

## ADDENDUM

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**No. 21-7948**

**Title:** Femi Isijola, Petitioner  
v.  
Elizabeth A. Bielecki, Director, New Hampshire Division of Motor Vehicles

**Docketed:** May 24, 2022

**Linked with 21A434**

**Lower Ct:** Supreme Court of New Hampshire

**Case Numbers:** (2021-0045)

**Decision Date:** November 18, 2021

**Rehearing Denied:** December 9, 2021

DATE	PROCEEDINGS AND ORDERS
Feb 10 2022	Application (21A434) to extend the time to file a petition for a writ of certiorari from March 9, 2022 to May 8, 2022, submitted to Justice Breyer.  <b>Main Document      Lower Court Orders/Opinions</b>
Feb 17 2022	Application (21A434) granted by Justice Breyer extending the time to file until May 9, 2022.
May 05 2022	Petition for a writ of certiorari and motion for leave to proceed in forma pauperis filed. (Response due June 23, 2022)  <b>Motion for Leave to Proceed in Forma Pauperis      Appendix      Petition      Proof of Service</b>
Jun 07 2022	Waiver of right of respondent Elizabeth Bielecki to respond filed.  <b>Main Document</b>
Jun 08 2022	DISTRIBUTED for Conference of 6/23/2022.

Jun 27 2022

Petition DENIED.

NAME	ADDRESS	PHONE
Attorneys for Petitioner		
Femi E. Isijola	1465 Hooksett Road Unit 66 Hooksett, NH 03106	603-560-4174
Party name: Femi Isijola		
Attorneys for Respondent		
Anthony Jordan Galdieri Counsel of Record	New Hampshire Department of Justice 33 Capitol Street Concord, NH 03301  anthony.j.galdieri@doj.nh.gov	603-271-1214
Party name: Elizabeth Bielecki		

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<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.56
<b>Total Postage and Fees</b>	<b>\$3.31</b>
<b>Sent To</b> HON. SCOTT S. HARRIS	
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<b>City, State, ZIP+4®</b> WASHINGTON, D.C. 20543	

FEMI ISIJOLA  
1465 HOOKSETT ROAD  
UNIT 66  
HOOKSETT, NEW HAMPSHIRE 03106

PHONE  
(603)-560-4174

EMAIL ADDRESS  
jayisijola.thelaw@aol.com

June 15, 2022

**VIA U.S. MAIL BY CERTIFIED MAIL**

Hon. Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

Re: Femi Isijola  
vs. Elizabeth A. Bielecki, Director, New Hampshire Division of  
Motor Vehicles.  
NHSC No. 2021-0045  
Docket No. 21-7948

Dear Clerk Harris:

**OBSERVATION OF CLAIMS OF COUNSEL OF RECORD  
IN THE ABOVE- ENTITLED CASE**

On checking this Court's website, I observe Anthony Jordan Galdieri, Esq claiming to be a Counsel of Record in this case and even claiming to send me a Waiver form, **an assertion that is not true.** Jessica A. King is the Counsel of Record for Elizabeth A. Bielecki in the above-entitled case. Even though Anthony J. Galdieri, Esq is the current Solicitor General in the State of New Hampshire, he never participated in this case. As Solicitor General of the State of New Hampshire, any person occupying that position is notified of Civil Case filings in the New Hampshire Supreme Court concerning Administrative Agencies of the State of New

Hampshire that includes the New Hampshire Division of Motor Vehicles and Solicitor General in New Hampshire are generally passive in Civil Cases in New Hampshire Supreme Court as they assigned Civil Cases to Assistant Attorney Generals or to Senior Attorney Generals depending on the Civil Case and they receive any updates from the New Hampshire Supreme Court when the parties are being notified of any decisions of any pleadings and filings by the Active Participants in the case. Even though Daniel E. Will, Esq was the Solicitor General, when my case was filed with the New Hampshire Supreme Court, he is now a **New Hampshire Superior Court Judge**. By default, I had to notify Anthony Jordan Galdieri, Esq because he is the current Solicitor General of the State of New Hampshire and **he never participated in the current above-entitled case**, nor was he a **Counsel of Record at any time**, but he had to be notified of the filing in this Court because Solicitor-General of New Hampshire are notified of Civil Case filings in the New Hampshire Supreme Court and in the Supreme Court of the United States that involves Administrative Agencies of the State of New Hampshire. I had to notify this Court about this Development because I found out about this Finding on checking the Supreme Court of the United States website diligently on the Status of my Case.

#### **KEY POINTS**

1. In my Affidavit in Support of Proof of Service to this Court, I ensure to mentioned that Jessica A. King, Esq is the Counsel of Record representing Elizabeth A. Bielecki in the above-entitled case and was the active Counsel of

Record in the New Hampshire Supreme Court proceedings. (See **Exhibit A page 6**) and that Anthony J. Galdieri, Esq is the Solicitor General of the State of New Hampshire and not the Counsel of Record.

2. On May 31, 2022, I mailed a Waiver Form sent to me by this Court on May 24, 2022, to Jessica A. King, Esq as the Counsel of Record via Certified Mail. (See **Exhibit B at page 9**).

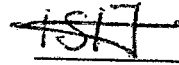
3. Even though Anthony J. Galdieri, Esq may be a Registered user of this Court's Filing System, he should have simply unchecked the "Counsel of Record" box on the "Attorney" page and have Jessica A. King, Esq enter a Notice of Appearance in the case and in that process check the "Counsel of Record" box. (See **Exhibit C at page 11**)

4. All Correspondence by this Court have been received by me at my residence at 1465 Hooksett Road, Unit 66, Hooksett, NH, 03106 within seven (7) days, even though Anthony J. Galdieri, Esq claimed to send me the Waiver Form on June 7, 2022, to my residential address (See **Exhibit D at page 13**), I have not received the Waiver Form, he claimed to send to me even though mailings within New Hampshire should not take more than three (3) days via U. S. mail postage prepaid mailings.

Thank you for your assistance and attention. Please do not hesitate to call or email me, if you should have any questions or concerns.

[Signature next page]

Sincerely,

A handwritten signature in black ink, appearing to read 'Femi Isijola', written over a horizontal line.

Femi Isijola, Pro Se Litigant

June 15, 2022

Enclosures:

cc: Jessica A. King  
Assistant Attorney General  
New Hampshire Department of Justice  
Anthony J. Galdieri  
Solicitor General  
Office of the New Hampshire Attorney General



EXHIBIT A

No. 21-7948

IN THE SUPREME COURT OF THE UNITED STATES

FEMI ISIJOLA,  
PETITIONER,

vs.

ELIZABETH BIELECKI, DIRECTOR, NEW HAMPSHIRE,  
DIVISION OF MOTOR VEHICLES,  
RESPONDENT.

AFFIDAVIT IN SUPPORT OF PROOF OF SERVICE

I, FEMI ISIJOLA, being of lawful age do certify that on this 17th day of May, 2022, in accordance with Supreme Court Rule 29, copies of the (1) Notarized Affidavit of Indigency that complies with Supreme Court Rule 39 (2) Notarized Affidavit of Proof of Service, (3) Declaration Verifying Timely Filing, (4) Redaction of Personal Information, and on the 5th of May, 2022, in accordance with Supreme Court Rule 29, copies of the (1) Motion for Leave to Proceed In Forma Pauperis, (2) Petition for Writ of Certiorari, (3) Appendix to the Petition for a Writ of Certiorari, (4) Affidavit for Proof of Service and (5) Certificate of Compliance, were served by United States mail with first class postage prepaid envelope via Certified mail with Return Receipt properly addressed upon the Respondent's Counsel of Record and the Solicitor General, Office of the Attorney General of the State of New Hampshire.

The names and addresses of those served by U. S. mail are as follows:

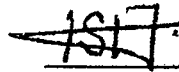
Jessica. A. King, Esq  
Counsel of Record,  
Assistant Attorney General,  
New Hampshire Department of Justice,  
33 Capitol Street,  
Concord, NH 03301  
jessica.a.king@doj.nh.gov

Anthony J. Galdieri, Esq  
Solicitor General,  
Office of the Attorney General,  
New Hampshire Dept. of Justice  
33 Capitol Street,  
Concord, NH 03301  
solicitor.general@doj.nh.gov  
anthony.j.galdieri@doj.nh.gov  
[Signature on next page]

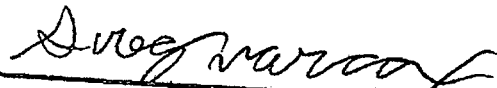
# EXHIBIT A

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

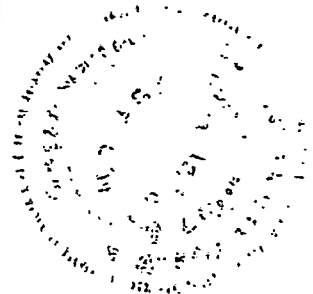
Dated: May 17, 2022



Femi Isijola, Pro Se Litigant  
1465 Hooksett Road, Unit 66  
Hooksett, NH 03106  
603-560-4174  
jayisijola.thelaw@aol.com



Gregory Marcoux  
Notary Public, State of New Hampshire  
My Commission Expires October 21, 2025



# EXHIBIT B

7021 2720 0000 7494 8645

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
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Certified Mail Fee	\$ 63.75
Extra Services & Fees (check box, add fee as appropriate)	
<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$ 2.80
<input type="checkbox"/> Return Receipt (electronic)	\$ 0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ 0.00
<input type="checkbox"/> Adult Signature Required	\$ 0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ 0.00
Postage	\$ 11.36
Total Postage and Fees	\$ 75.11
Sent To	JESSICA A. KINROSS
Street and Apt. No., or PO Box No.	33 CAPITAL TR
City, State, ZIP+4®	CONCORD, NH 03301
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

Postmark Here  
MAY 31 2022  
05/31/2022  
USPS MILK ST

**Is it required that the attorney submitting the cert petition be counsel of record in the case?**

No. Any registered user who represents a party can submit a cert petition on behalf of that party. If the user submitting the filing is not counsel of record, simply uncheck the "Counsel of Record" box on the "Attorney" page. The attorney who is counsel of record should then separately enter a notice of appearance in the case and in that process check the "Counsel of Record" box.

EXHIBIT D

# W A I V E R

## SUPREME COURT OF THE UNITED STATES

No. 21-7948

Femi Isijola

(Petitioner)

Elizabeth A. Bielecki, Director, New Hamp

V.

(Respondent)

I DO NOT INTEND TO FILE A RESPONSE to the petition for a writ of certiorari unless one is requested by the Court.

Please check the appropriate box:

- ☒ I am filing this waiver on behalf of all respondents.
- ☐ I only represent some respondents. I am filing this waiver on behalf of the following respondent(s):

Please check the appropriate box:

- ☒ I am a member of the Bar of the Supreme Court of the United States. (Filing Instructions: File a signed Waiver in the Supreme Court Electronic Filing System. The system will prompt you to enter your appearance first.)
- ☐ I am not presently a member of the Bar of this Court. Should a response be requested, the response will be filed by a Bar member. (Filing Instructions: Mail the original signed form to: Supreme Court, Attn: Clerk's Office, 1 First Street, NE, Washington, D.C. 20543).

Signature:

Anthony J. Galdieri

Digitally signed by Anthony J. Galdieri  
Date: 2022.06.07 08:41:43 -04'00'

Date:

6/7/22

(Type or print) Name

Anthony J. Galdieri

☒ Mr. ☐ Ms. ☐ Mrs. ☐ Miss

Firm

New Hampshire Department of Justice

Address

33 Capitol Street

City & State

Concord, NH

Zip 03301

Phone

603-271-3658

Email

anthony.j.galdieri@doj.nh.gov

A copy of this form must be sent to petitioner's counsel or to petitioner if *pro se*. Please indicate below the name(s) of the recipient(s) of a copy of this form. No additional certificate of service or cover letter is required.

cc:

Femi Isijola, 1465 Hooksett Road, Unit #66, Hooksett, NH 03106

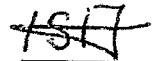
**CERTIFICATE OF SERVICE**

I, Femi Isijola, hereby certify that on this 15th day of June, 2022, I served a copy of the foregoing Observation of Claims of Counsel of Record on all parties and by causing a copy of the same by first class mail, postage prepaid, to:

Jessica. A. King, Esq  
Assistant Attorney General,  
New Hampshire Department of Justice,  
33 Capitol Street,  
Concord, NH 03301

Anthony J. Galdieri, Esq  
Solicitor General  
New Hampshire Department of Justice  
33 Capitol Street  
Concord, NH 03301

Dated: June 15, 2022



Femi Isijola, Pro Se Litigant  
1465 Hooksett Road, Unit 66  
Hooksett, NH 03106  
603-560-4174  
jayisijola.thelaw@aol.com

# W A I V E R

## SUPREME COURT OF THE UNITED STATES

No. **24-7948**

**Femi Isijola**

(Petitioner)

**Elizabeth A. Bielecki, Director, New Hamp**

(Respondent)

V.

I DO NOT INTEND TO FILE A RESPONSE to the petition for a writ of certiorari unless one is requested by the Court.

Please check the appropriate box:

- ☒ I am filing this waiver on behalf of all respondents.
- ☐ I only represent some respondents. I am filing this waiver on behalf of the following respondent(s):

Please check the appropriate box:

- ☒ I am a member of the Bar of the Supreme Court of the United States. (Filing Instructions: File a signed Waiver in the Supreme Court Electronic Filing System. The system will prompt you to enter your appearance first.)
- ☐ I am not presently a member of the Bar of this Court. Should a response be requested, the response will be filed by a Bar member. (Filing Instructions: Mail the original signed form to: Supreme Court, Attn: Clerk's Office, 1 First Street, NE, Washington, D.C. 20543).

Signature:

**Anthony J. Galdieri**

Digitally signed by Anthony J. Galdieri  
Date: 2022.06.07 08:41:43 -04'00'

Date:

**6/7/22**

(Type or print) Name

**Anthony J. Galdieri**

☒ Mr. ☐ Ms. ☐ Mrs. ☐ Miss

Firm

**New Hampshire Department of Justice**

Address

**33 Capitol Street**

City & State

**Concord, NH**

Zip **03301**

Phone

**603-271-3658**

Email

**anthony.j.galdieri@doj.nh.gov**

A copy of this form must be sent to petitioner's counsel or to petitioner if *pro se*. Please indicate below the name(s) of the recipient(s) of a copy of this form. No additional certificate of service or cover letter is required.

cc:

**Femi Isijola, 1465 Hooksett Road, Unit #66, Hooksett, NH 03106**

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1. Article Addressed to:  
**JESSICA A. KING, ESQ**  
**COUNSEL OF RECORD**  
**ASSISTANT ATTORNEY GENERAL**  
**NEW HAMPSHIRE DEPARTMENT OF JUSTICE**  
**33 CAPITOL STREET**  
**CONCORD, NH 03301**

9590 9402 7223 1284 7004 15

2. Article Number (Transfer from service label)  
**70212720000074948645**

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**Department of Justice**  
**33 Capitol St**  
**Concord, NH 03301**

B. Received by (Printed Name)  
**33 Capitol St**  
**Concord, NH 03301**

C. Date of Delivery  
**6-2-22**

☐ Agent  
☐ Addressee

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt



No. 21-7948

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**IN THE SUPREME COURT OF THE UNITED STATES**

---

**FEMI ISIJOLA,  
PETITIONER,**

**vs.**

**ELIZABETH BIELECKI, DIRECTOR, NEW HAMPSHIRE,  
DIVISION OF MOTOR VEHICLES,  
RESPONDENT.**

---

**AFFIDAVIT IN SUPPORT OF PROOF OF SERVICE**

I, FEMI ISIJOLA, being of lawful age do certify that on this 17th day of May, 2022, in accordance with Supreme Court Rule 29, copies of the (1) Notarized Affidavit of Indigency that complies with Supreme Court Rule 39 (2) Notarized Affidavit of Proof of Service, (3) Declaration Verifying Timely Filing, (4) Redaction of Personal Information, and on the 5th of May, 2022, in accordance with Supreme Court Rule 29, copies of the (1) Motion for Leave to Proceed In Forma Pauperis, (2) Petition for Writ of Certiorari, (3) Appendix to the Petition for a Writ of Certiorari, (4) Affidavit for Proof of Service and (5) Certificate of Compliance, were served by United States mail with first class postage prepaid envelope via Certified mail with Return Receipt properly addressed upon the Respondent's Counsel of Record and the Solicitor General, Office of the Attorney General of the State of New Hampshire.

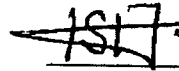
The names and addresses of those served by U. S. mail are as follows:

Jessica. A. King, Esq  
Counsel of Record,  
Assistant Attorney General,  
New Hampshire Department of Justice,  
33 Capitol Street,  
Concord, NH 03301  
jessica.a.king@doj.nh.gov

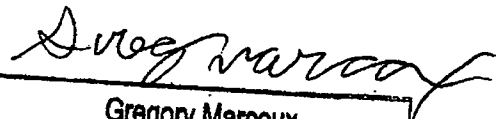
Anthony J. Galdieri, Esq  
Solicitor General,  
Office of the Attorney General,  
New Hampshire Dept. of Justice  
33 Capitol Street,  
Concord, NH 03301  
solicitor.general@doj.nh.gov  
anthony.j.galdieri@doj.nh.gov  
[Signature on next page]

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

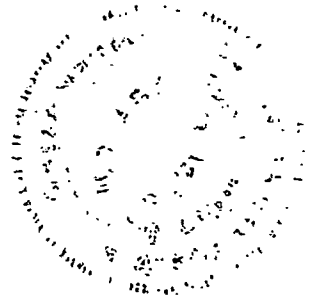
Dated: May 17, 2022



Femi Isijola, Pro Se Litigant  
1465 Hooksett Road, Unit 66  
Hooksett, NH 03106  
603-560-4174  
jayisijola.thelaw@aol.com



Gregory Marcoux  
Notary Public, State of New Hampshire  
My Commission Expires October 21, 2025



**THE STATE OF NEW HAMPSHIRE**  
**JUDICIAL BRANCH**  
<http://www.courts.state.nh.us>

Court Name: New Hampshire Supreme Court  
Case Name: Femi Isijola v. Director, New Hampshire Division of Motor Vehicles  
Case Number: 2021-0045  
(if known)

**APPEARANCE/WITHDRAWAL**

**APPEARANCE**

Please enter my appearance as:

- ☒ Counsel for Director, New Hampshire Division of Motor Vehicles  
☐ I will represent myself (*pro se*).

**WITHDRAWAL**

Please withdraw my appearance as:

- ☐ Counsel for \_\_\_\_\_  
Notice of Withdrawal sent to my clients on: \_\_\_\_\_  
at the following address: \_\_\_\_\_

**ANSWER YES TO ONE OF THE FOLLOWING (BUT NOT BOTH)**

Yes I am filing this form electronically. I certify that a copy of this form is being or has been served on all other parties or their counsel, in accordance with the rules of the Supreme Court, as follows: I am serving registered e-filers through the court's electronic filing system; I am serving or have served all other parties by mailing or hand-delivering a copy to them.

**OR**

\_\_\_\_\_ I am not filing this form electronically. I certify that a copy of this form is being or has been served on all other parties or their counsel, in accordance with the rules of the Supreme Court, as follows: I am serving or have served all other parties by mailing or hand-delivering a copy to them.

Jessica A. King  
Name of Filer

NH Attorney General's Office 265366  
Law Firm, if applicable Bar ID # of attorney

33 Capitol Street  
Address

Concord NH 03301-6397  
City State Zip code

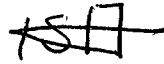
/s/ Jessica A. King 02/25/2021  
Signature of Filer Date

(603) 271-3675  
Telephone

Jessica.A.King@doj.nh.gov  
E-mail

**CERTIFICATION OF PARTY UNREPRESENTED BY COUNSEL**

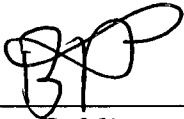
I certify under penalty of perjury pursuant to 28 U. S. Code § 1746 and 18 U. S. Code § 1621 that the above information contained within the foregoing Petition for Rehearing is true and correct and statements made in this foregoing Petition for Rehearing are based upon facts within my own personal knowledge. Petitioner understands that the filing of this Petition for Rehearing is predicated on intervening circumstances of a substantial or controlling effect or other substantial grounds not previously presented. I therefore place my hand as seal upon this document on the date below.



\_\_\_\_\_  
Femi Isijola, Pro Se

**NOTARY**

Subscribed and sworn as being true under the penalty of perjury pursuant to 28 U. S. Code § 1746 and 18 U. S. Code § 1621 by Femi Isijola, before me this 15<sup>th</sup> day of July, 2022. Said individual solemnly affirmed that he has firsthand knowledge of the facts contained herein and that the facts are true, correct, and complete to the best of his knowledge, understanding and belief.



\_\_\_\_\_  
Notary Public



June 30 2026  
My Commission expires

**No. 21-7948**

**IN THE SUPREME COURT OF THE UNITED STATES**

Femi Isijola,  
Petitioner,

vs.

Elizabeth A. Bielecki, Director, New Hampshire, Division of Motor Vehicles,  
Respondent.

**ON WRIT OF CERTIORARI TO THE SUPREME COURT OF NEW HAMPSHIRE  
PETITION FOR REHEARING ON PETITION FOR WRIT OF CERTIORARI**

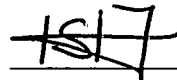
**CERTIFICATION OF GOOD FAITH**

I, Femi Isijola (“Petitioner”) certify that this Petition for Rehearing is presented in good faith and not for delay and in compliance with Rule 44 of the Rules of the Supreme Court of the United States. Petitioner believes that the Petition for Rehearing is Timely filed and has Merits. Petitioner believes he is entitled to be heard, as well as entitled to Relief as a matter of Law and presents his Petition in good faith in the hope that the Lower Court’s (deliberate and incidental) decisions will be corrected as this is causing many Citizens (New Hampshire Residents, Visitors and Commuters passing through) who are actually innocent may be falsely accused of New Hampshire Motor Vehicle Laws and be falsely accused by any State Official acting under the Color of the Law and Motor Vehicles Criminal Laws can be applied in having their Operating License and Vehicle Registration privileges suspended indefinitely. Petitioner now looks to this Court to hold the Supreme Court of New Hampshire accountable by mandating it that it comply with

its own Court's rules, the State of New Hampshire Laws and both the United States of America and the State of New Hampshire Constitution.

**CERTIFICATION OF PARTY UNREPRESENTED BY COUNSEL**

I certify under penalty of perjury pursuant to 28 U. S. Code § 1746 and 18 U. S. Code § 1621 that the above information contained within the foregoing Petition for Rehearing is true and correct and statements made in this foregoing Petition for Rehearing are based upon facts within my own personal knowledge. Petitioner understands that the filing of this Petition for Rehearing is predicated on intervening circumstances of a substantial or controlling effect or other substantial grounds not previously presented. I therefore place my hand as seal upon this document on the date below.

A handwritten signature in black ink, appearing to read 'Femi Isijola', written over a horizontal line.

Femi Isijola, Pro Se

Dated: July 1, 2022

NOTARY

Subscribed and sworn as being true under the penalty of perjury pursuant to 28 U. S. Code § 1746 and 18 U. S. Code § 1621 by Femi Isijola, before me this 15<sup>th</sup> day of July, 2022. Said individual solemnly affirmed that he has firsthand knowledge of the facts contained herein and that the facts are true, correct, and complete to the best of his knowledge, understanding and belief.



\_\_\_\_\_  
Notary Public



July 30 2026

My Commission expires