

Law office  
HENRY L. KLEIN  
ATTORNEY AND COUNSELOR AT LAW  
201 St. Charles Avenue  
Suite 2501  
NEW ORLEANS, LOUISIANA 70113-1103

[henryklein44@gmail.com](mailto:henryklein44@gmail.com)

Telephone: (504) 599-5661

Cellular: (504) 439-0488

September 24, 2021

The Honorable Scott S. Harris  
Clerk of Court  
The Supreme Court of the United States  
One First Street NE  
Washington, D.C. 20543

**Rule 22.4 Submission to Justice Sonia SOTOMAYOR**

Dear Mr. Harris:

On September 23, 2021, at Docket 21A41, Justice Samuel A. ALITO, Jr. denied a Rule 22 Emergency Application filed on behalf of Regina B. Heisler. Pursuant to Supreme Court Rule 22.4, you are respectfully asked to submit the denied Application to Justice Sonia SOTOMAYOR. Mindful that renewals are disfavored, the denied Application squarely addresses Justice SOTOMAYOR's concurrence in Chicago v. Fulton, 141 S. Ct. 585 (2021):

I write separately to emphasize that the Court has not decided whether and when §362(a)'s other provisions may require a creditor to return a debtor's property. Those provisions stay, among other things, "any act to create, perfect, or enforce any lien against property of the estate" and "any act to collect, assess, or recover a claim against [a] debtor" that arose prior to bankruptcy proceedings.

Because Justice SOTOMAYOR referenced a "...gap left by the Court's ruling today...", this is more an opportunity to fill the gap identified than a disfavored rehash.



As required by Rule 22.4, 10 copies of the original application, replicated *in totidem verbis*, are provided with proof of service herein<sup>1</sup>. Reasonable expedition is requested.

Respectfully yours,



**Henry L. Klein (Supreme Court Bar 99146)**

201 St. Charles Avenue

Suite 2501

New Orleans, LA 70170

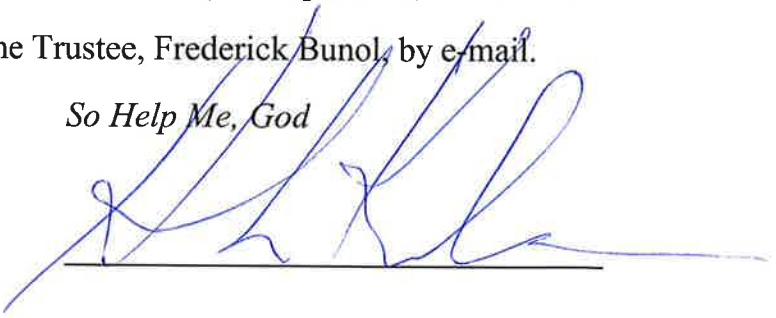
504-439-0488

[henryklein44@gmail.com](mailto:henryklein44@gmail.com)

**PROOF OF SERVICE**

I, Henry L. Klein, Declare Under Penalty of Perjury that I authored all pleadings in connection with Regina Heisler's defenses against Girod LoanCo, LLC and Girod REO, LLC and all statements are true and that I have this 24<sup>th</sup> day of September, noticed counsel for the Girod entities, Eric Lockridge, and the Trustee, Frederick Bunol, by e-mail.

*So Help Me, God*



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1 "A Justice denying an application will note the denial thereon. . . . the party making the application may renew it to any other Justice, subject to the provisions of this Rule. . . . a renewed application is not favored. A renewed application is made by a letter to the Clerk, designating the Justice to whom the application is to be directed, and accompanied by 10 copies of the original application and proof of service as required by Rule 29." Rule 22.4 (truncated).