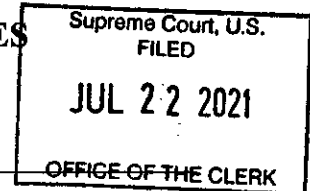


original

Cause no. **21-5864**

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES



COLUMBIA LUXAR, *Respondent-Plaintiff*,

vs.

DELORIS PHILLIPS, *Petitioner-Defendant*.

ON PETITION 20-10984 THE UNITED STATES COURT
OF APPEALS FOR THE FIFTH CIRCUIT

PETITIONER'S DE NOVO REVIEW ON CERTIORARI

Respectfully,

/s/: Deloris Phillips
AIFP-Pro se Appellant
P.O. Box 530236
Grand Prairie, TX 75053-0236
Email: delorisphillips360@aol.com
Phone: (469) 671-8941
Date: 09.24.2021

*Petitioner Humbly Request De Novo Review, Oral Argument, Reverse, and Remand
For Appointment of Counsel, and Trial-by-Jury with Court Reporter to Preserve Record.*

QUESTIONS PRESENTED

- 1) Whether it is unconstitutional, in violation of the Fourteenth Amendment- Equal Protection Clause, for any litigant alleging discrimination in the Court System of America to be labeled *vexatious, frivolous, and pernicious* without being granted due process to be heard physically in the court of law at least once to present evidence, exhibits, reports, support, witnesses, etc.;
- 2) Whether the United States District Court of Northern Texas Dallas Division and the United States Court of the Fifth Circuit violated the Fifth Amendment and erred in labeling and sanctioning litigant, Deloris Phillips as *vexatious, frivolous, and pernicious* without ever once granting petitioner Deloris Phillips due process once in the Court of Law; and
- 3) Whether America's Highest Court of Justice, the Supreme Court of the United States of America has an obligatory duty, per the United States Constitution, to correct obvious, miscarriages of documented and erroneous injustices of lower courts.

LIST OF PARTIES

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

RELATED CASES

1) SEC. HH and SEC. F 261-262: JE-19-00343-H

(Justice of the Peace Precinct One Place One) Honorable Judge Thomas Jones presiding. *Columbia Luxar v. Deloris Phillips*. Filed by plaintiffs on 01.15.2019. Petitioner motioned for appointment of counsel, trial-by-jury, Court reporter, motion to add parties, motion to deem case complex, motion for counterclaim, and rehearing but was denied. Petitioner motioned for rehearing but was denied.

2) SEC. GG and SEC. F 259-260: 3:19-CV-00136-G-BT

(U. S. D. C. Northern Texas Dallas Division) *Columbia Luxar v. Deloris Phillips*. Honorable Judge A. J. Fish (Honorable Magistrate Rebecca Rutherford) presiding. Motion for leave to file Notice of removal JE-19-00343-H per Federal question, filed by Removant-Defendant on 01.17.2019. Motion for leave to file denied (Doc. 5);

3) SEC. FF and SEC. F 249-258: CC-19-00788-E

(Dallas County Court at Law No. 5) *Columbia Luxar v. Deloris Phillips*. Honorable Judge Mark Greenberg presiding. Appealed by defendant on 02.06.2019 from JE-19-00343-H. Appellant motioned for appointment of counsel, trial-by-jury, court reporter, motion to deem case complex, and motion for rehearing but was denied. Appellant was actually told during

I

hearing that the jury was in the back waiting to come out but jury never came out;

4) SEC. EE and SEC. F 246-248: 3:19-CV-00478-M-BK

(U. S. D. C. Northern Texas Dallas Division) *Columbia Luxar v. Deloris Phillips*. Honorable Judge Barbara M. G. Lynn (Honorable Magistrate Rebecca Rutherford) presiding. Defendant filed motion for leave to file Notice of Appeal CC-19-0788-E on 02.26.2019 but motion was denied;

5) SEC. DD and SEC. F 239-241: 05-19-00251-CV (The Fifth Judicial District Court of Appeals-Texas) *Columbia Luxar v. Deloris Phillips*. Defendant filed Notice of Appeal CC-19-0788-E (Dallas County Court at Law No. 5) on 02.28.2019. This appeal was closed by mandate on 09.12.2019;

6) SEC. F 242-245: 05-19-00251-CV Clerk's Record Report VOL. I 04.24.2019;

7) SEC. EE and SEC. F 246-248: 19-10271 (The U. S. Court of Appeals for the Fifth Circuit). *Columbia Luxar v. Deloris Phillips*. Appellant-defendant filed appeal (3:19-CV-00478-M-BK) on 03.04.2019;

8) SEC. AA and SEC. F 227-235: 3:20-CV-00467-X-BT (U. S. D. C. Northern Texas Dallas Division) *Columbia Luxar v. Deloris Phillips*. Honorable Judge Brantley Starr (Honorable Magistrate Rebecca Rutherford) presiding. Motion for leave to file Notice of Removal CC-19-0788-E denied on 09.24.2020;

9) SEC. F 236-238: 3:20-CV-00464-K Hon/ Ed Kinkeade (U. S. D. C. Northern Texas Dallas Division) *Columbia Luxar v. Deloris Phillips* filed 02.24.2020;

II

- 10) SEC. CC and SEC. F 222-226: 20-10984 (The U. S. Court of Appeals for the Fifth Circuit). *Columbia Luxar v. Deloris Phillips*. Appellant-defendant filed appeal (3:20-CV-00467-X-BT) on 09.28.2020. On petition the Supreme Court of the United States of America on 09.24.2021;
- 11) SEC. BB: Supreme Court Orders & Letters and other Orders.
- 12) SEC. F 236-264: U. S. D. C. Northern Texas Dallas Court Query of Cases Appellant;
- 13) SEC. F 265: U. S. D. C. Northern Texas Dallas Court Query of Cases Appellant;
- 14) SEC. F 266: U. S. C. A. for the Fifth Circuit Court Query of Cases Appellant;
- 15) SEC. F 267-268: U. S. C. A. for the Fifth Circuit Court Query of Cases Appellant; and
- 16) SEC. F 269: U. S. Bankruptcy Court of Northern Texas Dallas Court Query of Cases Appellant.



Work

Quinton
List Parties
Related
Case

page
17-24

Petition
01.31.2021 AD
supporting
document

TABLE
OF
Cor SEC
B3

07.22.2021 AD
09.09.2021

Appendix
TOC
Old

Statement
of
Case 5

IX
I-III

LOC I III
COR

SEC B3
IV

IX

TABLE OF CONTENTS

PAGES

Motion for IFP.....Filed separately

Questions Presented for review.....

List of parties.....

List of Related cases.....

APPENDICES

Opinions/Citations Below

Petitioner respectfully prays that writ of certiorari is granted.

Jurisdiction.....

The jurisdiction of this court is invoked by 28 U. S. C. § 1254(1)

The last date which the United States Court of Appeals denied extension of time to file brief and record excerpts was Record excerpts was 08.05.2021

Constitutional and Statutory Provisions..... 1255

Statement of the case..... 1-8

Reasons for Granting the Petition..... -5

Concise statement.....

Conclusion..... FS-

Declaration Under Penalty of Perjury.....Attached to Petition

Proof of Service.....Separately submitted

Appendices
TABLE OF CONTENTS
ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS

<u>CASE</u>	<u>PAGE</u>
SEC. BB Supreme Court letters and other Orders	
Supreme Court letter (20-10984) regarding Appellant's Application	
For extension of time (Dated 02.17.2021).....	BB-1
Supreme Court letter (20-10984) regarding corrections	
To petition (dated 07.27.2021).....	BB-2
Supreme Court letter (20-10984) regarding amended application	
For extension of time (dated 09.15.2021).....	BB-3
Supreme Court Covid-19 Order dated 03.19.2020.....	BB-4-5
Supreme Court Covid-19 Order dated 04.15.2020.....	BB 6-7
3:21-CV-01628-C-BK (On appeal C21931270-01)	
<i>State of Texas v. Deloris Phillips</i>	
Dismissal [Cause C21931270-01 (City of Dallas Municipal Court)]	
on Appeal by defendant Deloris Phillips	
JUDGMENT (Doc. 19) Ticket for "no yield" dated 08.30.2021.....	BB-8
3:21-CV-1905-C-BN (On Appeal CC-21-03128)	
<i>State of Texas v. Deloris Phillips</i>	
Occupational License Petition	
ORDER (Doc. 6).....	BB-9

IV

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS RECOMMENDATION/JUDGMENTS CONT

CASE	PAGE
SEC. CC: 20-10984 (USCA5) MEMORANDUM-Deputy Clerk M. Mattingly Denying motion to file electronically Dated 10.06.2020.....	SEC. CC-1
20-10984 (USCA5) ORDER-Hon. Judge James L. Dennis Denying motion for reconsideration to file electronically Dated 11.10.2020.....	SEC. CC 2-3
20-10984 (USCA5) MEMORANDUM-Deputy Clerk C. Whitney Denying motion to supplement record on appeal Dated 11.19.2020.....	SEC. CC-4
20-10984 (USCA5) same as DOC. 41 (3:20-CV-00467-X-BT) PER CURIAM-Hon. Dennis, Southwick, and Engelhardt Denying appellant's motion to file electronically; denying motion For reconsideration to extend time; denying motion To suspend briefing; denying motion to appoint counsel; Denying motion for finding of fact; denying motion to Supplement brief Dated 01.13.2021.....	SEC. CC 5-7
20-10984 (USCA5) ORDER-Hon. Judge James L. Dennis Granting motion for extension time to file brief. Denying motion to suspend brief. Dated 02.08.2021.....	SEC. CC 8-9
20-10984 (USCA5) same as DOC. 42 (3:20-CV-00467-X-BT) ORDER-Hon. Judge James L. Dennis Denying Motion to Suspend Case pending the U. S. Supreme Court decision Dated 04.06.2021.....	SEC. CC 10-12
20-10984 (USCA5) ORDER-Hon. Judge James L. Dennis Granting motion for extension time to file brief Granting motion for extension to file record excerpts Dated 05.28.2021.....	SEC. CC 13-14

Appendices
ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CONT

CASE

PAGE

SEC. CC CONT

20-10984 (USCA5) same as DOC. 43 (3:20-CV-00467-X-BT)
ORDER-Hon. Judge James L. Dennis
Denying Motion for 90 day extension to file
Brief and record excerpts
Dated 07.15.2021.....SEC. CC 15-16

20-10984 (USCA5) same as DOC. 44 (3:20-CV-00467-X-BT)
CLERK'S OFFICE
Deputy Clerk C. Whitney
Appellant failed to timely file brief and record excerpts
Dated 07.15.2021.....SEC. CC 17-18

20-10984 (USCA5) 3:20-CV-00467-X-BT
PER CURIAM-Hon. Dennis, Southwick, and Engelhardt
Denying appellant's motion for extension to file
Brief and record excerpts.
Dated 08.05.2021.....SEC. CC 19-20

20-10984 (USCA5) DOCKET SHEET
Columbia Luxar v. Deloris Phillips.....SEC. CC 21-27

SEC. AA

3:20-CV-0467-X-BT (U. S. D. C. Northern Texas Dallas Division)
ORDER (Doc. 5) *Columbia Luxar v. Deloris Phillips*
Hon. Magistrate R. Rutherford
Granting motion to proceed IFP (dated 02.27.2020).....SEC. AA 20-10984.34-35

3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 6)
Hon. Magistrate R. Rutherford
Findings, Conclusions, & Recommendations
Of the U. S. Magistrate Labeling appellant vexatious
(Dated 03.06.2020).....SEC. AA 20-10984.36-38

3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 9)
Hon. Magistrate R. Rutherford
Granting motion for extension to file objection to FCR
(Dated 04.13.2020).....SEC. AA 20-10984.101

VI

Appendices
ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CONT

CASE	PAGE
SEC. AA CONT	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 11)	
Hon. Magistrate R. Rutherford	
Granting third motion for extension to file objection	
(Dated 04.27.2020).....SEC. AA 20-10984.119-120	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 13)	
Hon. Magistrate R. Rutherford	
Granting fourth motion for extension to file objection	
(Dated 05.19.2020).....SEC. AA 20-10984.131-132	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 17-3) filed 05.26.2020	
Copy of CC-19-00788-E ORDER (dated 02.21.2019)	
Hon. M. Greenberg	
<i>Columbia Luxar v. Deloris Phillips</i>	
Denying defendant's motion to deem case complex	
Denying motion to file counterclaim.....SEC. AA 20-10984.951	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 17-3) filed 05.26.2020	
Copy of CC-19-00788-E ORDER (dated 02.21.2019)	
Hon. M. Greenberg	
<i>Columbia Luxar v. Deloris Phillips</i>	
Granting plaintiff's motion for default judgment..... SEC. AA 20-10984.984	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 17-3) filed 05.26.2020	
Copy of CC-19-00788-E ORDER (dated 03.04.2019)	
Hon. M. Greenberg	
<i>Columbia Luxar v. Deloris Phillips</i>	
Denying defendant's motion to transfer case	
Denying defendant's motion to reopen case	
Denying defendant's motion to reconsider	
Denying motion to appoint counsel	
Denying motion for jury trial.....SEC. AA 20-10984.985	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 26)	
Hon. Magistrate R. Rutherford	
Denying fifth motion for extension to file objection	
(Dated 06.25.2020).....SEC. AA 20-10984.3832-3833	

VII

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS RECOMMENDATION/JUDGMENTS CONT

CASE	PAGE
SEC. AA CONT: 3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 27) Hon. Magistrate R. Rutherford Vacates (Doc. 6) FCR. State records filed. (Dated 06.25.2020).....SEC. AA 20-10984.3834	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 28) Hon. Magistrate R. Rutherford Findings, Conclusions, & Recommendations Of the U. S. Magistrate recommending denying Motion for leave to file a removal action and dismiss case (Dated 06.26.2020).....SEC. AA 20-10984.3835-3838	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 31) Hon. Magistrate R. Rutherford Denying motion for extension of time to object FCR (Dated 09.01.2020).....SEC. AA 20-10984.4213	
3:20-CV-0467-X-BT (20-10984) (Doc. 33) filed on 09.20.2020 Originally filed in 3:19-CV00136-G-BT (Doc. 5) on 01.28.2019 <i>Defendant's Objection [Doc. 4] Pursuant FRCP 46: Motion for Relief Pursuant FRCP 60 (b); Motion to Make Offer of Proof; Motion to reopen Case; Motion for Hearing; Motion for Review And reconsideration of Objection by all Justices of the United States District Court of Northern Texas Dallas Division; and Demand for Diverse Jury (Inclusive of Minorities, Nonminorities, Women, and Men Beyond Sexuality).....SEC. AA 20-10984.4280-4306</i>	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 34) 09.23.2020 Hon. Magistrate R. Rutherford Denying third motion for extension of time to object to second FCR.....SEC. AA 20-10984.4307-4308	
3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 35) 09.24.2020 Hon. Judge B. Starr accepting second FCR.....SEC. AA 20-10984.4309	
3:20-CV-0467-X-BT (20-10984) JUDGMENT (Doc. 35) 09.24.2020 Hon. Judge B. Starr accepting second FCR.....SEC. AA 20-10984.4310	
3:20-CV-0467-X-BT DOCKET SHEET <i>Columbia Luxar v. Deloris Phillips.....SEC. AA 20-10984.1-9</i>	

VIII

RECOMMENDATION/JUDGMENTS CONT
ORDER/OPINIONS/FINDINGS/CONCLUSIONS

PAGE

CASE

SEC. AA CONT: 3:30-CV-0467-X-BT (30-10984) ORDER (Doc. 37)
Hon. Magistrate R. Rutherford
7 dates (Doc. 3) FOR State Records Filed
(Dated 06.25.2020) SEC. AA 30-10984-834

3:30-CV-0467-X-BT (30-10984) ORDER (Doc. 38)
Hon. Magistrate R. Rutherford
Findings, Conclusions, & Recommendations
Of the U. S. Magistrate recommending denying
Motion for leave to file a removal action and dismiss case
(Dated 06.25.2020) SEC. AA 30-10984-835 838

3:30-CV-0467-X-BT (30-10984) ORDER (Doc. 39)
Hon. Magistrate R. Rutherford
Denying motion for extension of time to object FOR
(Dated 06.01.2020) SEC. AA 30-10984-1218

3:30-CV-0467-X-BT (30-10984) ORDER (Doc. 39) Filed on 07.20.2020
Originally filed in 3:19-CV-00136-D BT (Doc. 7) on 07.28.2019
Defendant's Objection (Doc. 3) Pursuant FRCP 46: Motion for
Relief Pursuant FRCP 60 (b) Motion to Make Order of Proof
Motion to reopen Case: Motion for Hearing: Motion for Review
and reconsideration of Objection by all parties of the United
States District Court of Northern Texas Dallas Division and
Demand for Divorce (Inclusive of Affirmed Nonparental
Woman and Men Beyond Severance) SEC. AA 30-10984-1580-4308

3:30-CV-0467-X-BT (30-10984) ORDER (Doc. 34) 06.23.2020
Hon. Magistrate R. Rutherford
Denying third motion for extension of time
to object to second FCR SEC. AA 30-10984-4307-4308

3:30-CV-0467-X-BT (30-10984) ORDER (Doc. 35) 06.24.2020
Hon. Judge B. Starr accepting second FOR SEC. AA 30-10984-4309

3:30-CV-0467-X-BT (30-10984) JUDGMENT (Doc. 35) 06.24.2020
Hon. Judge B. Starr accepting second FCR SEC. AA 30-10984-4310

3:30-CV-0467-X-BT DOCKET SHEET
Columbia Luzar v. Debra Phillips SEC. AA 30-10984-1-9

Appendix
ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CONT

CASE	PAGE
SEC. DD:	
05-19-00251-CV (The Fifth Judicial District Court of Appeals-Texas) Letter from Dallas County Noticing Record (CC-19-00788-E is Ready w/ copy of Index of Clerk's record. Letter Dated 04.25.2019.....	SEC. DD 1-3
05-19-00251-CV TRIAL COURT CAUSE CC-19-00788-E REPORTER'S RECORD VOLUMES III OF III Court Reporter Brooke Wagner Master Index Forcible Entry and Detainer	
VOL. I Trial and Motion to Transfer (02.21.2019).....	SEC. DD 4-9
VOL. II Trial (02.21.2019).....	SEC. DD 10-44
VOL. III Defendant-Appellant's Motion to Transfer And other motions (03.04.2019).....	SEC. DD-45-62
05-19-00251-CV ORDER Hon. Judge B. Whitehill Denying motion to supplement record on appeal Order dated 04.26.2019.....	SEC. DD-63
05-19-00251-CV ORDER Hon. Judge B. Whitehill Denying motion for en banc hearing. Order requiring appellant's jurisdictional brief. Order dated 05.30.2019.....	SEC. DD-64
05-19-00251-CV ORDER Hon. Judge B. Whitehill Denying appellant's second motion to supplement Record as moot. Order dated 07.03.2019.....	SEC. DD-65
05-19-00251-CV MEMORANDUM OPINION Hon. Judge B. Whitehill Granting appellant's motion for voluntary dismissal Pending Housing and Urban Development of Fort Worth And the City of Dallas Fair Housing Complaint Nos. 19.002 & 19.042 (transferred from HUD Fort Worth Office to the City of Dallas fair Housing Office Memorandum Opinion dated 07.03.2019.....	SEC. DD-66
05-19-00251-CV JUDGMENT Hon. Judge B. Whitehill Appeal dismissed Judgment dated 07.03.2019.....	SEC. DD-67

IX

RECOMMENDATIONS AND COMMENTS CONT
ORDERS ON APPEALS AND PETITIONS

PAGE

CASE

SEC. 101

02-19-00251-CV (The Fifth Judicial District Court of Appeals in Texas)
Letter from Dallas County Sheriff's Office dated 07-19-2019 E is Ready
at copy of index of Clerk's record. Index Dated 07-20-2019. SEC. 101-13

02-19-00251-CV TRIAL COURT CAUSE NO. 19-00251-E
REPORTER'S RECORD VOLUMES III OF III

Court Reporter George Wagner
Master Index for the Court and District
VOL. I Trial and Motion to Transfer (02-21-2019) SEC. 101-4-9
VOL. II Defendant's Appeal Motion to Transfer
VOL. III Defendant's Appeal Motion to Transfer
And other motions (02-04-2019) SEC. 101-4-5-2

02-19-00251-CV ORDER Hon. Judge B. Whitfield
Denying motion to supplement record on appeal
Order dated 07-20-2019 SEC. 101-6-3

02-19-00251-CV ORDER Hon. Judge B. Whitfield
Denying motion for an order granting Order regarding
appellant's jurisdictional issue
Order dated 07-20-2019 SEC. 101-6-4

02-19-00251-CV ORDER Hon. Judge B. Whitfield
Denying appellant's record motion to supplement
Record as most Order dated 07-08-2019 SEC. 101-6-5

02-19-00251-CV MEMORANDUM OF DECISION Hon. Judge B. Whitfield
Granting appellant's motion for voluntary dismissal
Pending Housing and Urban Development of Fort Worth
And the City of Dallas F.H.U. Housing Complaint
Nos. 19-002 & 19-042 withdrawn from H.U. Fort Worth
Office to the City of Dallas F.H.U. and Other
Memorandum Opinion dated 07-07-2019 SEC. 101-6-6

02-19-00251-CV JUDGMENT Hon. Judge B. Whitfield
Appel dismissed
Judgment 07-07-2019 SEC. 101-6-7

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS RECOMMENDATION/JUDGMENTS CONT

CASE	PAGE
SEC. DD CONT:	
05-19-00251-CV MANDATE Opinion delivered by Hon. Judge B. Whitehill Justices Partida-Kipness and Pedersen, III participating Dismissing appeal Order dated 09.12.2019.....	SEC. DD-68
05-19-00251-CV LETTER from Court dated 03.12.2020 Agreeing to transfer records on CD to appellant.....	SEC. DD-69
05-19-00251-CV (The Fifth Judicial District Court of Appeals-Texas) Docket Sheet <i>Columbia Luxar v. Deloris Phillips</i>	SEC. DD 70-72
SEC. EE: 3:19-CV-00478-M-BK DOCKET SHEET	
<i>Columbia Luxar v. Deloris Phillips</i>	SEC. EE 19-10271 PGS.1-2
CC-19-00788-E DOCKET SHEET	
<i>Columbia Luxar v. Deloris Phillips</i>	SEC. FF 1-4
3:19-CV-00136-G-BT DOCKET SHEET	
<i>Columbia Luxar v. Deloris Phillips</i>	SEC. GG1-2
Defendant-Appellant's Notice of Removal Doc. 2.....	SEC. GG-3-13
JE-19-00343-H DOCKET SHEET <i>Columbia Luxar v. Deloris Phillips</i>	
Copy of file folder represents docket sheet	
Motion for new trial denied 01.30.2019.....	SEC. HH-1
Defendant-Appellant's motion to remove default judgment and	
Motion to request new trial and hearing.....	SEC. HH 2-8
Defendant's Jury Trial Request.....	SEC. HH-9
JE-19-00343-H Letter to Appeal Court.....	SEC. HH 12-13

X

Appendices

TABLE OF CONTENTS

PAGES

EXHIBIT ONE: On appeal 20-10984 Nondispositive ORDER 01.13.2021

SEC. 1: STEPHANIE CLIFFORD V. DONALD TRUMP DEFAMATION AND SLANDER CLAIM.

STEPHANIE CLIFFORD PREVAILS VIA DUE PROCESS

Stephanie Clifford v. Donald Trump Case No. BC696568

Superior Court of California County of L.A. Central District Dept. 53

Honorable Robert B. Broadbelt III presiding

ORDER Granting Clifford's Attorney's Fees dated 08.17.2020.....SEC. 1: 1-29

Stephanie Clifford Related cases:

2:18-CV-02217-CV Honorable James Otero

2:18-CV-06893- Honorable Jesse M. Furman

CCA No. 18-56351 Ninth Court of Appeals. Appellant Clifford

SEC. A: DALLAS OBSERVER ONLINE ARTICLES CONCERNING ROBERT GRODEN

ROBERT GORDEN PREVAILS VIA DUE PROCESS

PAGES

The Sixth Floor's Conspiracy

Jim Schutze 09.12.2013 (6 pgs.).....SEC. A: 1-6

The City of Hate is Now the City of Bullies

Jim Schutze 07.03.2014 (5 pgs.).....SEC. A: 7-11

Dallas Has Now Lost 82 Cases Against Robert Groden.

Someone Call Guinness. Jim Schutze 09.08.2016 (4 pgs.).....SEC. A: 12-15

Robert Groden, JFK Expert, Settles with Dallas After 82 Bad Arrests

Jim Schutze 03.10.2017 (5 pgs.).....SEC. A: 16-20

Dallas Gets Sued: A Recent History

Stephen Young 02.10.2020 (7 pgs.).....SEC. A: 21-27

XXIX

Appendices

SEC. A: ROBERT GRODEN AND ATTORNEY KIZZIA SPEAKING OF DALLAS' DECADES 'OLE CONSPIRACY SETTLED IN 2017

YOUTUBE VIDEO: Robert Groden and Attorney Bradley Kizzia
The Conspiracy to Silence a JFK Assassination Theorist

Robert Groden and his Attorney Kizzia speaks of prevailing in all cases
Against the City of Dallas, Dallas County Historical Museum,
And Dallas Police Department (DC-06-12501, 3:10-CV-01280,
And DC-14-01521. Dallas lawlessly battled Groden over two decades.
And Groden also prevailed in all 82 citations Dallas lawlessly wrote him.
Robert Groden also mentions of being approached by Homeland
Security because Dallas intentionally and maliciously set up Groden.
To look as though he was a criminal.

<https://youtu.be/nfahV3CMbVA>

The Conspiracy to Silence a JFK Assassination Theorist - YouTube

The Conspiracy to Silence a JFK Assassination Theorist

Posted 01.06.2017 [6:37(8) minutes].....**PLEASE SEE YOUTUBE VIDEO**

SEC. A: GRODEN V. CITY OF DALLAS, DALLAS V. GRODEN GRODEN VS. DALLAS COUNTY DOCKET SHEETS & ORDERS

Groden v. City of Dallas, et al DC-06-12501 Docket Sheet (2 pgs.)

Hon. Emily Tobolowsky Dallas County 298TH District Court

(Opened 12.12.2006 Closed 03.10.2008).....**SEC. A: 28-29**

Groden v. City of Dallas, et al 3:10-CV-01280-N Docket Sheet (20 pgs.)

Honorable David C. Godbey

U. S. District Court of Northern Texas Dallas Division

(Opened 06.30.2010 Closed 03.22.2017).....**SEC. A: 30-49**

Robert Groden's Original Complaint 3:10-CV-01280-N

Groden v. City of Dallas, Sgt. Frank Gorka, and Cpl. Rodney Nevils

Civil Rights Violations

Complaint (14 pgs.) Filed 06.30.2010.....**SEC. A: 50-63**

The State of Texas (Appellant) vs. Robert Groden (Appellee)

MC-11-R0004-D Opinion, Judgment, and Mandate

Affirming Appellee's Motion to Quash 03.15.2013 (5 pgs.)

Honorable Kristen Wade

Dallas County Criminal Court of Appeals.....**SEC. A: 64-68**

TCAT

Appendix

SEC. A: GRODEN V. CITY OF DALLAS, DALLAS V. GRODEN GRODEN VS. DALLAS COUNTY DOCKET SHEETS, COMPLAINTS, ORDERS, AND JUDGMENTS

Groden v. City of Dallas, et al DC-14-01521 Docket Sheet (12 pgs.)
Honorable Ken Molberg- Dallas County 95TH District Court
(Opened 02.14.2014 Closed 05.20.2017).....SEC. A: 69-80

City of Dallas, et al v. Groden 05-15-00033 Docket Sheet (5 pgs.)
Justice Lang-Miers. Justices Brown and Schenck participating.
In the Court of Appeals Fifth District of Texas at Dallas
(Opened 01.12.2015 Closed 01.13.2017).....SEC. A: 81-85

Groden vs. City of Dallas, et al 3:10-CV-01280-N
ORDER (01.20.2015)
Denying Plaintiff's Motion for New Trial (3 pgs.).....SEC. A: 86-89

Groden v. City of Dallas, et al 15-10073 Docket Sheet (8 pgs.)
Honorable Circuit Judges King, Jolly, and Prado.....SEC. A: 90-97

City of Dallas, Vincent Golbeck, Stephen Worden, Raquel Hernandez,
and Carla D. Newson v. Robert Groden
05-15-00033-CV (DC-14-01521)
Justices Brown and Schenck participating.
In the Court of Appeals Fifth District of Texas at Dallas.....
Reversed, Rendered, and Dismissed with Prejudice
Memorandum and Opinion 04.16.2016 (15 pgs.).....SEC. A: 98-112
Judgment 04.16.2016 (1 pg.).....SEC. A: 113
Mandate and Bill of Costs 04.16.2016.....SEC. A: 114-116

15-10073 (3:10-CV-01280-N)
Robert Groden vs. City of Dallas, et al
Reversed and Remanded 06.16.2016 (10 pgs.)
Honorable Circuit Judge E. Grady Jolly King, and Prado
United States Court of Appeals for the Fifth Circuit.....SEC. A: 117-126
Judgment (07.08.2016).....SEC. A: 127

United States Court of Appeals for the Fifth Circuit.
Groden v. City of Dallas, et al 16-0559 (05-15-00333-CV) Docket Sheet (3 pgs.)
Texas Supreme Court
(Opened 07.28.2016 Closed 10.21.2016).....SEC. A: 128-131

[Handwritten signature]

Appendices

SEC. A CONT : GRODEN VS. CITY OF DALLAS, ET AL
COMPLAINT, ORDERS, OPINIONS, AND JUDGMENTS.
ROBERT GRODEN PREVAILED IN EACH/ALL CASES

PAGES

*Robert Groden v. City of Dallas, Vincent Golbeck, Stephen Worden,
Raquel Hernandez, and Carla D. Newson*
16-0559 (05-15-00333-CV)

Petitioner Robert Groden's Attorney Bradley Kizzia letter dated 10.18.2016
to Texas Supreme Court.....SEC. A: 132-133

*Robert Groden v. City of Dallas, Vincent Golbeck, Stephen Worden,
Raquel Hernandez, and Carla D. Newson*
16-0559 (05-15-00333-CV)

Petition Dismissed for Want of Jurisdiction

Petitioner's Motion for Writ of Mandamus Denied

(05-15-00033-CV, ___ SW3d ___, 04-06-16)

ORDER Denying Petitioner's 09.02.2016

FINAL ORDER-Petitioners Motion for Rehearing Denied (1 pg.)
(10.21.2016)

Texas Supreme Court.....SEC. A: 134

SEC. B: PEGGY YOUNG. VS. UNITED PARCEL SERVICE, INC.
12-1226 [11-2078 (USCA4/8:2008-CV-02586)].
DISPARATE TREATMENT AND DISCRIMINATION.
PEGGY YOUNG PREVAILS VIA DUE PROCESS

Peggy Young v. UPS, INC. 12-1226 Docket Sheet.....SEC. B: 135-140

Petitioner Peggy Young's Question Presented (12-1226).....SEC. B: 141

Peggy Young v. UPS, INC. Syllabus.....SEC. B: 142-146

Peggy Young v. UPS, INC. Opinion in Part.....SEC. B: 147-148

Oral Argument

https://www.supremecourt.gov/oral_arguments/audio/2014/12-1226 (12.03.2014)

SEC. C: DIANE FORD VS. UNITED PARCEL SERVICE, INC.
DC-2014-02874 NOTICE OF REMOVAL 3:14-CV-01872-D
DIANE FORD PREVAILS VIA DUE PROCESS

Diane Ford v. UPS, Inc. DC-14-02874 Docket Sheet (3 pgs.)

Honorable Martin Hoffman 68th Dallas County

Opened 03.20.2014. Notice of Removal 05.22.2014.....SEC. C: 149-151

FILED
IV

Appendices

SEC. C: DIANE FORD VS. UNITED PARCEL SERVICE, INC.
DC-2014-028743:14-CV-01872-D NOTICE OF REMOVAL
DIANE FORD PREVAILS VIA DUE PROCESS

Diane Ford v. UPS, Inc. DC-14-02874 (Dallas County 68th District Court)
Honorable Martin Hoffman 68th Dallas County
Petitioner Diane Ford's Original Complaint 03.20.2014
Racism Discrimination, wrongful termination (race/color based),
Disability discrimination, Age Discrimination (race/color based).....SEC. C: 152-160

Diane Ford v. UPS, Inc. 3:14-CV-01872-D Docket Sheet (3 pgs.)
U.S.D.C. Northern Texas (Dallas)
Honorable Sidney A. Fitzwater
Opened/Notice of Removal 05.22.2014. Closed 04.29.2015.....SEC. C: 161-163

Diane Ford v. UPS, Inc. 3:14-CV-01872-D Docket Sheet (3 pgs.)
Honorable Sidney A. Fitzwater
Agreed Stipulation of Dismissal with Prejudice 04.29.2015.....SEC. C: 164-166

SEC. D: CEDRIC HOWARD VS. UNITED PARCEL SERVICE, INC.
3:09-CV-02074-K (1:09-CV-02333 NOTICE OF REMOVAL)
42 U.S.C. 1981 (DISCRIMINATION/RACE) DISMISSED WITH PREJUDICE

Cedric Howard v. UPS, Inc. 3:09-CV-02074-K Docket Sheet (10 pgs.)
Honorable Ed Kinkeade
Opened/Notice of Removal 11.03.2009. Closed 01.18.2011SEC. D: 167-176

Cedric Howard v. UPS, Inc. 1:09-CV-02333-ODE
Original Complaint 08.26.2009 (17 pgs.).....SEC. D: 177-193

Bill of Costs 02.07.2011.....SEC. D: 194

SEC. E: JEARLDINE MANGUM VS. UNITED PARCEL SERVICE, INC.
3:09-CV-00385-D U.S.D.C. NORTHERN TEXAS (DALLAS)
CIVIL RIGHTS CLAIM DISMISSED WITH PREJUDICE

Jearldine Mangum v. UPS, Inc. 3:09-CV-00385-D Docket Sheet (10 pgs.)
Honorable Sidney A. Fitzwater
Opened 03.02.2009. Closed 12.14.2009SEC. E: 195-197

[Handwritten signature]

Appendices

SEC. E CONT: JEARLDINE MANGUM VS. UNITED PARCEL SERVICE, INC.
3:09-CV-00385-D U.S.D.C. NORTHERN TEXAS (DALLAS)
CIVIL RIGHTS CLAIM DISMISSED WITH PREJUDICE

Jearldine Mangum v. UPS, Inc. 3:09-CV-00385-D
Plaintiff's Reply to Defendant's Response to Findings of Magistrate Judge
11.17.2009.....SEC. E: 198-201

Jearldine Mangum v. UPS, Inc. 3:09-CV-00385-D
Plaintiff's Reply to Defendant's Response to Findings of Magistrate Judge
11.17.2009.....SEC. E: 201(a)

Debtor: Jearldine Mangum v. UPS, Inc. 13-35755 (Multiple Court Documents)
U.S. Bankruptcy Court Northern D.C. Texas (Dallas)
Honorable Stacey E. Jernigan
Filed 11.04.2013.....SEC. E: 202-215

SEC. F: COLUMBIA LUXAR VS. DELORIS PHILLIPS
3:20-CV-0467-X(BT) U.S.D.C. NORTHERN TEXAS (DALLAS)
DALLAS' RETALIATORY CONSTRUCTIVE EVICTION
BY "OPEN" QUID PRO QUO

20-10984 *Columbia Luxar v. Deloris Phillips*
U.S. Court of Appeals for the Fifth Circuit
NOA Filed 09.24.2020
Docket Sheet (09.24.2020-10.01.2020).....SEC. F222-226

3:20-CV-467-X-BT *Columbia Luxar v. Deloris Phillips*
Honorable Brantley Starr and Hon. Magistrate Rebecca Rutherford
U. S. District Court of Northern Texas Dallas Division
Opened 02.24.2020. Terminated 09.24.2020
.....Docket Sheet SEC. F227-235

TOC
~~XVII~~

Appendix

SEC. F: COLUMBIA LUXAR VS. DELORIS PHILLIPS
3:20-CV-0467-X(BT) U.S.D.C. NORTHERN TEXAS (DALLAS)
DALLAS' RETALIATORY CONSTRUCTIVE EVICTION
BY "OPEN" QUID PRO QUO

3:20-CV-0464-K (Hon. Ed. Kinkeade)/3:20-CV-047-X-BT (Hon. Starr)
Defendant's Motion for State Court Records to be Provided for JE-19-
00343-H,

CC-19-0788E, AND 05-19-00251-CV, Pursuant 28 U.S.C. § 1449 AND
FRCP 11; AND ASSISTANCE WITH DISCOVERY AND DISCLOSURE
FROM THE CITY OF DALLAS FAIR HOUSING, HUMAN RIGHTS,
AND OFFICE OF EQUITY FOR COMPLAINTS 9.0042/06-19-5157-
8/19.002 Filed 02.24.2020.....SEC. F236-238

05-19-CV-0251 *Columbia Luxar v. Deloris Phillips*
Dallas County Court at Law No. 5.
NOA Filed 02.28.2019 Docket Sheet.....SEC. F239-241

05-19-CV-0251 *Columbia Luxar v. Deloris Phillips*
Clerk's Record Report (CC-19-00788-E)
Dallas County Court at Law No. 5
VOL. I of I-04.24.2019 (report 3 pgs.).....SEC. F242-245

3:19-CV-478-M-BK *Columbia Luxar v. Deloris Phillips*
Honorable Barbara M.G. Lynn and Hon. Magistrate Renee Harris
U. S. District Court of Northern Texas Dallas Division
Opened 02.25.2019. Terminated 02.26.2019
Docket Sheet.....SEC. F246-248

CC-19-00787-E Honorable Mark Greenberg
Dallas County Court at Law No. 2
Opened 02.06.2019.Closed 03.04.2019
Docket Sheet.....SEC. F249-258

TCC
[Signature]

Appendix

3:19-CV-00136-G-BT (Opened 01.22.2019 closed 01.28.2019)

Honorable A.J. Fish and Hon. Magistrate Rebecca Ruthefrford

U. S. District Court of Northern Texas Dallas Division

Opened 01.17.2019 closed 01.22.2019

Docket Sheet..... SEC. F259-260

JE-19-00343-H Honorable Thomas Jones

Justice of the Peace Precinct One Place One

On the day of hearing this case was on appeal

in USDC North TX (Dallas) as 3:19-CV-0136

Opened January 15, 2019....file folder.....SEC. F261-262

U.S. D.C. Northern Texas Dallas Court Query of Cases

for Plaintiff/Appellant/Petitioner Deloris Phillips

Dated 06.26.2019.....SEC. F 263-264

U.S. D.C. Northern Texas Dallas Court Query of Cases

for Plaintiff/Appellant/Petitioner Deloris Phillips

Received after 06.26.2019.....SEC. F 265

U.S. C. A. for the Fifth Circuit Court Query of Cases

for Plaintiff/Appellant/Petitioner Deloris Phillips

Dated 12.16.2019.....SEC. F 266

U.S. C. A. for the Fifth Circuit Court Query of Cases

For Plaintiff/Appellant/Petitioner Deloris Phillips

Dated 12.16.2019.....SEC. F 267-268

U.S. Bankruptcy Court of Northern Texas Court Dallas

Query of Bankruptcies for Deloris Phillips.....SEC. F269

Columbia Luxar's Cease & Desist Email to petitioner

Deloris Phillips delorisphillips360@yahoo.com on

09.25.2020.....SEC. F270

TOC
~~XVIII~~

Appendix

SEC. G: COLUMBIA LUXAR VS. DELORIS PHILLIPS
3:20-CV-0464-K U.S.D.C.N TEXAS (DALLAS)

3:20-CV-0464-K (Hon. Ed. Kinkeade)/3:20-CV-047-X-BT (Hon. Starr)
Defendant's Motion for State Court Records to be Provided for JE-19-00343-H,

*CC-19-0788E, AND 05-19-00251-CV, Pursuant 28 U.S.C. § 1449 AND
FRCP 11; AND ASSISTANCE WITH DISCOVERY AND DISCLOSURE
FROM THE CITY OF DALLAS FAIR HOUSING, HUMAN RIGHTS,
AND OFFICE OF EQUITY FOR COMPLAINTS 9.0042/06-19-5157-
8/19.002 Filed 02.24.2020.....SEC. G271-318*

TOC
~~XIX~~

STATEMENT OF THE CASE

Appellant duly Filed appeal 20-10984 (3:20-CV-00467-X-BT).

REASONS FOR GRANTING THE PETITION

There will be ongoing erroneous miscarriages of injustices if writ of certiorari is not granted. This is not a frivolous writ. This is the fact of ongoing, lawless, retaliatory, antics by an "open" quid pro quo with endless links connections and networks.

Appellant requests for the Highest Court of Justice to audit her cases and it will prove beyond any type doubt that appellant is not frivolous. An audit of all cases filed by appellant Deloris Phillips will validate that she has been unlawfully battled by over a decade. Appellant has never been heard in the court of law as a plaintiff.

Prevailing in the court of law is impossible without due process.

Appellant humbly asks the questions stated below to the court:

- 1) Whether it is unconstitutional, in violation of the Fourteenth Amendment- Equal Protection Clause, for any litigant alleging discrimination in the Court System of America to be labeled *vexatious, frivolous, and pernicious* without being granted due process to be heard physically in the court of law at least once to present evidence, exhibits, reports, support, witnesses, etc.;
- 2) Whether the United States District Court of Northern Texas Dallas Division and the United States Court of the Fifth Circuit violated the Fifth Amendment and erred in labeling and sanctioning litigant, Deloris Phillips as *vexatious, frivolous, and pernicious* without ever once granting petitioner Deloris Phillips due process once in the Court of Law; and
- 3) Whether America's Highest Court of Justice, the Supreme Court of the United States of America has an obligatory duty, per the United States Constitution, to correct obvious, miscarriages of documented and erroneous injustices of lower courts.

This petition is duly submitted for more time to file her brief and extensions in lower court. Appellant motioned to supplement record but was denied. This petition is in all reality one and the same as:

- 1) JE-19-0788-E; 2) 3:19-CV-00136-G-BT; 3) JE-19-00788-H; 4) 05-19-00251-CV;
- 5) 3:19-CV-00478-M-BK; 6) 19-10271; 7) 3:20-CV-00467-X-BT; and
- 8) 20-10984.

Plaintiff reiterates each of her three applications for extensions of time as if each were fully rewritten herein (with all attached supporting evidence/documents/records/files/etc. attached thereto) in its entirety listed below and attached as Evidence/Exhibit 6, Evidence/Exhibit 7, Evidence/Exhibit 8.

EVIDENCE/EXHIBIT 6: *Petitioner's Application to Extend Time to File De Novo Writ of Certiorari only on issues of Nondispositive Order (01.13.2021) filed on 01.13.2021 and attached exactly the same;*

EVIDENCE/EXHIBIT 7: *Petitioner's Application for Extension of Time to File Writ of Certiorari 20-10984 (USCA5) Denied Extension of Time to File Brief and Record Excerpts filed on 07.21.2021;*

EVIDENCE/EXHIBIT 7: *Petitioner's Amended Application for Extension of Time Per Instruction Court Letters Dated 02.17.2021 & 07.27.2021 to File Writ of Certiorari for Denied Multi Motion, Brief, and Record Excerpts. Petitioner Motion Court (Per Rules 21 & 22) to Accept this Application for Extension of Time that Exceeds Page limit filed on 09.09.2021.*

Appellant humbly pleads with said Court, the Highest Court of Justice, the Supreme Court of the United States to impartially rule after reviewing all original records in lower courts. In Sec.BB (pgs. 8-9) these two cases (3:21-CV-1628-C-BK & 3:21-1905-C-BN) appellant alleges to be ongoing retaliation. One case is for an occupational license because appellant can pay for a "DOT-CD Don't Walk Ticket from 04.28.2016. Appellant had all required documents and monies and was denied

in three different courts and this is documented and recent history. Appellant has to appeal these cases. Appellant is in this process now. Appellant seeks more time to file brief and records excerpts in this petition due to covid-19 limiting movement and other issues.

Appellant seeks review on all Orders, Judgments, and opinions from lower court listed and attached as:

05-19-00251-CV (The Fifth Judicial District Court of Appeals-Texas)
Letter from Dallas County Noticing Record (CC-19-00788-E is Ready
w/ copy of Index of Clerk's record. Letter Dated 04.25.2019..... SEC. DD 1-3

05-19-00251-CV TRIAL COURT CAUSE CC-19-00788-E
REPORTER'S RECORD VOLUMES III OF III
Court Reporter Brooke Wagner
Master Index Forcible Entry and Detainer
VOL. I Trial and Motion to Transfer (02.21.2019).....SEC. DD 4-9
VOL. II Trial (02.21.2019).....SEC. DD 10-44
VOL. III Defendant-Appellant's Motion to Transfer
And other motions (03.04.2019).....SEC. DD-45-62

05-19-00251-CV ORDER Hon. Judge B. Whitehill
Denying motion to supplement record on appeal
Order dated 04.26.2019.....SEC. DD-63

05-19-00251-CV ORDER Hon. Judge B. Whitehill
Denying motion for en banc hearing. Order requiring
appellant's jurisdictional brief.
Order dated 05.30.2019.....SEC. DD-64

05-19-00251-CV ORDER Hon. Judge B. Whitehill
Denying appellant's second motion to supplement
Record as moot. Order dated 07.03.2019.....SEC. DD-65

05-19-00251-CV MEMORANDUM OPINION Hon. Judge B. Whitehill
Granting appellant's motion for voluntary dismissal
Pending Housing and Urban Development of Fort Worth
And the City of Dallas Fair Housing Complaint
Nos. 19.002 & 19.042 (transferred from HUD Fort Worth
Office to the City of Dallas fair Housing Office
Memorandum Opinion dated 07.03.2019.....SEC. DD-66

05-19-00251-CV JUDGMENT Hon. Judge B. Whitehill

Appeal dismissed

Judgment dated 07.03.2019.....SEC. DD-67

05-19-00251-CV MANDATE Opinion delivered by Hon. Judge B. Whitehill

Justices Partida-Kipness and Pedersen, III participating

Dismissing appeal

Order dated 09.12.2019.....SEC. DD-68

05-19-00251-CV LETTER from Court dated 03.12.2020

Agreeing to transfer records on CD to appellant.....SEC. DD-69

Appellant reiterates her list of related cases to be true and correct as if these cases were fully rewritten herein. Appellant reiterates her supporting appendices Sec.1, Exhibit 1, Sections A-G and Evidence/Exhibits 6, 7, 8, 9 as if each were fully rewritten herein. Appellant in this said petition motions for leave to file amended de novo writ at the granting of court. Petitioner motions for Court to please accept this one copy of petition and supporting documents. Petitioner does not have the monies to make duplicate copies.

Petitioner alleges lower courts not granting due process at least once allowed an ongoing, decade, and continuous, retaliatory "open" quid pro quo to lawlessly persist. Petitioner alleges being heard in the court of law, by due process, will prove, beyond any doubt, petitioner too was/is battled as Robert Groden proved in the Court of a law as a plaintiff in DC-06-12501 (Robert Groden vs. City of Dallas, et al.)-personal injury. 3:10-CV-1280-N (Robert Groden vs. City of Dallas, et al)-Constitutional Rights Violation. DC-14-01521 (Robert Groden vs. Dallas County Historical Museum, et al.)—Civil Rights Violation. Robert Groden duly prevailed in each of his cases (including when Dallas' frivolously made him a defendant).

Petitioner alleges this appeal for 20-10984 was created by the City of Dallas creating a hostile living environment because petitioner continues to speak truthfully of an ongoing cover-up within a cover-up that involved a fabricated police report, premeditated official oppressions, sabotaged educations, unlawfully redacted

4

video and audio of dash cam and car cam. Robert Groden proved in the Court of law, Federal Court (3:10-CV-1280-N) with two law enforcement officers testifying that they were instructed to be unlawful with Groden while calling it other names. Petitioner alleges if she was granted due process she too could allow evidence, Law Enforcement testimonies, witness, depositions, Police dash cam and body cam, and evidence would show an ongoing, relentless, retaliatory quid pro quo. Groden called his twenty years plus of being battled by Dallas the *crackdown*. Appellant is calling the "open" quid pro quo. Ford of *Diane Ford vs. UPS, Inc.* was granted due process and prevailed. Young of *Peggy Young vs. UPS, Inc.* was granted due process and prevailed. Fisher of *Abigail Fisher vs. University of Texas at Austin, et al.* was granted due process and prevailed.

CONCISE STATEMENT

Appellant alleges her attached supporting documents, the documents she filed in lower courts, the orders, denial, dismissal, and more so, reviewing the original records will show that lower courts were in violation of the 14th Amendment Equal protection Clause and seemingly, intentionally biased with petitioner when allowing other litigants due process regarding the same issues and parties.

CONCLUSION

For the aforementioned reasons, petitioner prays Court vacate, reverse with instructions, and remand.

Respectfully,

/s/ Deloris Phillips

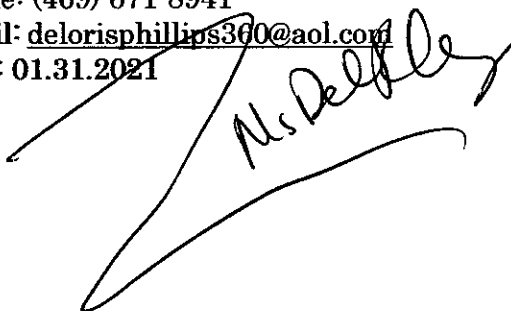
P.O. Box 530236

Grand Prairie, TX 75053-0236

Phone: (469) 671-8941

Email: delorisphillips360@aol.com

Date: 01.31.2021



(5)

**STATE OF TEXAS §
DALLAS COUNTY §**

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that the foregoing is true and correct. Declarant has irrefutable evidence to physically present before the Court indisputably validating this has been an ongoing decade plus, retaliatory "open" quid pro quo. I write/speak as if I were in the court of law, under sworn oath to speak the truth, whole truth, and nothing but the whole truth so help me God.

EXECUTED on the **25** September, 2021.

S/: Deloris Phillips
Declarant