

IN THE SUPREME COURT OF THE UNITED STATES

TERRY G. WATSON,
MOVANT,

VS.

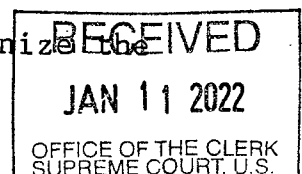
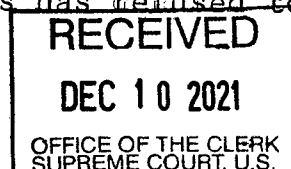
CAUSE NO.
LOWER COURT DECISIONS
2:16-CV-71-HEA ST. LOUIS DIST. CT.
21-1963 USCA8

KAREY L. WITTY, ET.AL.,
RESPONDENTS,

MOTION FOR LEAVE TO PROCEED AS A VETERAN UNDER RULE 40

COMES NOW, Terry G. Watson VA File No. 489-72-4137 with a motion to proceed as a veteran under Rule 40. Movant is seeking leave to file a writ of certiorari concerning the denial of healthcare and reasonable accommodations for disabilities incurred as a result of active service in the United States Army from October 13, 1988 through April 12, 1994/ with combat service in Southern Turkey and Northern Iraq from May through June of 1991.

Movant is a 100% permanent and totally disabled veteran with house bound status under 38 USC § 1114. He has been granted forma pauperis status in the United States District Court Eastern District of Missouri and the United States Court of Appeals for the Eighth Circuit. The lower courts have denied relief of any type, even a declaratory judgement to enforce the rights of veterans under Title 38 of the Federal Code predicated upon the Supremacy Clause. Since circa August of 2012 the State of Missouri through its agency the Missouri Department of Corrections has refused to recognize the



Title 38 decisions of the Secretary in violation of 38 USC § 511 and provide health care and reasonable accommodations under Title II of the ADA.

WHEREFORE, Movant requests this honorable Court to grant his veteran status to proceed upon a writ of certiorari.

Signed,



Terry G. Watson 12/8/2021

AFFIDAVIT OF TERRY G. WATSON

Pursuant to 28 USC § 1746, all statements contained in this affidavit are true and correct under the penalty for perjury.

1. I am a veteran Honorable discharged from the United States Army.

2. I served on active duty from October 13, 1988 through April 12, 1993. I am a combat veteran of Operation Provide Comfort from May-June 1991.

3. I am a 100% permanent and totally disabled veteran with house-bound status under 38 USC § 1114.

Signed,



Terry G. Watson 12/8/2021

CERTIFICATE OF SERVICE

I hereby certify that on 12/8/2021, the original was placed in the institutional mail box and first class postage paid to the Supreme Court of the United States, 1First Street, N.E., Washington, D.C. 20543.

Pursuant to 28 USC § 1746, all statements contained in the foregoing are true and correct under the penalty for perjury.

Signed,



Terry G. Watson 12/8/2021

**UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

No: 21-1963

Terry G. Watson

Plaintiff - Appellant

v.

Karey L. Witty, Corizon Corrections Health Inc. CEO; Ralf Sulke, Vice President of Operations; Geeneen Wilhite, MCC Manager of Health Services; Renee Tradaro, SCCC Manager of Health Services; Dr. Paul Jones, Doctor; Dr. Aschok Chada, MD; Matt Strumm, MDOC Division Director; Assistant Director Deloise Williams, Assistant Director of Health Services; George Lombardi, DIRECTOR OF MDOC; Michael Bowersox, Warden SCCC; Michele Buckner, Assist. Warden, SCCC; Jeff Allen; Dean Minor, Warden MCC; Lisa Pogue, Asst. Warden, MCC; Cathy Barton, Manager of Nurses; Cari D. Collins, ADA Site Coordinator; Will Jones, ADA Site Coordinator; Chris Sweeten, MDOC Director of ADA; Lori Lewis, Deputy Warden and ADA Site Director; Governor Michael L. Parson; Anne L. Precythe, MODOC Director; FNP Tamra L. Crouch; CO II D. Kattelman; Asst. Warden Chantay Godert

Defendants - Appellees

Appeal from U.S. District Court for the Eastern District of Missouri - Hannibal
(2:16-cv-00071-HEA)

JUDGMENT

Before BENTON, ERICKSON, and GRASZ, Circuit Judges.

This court has reviewed the original file of the United States District Court. It is ordered by the court that the motion to correct caption and the motion for leave to add defendants are denied as moot, and the judgment of the district court is summarily affirmed. See Eighth Circuit Rule 47A(a).

October 04, 2021

Order Entered at the Direction of the Court:
Clerk, U.S. Court of Appeals, Eighth Circuit.

/s/ Michael E. Gans

**UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

No: 21-1963

Terry G. Watson

Appellant

v.

Karey L. Witty, Corizon Corrections Health Inc. CEO, et al.

Appellees

Appeal from U.S. District Court for the Eastern District of Missouri - Hannibal
(2:16-cv-00071-HEA)

ORDER

The petition for rehearing en banc is denied. The petition for rehearing by the panel is also denied.

November 19, 2021

Order Entered at the Direction of the Court:
Clerk, U.S. Court of Appeals, Eighth Circuit.

/s/ Michael E. Gans

**Additional material
from this filing is
available in the
Clerk's Office.**