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;

11

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.

Lorem

Question
List Parties
Related
Case

page
17-24

Petition
01.31.2021 App
supporting
document

07.22.2021
App
09.09.2021

TABLE
OF
Con SEC
BB

Appendix
TOC
Old

Statement
of
Case S

TOC
I-III

LOC
LOR I III

SEC BB
IV

XIX

TABLE OF CONTENTS

PAGES

Appendices

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

IV

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CON'T

CASE PAGE

V

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CON'T

CASE PAGE

VI

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CON'T

CASE PAGE

SEC. AA CON'T

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CON'T

CASE PAGE

VIII

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATIONS/JUDGMENTS CONT

CASE PAGE

SEC. AA CONT: 3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 27)
Hon. Magistrate R. Rutherford
Counts (Doc. 6) FCH. State records filed.
(Dated 06.25.2020) ..... SEC. AA 20-10984-3853

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 06.25.2020) ..... SEC. AA 20-10984-3853 3853

3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 31)
Hon. Magistrate R. Rutherford
Denying motion for extension of time to object FCH
(Dated 06.01 2020) ..... SEC. AA 20-10984-1213

3:20-CV-0467-X-BT (20-10984) (Doc. 33) filed on 06.20.2020
Originally filed in 3:19-CV-00139-G BT (Doc. 5) on 01.28.2019
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 Reason-
-and reconsideration of Objection by all duties of the United
States District Court of Northern Texas Dallas Division and
Demand for Diverse Jury: (Inclusive of Minorities, Non-minorities
Women, and Men Beyond Scrutiny..... SEC. AA 20-10984-4280-4306

3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 34) 06.23.2020
Hon. Magistrate R. Rutherford
Denying third motion for extension of time
to object to second FCH..... SEC. AA 20-10984-4307-4308

3:20-CV-0467-X-BT (20-10984) ORDER (Doc. 35) 06.24.2020
Hon. Judge B. Starr accepting second FCH..... SEC. AA 20-10984-4309

3:20-CV-0467-X-BT (20-10984) JUDGMENT (Doc. 36) 06.24.2020
Hon. Judge B. Starr accepting second FCH..... SEC. AA 20-10984-4310

3:20-CV-0467-X-BT DOCKET SHEET
Columbia Lucas v. Dolores Phillips..... SEC. AA 20-10984-1-9

Appendix

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CON'T

CASE PAGE

SEC. DD:

IX

ORDERS/OPINIONS/FINDINGS/CONCLUSIONS
RECOMMENDATIONS/DOCUMENTS CONT

Appendices

ORDERS/OPINIONS/FINDINGS CONCLUSIONS
RECOMMENDATION/JUDGMENTS CON'T

CASE PAGE

SEC. DD CON'T:

I

Appendices

TABLE OF CONTENTS

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**

Appendices

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

Appendix

SEC. A CON'T :*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. Sylabus.....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

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 01.18.2011 .....**SEC. 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 12.14.2009 .....**SEC. E: 195-197**

Appendices

SEC. E CON'T: *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

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

TOC

Appendix

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

TCC
XVII

Appendices

TOC
XVIII

Appendices

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

TOC
IX

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 Nondispoistive 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 **MEMRANDUM 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

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

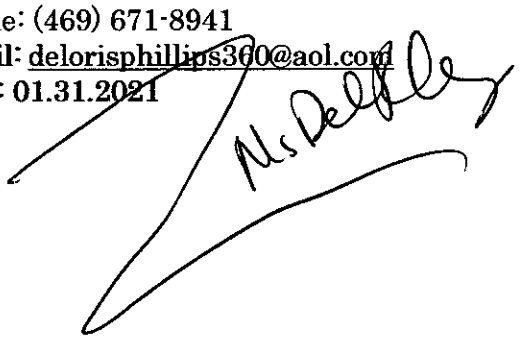
Appellant alleges her attached supporting documents, the documents she filed in lower courts, the orders, denial, dismissal, and more so, reviewing the original records will show that lower courts were in violation of the 14th Amendment-Equal protection Clause and seemingly, intentionally biased with 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