

No. 21-739

IN THE SUPREME COURT OF
THE UNITED STATES

Mandeep Singh,
Petitioner,

v.

Haerim Won and Microsoft Corporation,
Respondents.

On Petition for a Writ of Certiorari to The Supreme
Court of The State of Washington

PETITION FOR REHEARING

Mandeep Singh
Pro Se
PO Box 7204,
Beaverton. OR 97007
Email: singh12112018@gmail.com
Ph: 503-515-5210

Mr. Chief Justice and may it please the Court.

"We are not final because we are infallible, but we are infallible only because we are final." - Justice Robert H. Jackson

After going through page 7, 8, 9, 10 of the article¹, I am filing this rehearing petition pursuant to Rule 44.2 to seek justice for America (in relation to Chips Act), my family & me. This petition is in good faith and not for delay.

As far as intervening circumstances is concerned, sure, Microsoft goes unchecked after taking domestic talent from Intel (legally it may be ok but morally?), Ms. Won gets unneeded protection which is result of her lying, and I along with my family is left to suffer from this injustice for rest of our life. It's another around \$1100 for printing the petition with no light at end of tunnel to get justice.

Most of the statements below are questions that I request the Court should ask Ms.

¹ Vito, Brian De, "When U.S. Supreme Court Decisions Are Not Final: An Examination of the Rehearing Rule and the Court's Application of It in *Kennedy v. Louisiana*" (2010). *Law School Student Scholarship*. 36. https://scholarship.shu.edu/student_scholarship/36

Won/Microsoft/Officer Knight. Some of these questions/statements may appear similar to contents of my writ petition but it is purely to help The Court for pertinent material questions keeping in light of 28 U.S.C. § 1746 & Rule 44 Certificate. I sincerely respect important Court's time. I have read relevant Court Rules and laws to best of my ability and knowledge.

Amendment VIII - Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted; cruel & unusual is interpreted by what those terms mean today, not what they meant when the Constitution was adopted.

**GROUNDS FOR REHEARING AND
GRANTING RELIEF SOUGHT MENTIONED
IN WRIT PETITION**

1. As per question presented in **The US Supreme Court case number 21-499**, Ms. Won cannot claim anything since **no** Miranda rights were said to me (this fact is off record with no evidence but purely on my testimony which is true) by Officer Knight who called me over the out of jurisdiction phone call in June 2019 and hence The Honorable Judge Amini's citation of the cases [State v. Basson 105 Wash.2d 314 (1986) - criminal case; City of Seattle v. May 151 Wn.App.694 (2009)] in her order becomes

irrelevant too as **no** Miranda rights were said to me by Officer Knight. This is strong ground to remand the case back to King County Superior Court for the dismissal of the protection order case KCDC 205-00179. Moreover Won v. Singh is a civil case which in and of itself is challenged and stays challenged. As already stated, one time apartment building visitation was provoked by Ms. Won herself when she demanded me to get my wife & daughter to Seattle. Ms. Won was in New York at the time. These are unarguably legitimate grounds for suppression of oblivious Sept 27th, 2019 police report. The Court should be reminded that none of the protection order terms have been violated in this civil protection order case, a fact. 2nd temporary protection order expired Dec 31st, 2021 with no violation as well.

All these errors made by The Court are creeping up because of very legitimate reason which is Question 4 & 5 presented in writ petition 21-739. These questions are not only applicable in my case but in general also to everyone who are suffering from injustice just because the decision has **not** been made based on material truthfulness of the events between the parties.

2. The US Supreme Court committed an error ignoring (not sure if it is really error as *cert* petition denial does not establish precedence –

please pardon me if this is my mistake analyzing Court procedure) the inaccurate statement from Washington Supreme Court Commissioner's ruling where it states that Singh made advancements towards Won. This error is again creeping up from Question 5 presented in 21-739. I never made any negative advancement towards Won. The Court err on the fact that as a human being should a person stop thinking about earning good for his family? Should a person stop thinking about getting best out of intellectual abilities? So The Court would want a person should just give-into the poor coercive decisions from external forces & their wrongful projections? Like this anyone can be off the hook and say, "i have nothing to do with you" after they get all the intellectual information, coerce and bully, with no accountability and responsibility.

As per Question 8 of writ petition 21-739, The Court is giving an impression that just pumping taxpayers' money through Chips For America Act is good enough to protect the semiconductor technology of the country? Individuals' efforts (like Singh's) who really work on innovation to bring state of the art forward don't matter? The Court must ask Microsoft on why they have hired so many engineers from Intel? What semiconductor technology process these Ex-Intel Engineers are designing their chips on? The Court must also ask the Federal

Trade Commission about the same where they are at on their investigation. The Court must ask why there is new Microsoft office where there is Intel (Hillsboro - Oregon)? On one side the government is funding with Chips For America Act to have domestic manufacturing and chip design but on the other side the Ex-Intel talent at Microsoft is not empowering domestic semiconductor manufacturing anymore.

There are company merger guidelines for potential anticompetitive and antitrust when companies merge, but there are no guidelines when talent flow happens and this goes unchecked, especially at this scale (this is not part of great resignation). Sure, at high level it will appear as if Microsoft is creating lot of employment but only to de-empower domestic semiconductor technology - Intel.

Sure, some competition should be there and it is already there but it should not be to the extent that companies with lot of money start taking talent away and leaving it for the government to fix and maintain the semiconductor crown jewel of The US with tax payers' money. And amidst all this, Intel employees like me who really wants to bring country's semiconductor state of art forward are grinded and fell into the trap of that Ms. Won will understand what collaboration & innovation mean since I already apologized

to her on Dec 20th, 2018 on any misunderstanding on respectable sequence of events.

My family's sufferings are not a collateral damage at the expense of un-intellectual conclusions by external forces (Microsoft & Ms. Won in this case), when I knew that I can innovate American semiconductor technology through some collaboration with Ms. Won from Microsoft (American company). There was a straight intellectual property with potential patent on the horizon back then. We as professionals are driven by ideas on how to create new intellectual property and make this world a better place to live.

3. The Court must ask Ms. Won, why she did not sent the scientific problem statements when she verbally agreed to send them on Dec 20th, 2018 during 40 minutes phone call?

This is transparently breach of verbal contract by her under RCW 4.16.080(3). Microsoft must be asked to pay for the damages for this breach of verbal contract by their employee based on evaluation of intellectual property that is lost. This is very reasonable ask. This would have been domestic research & development in designing chips which is directly the agenda of Chips For America Act. Court/Microsoft can consult Google's Jeff Dean (independent evaluator) & also Intel Corporation managers

that work in Advanced Design Group about the value of the intellectual property (<https://www.linkedin.com/pulse/ic-design-rule-checker-development-data-vision-mandeep-singh/>). Court/Microsoft can get status of my intellectual abilities to make professional things into realization by questioning my managers and colleagues from Intel Corporation. Bringing the state of art forward was **my bread and butter back then** being at Intel and I was the sole earner for the family with my wife taking care of our infant daughter full-time.

4. The Court must ask Ms. Won, why she intentionally did not include the Jan 27th, 2019 life threatening harassment actions by her in her petition? Why she brought excerpts, shuffled, withheld & misrepresented the chain of events in her petition to mislead The Court? Washington Supreme Court Commissioner says in the oral argument something along the lines, "...*we take this very seriously...*", why The Court is not taking harassment & misleading the court actions by Ms. Won seriously? The Court err by merely relying on their experience based on generalized results of cases they have decided in the past and always try to find "males" as the culprit (no offense to anyone with all due respect), when the evidence in this case tells otherwise and Singh should be granted permanent protection against Ms. Won because she created

extremely threatening & harassing environment which represents stalking by her.

Ms. Won pulled me (not in physical sense but thru gesture and talks) aside to have lunch with her on Dec 11th, 2018. Washington Supreme Court cannot conclude on their own as if I persuaded Won to have her phone number. Especially when Ms. Won herself is writing in her petition, "*we exchanged numbers*".

Ms. Won was saying, "*we should know each other*" while I was dropping her at the train station. Moreover, half hour earlier than that conversation she said to let her know when any of us are in Seattle, the Dec 13th, 2018 email evidence is there.

5. The Court must ask Ms. Won, why she did not call the police as she has been extremely threatening Singh about it pre-Jan 27th, 2019?

6. The Court must ask Ms. Won why she called me on Jan 10th, 2020 given the fact she had temporary protection order active against me just 7 days ago? This is material fact relevant to the RCW 10.14.030(1) law.

7. The Court must ask Ms. Won & Ms. (Leeann) Choi why they continued to stalk Singh's twitter & linkedin throughout entire 2019 and writing coercive cryptic messages on their instagram if they have nothing to do with me? **The Court**

must ask Ms. Won to submit all her instagram posts from June 2019 to Dec 2019 which she wrote. The Court must also ask Ms. (Leeann) Choi why she wrote coercive cryptic messages from Aug 2019 to Dec 2019 and ask her to submit instagram posts. If they do not furnish this information in its relevant entirety then I would need order from Court to get their instagram account status messages from instagram company in the year 2019. Also I need Court order to get my twitter & linkedin visitor information in the entire year of 2019 from twitter & linkedin. This will prove that any action which is perceived negatively by Court from my side is direct result of provocation by them and also direct result of the inflicted trauma caused by Ms. Won on Jan 27th, 2019, the car accident of Sept 21st, 2019. All this is before Ms. Won obtaining temporary protection order on Jan 3rd, 2020. It will be a long shot as I don't know how long the companies keep the data but why I should suffer (along with my family) from this injustice where Won withheld many material facts related to obtaining the protection order by framing me?

Evidence related to this point has already been presented but it may not appear conclusive to Court and hence this direct question.

8. The Court must ask Police Officer Knight why he did not contact Singh in Sept 2019 when he created the report and kept Singh oblivious? This is transparently framing of Singh by Ms. Won. This is wrongful making of a case against Singh to ruin his life and his family's life.

9. The Court must suppress all evidence including police report, i do not agree to any of the evidence presented by Won where whole context is lost & misrepresented by Won. Fed Rule 1003.

10. The US Supreme Court did not even exercise original jurisdiction under Article III and nor exercised Rooker-Feldman doctrine as mentioned in my supplemental brief to serve justice to me and my family. If I have to go to US District Court here in Portland, Oregon, i think they will again direct me to file writ petition in The US Supreme Court. The Court transparently failed to serve justice and want people to come over and over in Court which is strictly against the case consolidation rules. I do not have to file explicit petition of extra ordinary writ of mandamus on KCDC case 20CIV14926KCX. The Court must grant protection for me and my family against Ms. Won as she has transparently harassed me and used profane words on my sacred values to obtain the purpose of "no contact" when my only reason for legitimate contact was to have amicable situation and create intellectual property. Her harassing

statements caused suicidal thoughts and great deal of stress to me and my family. The emails to self from Jan 15th, 2019 to Jan 28th, 2019 exactly positions my mental state back then (its even traumatizing now when i try to go back in time to explain it over and over and over again). This in and of itself are intervening circumstances of a substantial or controlling effect. On top of that the injustice done to me and my family are intervening circumstances of substantial effect.

The law has not been applied based on truthfulness (on or off record) of the events in this case. The Court erred by extrapolating on their own neglecting my intellectual abilities of collaboration and empowerment and label it as harassment (Amendment VIII) and say law was followed and justice was served.

I have not harassed Ms. Won. Ms. Won has harassed me, bullied me with suicidal thoughts and lied in The Court of law to ruin my life and my family's life. No one needs any protection from me.

It is also **extremely disheartening & painful** that The Court failed to serve justice to The United States of America by not even questioning Microsoft on why they cannot use Intel's (Intel Corporation) semiconductor process for their chip

design as they took significant talent away from Intel itself. Why they are on the path to empower foreign technology when our own country's technology is on life support from the tax payers' money. Washington State Supreme Court has committed a mistake not taking any action or giving any suggestion to Microsoft but The US Supreme Court is also doing the same mistake. Does The Court need some special explicit cases to be filed to make good decisions for our United States when the information supported with substantial evidence is already there in front of The Court?

KCDC 205-00179 must be dismissed with all orders in this matter from Washington State Courts reversed, cancelled & rescinded.

Respectfully Submitted,

/s/Mandeep Singh

Feb 17, 2022

Mandeep Singh with
his family,

PO Box 7204,
Beaverton, OR – 97007
Email: singh12112018@gmail.com
Ph: 503-515-5210