>N/A</u>	\$ <u>0</u>	\$ <u>/</u>
Alimony, maintenance, and support paid to others		
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>/</u>
Other (specify): <u>N/A</u>	\$ <u>0</u>	\$ <u>/</u>
Total monthly expenses:	\$ <u>0</u>	\$ <u>/</u>

Storage Unit (3x4) \$21.35 - PAID w/borrowed Funds
 Food* 20.00
 Laundry/misc. (e.g. Toothpaste) 5.00
\$46.35/mo.
 * VARIES TOTAL @ \$50 per month

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☒ Yes ☐ No If yes, describe on an attached sheet.

SEE: District Court Docket 20-1833-27
 Pending Disclosure of Trust Fund. ECF/26-29
 (SEE: District Court WD PA CASE NO. 20-1833 (ECF No. 27))

10. Have you paid - or will you be paying - an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? N/A

If yes, state the attorney's name, address, and telephone number:

N/A

11. Have you paid - or will you be paying - anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes ☒ No

If yes, how much? N/A

If yes, state the person's name, address, and telephone number:

N/A

12. Provide any other information that will help explain why you cannot pay the costs of this case.

Assets (incl. Trust Fund) Undisclosed
In litigation and Withheld (SEE: District Court WD PA CASE NO. 20-1833, ECF No. 27)

I declare under penalty of perjury that the foregoing is true and correct.

AND S.C.T. Docket # 20-8176

Executed on: September 17, 2021

Lestie Willis
 (Signature) LW

9/18/2021 Lestie Willis
Lestie Willis
 12/20/2021