

22-5527

IN THE
Supreme Court of the United States

DORA L. ADKINS,

Petitioner,

v.

TYSONS LODGING, LLC,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

SUPPLEMENTAL BRIEF FOR PETITIONER

Dora L. Adkins, Pro Se
P.O. Box 3825
Merrifield, VA 22116
DoraAdkins7@aol.com

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SUPPLEMENTAL BRIEF

NEW MATERIAL:

Petitioner at the time of filing a Writ of Certiorari on September 1, 2022, in the case of *Dora L. Adkins v. Tysons Lodging, LLC*, Law Case No. 1:22-cv-00553 (AJT/WEF), did not know that the U. S. District Court for the Eastern District of Virginia and U.S. Court of Appeals for the Fourth Circuit Abused its Discretion when it did not properly apply a Pre-Filing Injunction Order to deny Petitioner Dora L. Adkins' motions for leave to file a complaint against respondent Tysons Lodging, LLC and that the Judgment and Order needs to be VACATED by this Honorable Court. (Dkt. No. 23, Dkt. No. 24) Pet. Appendix A, pg. 22; Pet. Appendix B, pg. 23.

Petitioner had no way to know how the District Court ruling in the case of *Dora L. Adkins v. Hyatt Corp.*, 1:20-CV-1410 issued to the Petitioner regarding previous filings (listed below) related to chemical and/or food poisoning; would in fact STALL all Complaints whether or not the Complaint was labeled by the Petitioner as an Emergency Complaint as in the case *Dora L. Adkins v. Tysons Lodging, LLC*, Law Case No. 1:22-cv-00553 (AJT/WEF), and would prove to have a devastating effect on the Petitioner when poisoned by Chemicals by the Respondent, Tysons Lodging, LLC. Petitioner had no way of knowing that NO chemical

poisoning and/or food poisoning Complaints filed by the Petitioner would ever be GRANTED.

It is not that that the Petitioner is a vexatious pro se litigant; filing groundless and vexatious litigation, but it is GOD who provided EVERY detail in EVERY COMPLANT and/or EMERGENCY COMPLAINT who caught ALL of the Defendants in over correction (90-Complaints) filed by the Petitioner. “Legal proceedings starting with malice and without good case,” has NEVER been the objective of the Petitioner. Vexatious litigation is meant to bother, embarrass, or cause legal expenses to the defendant. A plaintiff who starts such litigation either knows or should reasonably know that no legal basis for the lawsuit exists. To obtain a remedy for vexatious litigation, the injured party often files a claim for malicious prosecution.” Petitioner did not file any of the 90-Complaints and/or Emergency Complaints combined without good cause and in the approximately 90-Complaints and/or Emergency Complaints filed by the Pro Se Petitioner, no Defendant filed a Claim for Malicious Prosecution; which mean Petitioner should not have been ENJOINED by the District Court and certainly not ALL of the Courts in the State of Virginia.

Legal proceedings were not started by the Petitioner with malice and without good case in the approximate 28-Complaints filed by the Petitioner that were later Petitioned in the Supreme Court of Virginia; with the U.S. Court of Appeals for the Fourth Circuit; and the United Stated Supreme Court:

I. ALL OF THE FOLLOWING PETITIONS ALLEGED FOOD AND/OR CHEMICAL POISONING OF THE PETITIONER:

These petitions related to food poisoning and chemical poisoning were filed with the Supreme Court of Virginia:

- 1) *Dora L. Adkins v. HEI Tyson's Corner, LLC*, Record No. 111454;
- 2) *Dora L. Adkins v. Davidson Hotel Company, LLC*, Record No. 131897;
- 3) *Dora L. Adkins v. High Velocity Hospitality, LLC*, Record No. 140431;
- 4) *Dora L. Adkins v. Fair Oaks Inn, LLC*, 140690;
- 5) *Dora L. Adkins v. King Street Station and Hotel Associates, LLC*, Record No. 140872;
- 6) *Dora L. Adkins v. Hilton Worldwide, Inc.*, Record No. 140875;
- 7) *Dora L. Adkins v. Alexandria Hotel Associates, LLC*, Record No. 141334;
- 8) *Dora L. Adkins v. The Ritz-Carlton Hotel Company, LLC*, Record No. 150574;
- 9) *Dora L. Adkins v. Renaissance Hotel Operating Company*, Record No. 150623;
- 10) *Dora L. Adkins v. HEI Tyson's Corner, LLC*, Record No. 151510;
- 11) *Dora L. Adkins v. W-LCP Alexandria VII, LLC*, Record No. 160570;
- 12) *Dora L. Adkins v. CP/IPERS Arlington Hotel, LLC*, Record No. 160685;
- 13) *Dora L. Adkins v. JBG/Tysons Hotel, LLC*, Record No. 161145;
- 14) *Dora L. Adkins v. Noodles & Company*, Record No. 161238;
- 15) *Dora L. Adkins v. CH Realty VI-Grey-Star MF Tysons Elan, LLC*, Law Case No. Case No.: 2017-17657;
- 16) *Dora L. Adkins v. Park Hotels & Resorts, Inc* 2016;
- 17) *Dora L. Adkins v. Hyatt Corporation* 2017;

- 18) *Dora L. Adkins v. B. F. Saul Company*;
- 19) *Dora L. Adkins v. Park Hotels & Resorts, Inc* 2018;
- 20) *Dora L. Adkins v. Chipotle Mexican Grill of Colorado, LLC*. Law Case No. CL 19003708-00

These petitions related to food poisoning and chemical poisoning were filed with the U.S. Court of Appeals for the Fourth Circuit:

- 1) *Dora L. Adkins v. Whole Foods Market Group, Inc.*; Docket Number 1:16 -CV-00031-CMH-JFA, (Dismissed)
- 2) *Dora L. Adkins v. Public Storage*; Docket Number 1:16-cv-01556-JCC-IDD, (Dismissed)
- 3) *Dora L. Adkins v. Whole Foods Market Group, Inc.*; Docket Number 1:17-cv-01023-AJT-JFA, (Dismissed)
- 4) *Dora L. Adkins v. Alexandria Towers, LLC*; Docket Number 1:16-cv-0049 – JCC-TCB, (Dismissed)
- 5) *Dora L. Adkins v. Dulles Hotel Corporation*, Docket Number 1:20-cv-00361-RDA-IDD, (Dismissed)
- 6) *Dora L. Adkins v. Driftwood Special Servicing, LLC*, Docket Number 1:22-cv-00109-AJT-IDD, (Affirmed)
- 7) *Dora L. Adkins v. Merrifield Hotel Associates, L.P.*, Docket Number 1:22-1414-AJT-IDD, (Affirmed)
- 8) *Dora L. Adkins v. Tysons Lodging LLC.*, Docket Number 1:22-cv-00553, (Affirmed)

II. THE FOLLOWING CHEMICAL AND/OR FOOD POISONING EMERGENCY COMPLAINTS HAVE NOT BEEN FILED BECAUSE PETITIONER IS ENJOINED IN THE DISTRICT COURT AND EVERY COURT IN THE STATE OF VIRGINIA:

- 1) *Dora L. Adkins v. Ashford TRS Alexandria, LLC;*
- 2) *Dora L. Adkins v. Ashford TRS Alexandria, LLC;*
- 3) *Dora L. Adkins v. Fitness International, LLC;*
- 4) *Dora L. Adkins v. SP Hotel, LLC;*
- 5) *Dora L. Adkins v. Hilton Worldwide Holding, LLC;*
- 6) *Dora L. Adkins v. The Ritz-Carlton Hotel Company, LLC;*
- 7) *Dora L. Adkins v. THC Arlington, LLC;* (FILED IN ARLINGTON COUNTY CIRCUIT COURT)
- 8) *Dora L. Adkins v. HEI Tyson's Corner, LLC.*

III. OTHER EMERGENCY COMPLAINTS ALLEGING FOOD AND/OR CHEMICAL POSITIONING AFTER BEING ENJOINED IN EVERY COURT IN THE STATE OF VIRGINIA:

- 1) *Dora L. Adkins v. Hilton Worldwide Holdings, Inc.;* (FILED IN FAIRFAX COUNTY CIRCUIT COURT)
- 2) *Dora L. Adkins v. 12777 Fair Lakes Circle Owner, LLC.;* (FILED IN FAIRFAX COUNTY CIRCUIT COURT)
- 3) *Dora L. Adkins v. Davidson Hotel Company, LLC*, Record No. MO21001647; (FILED IN THE CITY OF ALEXANDRIA CIVIL DIVISION)
- 4) *Dora L. Adkins v. Starbucks Corporation;* (FILED IN U.S. DISTRICT COURT)
- 5) *Dora L. Adkins v. HEI Tyson's Corner, LLC.* (FILED IN FAIRFAX COUNTY DISTRICT COURT)

PETITIONER NEVER FILED A LAWSUIT IN NO. 6 THAT CAUSED DEATH IN THE PETITIONER (RE-LIVED THROUGH AND BY GOD's DEVINE INTRVENTION):

- 6) Dora L. Adkins v. Hilton Garden Inn, Woodbridge, VA; (NEVER FILED A

LAWSUIT)

7) Dora L. Adkins v. Red Lobster. (NEVER FILED A LAWSUIT)

IV. PETITIONER'S DEVASTATING IMPACT OF BEING ENJOINED

With GOD's help of providing Petitioner with EVERY detail in EVERY Complaint and/or Emergency Complaint, Petitioner was able to allege cognizable claims with supporting Facts, Proof, and Evidence that is ACCURATE and TRUE. EVERY Complaint and/or Emergency Complaint involved GOD directly. Petitioner analyzed Five of the Emergency Complaints presently before the District Court and found the physical and emotional injuries are the same for the same Defendant Years later. Petitioner in 17-years have not had to file Emergency Complaints while already in Court for chemical poisoning and/or food poisoning but the physical and emotional injuries occurred at EVERY hotel. Petitioner's claims are ACCURATE and TRUFUL.

Chemical poisoning of the Petitioner in Petitioner's Condominium Unit #304 located at Hallmark Condominium, Alexandria, VA in the Year 2005 that caused Petitioner five-DEATHS and Petitioner re-lived through and by GOD's *Devine Interventions* was copied on September 3, 2022, in the Conference Room located at the Hampton Inn & Suites located in Richmond, VA and/or 17-years ago is PROOF and EVIDENCE that the facts Petitioner alleged and/or plead in ALL of the Complaints and Emergency Complaints related to chemical poisoning and/or food poisoning were TRUE and ACCURATE. Petitioner filed the following Emergency

Complaint in the case of *Dora L. Adkins v. SP Hotel, LLC* that is stalled because Petitioner is ENJOINED. Petitioner was seen at the Emergency Room located in Reston, VA for an unrelated matter and Petitioner's Blood Pressure read 175/125 from inhaling chemical poisoning from inside the Conference Room at the Hampton Inn & Suites, located in Richmond, VA that was meant to kill the Petitioner.

A second example is found in the same District Court on August 25, 2022, which granted Petitioner's Motion for Leave to Proceed *in forma pauperis* in the case of *Dora L. Adkins v. The Ritz-Carlton Hotel Company, LLC*, Case No., 1:22-cv-00934 that claims chemical poisoning which caused Petitioner Death from inhaling septic poisoning amongst other claims in the Emergency Complaint. The exact way of chemical poisoning the Petitioner in a prior case against The Ritz Carlton Tysons was by septic poisoning in its parking area all the way to the entrance to the elevator to the Guest Rooms. *Dora L. Adkins v. The Ritz-Carlton Hotel Company, LLC*, Case No., 1:22-cv-00934 would not have been approved to proceed *in forma pauperis* if the CLAIMS alleged were not substantiated.

A third example is Petitioner allegedly being both food poisoned and chemically poisoned at the Embassy Suites Tysons since the Year 2010 and/or 12-Years later that caused the Petitioner two-Deaths and is one of the 10-Emergency Complaints presently filed but is stalled because Petitioner is ENJOINED in the District Court is against the Embassy Suites Hotel Tysons and/or *Dora L. Adkins v. Hilton Worldwide Holding, LLC* that is stalled because Petitioner is ENJOINED.

There were five Complaints filed by the Petitioner against the Embassy Suites Tysons who was allegedly dishonest about who the Registered Agent is and has an out-of-date license in its office; the same problem exists with the Hilton Garden Inn, located in Woodbridge, VA; whereby Petitioner was unable to locate the Registered Agent for the Hilton Garden Inn.

AN ACTIVE EMERGENCY: While Petition has been in an Emergency State from food and chemical poisoning for over 3-Years as Petitioner went to three-State Courts and one-District Court with the Emergency Complaints; Petitioner is presently suffering from the potent chemical poisoning Petitioner inhaled in the Conference Room of the Hampton Inn & Suites, Richmond, VA and from chemical poisoning sprayed directly onto Petitioner's vehicle three-times within the month of September 2022.

In a Summary: It was good for Petitioner to show this Court how the New Material fit together and sadly from the standpoint of the extreme pain and suffering endured by the Petitioner, but it would not have been possible to showcase GOD's work had any one of the 28-Petitions been GRANTED to the Petitioner. It paints a clear picture of GOD's involvement.

CONCLUSION

For the foregoing reasons, the Court should grant the petition.

Dated: September 22, 2022

Respectfully submitted,