

ORIGINAL

No: 22-5085

IN THE

SUPREME COURT OF THE UNITED STATES

FILED
OCT 12 2022

OFFICE OF THE CLERK
SUPREME COURT, U.S.

PALANI KARUPAIYAN; P.P.; R.P., Petitioners

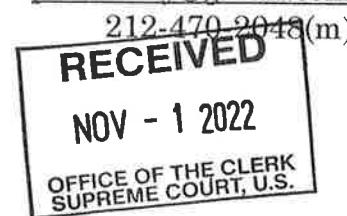
v.

L.NAGANDA, individually and in his official capacity as Owner of Naga Law Firm; NAGA LAW FIRM;
J. RAMYA; P. JAYABALAN; J. RANJEETHKUMAR;
ARUL THIRUMURUGU;
ATLANTIC REALTY DEVELOPMENT CORP AND MIDDLESEX MANAGEMENT;
MIDDLESEX MANAGEMENT INC; OAK TREE VILLAGE;
DAVID HALPERN, individually and in his official capacity as CEO, Owner of Atlantic Realty Development Corp, Middlesex Management, Oak Tree Village;
D&G TOWING; GLENN STRAUBE, individually and in his official capacity as owner of D&G Towing;
COUNTY OF MIDDLESEX; STATE OF NEW JERSEY;
TOWNSHIP OF EDISON Respondents

On PETITION FOR A WRIT OF CERTIORARI
to the United States Court of Appeals
for the 3rd Circuit

PETITION FOR REHEARING

Palani Karupaiyan.
Pro se, Petitioner,
C/o Pravin
110 Caton Ave, Unit-2M
Brooklyn, NY-11218
Email: palanikay@gmail.com



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III. PETITION FOR REHEARING

Pursuant to Rule 44.2, Petitioner(s) Palani Karupaiyan

respectfully Petition for Rehearing of the Court's order denying
Certiorari. The PETITION FOR A WRIT OF CERTIORARI is denied
on 10/3/2022. (**Exhibit-B**).

IV. REASONS FOR GRANTING REHEARING.

1) PRO SE STANDARDS

Because of Petitioner is pro se, Petitioner prays this Court for his
pleadings are to be "*liberally construed*". Federal Exp. Corp. v.
Holowecki, 552 US 389 - Supreme Court 2008 at 1158, pro se litigants
are held to a lesser pleading standard than other parties. See Estelle v.
Gamble, 429 U.S. 97, 106, 97 S.Ct. 285, 50 L.Ed.2d 251 (1976) (Pro se
pleadings are to be "liberally construed")

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.

**2) NEW JERSEY'S LOCAL GOVT ORDERED ARREST
WARRANT WITHOUT DUE PROCESS BECAUSE PETITIONER
FILED US DISTRICT COURT COMPLAINT.**

When this petition is subjudiced with USSC, New Jersey's Middlesex probation, childsupport enforcement (Local Govt) left the following voice mail that message the issued bench warrant.

Good morning. There's nothing just for cuddle high on Palani. I'm calling from Middlesex Child Support Enforcement call. They know we are issued a bench warrant for your arrest as you have not made payments. You have not contacted the Court. You have not filed any motion and family Court and you have not provide us with any updated information. Call us back 1877-655-4371 because we are issued a bench warrant for your arrest. Have a nice day.

a) THE ARREST WARRANT VIOLATED THE DUE PROCESS

The above arrest warrant violated the Due process guaranteed in the Constitution. The above message has no information, who filed, where filed, what time, Plaintiff of the case is NJ State or Local govt filed the application. Who were the beneficiaries Party(s) or Govt(s) in the application?

When the Petitioner is unemployed, homeless, diabetic, disabled, suffering/recovering from COVID illness, living in public welfare, the above arrest warrant for child support by judicial fraud violated the due process which is guaranteed in Constitution.

b) RETALIATION MOTIVE THE ARREST WARRANT IS ISSUED

The above arrest warrant is issued because of Petitioner filed US Dist Court Complaint.

In Allah v. Seiverling, 229 F. 3d 220 - Court of Appeals, 3rd Circuit 2000 @ 225

"We have recognized that "[t]he right of access to the Courts ... must be freely exercisable without hindrance or fear of retaliation. Milhouse v. Carlson, 652 F.2d 371, 374 (3d Cir.1981) (locating right to access the Courts in a retaliation case in the First Amendment right to petition for redress of grievances); see also Crawford-El v. Britton, 523 U.S. 574, 588 n. 10, 118 S.Ct. 1584, 140 L.Ed.2d 759 (1998) (stating that "[t]he reason why ... retaliation offends the Constitution is that it threatens to inhibit exercise of the protected right").

*"[G]overnment actions, which standing alone do not violate the Constitution, may nonetheless be Constitutional *225 torts if motivated in substantial part by a desire to punish an individual for exercise of a Constitutional right." Thaddeus-X v. Blatter, 175 F.3d 378, 386 (6th Cir.1999) (en banc).*

In Sullivan v. Little Hunting Park, Inc., 396 US 229 - Supreme Court 1969 @ 239-240

"[W]here federally protected rights have been invaded, it has been the rule from the beginning that Courts will be alert to adjust their remedies so as to grant the necessary relief. And it is also well settled that where legal rights have been invaded, and a

federal statute provides for a general right to sue for such invasion, federal Courts may use any available remedy to make good the wrong done. " Id., at 684."

3) WHEN THIS CASE IS SUB JUDICE WITH USSC, NEW JERSEY JUDICIAL AUTHORITIES KEPT ON PRESSURING TO SUPREME COURT OF INDIA TO INVALIDATE THE LAW BASED TO INDIAN FAMILY COURT ORDER GRANTED.

When this petition for Writ of Certiorari is subjudiced with this Court, New Jersey judicial authorities hired proxy peoples in India to file case in Indian Supreme Court (OJASWA PATHAK vs. UNION OF INDIA, Dkt# W.P.(C) No. 000250 - / 2019) invalidate the law based on the Indian family Court reconciliation order (**Exhibit-A**) granted to the Petitioners.

Doing such legal wrong by NJ judicial authorities, the sovereignty of the over 1.4 billion Indian citizen's best interest should be seriously damaged.

Further for the purpose of delaying the case, New Jersey justices pressuring the Indian Supreme Court to strike down the section-9 of Hindu Marriage Act. NJ Supreme court 3 times pressured the Supreme

Court of India for strike down the Sec-9 of Marriage Act which caused 3 years delay to this case.

Sep 28 2022 was the final hearing date for PATHAK which did not happened. In the three Justices bench, lead justice Indira Banerjee retired on Sep 23 2022.

Until this court grant this Petition for Rehearing, New Jersey Judicial authorities kept on going to Supreme Court of India to invalidate the law which should the time waste of Indian Supreme Court and US Federal Court's time as well. So the Petitioners pray this court to grant the Petition for Rehearing.

**4) PROLONG DAMAGES TO THE PETITIONER(S), AND
THOSE DAMAGES CONTINUES FOREVER.**

Due to prolong Petitioner(s)' Constitutional violation of New Jersey and Local Govt, harassment, damages, injuries by the New Jersey judicial authorities for more than 7 years the petitioner become unrecoverable diabetic, unemployed, homeless, disabled, suffered by Covid, Living on public welfare.

Petitioner(s) continues suffered by parenting rights, conjugal rights, cohabiting rights, violation/contempt of Indian family

recompilation Court order **Exhibit-A**, 14th amendment (parenting rights), kept on arresting, jailing by violating Due process because petitioner refused to bring the India family home money for the purpose of benefit of NJ Judicial authorities, jailed the petitioner twice so they violated the India family Court order.

Children Petitioner's Constitutional rights also violated in parent-children relationship which need to be protected by USSC

5) REHEARING GRANTING STANDARD

In Conner v. Simler, 367 US 486. Sup. Ct (1961), Certiorari was originally denied, 365 US 844 (1961), in which on rehearing, that order was vacated and Certiorari granted; the case was then decided on the merits. Same in Boumediene v. Bush, 551 US 1160 – Sup. Court 2007.

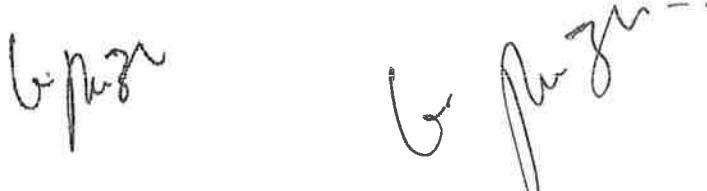
V. CONCLUSION

For the reasons set forth in this Petition, Palani Karupaiyan respectfully requests this Honorable Court grant rehearing and his Petition for a Writ of Certiorari. Vacate the denial order Oct 3 2022.

Also, the Court should hold the parallel petition for Certiorari (22-5081 KARUPAIYAN ; P.P.; R.P., v. TWP OF WOODBRIDGE ET AL) and its

rehearing, then consider both petitions together

Respectfully Submitted

Two handwritten signatures are shown side-by-side. The signature on the left appears to be "Palani" and the signature on the right appears to be "Pravin".

Palani Karupaiyan, prose petitioner
C/o Pravin
Brooklyn, NY-11218
2124702048(m)
palanikay@gmail.com

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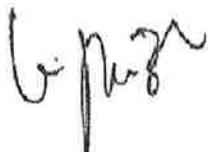
L.NAGANDA et al

**VI. CERTIFICATE OF GOOD FAITH AND OTHER
NEED**

The Petitioner hereby certify that the grounds are limited to intervening circumstances of substantial or controlling effect or to other substantial grounds not previously presented.

The Petitioners, we believe this petition for rehearing to be meritorious and hereby certify that this petition is presented in good faith and not for purpose of delay.

The Petition for rehearing was prepared with Word 2013, Century schoolbook font 14¹ and contains words count 2500 approx and Pages 14
Respectfully Submitted



Palani Karupaiyan.

¹ Due to Petitioner's diabetic, eye blurring disability petitioner used Font 14 instead of 12 which may add additional pages but word counts is not violated.

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VII. CERTIFICATE OF SERVICE

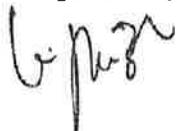
I, Palani Karupaiyan, on Oct 27 2022?, declare under penalty of perjury that I have served a copies of the Petitioner's 1) **Petition for Rehearing** to the Respondents as below

Defendant	Email ID
L.NAGANDA	naga@nagalaw.com
J. RAMYA	ramyabalan79@gmail.com
P. JAYABALAN	jayapalansp@gmail.com
J. RANJEETHKUMAR	ranjeethkumarj@gmail.com
ARUL THIRUMURUGU	arulmurugu@gmail.com
ATLANTIC REALTY DEVELOPMENT CORP AND; MIDDLESEX MANAGEMENT INC; OAK TREE VILLAGE; DAVID HALPERN, Oak Tree Village	atlantic@arcrealty.com and MargaretS@atlanticrdc.com (Legal Dept)
COUNTY OF MIDDLESEX	m.williams@co.middlesex.nj.us
STATE OF NEW JERSEY	NJAG.ElectronicService.CivilMatters@law.njoag.gov
TOWNSHIP OF EDISON	lrainone@edisonnj.gov

D&G TOWING; GLENN STRAUBE thru USPS

48 Garretson Ave, Perth Amboy, NJ 08861

Respectfully submitted



Palani Karupaiyan, Prose Petitioner

VIII Exhibits

- a) Exhibit-A—Indian Family Court’s Reconciliation Order.
- b) Exhibit-B— Order denial of Writ of Certiorari -docket 22-5085,
Karupaiyan et al v. Naganda et al.

**Additional material
from this filing is
available in the
Clerk's Office.**