

In the Supreme Court of the United States

Supreme Court Justice

Vinodh Raghubir, Petitioner, v. Secretary FDOC et.al., Respondent.

ON PETITION FOR WRIT OF HABEAS CORPUS

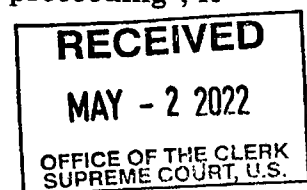
APPLICATION TO EXCEED WORD LIMITS

Pursuant to Supreme Court Rules 22 and 33.1(d), respondent respectfully requests leave to file a petition for writ of habeas corpus on the merits in excess of the word limits, up to a total word limit of 12,900 words.

This case arises from two state court judgement and convictions in which the latter the petitioner argues , inter alia, is a violation of the double jeopardy clause as the charges arise from the same alleged "scheme to defraud" under Florida statute 817.034(d) which punishes a ongoing course of conduct. It includes argument in which the petitioner demonstrates related conduct, and alleged government dissatisfaction with the outcome of the proceedings which resulted in vindictive conduct in the latter case and conduct which was intended to goad the petitioner into seeking a mistrial in the first. The court will also require that cause be shown why relief cannot be granted in a lower court, and the petitioner also demonstrates such cause in this petition including reference to and record not submitted by the state to lower courts in review , both state and federal. The petitioner also cites and incorporates dictation as argument from over 100 US Supreme court cases in which the challenged judgements are in conflict with.

The petitioner is a pauper and has previously applied to this court for such relief. Unfortunately , the petitioner only challenged the lower court's refusal to adjudicate the matters he had set forth, further complained of state misconduct upon the assertion of his rights, which he felt was unconstitutional, and this court issued an order in his last case in this court requiring him to prepayment of filing fees , unless regarding "criminal matters ",and compliant with rule 33. The petitioner is still a pauper, and unfortunately will remain so as due to the state misconduct as described, he suffered , inter alia, traumatic brain injury resulting in anterograde amnesia and partial blindness. (See attached.)

Due to these serious conditions , and the complexities of the case it is very difficult to compose these documents anew. The petitioner has already created a petition, over several years, which remain unaddressed and or evaded in any lower court, compliant with the format required under rule 33.2 , which he forwarded to the court with the belief that even though the petition was a "civil proceeding", it



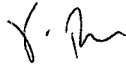
was still regarding "criminal matters". The rationale was that the proceeding type and the subject matter were two different things. That petition was compliant with rule 33.2 and did not exceed the page limit. That petition however, if converted to book format under rule 33.1, would exceed the word limit. It would not exceed 13000 words. Due to the complexity of the dual cases , requiring review as a whole instead of separate, the necessity to demonstrate cause for filing in this court, and that the petition has been condensed to the maximum, the petition cannot be shortened any further without waiver of claims or demonstration of cause.

That petition , appendix and application to proceed inform a pauperis were returned by the clerk. The petitioner in turn , pleaded with family members to obtain the filing fee and investigated the cost of creating booklet format petitions under rule 33.1. The costs exceeded \$1800.00.

With the filing fee obtained ,on 04/11/22 a motion was filed in this court pursuant to rules 22 and 33.1(d). On 04/24/22, the motion was returned without address by a justice pursuant to the rules with correspondence from the clerk. It appears the motion was misconstrued. The clerk misconstrued the relief , in that it was seeking leave to file a petition compliant with rule 33.2 in excess of the word limit. This was incorrect. The petitioner sought to file a book format petition in excess of the word limit not to exceed 12900 words otherwise compliant with rule 33.1.

In the alternative, because the petitioner remains a pauper, the petitioner respectfully requests this honorable court , accept the petition with said filing fee in the format already procured under rule 33.2 that would not require an increase in word limit as is compliant with the page count requirement under 33.2.

Respectfully submitted,



Vinodh Raghubir

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EXHIBIT A

Summary Of Today's Visit

Page 1 of 2

RAGHUBIR, Vinodh DOB: 02/03/1976 (46 yo M) Acc No. 86804



Summary of Today's Visit
 Raghbir, Vinodh DOB: 02/03/1976
 Account No 86804
 Sex: Male
 Preferred Language: English
 04/05/2022 visit with Fernando Gonzales-Portillo MD

Allergies

- N.K.D.A.

Other Medical Conditions (Problem List)

- R41.1 Anterograde amnesia
Modified On: 02/08/2022
W/U Status: confirmed
- G31.84 Mild cognitive impairment, so stated
Modified On: 02/08/2022
W/U Status: confirmed
- G31.1 Senile degeneration of brain, not elsewhere classified
Modified On: 02/08/2022
W/U Status: confirmed
- E55.9 Vitamin B deficiency, unspecified
Modified On: 02/08/2022
W/U Status: confirmed
- E83.42 Hypomagnesemia
Modified On: 02/08/2022
W/U Status: confirmed
- E53.9 Vitamin E deficiency, unspecified
Modified On: 01/15/2022
W/U Status: confirmed
- S09.90XALA Unspecified injury of head, initial encounter
Modified On: 01/15/2022
W/U Status: confirmed
- E66.9 Obesity, unspecified
Modified On: 02/08/2022
W/U Status: confirmed
- Z68.33 Body mass index [BMI] 33.0-35.9 adult
Modified On: 02/08/2022
W/U Status: confirmed

Summary of Today's Visit for Raghbir, Vinodh DOB: 02/03/1976 Account No: 86804
 NHA Company 6735 E. Huron Rd Suite 229 Orlando, FL 32835-3570 407-581-8040
 Summary generated by eClinicalWorks (www.eclinicalworks.com)

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<https://nha1ann.ecwcloud.com/mobiledoc/iss/catalog/xml/print/VisitSummary.asp?encounte...> 12/8/2022

EXHIBIT B

Respectfully submitted,

Vinodh Raghubir

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CERTIFICATE OF COMPLIANCE

This document complies with rules 22 and 33.1.

CERTIFICATE

I Vinodh Raghubir, swear under penalties of perjury, that the foregoing is true , correct and not meant to mislead. I also certify that a true , correct copy has been forwarded 04/24/22.

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