

22-1100

In The
SUPREME COURT OF THE UNITED STATES

ORIGINAL

PALANI KARUPAIYAN; P. P.; R. P.

--Petitioners

v.

WOODBIDGE TOWNSHIP OF NJ;

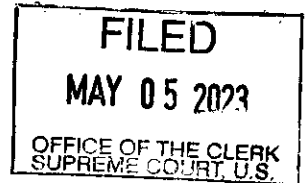
STATE OF NEW JERSEY;

UNITED STATES;

UNION OF INDIA;

OFFICER GANDHI, 5038 individually and in his official capacity as Parking
enforcement officer of Woodbridge;

POLICE DEPARTMENT OF WOODBRIDGE



-- Respondents

On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Third Circuit

PETITION FOR A WRIT OF CERTIORARI

Palani Karupaiyan.
Pro se, Petitioner,
1326 W William St,
Philadelphia, PA 19132
212-470-2048(M)

I. QUESTIONS PRESENTED

Petitioner's prayed reliefs were

- i) National importance of having the US Supreme Court decide or conflict with USSC ruling, or importance of similarly situated over millions of citizens or the first impression is raised at USSC.
- ii) Petitioners' property rights under *42 U.S.C § 1982 and Hindu Successive Act* were denied when USSC ruled in *Sullivan v. Little Hunting Park, Inc., 396 US 229 - Supreme Court 1969 @237* "Section 1982 [42 U.S.C § 1982] covers the right to inherit, purchase, lease, sell, hold, and convey real and personal property."
- iii) Local Govts/Foreign Gout violating, Parents rights (14th amendment) which were ruled by USSC under *Troxel v. Granville, 530 U.S. 57 (2000)* and *Washington v. Glucksberg, 521 U. S. 702, 720.*
- iv) Local Govts illegally taken away Petitioners property without Jury trial.
- v) Local Govts illegally issued arrest warrant without Jury trial.

Petitioner's prayed over 10 reliefs were as Writ of Mandamus or Prohibition or alternative so the questions were part of three test condition requirement of the Writs.

II. PARTIES TO THE PROCEEDING

- i) PALANI KARUPAIYAN; P. P.; R. P., are petitioners
- ii) WOODBRIDGE TOWNSHIP OF NJ; STATE OF NEW JERSEY; UNITED STATES; UNION OF INDIA; OFFICER GANDHI, 5038 individually and in his official capacity as Parking enforcement officer of Woodbridge; POLICE DEPARTMENT OF WOODBRIDGE are respondents.

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V. PETITION FOR A WRIT OF CERTIORARI

Petitioner respectfully prays that a Writ of Certiorari issue to review the opinion/judgment/orders of USCA3's (docket 22-2949) and US Dist Court for New Jersey- Newark div (Dist docket 21-cv-19737) **below**.

VI. OPINION(S)/ORDERS/JUDGMENT(S) BELOW (FROM DIST COURT AND USCA3)

1. USCA3' Opinion date Feb 23, 2023 (**App.1a**)
Hon. KRAUSE, PORTER, and AMBRO, USCA3's Circuit Judges
2. USCA3' Judgment date Feb 23, 2023 (**App.4a**)
3. Dist Court order Aug 19 2022. Ecf-22 (**App.6a**)
4. USCA3's Order to Attorney Representation for Minor (**App.11a**)
5. USCA3's order that forma pauperis granted and denied to appoint attorney (**App.13a**)
6. US Dist Court's Letter order (Sua sponte) dismiss the Complaint (**App.15a**)
7. US Dist Court's Injunctive reliefs denied. (**App.23a**)
Hon. Esther Salas USDJ; Hon. Jessica S. Allen USMJ

VII. JURISDICTION

In Hohn v. United States, 524 US 236 - Supreme Court 1998@ 258 ("Rosado v. Wyman, 397 U. S. 397, 403, n. 3 (1970) (a court always has jurisdiction to determine its jurisdiction)).

Hohn @264 ("We can issue a common-law writ of certiorari under the All Writs Act, 28 U. S. C. § 1651.)
Hobby Lobby Stores, Inc. v. Sebelius, 568 US 1401 - Supreme Court 2012@ 643

The only source of authority for this Court to issue an injunction is the All Writs Act, 28 U.S.C. § 1651(a) and Following a final judgment, they [Petitioner] may, if necessary, file a petition for a writ of certiorari in this Court.

On Feb 23 2023, United States Court of Appeals for 3rd
Cir entered opinion and Judgment. **App-1a to App-4a**

The jurisdiction of this Court is invoked under 28 U. S.
C. § 1254(1).

VIII. CONSTITUTIONAL AND
STATUTORY PROVISIONS INVOLVED

Fed.R.Civ.P. 8(a)(2) and (3)
Fed.R.Civ.P. 12(b)
Fed.R.Civ.P. 17
Fed.R.Civ.P. 54(c)

1st Amendment

Article VI, Paragraph 2 of the U.S. Constitution (Supremacy
Clause)

42 US Code § 1983 - Civil action for deprivation of rights
42 US Code § 1982 - Property rights of citizens
42 US Code § 1988 - Proceedings in vindication of civil rights

Hindu Marriage Act, 1955 and its Amended
Hindu Succession Act, 1956 and its Amended

Comparative Approaches of Supreme Courts of the World's
Largest and Oldest Democracies

--By Justice Hon. Stephen Breyer of US Supreme Court, Chief
Justice Hon. NV Ramana of Supreme Court of India, and
William M Treanor, Dean of Georgetown University Law
Centre Dated: April 11, 2022

The New Jersey Law Against Discrimination (NJLAD)
.. and more

Article II and III

5th amendment

11th amendment – New Jersey State's sovereign immunity.

14th amendment- Glucksberg, 521 U.S. 702 (1997)) (Parental rights)
Troxel v. Granville, 530 U.S. 57 (U.S. 2000).” (Parental rights)
Foreign Sovereign Immunities Act, 28 U.S.C. §§ 1605–1607
28 USC § 1915(e)(2)(B)(ii) (forma pauperis)
Civil Rights Act of 1866
42 U.S.C. § 1981 & 1982

IX. STATEMENT OF THE CASE

a) DIST COURT PROCEEDING

Plaintiff filed complaint with US Dist Court of New Jersey-Newark and timely served the complaint to all captioned defendants.

On Dec 09 2021 Dist Court dismissed the complaint by *Sua Sponte* when no defendants appeared. **App.15a**

On Jan 13 2022, Dist Court denied the plaintiff injunctive relieve motion. **App.23a**

Dist Court entered the final order of dismissal on Aug 19 2022. **App.06a.**

Plaintiff filed notice of appeal for final order. **App.6a**

b) CORE FACTS OF THE COMPLAINT

a) Plaintiffs' facts

Pro se plaintiff Palani Karupaiyan ("Plaintiff") initiated the instant action against defendants Woodbridge Township of NJ, the State of New Jersey, the United States, the "Union of India," Officer Gandhi, and the Police Department of Woodbridge

Plaintiff Palani Karupaiyan ("Palani") is 50 yrs old Naturalized US citizen from India. Home evicted and homeless. Palani is Tamil speaking ethnicity, black color.

Before filing complaint I talked to Woodbridge that I or car did not violated any traffic rule, my home is evicted, the car is my sleeping, living, laptop charging place, why did you tow the car.

b) Following facts against Woodbridge Township

26. On Sep 24 2021, My living place was standing at Silzer ave, Iselin NJ.

27. Both keys of the Porsche is[are] with plaintiff.

28. Silzer ave is dead-end no-traffic, about 10 houses both sides. General resident with parking sticker park both side.

29. No cleaning, or maintenance were done to the silzer ave. there are few potholes.

30. At Parking violation signs were hidden in short live dense tree.

31. Only walk close to the parking sign, anyone see the parking hours,

32. When I walked close and looked at the parking violation sign said that weekdays 12am to 1pm is no parking for non-resident,

33. One of the indian living in the street, that he is happy to see Porsche stopped on their street.

34. None of the street resident is disturbed or they complaint to Woodbridge that they were disturbed by my living place. Traffic also not disturbed; it is deadend street.

35. I placed two big visible notice on the car windshield and driver window.

36. Notice on the car had "Tow service is coming, Palani 212-470-2048"

37. I called local towing he said that fee is \$45 for in-town and should come by 4pm

38. On Sep 23 2021 by 2:30pm I was called my friend and said that a towing vehicle accompanied by black unmarked black car towing the Porsche.

39. When my friend said the our towing is coming pick and leave the car, the woodbridge towing guys waved his hand and said I love you to him.

40. The Woodbridge did not put the car in to neutral, uplift only two wheels dragged the car.

41. My friend said that the way Woodbridge dragged, two tires were scratching the road and tire marks were visible.
42. Sep 23 2021, on or around 3:20pm, Gandhi drive thru to Silzer ave, told me "you black madrasi register your car and park here. I wanted to charge parking violation. It is my living. Otherwise kill you goback to madras"
43. When Sep 24 2021 I called Woodbridge police to confirm who towed the car, they wanted me to say the vin number. I never come to know anyone remember the vin number. I told them I will find out the vin and call them back,
44. At the time of buying car, I wrote the vin my nail which was not able to withstand for 5+yrs
45. I tried to reach home in India for any document have Porsche vin and got from them.
46. Oct 29 2021 I saw a google voice mail at 212-470-2048 saying that I have hearing on Oct 25 2021.
47. When I called the woodbridge, asked about what hearing, they said about unregistered car, and they send summon to 606 Cinder rd, Edison NJ 08820. (already evicted more than year ago).
48. Township told that I need to pay \$55 fine for unregistered car.
49. I told township, I or car did not violated any traffic rule. My home is evicted, the car is my sleeping, living, laptop charging place, why did you tow the car.
50. After Conversation Township took my phone number again and said they should get back to me.
51. I called Woodbridge PD, my home is evicted, the car is my home, sleeping place, I or the car did not violated any traffic violation. Woodbridge PD said they do not believe and refused to return my car.
52. I was told by Woodbridge PD that I need to Mvc to register

53. Woodbridge PD should release the car when I comeback with Car Registration and pay \$1445

54. When I asked do I need to pay \$1445 the Woodbridge Township, Police said no, pay to the police and they need to share with towing guy.

55. I asked the PD to provide me itemized bill for \$1445 which was denied.

56. Police confirmed the car is parked on the yard.

57. When say the web docket, following charges are against me

39:3-4	DRIVING OR PARKING UNREGISTERED MOTOR VEHICLE
39:6B-2	NO LIABILITY INSURANCE COVERAGE ON MOTOR VEHICLE
39:4-56.1(B)	WILLFULLY ABANDONING MOTOR VEHICLE
39:8-1	FAILURE TO HAVE INSPECTION

Petitioner's car is Petitioner's living place, I do not need to have above state's requirement. Township did not need to search above for a parked car.

c) Against traffic/Parking enforcement officer.

42. Sep 23 2021, on or around 3:20pm, Gandhi drive thru to Silzer ave, told me "you black madrasi register your car and park here. I wanted to charge parking violation. It is my living. Otherwise kill you goback to madras"

60. 20 foot away where my car was stopped at Silzer ave by white women, in Aug 2021, more than 2 weeks a car was parked with sticker saying that towing service requested with her phone number. This women is not homeless.

d) Allegation against United States and India.

63. I (Palani Karupaiyan) requested Dept of States of US for deny the passport of kids to go to India because of they should be injured in India.

64. Dep of State said Because of NJ state Court order the kids go India, US will not be able to stop the kids going to India.

65. After visiting India, the Kids come back to US with injuries.

66. When I see the kids injured, I cried and did not sleep few days.

67. The kids said the injuries were continuously painning.

68. I was not allowed to take care of the medical attention of kids injuries

69. No others did not take care of the medical attention or need of kids for their injuries.

72. **Relief ()**. Plaintiff pray a declarative order and/or permanent injunction against US that make amendment to the Constitution that Parental rights are Constitutional rights

115. **Relief ()**. Plaintiff pray declarative order or permanent injunction against Union of India that 1) US citizen kids should not be hold in India, and Kids need to return to US for their education, summer vacations and 2) properly kids inheritance property/wealth need to transfer to the kids in USA.

e) Allegations against New Jersey - MVC

84. I requested NJ Motor Vehicle Commission ("MVC") to provide me duplicate title Of Porsche cayenne so I can register my car on some other state which was denied by NJ Mvc.

85. On or around Aug 2021 (approx) at Edison, Sugartree plaza, I requested the NJ Mvc mobile service to provide me registration to Porsche which was denied.

86. I was told by NJ Mvc's mobile service that Stop order is placed on this Porsche cayenne registration.

f) Complaint with NJ attorney general office (NJAG)

87. On Oct 29 2021, after talking to Woodbridge, I called NJ attorney general (NJAG) office to help about the illegal towing of the vehicle.

88. I told NJAG that my home evicted and Porsche car is my home, sleeping place.

89. NJAG told that Woodbridge can tow the vehicle for unregistered and refused to help me.

90. NJAG told that they do not have **jurisdiction** to resolve the issue. [NJ waived its 11th amendment immunity]

91. NJAG told that always I should keep the unregistered car in my shoulder or park it in Walmart parking lot to sleep.

92. NJag told that I should apply for **housing assistant** and should not sleep in the car.

93. NJAG told that apply food stamp, pay the food stamp money to Woodbridge. Need to pay the municipal judges by money collected by municipal orders.

g) NJ judicial authority

94. NJ judicial authority denied plaintiff Palani Karupaiyan's multiple request that children should not go to India because they should be injured.

h) Allegations against NJ, US, India

163. India, US, NJ failed to protect the kids from injury is violation in NJ personal injury act, the Fifth Amendment US Constitution

165. India, US, NJ failed to protect the kids from injury is violation in NJ Pain and suffering act, the Fifth Amendment US Constitution

168. India, US, NJ failed to protect the kids from injury and cause the plaintiff father and kids suffer from sleep difficulties, untreated injuries is emotional distress violation in NJ Pain and suffering act, the Fifth Amendment US Constitution

i) Against United States

73. When the plaintiffs were injured in Little Rock, Arkansas, I filed petition and its reconsideration with US Supreme Court. docket# 10-9787 which was denied because not enough resource(Justices) available with US Supreme Court. Top most Court denying justice is because of resource is injustice, violation of 1st amendment Constitutional rights.

74. After disposing ex-rays of broken ribcage, Dr Blankenship told me that I could go anywhere for justice.

75. In the situation in accident, Little Rock, Arkansas, my rib cage is collapsed, untreatable injury, still today I have pain, and the injuries were not healed yet. So top most US Court denying justice to me because of resource is unacceptable injustice to civilized society.

76. A dog cannot be kick, break its bone under law which is jail able crime but my bone broken, justice is denied because unavailability of resource with US Supreme Court.

83. Relief() for any all reason stated above plaintiff prays this Court declarative order or permanent injunction against US that i) US govt/President should not appoint the US Supreme Court justices and promote the Judges from United States Court of appeal by most experienced/expertise. Ii) Promote 34 most experience/expertise USCA Judge to US Supreme Court

for 5 years, and they should retire at 70 whichever comes 1st.

12. Plaintiff Roshna P ("RP") is Plaintiff Palani Karupaiyan's daughter.

13. RP is born from Edison , NJ.

k) Defendant Woodbridge's facts

14. Woodbridge is a township in Middlesex County, New Jersey, United States.

15. Address of Woodbridge is 1 Main Street Woodbridge, NJ 07095.

16. Woodbridge's email is john.mitch@twp.woodbridge.nj.us.

j) Allegation against Officer Gandhi and Woodbridge

17. Office Gandhi is parking enforcement officer of woodbridge township and his id is

5038. Gandhi is Gujarati speaking north Indian ethnicity, white skin.

18. New Jersey is a state in United States.

153. **Officer Gandhi** called the plaintiff as **black madrasi** is Racial/color/ethnicity discrimination by **woodbridge, Office Gandhi** violation of

NJ Law against Discrimination (LAD), 18 U.S.C. §§ 242 ,42 U.S. Code § 1988

(vindication of civil rights), 42 U.S.C. § 1983, Civil Rights Act of 1866, Title VI of

the Civil Rights Act of 1964 and the "OJP Program Statute as set forth in

paragraph 42, above.

c) DIST COURT ANALYZE AND RULING

Dist Court ruled that Plaintiff alleges various claims for relief that do not exist, such as “denial of justice” (Count 14), “unfair justice” (Count 17), and “excessive charging” (Count 18).

Plaintiff does include some recognized legal theories for relief such as

malicious prosecution (Count 1),

unlawful discrimination (Count 2),

Violation of the Americans with Disabilities Act (Count 5), and violation of due process (Count 16).

Compl. ¶ 153 (152?) (alleging that by taking away Plaintiff’s “living property,” Woodbridge and its police violated the Americans with Disabilities Act)

Additionally failure to exercise the Supplemental jurisdiction over any state-law claims. (see. Footnote, Dec 9 2021’s order)

First, the Foreign Sovereign Immunities Act (“FSIA”) “provides the sole basis for obtaining jurisdiction over a foreign state in federal Court.” Specifically, the FSIA provides that a “foreign state shall be immune from the jurisdiction” of both federal and state Courts except as provided by 28 U.S.C. §§ 1605–07. *See* 28 U.S.C. § 1604. Based on the facts as pled, it does not appear that any of the exceptions apply to permit suit against India

Second, “[t]he United States, as sovereign, is immune from suit save as it consents to be sued, and the terms of its consent to be sued in any Court define that Court’s jurisdiction to entertain the suit

The Court ruled that Karupaiyan’s claims against New Jersey, the United States and India are barred by immunity doctrines. The Court also ruled

that Karupaiyan's allegations against the Woodbridge defendants were too conclusory to state a federal claim, and it declined to exercise supplemental jurisdiction over any state-law claims,

He also filed several post-judgment motions, which the District Court construed in part as motions for reconsideration and denied. Karupaiyan has amended his notice of appeal to challenge that ruling as well.

d) USCA PROCEEDING

Appellant filed all the reconsideration motions and post judgement motions from Dist court with USCA 3rd circuit, 22-2949, Dkt-07

USCA granted the forma pauperis to the appellant(s) and ordered the appellant(s) to file 5 pages brief in support appeal.

On Feb 23, 2023, USCA3 affirmed the dist court order(s) and entered Judgment. **App.1a, App.4a.**

X. ALL WRITS ACT, 28 U.S.C. § 1651(A)

In Pa. Bureau of Correction v. US Marshals Service, 474 US 34 - Sup Ct 1985 @43

The All Writs Act is a residual source of authority to issue writs that are not otherwise covered by statute.

XI. PETITIONER'S PARENTING RIGHTS

Petitioners' Parenting Rights were in 14th Amendment of Constitution, *Troxel v. Granville, 530 U.S. 57 (2000)* and *Washington v. Glucksberg, 521 U. S. 702, 720.*

XII. PETITIONER PRAYED DECLARATIVE/INJUNCTIVE RELIEFS IN THE LOWER COURT BY FOLLOWING.

In Bolin v. Story, 225 F. 3d 1234 – USCA, 11th Cir 2000 @ 1243

"In order to receive declaratory or injunctive relief, plaintiffs must establish that there was a violation, that

there is a serious risk of continuing irreparable injury if the relief is not granted, and the absence of an adequate remedy at law". See Newman v. Alabama, 683 F.2d 1312 (11th Cir.1982).

In Azubuko v. Royal, 443 F. 3d 302 - USCA, 3rd Cir 2006 @ 304

Injunctive relief shall be granted when a declaratory decree was violated or declaratory relief was unavailable." 42 U.S.C. § 1983; Bolin v. Story, 225 F.3d 1234, 1242 (11th Cir.2000) (explaining that the amendment applies to both state and federal Judges); see also Mullis v. United States Bankr. Court for the Dist. of Nev., 828 F.2d 1385 (9th Cir.1987); Antoine v. Byers & Anderson, Inc., 508 U.S. 429, 433 n. 5, 113 S.Ct. 2167, 124 L.Ed.2d 391 (1993) (noting that the rules regarding judicial immunity do not distinguish between lawsuits brought against state officials and those brought against federal officials).

In Bontkowski v. Smith, 305 F. 3d 757 - USCA, 7th Cir. 2002@762 "can be interpreted as a request for the imposition of such a trust, a form of equitable relief and thus a cousin to an injunction. Rule 54(c), which provides that a prevailing party may obtain any relief to which he's entitled even if he "has not demanded such relief in [his] pleadings." See Holt Civic Club v. City of Tuscaloosa, 439 U.S. 60, 65-66, 99 S.Ct. 383, 58 L.Ed.2d 292 (1978);

In Boyer v. CLEARFIELD COUNTY INDU. DEVEL. AUTHORITY, Dist. Court, WD Penn 2021

"Thus a prayer for an accounting, like a request for injunctive relief, is not a cause of action or a claim upon which relief can be granted. Rather, it is a request for another form of equitable relief, i.e., a "demand for judgment for the relief the pleader seeks" under Rule 8(a)(3) of the Federal Rules of

*Civil Procedure. D****As such, it too is not the proper subject of a Rule 12(b)(6) motion. D***Global Arena, LLC, 2016 WL 7156396, at *2; see also Bontkowskiv. Smith, 305 F.3d 757, 762 (7th Cir. 2002).*

Petitioners prays this court any and all benefit of above ruling.

XIII. WHY USCA3 WAS NOT ABLE TO GRANT THE APPELLANT'S WRITS/INJUNCTION(S) RELIEFS

In the USCA3, Appellants filed appeal and injective reliefs thru motion. As per the Moses footnote [6], USCA3 shall not able to grant the injunctive reliefs along with the appeal.

In Moses H. Cone Memorial Hospital v. Mercury Constr. Corp., 460 US 1 - Supreme Court 1983 @footnote[6].

More fundamentally, a court of appeals has no occasion to engage in extraordinary review by mandamus "in aid of [its] jurisdiction[n]," 28 U. S. C. § 1651, when it can exercise the same review by a contemporaneous ordinary appeal. See, e. g., Hines v. D'Artois, 531 F. 2d 726, 732, and n. 10 (CA5 1976).

XIV. USSC'S WRIT AGAINST USCA/DIST COURT OR ANY COURT

Bankers Life & Casualty Co. v. Holland, 346 US 379 - Supreme Court 1953@383

As was pointed out in Roche v. Evaporated Milk Assn., 319 U. S. 21, 26 (1943), the "traditional use of the writ in aid of appellate jurisdiction both at common law and in the federal courts has been to confine an inferior court to a lawful exercise of its

prescribed jurisdiction or to compel it to exercise its authority when it is its duty to do so."

e) AGAINST ANY JUDICIAL AUTHORITY (INCLUDING NJ AUTHORITY)

Bankers Life @383 there is clear abuse of discretion or "usurpation of judicial power" of the sort held to justify the writ in *De Beers Consolidated Minesv. United States*, 325 U. S. 212, 217 (1945).

XV. USSC'S RULE 20.1 AND RULE 20.3.

In *re US, 139 S. Ct. 452* - *Supreme Court 2018* @ 453

S.Ct. Rule 20.1 (Petitioners seeking extraordinary writ must show "that adequate relief cannot be obtained in any other form or from any other court" (emphasis added));

S.Ct. Rule 20.3 (mandamus petition must "set out with particularity why the relief sought is not available in any other court"); see also *Ex parte Peru*, 318 U.S. 578, 585, 63 S.Ct. 793, 87 L.Ed. 1014 (1943) (mandamus petition "ordinarily must be made to the intermediate appellate court").

The requirement is substituted by *Moses* 460 US 1 - *Supreme Court 1983* @footnote[6].

More fundamentally, a court of appeals has no occasion to engage in extraordinary review by mandamus "in aid of [its] jurisdiction[n]," 28 U. S. C. § 1651, when it can exercise the same review by a contemporaneous ordinary appeal. See, e. g., Hines v. D'Artois, 531 F. 2d 726, 732, and n. 10 (CA5 1976)

Also the above Substitute the Test-1 of 3 tests
requirement of grating most of the writs in US Supreme Court.

XVI. THREE TEST CONDITIONS FOR GRANT THE WRITS (OF
MANDAMUS, PROHIBITION OR ANY ALTERNATIVE)

Test-1: No other adequate means [exist] to attain the relief
[the party] desires

Or it (injunction) is necessary or appropriate in aid of our
jurisdiction (28 USC§ 1651(a))

Or "the party seeking issuance of the writ must have no other
adequate means to attain the relief [it] desires";

Test-2: the party's `right to [relief] issuance of the writ is clear
and indisputable

Or *Bankers Life & Casualty Co. v. Holland*, 346 US 379 –
Sup.Ct 1953

*clear abuse of discretion or "usurpation of judicial power" of the
sort held to justify the writ in De Beers Consolidated Minesv.
United States*, 325 U. S. 212, 217 (1945).

Or *Hobby Lobby Stores, Inc. v. Sebelius*, 568 US 1401 – Sup.Ct
2012

*whatever the ultimate merits of the applicants' claims, their
entitlement to relief is not "indisputably clear"*

Or the Petitioner must demonstrate that the "right to
issuance of the writ is clear and indisputable." *Cheney*, 542
U.S. at 380-81, 124 S.Ct. 2576

Or *Cheney v. United States Dist. Court for DC*, 542 US 367-
Sup.Ct 2004

Defendant owes him a clear nondiscretionary duty

Test-3: a question of first impression is raised.

Or

"the issuing court, must be satisfied that the writ is appropriate under the circumstances"

XVII. PRO SE PLEADING STANDARDS

Erickson v. Pardus, 551 US 89 - Supreme Court 2007 @ 2200

A document filed pro se is "to be liberally construed," Estelle, 429 U.S., at 106, 97 S.Ct. 285, and "a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.

XVIII. REASONS FOR GRATING THE WRITS

a) PARENTAL RIGHTS AGAINST US AND NJ

1) Writ against United States and New Jersey that make amendment to the Constitution that Parental rights are Constitutional rights

Test-2

Plaintiff requested multiple times to govt of United States/Dept. of States to deny that kids' passport(s) and my kids should not go to India because the kids should be injured/endangered which was denied. When the kid went to India, the kids were seriously injured, endangered in India and their life is threatened. Since Aug 2015 to today I'm separated from my kids illegally. Kids' education, health, well beings, day to day parent-child relationship, cultural relationship religious relationship and theirs' day to day care need is violated.

Test-3.

It is violation of US. In *Washington v. Glucksberg*, 521 U.S. 702 (1997), @ 720

"that the Constitution, and specifically the Due Process Clause of the Fourteenth Amendment, protects the fundamental right of parents to

direct the care, upbringing, and education of their children”.

In Troxel v. Granville, 530 U.S. 57 (U.S. 2000).

“The United States Supreme Court has recognized the right of parents to be and active and integral part of their children’s lives as “perhaps the oldest of the fundamental liberty interests recognized by [the Supreme] Court.”

In Troxel @ 65

The Fourteenth Amendment provides that no State shall “deprive any person of life, liberty, or property, without due process of law.” We have long recognized that the Amendment’s Due Process Clause, like its Fifth Amendment counterpart, “guarantees more than fair process.” Washington v. Glucksberg, 521 U. S. 702, 719 (1997). The Clause also includes a substantive component that “provides heightened protection against government interference with certain fundamental rights and liberty interests.” Id., at 720; see also Reno v. Flores, 507 U. S. 292, 301-302 (1993).

For Any and all reasons stated above, petitioners pray this court to order the United States and New Jersey to make amendment to US and New Jersey constitution to make amendment for parental rights.

2) (i)US govt/President should not appoint the US Supreme Court justices and

(ii) Thru Collegium process Promote 34 most experience/expertise USCA Judge to US Supreme Court for 5 years, and they should retire at 70 whichever comes 1st.

(iii) invalidate the Judge/Justice Brown appointment to US Supreme Court

Test-2.

When this case was at Sub-Judice, President Biden nominated Judge Brown for US Supreme Court because his promised in the election campaign that he should appoint a black women justice to US Supreme Court if he win the election. Now Judge Brown is appointed.

Racial based promising itself wrong/incorrect where/when Justice System or US Supreme Court needs unbiased decision maker.

If US President should have promised in his election that he should appoint all black women justices to entire US Supreme Court, no one in the civilized society accept the biased promise where unbiased decision need to be taken.

US President and US govt appointing judge Brown Jackson to US Supreme Court is violating racial, age, and gender discrimination as in *Babb v. Wilkie*, 140 S. Ct. 1168 - Supreme Court 2020 and *Babb v. SECRETARY, DEPT. OF VETERANS AFFAIRS*, 992 F. 3d 1193 - Court of Appeals, 11th Circuit 2021

US Supreme Court (Constitutional guardian) cannot take racial, age and gender based discriminative decision which applicable to US Govt and President (Constitutional leader) when they makes (public) decisions.

When these petitioner(s) were injured in Little Rock, Arkansas, I filed Petition and its reconsideration with US Supreme Court which was denied because not enough resource (Justices) available with US Supreme Court which violation of 1st amendment, petition to court clauses.

Also Constitution does not specify/require qualifications for US Supreme Court Justices such as age, Education, profession, or native-born citizenship.

Test-3.

Now Judge Brown is appointed by President Biden's Racial based promising of Election campaign.

Also politician/US govt appointing Justice in the US Supreme Court violated the title vii, age, race, and Gender discrimination, , Babb v. Wilkie, 140 S. Ct. 1168 - Supreme Court 2020 and

Babb v. SECRETARY, DEPT. OF VETERANS AFFAIRS, 992 F. 3d 1193 - Court of Appeals, 11th Circuit 2021, equal employment opportunities, EQUAL JUSTICE UNDER LAW which was welcome message of US Supreme Court front of the building.

In session dated Apr 11, 2022 **Comparative Approaches of Supreme Courts of the World's Largest and Oldest Democracies** with Hon. Justice Stephen Breyer of US Supreme Court, Hon. Chief Justice NV Ramana of Indian Supreme Court, and William M Treanor, Dean of Georgetown University Law Centre, Justice Breyer said below:

"Breyer recalled being impressed by a clinic he saw in Ahmedabad, Gujarat on a visit to India more than two decades ago. It offered women the chance to present problems they were experiencing to a panel of three experts: a lawyer, a psychologist and a social worker"

"Those three women who hear the problem will try to figure out how to help them. It might be going to the police, it might not be. It might be bringing a law case, it might not be." Breyer added that he kept a photo of that scene on his office wall for years, and often described the model to visitors"

He [justice Breyer] really appreciated the system.

In same above session Justice Ramana said that

Collegium process to appoint judges most democratic.

On judicial appointments, CJI Ramana said that although the government is a key stakeholder, when

the collegium reiterates its decision to appoint a candidate, the government has no choice but to comply with it. 'Cannot get more democratic than this [Collegium process]. Supreme Court of India has 34 justices including CJI. (by The Supreme Court (Number of Judges) Amendment Bill, 2019)

.....

The PIL (Public Interest Litigation) jurisdiction is an innovation of the Indian judiciary, particularly the Supreme Court. It is mainly meant for the marginalised people who cannot approach the Court through advocates to expose their cause. The idea is to promote access to justice.

US Govt and President that to make Constitutional changes that age, citizenship need to US Supreme Court justice as the age, citizenship requirement of US president. Educational/Professional qualification requirement should match Admission to the Bar of the Federal Court

Nowhere in the constitution states that this Petitioners justice could be denied because of not enough justices in the US Supreme Court.

Any and all reasons stated above, petitioners pray this court for

i) US Govt should not appoint justice to US Supreme Court and US Supreme Court should invalidate the Hon. Justice Brown's appointment by US President/Govt.

ii) Thru Collegium process, without violating age, race, gender, Babb v. Wilkie, 140 S. Ct. 1168 - Supreme Court 2020 and Babb v. SECRETARY, DEPT. OF VETERANS AFFAIRS, 992 F. 3d 1193 - Court of Appeals, 11th Circuit 2021 promote 34 most

experience/expertise USCA Judge to US Supreme Court for 5 years, and they should retire at 70 whichever comes 1st. Every subject matter expert should be given equal opportunity to serve the noble jobs/duty.

iii) when Chief Justice of US Supreme Court retire, promote the most experience/expertise associate justice of US Supreme to be promoted as Chief Justice of US Supreme Court.

Recently in the Supreme Court of India, Hon. Chief Justice Uday Lalit served 70 days only and cleared 10,000 dockets.

iv) Same common Collegium process should be available to promote US Dist Court Judges to US Court of Appeal Judges based on experience/expertise without violating Age, Race, Gender, 140 S. Ct. 1168 and 992 F. 3d 1193. Same common Collegium process should assist appoint US Dist Court Judges.

3) Same Common Collegium process should be available to promote [NJ]States' Appellate Court Judges to States' Supreme Court Justices for 5 years, they should retire at 70 age whichever comes 1st and States' trial Court Judges to States Appellate Court Judges based on experience/expertise without violating Age, Race, Gender, 140 S. Ct. 1168 and 992 F. 3d 1193.

By Supremacy clause, All the States' democracy [smaller umbrella] is under US democracy, the bigger umbrella, so to have one US level Collegium and interact with Local/state govts to promote States Supreme Court Justices and State' Appellate court judges. Everywhere/Every state Justice should be promoted for 5 years and retired at 70 whichever comes 1st without violating age, gender, and race. US Supreme Court justices or State's Supreme Court Justice noble jobs/duty's which should be available to every subject matter experts under equal opportunity.

There are 20 states in United States have Judicial Nominating Commissions/ Assisted Commission which similar or subset of Collegium process for appointing States' Supreme Court justices.

b) AGAINST INDIA FOR PARENTAL AND INHERITANCE /PROPERTY RIGHTS

3) Order to Union of India that US citizen kids should not be hold in India, and US citizen Kids need to return to US for their education, vacations, and holidays, parental rights and properly kids Ancestral inheritance property(s)/wealth need to transfer to the kids in USA

Test-2.

Union of India have habit of holding US citizen kids India for the reasons that Kids admitted in Indian school or going to school in India.

Petitioner requested Indian consulate/embassy that do not issue visa/travel document to kids to go India because of injury, endangerment of children in India, endangerment of abduction of children, which was denied.

When the kids went to India, they were endangered and injured in

India. No medical attentions were given to kids injuries/endangered.

Petitioners' father in law, brother in law tried to abduction my children for the purpose of refusing/deny to provide in heritance to the children, to do corruption against Govt of India by abducting to India.

45) The same reasons as my relatives, India also hold the US citizen children in India, refused to return the children back to US. Also deny the US Court orders to return the US citizen kids to USA.

In India, by law, children inherit the parents/fore-parents inheritance (Heir) automatically, without will.

Test-3

India and my relatives (in India)'s wrong doings violates 42 USC § 1982 and Hindu Succession Act, 1956 and its amended (2005), parental rights as in 14th amendment, Glucksberg, Troxel,

In Sullivan v. Little Hunting Park, Inc., 396 US 229 - Supreme Court 1969 @237

"Section 1982 [42 U.S.C § 1982] covers the right "to inherit, purchase, lease, sell, hold, and convey real and personal property."

For any and all reasons stated above, petitioners prays this court for their prayer to be granted.

c) AGAINST LOWER COURTS

4) Order to vacate the sua sponte order of dismissal the complaint.

Test-2.

Salahuddin v. Cuomo, 861 F. 2d 40 - Court of Appeals, 2nd Circuit 1988 @43, when the Dist court dismissed the complaint by sua sponte, USCA2 vacated the dismissal

"this Court [USCA 2nd Cir] has repeatedly cautioned against Sua Sponte dismissals of pro se civil rights complaints prior to requiring the defendants to answer. See, e.g., Bayron v. Trudeau, 702 F.2d 43, 45 (2d Cir.1983); Fries v. Barnes, 618 F.2d 988, 989 (2d Cir.1980) (citing cases)."

Additionally dismissing the claims against (1) United States under Sovereign Immunity, (2) claims against Union of India under Foreign Sovereign Immunities Act ("FSIA") and (3) dismissing claims against New jersey under 11th amendment,

(4) dismissing claims against Woodbridge **without prejudice for failure to state a claim**, and failure to exercise supplemental claims were error.

Test-3.

In *Bivens v. Six Unknown Named Agents of Fed. Bur. of Narc.*, 456 F. 2d 1339 - Court of Appeals, 2nd Circuit 1972 @ 1341

"Agents of the FBI performing similar functions, have no immunity to protect them from damage suits charging violations of Constitutional rights."

Under *Bivens*, no govt can violated the constitutional rights of petitioners. In this case, United States, Union of India, State of New Jersey, Twp of Woodbridge violated one or more constitutional rights of petitioners(s) including parental rights, petitioners were injured and the injuries are continued until now. So lower court dismissing claims against United States, Union of India, New Jersey and twp of Woodbridge were error. This court should vacate the dismissal order **App.15a** and remand the case to appropriate lower court(s).

5) Order to appoint guardian ad litem or alternatively pro bono attorney

Test-2. Petitioners requested the Lower Courts to appoint guardian ad litem and/or probono attorney **ECF(13)** which was denied.

Appoint father Petitioner as guardian ad litem as well denied based on 28 USC§ 1654; *Osei-Afriye v. The Medical College of Penn..vania*, 937 F.2d 876(3d Cir. 1991)

Test-3. In *Montgomery v. Pinchak*, 294 F. 3d 492 - USCA, 3rd Cir. 2002 @ 502 (*"Montgomery was not a sophisticated jailhouse lawyer"*). *Tabron v. Grace*, 6 F. 3d 147 - Court of Appeals, 3rd Circuit 1993 @ 156-157 (*The plaintiff's ability to present his or her case is, of course, a significant factor that must be considered in*

determining whether to appoint counsel. See Hodge, 802 F.2d at 61; Maclin, 650 F.2d at 888). In this case, Petitioner is homeless, live here and there, cars, an towed away. Suffering from spine injury.

In Bethel School District No. 403 et al. v. Fraser, A Minor, et al. 478 U.S. 675 (1986) (minor is party and his father was appointed as Guardian ad litem. See @ FRASER 680. The father brought the action in the Dist Court for FIRST AMENDMENT constitutional violation. In Board Of Education Of The Westside Community Schools (Dist. 66) et al. V. Mergens, By And Through Her Next Friend, Mergens, Et. 496 U.S. 226 (1990), @233 (Respondents, by and through their parents as next friends, then brought this suit in the United States District Court for the District of Nebraska for Constitutional violation. In ANKENBRANDT, as next friend and mother of L. R., et al. v. RICHARDS et al 504 U.S. 689 (1992) (mother is party and claimed as next friend to her minor daughter for tort claim.

In Jacob WINKELMAN, a minor, by and through his parents and legal guardians, Jeff and Sandee WINKELMAN, et al., v. PARMA CITY SCHOOL DISTRICT, 550 U.S. 516- 127 S.Ct. 1994 (2007),

In Winkelman, Parents on their own behalf and on behalf of Jacob, filed a complaint in the United States District Court for the Northern Dist of Ohio, later their appeal, without the aid of an attorney,

When the USSC examined “The question is whether parents, either on their own behalf or as representatives of the child, may proceed in court unrepresented by counsel though they are not trained or licensed as attorneys”

And USSC ruled that (Winkelman @2007)

“The Court of Appeals erred when it dismissed the Winkelmans' appeal for lack of counsel.

It is beyond dispute that the relationship between a parent and child is sufficient to support a legally cognizable interest [in the education of one's child];

In this case, Constitutional rights of appellant Karupaiyan's Children, Children Educational rights, petitioners' cultural and religious rights were greatly suffered by separation.

Winkelman @2008

"party aggrieved" means "[a] party entitled to a remedy; esp., a party whose personal, pecuniary, or property rights have been adversely affected by another person's actions or by a court's decree or judgment" ante, at 2003-2004.

"rights and remedies are parents properly viewed as "parties aggrieved," capable of filing their own cases in federal court. They [Parents] are "parties aggrieved" when those rights are infringed, and may accordingly proceed pro se when seeking to vindicate them"

Winkelman @2011

"They will have the same remedy as all parents who sue to vindicate their children's rights: the power to bring suit. I agree with the Court that they may proceed pro se with respect to the first two claims"

In this case, Appellant Karupaiyan not only guardians of their children's rights, Appellant Karupaiyan himself real party/plaintiff for his claims which is unlike Osei-Afriye, USCA3's ruling against this case Appellant father.

*In this case Prose father parental rights under 14th amendment, Washington v. Glucksberg, 521 U.S. 702 (1997), Troxel v. Granville, 530 U.S. 57 (U.S. 2000). Children has right on the Reverse of Parental rights, 14th amendment **Equal Protection Clause.***

1) Rule 17(c) Robidoux v. Rosengren, 638 F. 3d 1177 –
USCA9 2011 @ 1182

“District Courts have a special duty, derived from Federal Rule of Civil Procedure 17(c), to safeguard the interests of litigants who are minors. Rule 17(c) provides, in relevant part, that a district Court “must appoint a guardian ad litem or issue another appropriate order”.

2) In CJLG v. Barr, 923 F. 3d 622 - Court of Appeals, 9th Circuit 2019, @632 “children have due process rights to appointed counsel. See, e.g., In re Gault, 387 U.S. 1, 36-37, 87 S.Ct. 1428, 18 *632 L.Ed.2d 527 (1967)”

In CJLG @ 633-639

*“When determining whether there is a right to counsel in civil proceedings, like here, the Court must “set [the] net weight” of those three factors “against the presumption that there is a right to appointed counsel only where the indigent, if he is unsuccessful, may lose his personal freedom.” Lassiter v. Dep’t of Social Servs. of Durham Cty., 452 U.S. 18, 27, 101 S.Ct.2153, 68 L.Ed.2d 640 (1981). The Lassiter presumption is rebuttable. *Id.* at 31, 101 S.Ct. 2153”. Mathews, 424 U.S. at 348, 96 S.Ct. 893. The government also has an interest in fair proceedings and correct decisions.*

In CJLG @ 639,

“Providing counsel would be costly to the government, but the government already chooses to undertake similar costs here. It would also lead to fairer, more accurate decisions—decisions that a broader public might view as more legitimate”.

For reasons above, petitioners pray this court for above prayers to be granted.

6) Order that Lower Court should exercise supplemental jurisdiction for state-law claims

Test-2

Towing the petitioner car for parking violation is clear error. There are another white women car was parked 20 meters away permanently for a months. Writ against New Jersey. Petitioner has claims under one or more defendants under New Jersey Law against the discrimination (NJLAD)

Test-3.

Petitioner survived one or more federal claims against the one or more respondents including Section 1983, Parental rights, injury(s) to petitioner(s), 14th amendment, so the Petitioners state claims should survive as well.

Any and all reasons stated above, petitioners pray this court for their' prays to be granted.

- 7) (i)Moving New Jersey Municipal Judges into New Jersey payroll and (ii) NJ Municipal Mayor should not appoint Municipal Court Judge(s) and such appointment should be done by NJ State govt. and (iii) Deposit traffic violations fine in New Jersey treasury. (iv) Remove the Petitioners traffic ticket to US District Court (v) By parties request Jury should be available for traffic ticket hearing/municipal hearing.**

Test-2

NJ Municipal judges are appointed by Municipal Mayor who are relative/friend to Mayors for the purpose of generating revenue for municipality by Municipal judges who were writing traffic ticket orders.

By the revenue generated by Municipal judges, they were paid by Municipal govt.

For the benefit of Municipal Mayor, municipal police is ordered to write more ticket to generate more money for the personal gain/benefit of Municipal Mayor and Municipal Judges.

Citizens/Petitioner is entitled to file claim/counter claim against the false charges of Municipal govt which is constitutional rights.

NJ Municipal court charges, additional appearance fees when any citizen/this petitioner contest the false traffic ticket.

Test-3

Municipal judges are appointed by NJ Municipal Mayor when parties entitled to hear by constitutionally appointed Judges.

Judge should be disinterested person of money from the order he signs which is failing in the Municipal Court function, municipal judges appointment by Mayor from theirs' list of friends/relatives, Municipal judges sign order to generate money and Judges paid from the money generated.

Municipal judges were encouraged by Municipality and its mayor to Write traffic ticket orders to generate revenue. So the Mayor and municipal Judges were beneficiary of the money generated.

Citizens, Residents were biased, prejudiced/injured, constitutional rights were violated, by the municipal judges appointed by Municipal Mayor and by Municipal Writing orders to the benefit of Municipal Mayor and Municipal Judges (together).

Citizens/Petitioner is entitled to file claim/counter claim against the false charges and those claims should be heard/tried together which is constitutional rights. so these Woodbridge traffic ticket docket to be moved to Dist Court.

NJ Municipality also charges, additional appearance fee when any citizen contest the traffic ticket which violate the fair justice, petition to court clause of 1st amendment, due process guaranteed in the constitution.

The hidden truth is that NJ governor to get the political/election support from the Municipal mayor, NJ govt allow the Municipal govt to charge the traffic ticket, Municipal mayor is benefited and so the Mayor support the NJ governor in Election.

To this petitioner or any citizen the municipal court issued arrest warrant for the false charge without jury hearing. Jury hearing is constitutional rights to punish the charge. In this case, the Municipal govt issue arrest warrant without jury trial for Municipal wrong doing against the petitioner is violation of constitutional rights.

For any and all reason stated above the petition pray this court

i) Move all the NJ municipal judges to NJ judiciary payroll and deposit all the traffic violation fines in NJ treasury.

ii) Municipal Govt should not appoint Municipal Judges and Under NJ Constitution, NJ govt should appoint the Municipal judges.

iii) Jury should be available in Municipal court on demand of parties and without Jury hearing local court should not issue arrest warrant.

iv) Remove the Woodbridge charges against the petitioner to US Dist court.

8) NJ and it's local Govt should not tow/taken away the home less's property(s).

Test-2

When petitioner is homeless, NJ dmv/mvc refused to register my vehicle because car registration has stop order which is not petitioner's fault and

Woodbridge taken away without notifying petitioner and without jury hearing. Woodbridge charging \$1445 for towing. When petitioner requested the Woodbridge to provide the itemized billing/invoice \$1445 for towing which was denied.

In fact petitioner called and waited for local tow service which ready to tow for \$45.

Test-3 Local govt taking away petitioner sleeping property/mobile home violate the due process and jury trial, excessive fine instead of local govt to help the less fortunate poor.

Petitioner suffered from sleeping on the roadside, covid attached, **finger is disfigured** because the local govt taking away my property. Still the lungs are not cleared which situs inversus totalis ill formed lungs.

The NJ municipal including Woodbridge twp have towing contract with The towing companies who are relative/friend to the Township mayor. To share the predatory towing money between towing agency and Mayor, these predatory towing is happening. See. The local Govt towing fee is \$1445 and local private towing fee is \$45.

Petitioner/ hominess's car is sleeping place which is equal to MOBILE home property. Without jury hearing the Woodbridge taken away the petitioner's property.

For any and all reasons stated, petitioners pray this court for their above prayer to be granted.

d) WRITS AGAINST WOODBRIDGE

9) Order the respondent Woodbridge Township should pay 295/day for TAKEN AAWAY Porsche cayenne to the plaintiff.

Test-2.

Petitioner's home evicted and unable to secure/lease a apartment yet due to disability and unemployment, suffering from financial hardship. In this hardship situation, cayenne is sleeping place for the petitioner.

When the petitioner was waiting for local towing man to tow the car for \$45, respondents Woodbridge towed the car/sleeping property by violating due process and deceptive business practice and predatory towing. These illegal towing, Woodbridge charging \$1445. When the petitioner asked Woodbridge to provide itemized invoice for \$1445, which was denied because of deceptive, predatory towing. Woodbridge profled that Porsche owner should be ready to pay \$1445 for towing when Woodbridge should illegally harasses petitioner.

Test-3.

Without car, so many days Petitioner slept on the road side bench which was seen by Woodbridge police. In the Summer time, so many days the temperature was over 90. Corona attached disfigured the finger. From Corona, till today the lungs are not clear. Situs inversus lungs.

Porsche cayenne rental cost \$295/day from Porsche USA. See below.

Porsche Drive – Rental Available Models	
Rental Period	1-3 Day(s)
Cayenne	From \$295/Day
Taycan	From \$335/Day
Panamera	From \$345/Day
911	From \$395/Day
6 more rows	
https://www.porsche.com > ... > Porsche Drive Porsche Rental - Porsche USA	

Figure 1 List of Porsche rental cost

Imagine a situation to anyone whose car is stopped middle of the way to home, picking taxi to home, and continues use the taxi for every day to day need. See petitioner situation when he is poor, unable to hire taxi either. Walked day after day, month after months, now more than year which 450 days.

For printing paper for the petition to US Supreme Court, I walked 6 miles on way to Walmart to buy printing paper and on the way back I need to walk on rain and cross the highway. Someone with mercy stopped the car at middle of the highway for me to help crossing the highway while rain. Im diabetic, and situs inversus totalis. Being home evicted, homeless, this car is sleeping place/property. Anyone imagine the situation of sleeping on the road side bench when the temperature is over 90 degrees.

When One day without car is unacceptable suffering to anyone, day by day suffering's magnitudes is higher after higher.

The petitioner car is towed by the towing agency is relative/friend to the Mayor so they local govt do the

predatory towing for the personal gain of the mayor and towing agency

Petitioner pray this court order the Woodbridge to pay as below for the car taken away from the petitioner.

450 days x \$295 /day x 3 times = \$398,250

And remand the case back to lower court.

e) ADDITIONAL PRAYERS

10) Order the each defendant to pay \$15 million for the Petitioners' effort, pain and suffering, expenses, litigation cost or pain and suffering by litigation.

Test-2. Because of this case, two winters, without petitioner with car to survive and the litigation is going on, extended by the obstruction of justice by the defendant(s). Lot of effort to draft the pleading. Lot of painful effort to draft with spine injuries. Because I dedicated time to draft the pleading I was not able to physical activity to bring down the blood sugar went up. Now both leg, foot are numbing. Im afraid kidney should be permanent damage. Due to Situs inversus the born defect, adapting body parts is not possible either.

Test-3. The defendant hired someone to attempted murder the Petitioner. The attack to the Petitioner was deadly, injured the spine. With the pain in the spine, Petitioner drafted all pleading. Pray USSC to order them \$15 million dollar each defendant should pay for the time and effort, pain and suffering. In the painful situation, appointing attorney also denied. Or this prayer should be paid in pain and suffering. When I tried to find attorney and unable to find since Im poor and not able to pay down payment to the attorney. Lower Court denied pro bono attorney as

well. Also I have claim against the NJ Supreme court violation of freedom of information act.

Boyadjian v. Cigna Companies, 973 F. Supp. 500 - Dist. Court, D. New Jersey 1997@504

*Although plaintiff may not recover attorneys' fees, he may recover litigation costs reasonably incurred. See Cunningham, 664 F.2d at 387 n. 4; Carter, 780 F.2d at 1482; DeBold, 735 at 1043 (citing Crooker v. United States Dep't of Justice, 632 F.2d 916, 921 (1st Cir.1980)) ("[A] pro se litigant who substantially prevailed certainly is entitled to '**litigation costs reasonably incurred**' A pro se litigant is made whole thereby, serving as a small incentive to pursue litigation if no attorney may be found to represent the litigant.")*

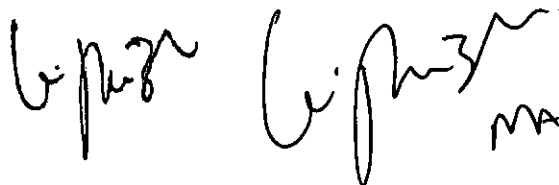
The First Circuit has reached the opposite conclusion in Crooker v. Department of Justice, supra, holding that "in actions where the complainant represents himself, sometimes as a hindrance instead of an aid to the judicial process, an award of fees does nothing more than subsidize the litigant for his own time and personal effort.

For reasons above, petitioners pray this court for above prayers to be granted.

XIX. CONCLUSION

Petitioner(s) Palani Karupaiyan, PP, RP pray(s) the US Supreme Court for the Petition for a Writ(s) of Certiorari should be granted.

Respectfully submitted.

 MAY 05 2023

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