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ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

FILED

DEC 4 2022

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

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**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; MIDDLESEX MANAGEMENT INC; OAK TREE VILLAGE; DAVID HALPERN, individually and in his official capacity as CEO, Owner of Atlantic Realty Development Corp, Middlesex Management, Oaktree Village; D&G TOWING; GLENN STRAUBE, individually and in his official capacity as owner of D&G Towing; Judge MARCIA SILVA, individually and in her official capacity as Judge of the Superior Court, Middlesex County, NJ; Judge CRAIG CORSON, individually and in his official capacity as Judge of the Superior Court, Middlesex County, NJ; Judge JERALD COUNCIL, individually and in his official capacity as Judge of the Superior Court, Middlesex, NJ; Justice STUART RABNER, individually and in his official capacity as Chief Justice of Supreme Court of NJ; Justice JAYNEE LA VECCHIA, individually and in her official capacity as Justice of Supreme Court of NJ; Justice BARRY T. ALBIN, individually and in his official capacity as Justice of the Supreme Court of NJ; Justice ANNE M. PATTERSON, individually and in her official capacity as Justice of the Supreme Court of NJ; Justice FAUSTINO J. FERNANDEZ-VINA, individually and in his official capacity as Justice of the Supreme Court of NJ; Justice

LEE A. SOLOMON, individually and in his official capacity as Justice of the Supreme Court of NJ; Justice WALTER F. TIMPONE, individually and in his official capacity as Justice of the Supreme Court of NJ; Judge GLENN GRANT, individually and in his official capacity as Administrative Director of the Courts of the State of New Jersey; Judge ALLISON E. ACCURSO, individually and in her official capacity as Judge of Appellate Division of NJ; Judge PATRICK DEALMEIDA, individually and in his official capacity as Judge of the Appellate Division of NJ; Judge JOSEPH L. YANNOTTI, individually and in his official capacity as Judge of the Appellate Division of NJ; COUNTY OF MIDDLESEX; STATE OF NEW JERSEY; TOWNSHIP OF EDISON  
— Respondents

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**PETITION FOR WRIT FOR CERTIORARI**  
to the United States Court of Appeals  
for the Third Circuit,

---

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## I. QUESTIONS PRESENTED

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

## II. PARTIES TO THE PROCEEDING

**All parties appear in the caption of the case on the cover page.**

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; MIDDLESEX MANAGEMENT INC; OAK TREE VILLAGE; DAVID HALPERN, individually and in his official capacity as CEO, Owner of Atlantic Realty Development Corp, Middlesex Management, Oaktree Village; D&G TOWING; GLENN STRAUBE, individually and in his official capacity as owner of D&G Towing; JUDGE MARCIA SILVA, individually and in her official capacity as Judge of the Superior Court, Middlesex County, NJ; JUDGE CRAIG CORSON, individually and in his official capacity as Judge of the Superior Court, Middlesex County, NJ; JUDGE JERALD COUNCIL, individually and in his official capacity as Judge of the Superior Court, Middlesex, NJ; JUSTICE STUART RABNER, individually and in his official capacity as Chief Justice of Supreme Court of NJ; JUSTICE JAYNEE LA VECCHIA, individually and in her official capacity as Justice of Supreme Court of NJ; JUSTICE BARRY T. ALBIN, individually and in his official capacity as Justice of the Supreme Court of NJ; JUSTICE ANNE M. PATTERSON, individually and in her official capacity as Justice of the Supreme Court of NJ; JUSTICE FAUSTINO J. FERNANDEZ-VINA, individually and in his official capacity as Justice of the Supreme Court of NJ; JUSTICE LEE A. SOLOMON, individually and in his official capacity as Justice of the Supreme Court of NJ; JUSTICE WALTER F. TIMPONE, individually and in his official capacity as Justice of the Supreme Court of NJ; JUDGE GLENN GRANT, individually and in his official capacity as Administrative Director of the Courts of the State of New Jersey; JUDGE ALLISON E. ACCURSO, individually and in her official capacity as Judge of Appellate Division of NJ; JUDGE PATRICK DEALMEIDA, individually and in his official capacity as Judge of the Appellate Division of NJ; JUDGE JOSEPH L. YANNOTTI, individually and in his official capacity as Judge of the Appellate Division of NJ; COUNTY OF MIDDLESEX; STATE OF NEW JERSEY; TOWNSHIP OF EDISON

## III. RELATED CASE(S)

USCA3's docket# 22-2949, Palani Karupaiyan et al v. Twp of Woodbridge et al is Parallel dockets which is pending in USCA3

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## VII. PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a Writ of Certiorari issue to review the opinion/judgment/orders of USCA3's (docket 22-2066) and US Dist Court for New Jersey- Newark div (Dist docket 19-cv- 12356) below.

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

- 1) USCA3' Order of Appeal for Affirm. App.1
- 2) USCA3' Judgment (appeal) App.6
- 3) ECF (56) WHEREAS OPINION dated May 20 2022. App.8
- 4) ECF (57) WHEREAS Order dated May 20 2022. App.14
- 5) ECF (65) order denying pro bono or Guardian ad litem (6/6/22) App.16
- 6) ECF (66) Order denying Permanent injunction (6/8/22). App.18
- 7) USCA denial of
  - (1) Motion filed by Appellant for Permanent Injunction and Declarative Order Reliefs - Reconsiderations (ECF-59)
  - (2) Motion filed by Appellant Request for a Stay New Jersey to Appoint NJ Supreme Court Justices **and**
  - (3) Motion filed by Appellant Requesting to Stay the Appeal until U.S. Supreme Court decide the Appellants' Petition for Rehearing App.20
- 8) **USCA Order denying Panel and En Banc rehearing. App.21**
- 9) ECF(44) Opinion (Dismissing FAC) date Aug 12 2021 App.25
- 10) ECF(45) Order Dismissing FAC dated Aug 12 2021. App.31
- 11) ECF(3) Sua Sponte Dismissal of complaint dated Oct 1 2020. App.33

**Hon. Susan D. Wigenton USDJ; Hon. Leda Dunn Wettre USMJ**

## IX. 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.*

United States Court of Appeals 3rd Cir decided case on Oct 4, 2022 at Exhibit: 1, App-1

A timely filed petition for rehearing and En Banc was denied by the USCA3 on Nov 28, 2022<sup>1</sup>, Exhibit-6. **App-21**.

## X. CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

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

1st Amendment  
4th Amendment  
5th Amendment.  
8th Amendment.

14th amendment  
Article VI, Paragraph 2 of the U.S. Constitution (Supremacy Clause)  
42 US Code § 1983 - Civil action for deprivation of rights

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<sup>1</sup> Nov 29 2022, docket sheet entry was modified

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  
Indian family court order ()  
Few Indian penal codes.

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 Indian Supreme Court, and William M Treanor, Dean of Georgetown University Law Centre Dated: April 11, 2022

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

## XI. STATEMENT OF THE CASE

### a) BEFORE DIST COURT PROCEEDING (PARALLEL FAMILY CASES IN NEW JERSEY AND INDIA)

Defendant Ranjeeth called Mr. Karupaiyan ("Palani", Petitioner) before filing fake domestic violence (dv) case and said that himself along with Defendant Naga doing black money/corrupt money transaction in Ramya(my wife)'s bank account and they were plaining to these black money in Ramya's Bank account in billions of dollars so Petitioner should allow them to do. Same time, Ramya acted irresponsible, took the kids to daytime women club parties where 2 year old RP was chocked, visited emergency to save life. I told Ramya (Petitioner's wife, Respondent), do not involve these illegal things, go to work, we need to send the kids to college, Kids marriage expense were unlimited.

Naga, Ranjeeth, Jayapalan (Relatives) came with plan to abduct the kids to India where they have friends/relatives works in judicial Dept so get child custody to hold the kids in India, use the child support/family support money as source of income to do the corruption against Govt of India.

Mr Karupaiyan cancel the kids passport.(**app.68**) Naga, Ranjeeth, Jayapalan came with Plan-B that NJ judicial were total corrupt so easy to file fake domestic violence case against Petitioner to get child custody, further abduct to India for above reason(s).

Petitioner leased apartment in Dallas, TX for family, moved out before Defendant Atlantic's apartment at Edison, NJ lease expired. When Jayabalan to occupy the lease expired apartment, waited for the kids passports to arrive for kids abduction, Atlantic got under table money from Jayapalan to occupy the appartment. Atlantic told me that my responsibility to clean the lease expired apartment. Multiple time I refused to clean because lease expired and I moved out. Atlantic listed me in the rental history, forced me to clean the apartment.

Because of Petitioner clean the apartment, Naga, Jayapalan, Ranjeeth filed fake dv case against me. Judge Silva entered Final Restating order (FRO) against me because Im black male, make \$140k/year, owe Porsche car, owe \$400k home in India when No support evidence/testimony against me. By FRO I was ordered to pay \$1900/month (approx.) child support money (**app.30**)



In weeks Judicial Fraud consolidation ordered is filed prevent me appeal the FRO. **(app.38, 39)** The purpose of fraud consolidation order is to continue bill the child support money, grand the divorce so bill the \$400k India family home money. These moneys were billed and shared with NJ judicial authorities up to NJ Supreme Court Justices.

I refused to bring the \$400k India home money because Im married from India, so NJ does not have jurisdiction to hear family matter because my joint family from India and Im married from India. Indian Supreme Court also ruled same manner.

When NJ judicial fraudulently dragged case for billing benefit, I filed the parallel case in Indian family Court for family reconciliation. **App.50**. Also paid approx. \$10k to Ramya to go appear in Indian family Court. Ramya went to India and injured the kids and did not appear in India family Court because she did not interest in divorces.

Oct 11 2016 Nj family Court entered ex-parte divorce **(app.46)**, ex-parte amended FRO **(app.40)**.

New Jersey have high densely engineers, scientists, doctors (high income professional) living than any part of the earth. NJ judicial authorities profiled that these high income professional's family have kids and they save money for kid's education. To rob the kids' education saving, NJ judicial authorities run the corrupt family/trial Courts, share the money upto NJ Supreme Court justices. The same method of operation they applied against this Petitioners.

In the Parallel case, this Petitioner got final, latest order from India. **App.56** Petitioner appealed to NJ appellate Court which denied my appeal for corrupt and fraud purpose as above said judicial fraud. Further I filed petition to NJ Supreme Court which denied my petition with judicial defect by its own mistake.

b) AT DISTRICT COURT PROCEEDING

Plaintiffs filed forma pauperis and civil action against petition captioned defendants and NJ judicial authorities and NJ local Govts. Also plaintiff requested civil action to be combined with Criminal action. The charges are ranging from bicycles thief to NJ Chief Justice violating civil, parental and constitutional rights and so on.

Before serving the complaint, On Oct 1 2020, Dist Court **ORDERED (Sua Sponte)** that

*the Complaint (D.E. 1) is dismissed without prejudice, except as to Plaintiff's claims (1) against the Judges for acts made in their*

*judicial capacity, and (2) which seek to appeal or overturn the Judges' state Court rulings. Such claims are dismissed with prejudice. Plaintiff shall have (30) days to file an Amended Complaint.*

Plaintiff filed Notice of appeal (USCA doc# 20-3063) and amended the complaint ECF-7 and served all the defendants including the NJ Judicial authorities. In the USCA 3<sup>rd</sup> circuit, NJ attorney general office filed as below CA-Dkt-11 under doc# 20-3063.

USCA ruled that Oct 1 2020 order is not final.

None of the defendants appeared in Dist Court.

During this trial in Dist Court, NJ judicial authorities hired some proxy parties and lawyer in India, filed case in Indian Supreme Court invalidate the law(s) based on Mr Karupaiyan got family Court order from India.(**app.54,56**) Because I filed civil action in US Dist Court, the defendants together attempted to murder the Petitioner.(**app.99,100**) Recently NJ issues active arrest/jail warrant.(Dist-Dkt#54)

Only Middlesex County appeared late, requested the Dist Court to dismiss the complaint on Rule 8.

On Aug 12 2021 Dist Court enter dismissal order (**app.25, 31**) with prejudice for Rule 8 violation and gave opinion.(**app.31**).

On May 20 2022, District Court entered the appealable Opinion and order. **ECF-8,14**. Plaintiff(s) filed Post Judgement motions permanent injunction, declarative order, guardian ad litem/Pro bono appointment. **ECF-59, 63, 64**. Appellant filed notice of appeal and amended notice of appeal timely. **ECF-58, 67**.

**c) AT USCA 3<sup>RD</sup> CIR. PROCEEDING**

On Jun 10 2022, USCA 3<sup>rd</sup> circuit ordered for Briefing schedule. USCA dkt-8. Appellant's brief is schedule to file on Jul 20 2022 or before. Now the Petitioners filing the Petition for Writ of Certiorari under Rule 11 of US Supreme Court

On Oct 4 2022, USCA3 affirmed the Dist Court order (**App.1**).

On Nov 1, 2022 USCA3 denied 1) Motion filed by Appellant for Permanent Injunction and Declarative Order Reliefs - Reconsiderations (**ECF-59**), 2) Motion filed by Appellant Request for a Stay New Jersey to Appoint NJ Supreme Court Justices, 3) Motion filed by Appellant Requesting to Stay the Appeal until U.S. Supreme Court decide the Appellants' Petition for Rehearing where denied. Ddkt#34

Nov 28 2022, USCA 3<sup>rd</sup> Cir denied the Petition for Panel Rehearing and En Banc. Judge Rendell and Judge Fuentes Voted in favor appellant. **App.21**

## XII. 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.*

## XIII. NJ JUDICIAL AUTHORITIES ILLEGAL WRONGDOINGS AGAINST PETITIONERS BY OUTSIDE SCOPE OF THEIR JUDICIAL DUTY.

- 1) *Entered FRO by violating unfair justice because Petitioner is Black Indian, owe Porsche car, Makes \$200k/year, owe home in India for \$400k which are billing criteria . App.34*
- 2) *Fraud-on-Court, Judicial Fraud Consolidation filed and prevented Petitioner from appeal. App.38, 39, Continues billing child support money.*
- 3) *Deny the Children Custody, violated 14<sup>th</sup> amendment when Petitioner have best interest of children evaluation.*
- 4) *All these wrongs to bill the child support money and family properties from India, and alimony.*
- 5) *Dishonored Indian family court order. App.56. They did contempt of Court. Continue violating the Petitioner's cohabitating, sexual rights as well.*
- 6) *Intentionally denied the appeal and Petitioner for Certification with NJ Supreme court with the Fraud consolidation order.*
- 7) *Because Petitioner refused to bring Indian family property money \$400k for the benefit of NJ Judicial Authorities, multiple times arrested and jailed the Petitioner.*
- 8) *These all above wrong doing, NJ Judicial authorities did against the Petitioner(s) together, integrated.*
- 9) *Many more wrongs in the complaint over 7 years.*

## XIV. PETITIONER'S PARENTING RIGHTS

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

XV. PETITIONER PRAYING 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 Bontkowski v. Smith, 305 F.3d 757, 762 (7th Cir. 2002).*

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

XVI. 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 could not able to grant the injunctive reliefs along with 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).*

XVII. USSC'S WRIT AGAINST USCA/DIST 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."**

.....

a) AGAINST ANY JUDICIAL AUTHORITY (INCLUDING NJ AUTHORITY)  
@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).

XVIII. 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 granting most of the writs in US Supreme Court.

#### XIX. THREE TEST CONDITIONS FOR GRANT THE WRIT (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 Mines v. 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

## XX. REASONS FOR GRANTING THE WRIT

- a) GRANT CHILDREN CUSTODY, INVALIDATED JUDGEMENT OF DIVORCE-JOD (), INVALIDATING FINAL RESTRAINING ORDERS FROs, AND VALIDATE INDIAN FAMILY COURT ORDER.

**Test-2,** 1) Petitioner have best interest of Evaluation.(**App-70**), Respondent Ramya hold the custody/FROs/JoD by Fraud-on-court/Judicial fraud.(**App-38,39**)

**Test-3,** 1) In Beck v. Beck, 432 A. 2d 63 - N.J: Supreme Court 1981, @ 499, the best interest of children is the polestar for grating the children custody

2) In Spindel v. Spindel, 283 F. Supp. 797 - Dist. Court, ED New York 1968 at 811  
.....*For what the judgment was rendered is not essential.*

*It is that it was obtained by fraud, and hence unjust to hold and use, and, because it is, the Court has jurisdiction."* 78 F. at 835....

320 U.S. 796, 64 S.Ct. 263, 88 L.Ed. 480 (1943).

So Petitioners pray this court should invalidate JOD and FROs granted by New Jersey, and validating Indian family court reconciliation order. Grand the child custody to Petitioner until Ramya should appear in the Indian family court.

b) ISSUE AN ORDER TO INDIAN SUPREME COURT TO DISMISS AND CLOSE THE DOCKET IS OJASWA PATHAK vs. UNION OF INDIA, DKT# W.P.(C) No. 000250 - / 2019

Test-2. When this Petitioner filed US Dist Court case in Newark, NJ, docket under this petitioner request to review, NJ Supreme Court justice hired proxy peoples India to file case in India Supreme Court to strike down the section of Indian Family law based on the Indian family court reconciliation order App.54 was granted to this petitioner.

The docket in the Indian Supreme Court is OJASWA PATHAK vs. UNION OF INDIA, Dkt# W.P.(C) No. 000250 - / 2019.

When the Pathak is active, not closed yet, this petitioners this case in US Federal Court is delayed. Now the petition is suffering for more than 7 years which is inhuman loss, damage, injury to the petitioners.

The NJ supreme court active it uncivilized.

**Test-3.** NJ Supreme doing above such, the case is delayed unnecessarily. Three times NJ Supreme court pressured in Indian Supreme Court, here the case is delayed 3 years. Totally the Petitioners suffered which no human Being should suffer in civilized society and wasting time in the US federal Court. So this prayer should be granted. Striking down the Indian family law in-part against the order Petitioner got from India is not going to be nullify the order past 10 years. Approx. 10 years ago, one India lady got reconciliation order from India which is not going to be null now. She might have two more kids now. Who is going to step in their home and tell husband and wife get out and live separate. Petitioner have gave a Indian family court petition in English translated as they needed so they knew what is going to be out come. They are corrupt and forever corrupt. Only truth and justice should survive.

When OJASWA PATHAK is not closed and kept on wasting time of Federal Court, this court issue order to Indian Supreme Court to dismiss and close the docket in Indian Supreme court.

*In the past, there was a scam in Indian parliament question for cash. When the matter went to Indian supreme court which warned the Member of parliament due to*



proxy activity on the parliament. Same/Similar situation in the Pathak case, these proxy peoples were hired by this case respondents including NJ judicial authorities.

These respondents hire the people around the petitioner to talk over the phone and records the phone call. Lot of people called petitioner and threaten to withdraw district court complaint. Few weeks ago, one of petitioner's friend called that these respondents were ready to pay \$200k, if he allowed this petitioner to have sex with his wife. These respondents have multiple to defend the petitioner so they hire proxy people to delay the case.

Especially the proxy Pathak, is to delay this case, wasting time of US federal Courts.

For any and all reasons stated above, petitioners pray this court issue an order to Indian Supreme Court to dismiss and close the is OJASWA PATHAK vs. UNION OF INDIA, Dkt# W.P.(C) No. 000250 - / 2019.

c) WRIT AGAINST NEW JERSEY FOR

1. Order that NJ govt should not appoint NJ Supreme Court justices and Chief Justice of NJ Supreme court should not appoint/Promote NJ Supreme Court justice, NJ appellate court Judge, and Administrative Director of the Courts of NJ Courts and appoint 22 NJ Supreme Court Justices thru Collegium Process

**Test-2.** When the case under subjudiced, NJ Supreme Court Chief Justice appointed/promoted the NJ Supreme Court justice, NJ appellate Court Judges, Administrative director of the Courts of NJ Courts.

Also When the case is under subjudiced NJ govt appointed **Fabiana Pierre-Louis** as NJ Supreme Court Justice and now NJ in the process of appointing New Jersey Supreme Court justices **Wainer Apter** and **Douglas Fasciale**. These **appointment/promotions** violated the ruling by age, gender (Title VII), in Babb v. Wilkie, 140 S. Ct. 1168 – Sup. Ct 2020 and Babb v. Secretary, dept. Of veterans affairs, 992 F. 3d 1193 – USCA11- 2021

**Test-3.** Under said Supremacy Clause this court has power to enforce the federal law and rules and ruling.

Article VI, Paragraph 2 of the U.S. Constitution is commonly referred to as the Supremacy Clause. It establishes that the federal constitution, and federal law generally, take precedence over state laws, and even state constitutions.

In Comparative Approaches of Supreme Courts of the World's Largest and Oldest Democracies, by Justice Stephen Breyer of USSC, CJI NV Ramana, (4/11/2022), CJI said that Judge promoting Judge is not true democracy. In fact Judge or Govt promote/appoint Judge is not true democracy.

Notably, historically, New Jersey Lawmaker appoint their relatives, friends as Justices to NJ Supreme Court for their personal gain. Recently close to 100 Judges were forced to resign who are relatives/friend to NJ Lawmaker and because their retirement account had disproportionate money.

Petitioner(s) prays an order that NJ Govt/NJ chief Justice should not appoint/promote Justice/Judge to NJ Supreme Court, NJ appellate court, Admin. Director of NJ court. And these position should be appointed by Collegium Process as CJI said

*"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]"*

United States should have common Collegium to appoint all its State's Apex/Supreme Court, Appellate Court justices/Judges.

This court should invalidated the all appointment/promotion of NJ Supreme court Justice/appellate court Judges by NJ Govt and NJ chief justice. Functioning of NJ Supreme court Justice, Appellate court justice should be independence which is violated by above said appointment/promotion. So collegium process is needed.

In SIANO, I filed motion to reconsideration with NJ Supreme court, I was told that not enough justice in NJ Supreme Court so denied my petition and I should goto US Supreme Court for justice. so Petitioner pray this court for order to appoint 22 justices thru Collegium Process.

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

2. **Remove the New Jersey Supreme Court Justices, NJ appellate/family court Judges defending the Petitioner in the case and Jail them 21 years.**

Test 2. Violated the Parenting Rights/14<sup>th</sup> amendment, dishonored India family court order. When they are not fired yet, kept on going to Indian Supreme Court to strike down Indian family law which base of Indian family Court reconciliation order and many more.

Continues violating India family court order, Petitioner cohabitation with family, sexual rights. Over 7 year Petitioner did not have sex which is human being need. Kept on Arresting and Jailing the Petitioner.

Test-3. Very obvious. This court should remove them from Judicial position and Jail them for 21 year. They violated the Oath and did corruption. Otherwise they continuously kept on doing the illegal wrongdoing against the Petitioner. Kept of going to Indian Supreme Court. Grant Permanent Restraining order against these Respondent NJ Judicial authorities in favor of Petitioner(s), father Karupaiyan, Minor Petitioners and Ramya because they could continuously endangering the Petitioners and Ramya.

NJ Family Court business model is that delay the case so divorced parties urged to have sex (which human being need, every animal does/need) with anyone so fraudulently granted divorce become valid.

Recently one Indian was hired by these respondents for \$200k (similarly OJASWA PATHAK where proxy people to file case against this cases) who said I can have sex with his wife and he recorded the phone conversation. When Naga and Arul said I can have sex with their wife, NJ judicail changed the

law in India. Jail these the NJ judicial respondents as soon as possible, the delay in the case should be avoid further and inhuman damage to the petitioner can be avoided further.

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

**3. Shared Children Custody and NJ should not violate Parents disability in grating children Custody.**

Test-2. In this case children custody is with Ramya because she does not got work so will not be able to pay child support, because I was going to work, fake FRO order was entered against me to order the child support. Further continues bill the child support, Judicial fraud consolidation order filed obstruct my justice. Millions of time, NJ judicial authorities did these wrongdoings against millions of family and

Violated the 14<sup>th</sup> amendment parental rights.

Test-3. Denying Share Custody, denying custody due to disability is continuously violated the Parental rights 14<sup>th</sup> amendment. Also bring down the Family court Corruption/fraud. When the Petitioner spine injured in car accident, unable to work for 18 months, parental rights were not violated, 2 year old child home eviction, breath cold air, had chest pain.

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

**4. Acceptable form(s) of Child Support and Save the child support money to Child need.**

Test-2. In NJ family courts Child support money and IRS income tax, Disability income/SSA, title vi-d, and Unemployment withhold due to Childsupport. These money(s) were become benefit of Family court lawyer and NJ Judicial Authorities upto NJ Supreme Court. For the reasons, NJ judicial authorities and family court attorney focus to rob the above said money.

Test-3. Saving the Child support money, IRS income tax, Disability income/SSA, title vi-d, and Unemployment withhold due to Childsupport in Children Saving should be used for Children college education and bring down the family court corruption/fraud. Children are protect by SNAP, When Petitioner spine injure on help was available to his kids.

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

**5. i) Family Properties inheritance to Children, ii) No lawyer fee from family properties, Disclose/open to public family court lawyer fee.**

**Test-2.** NJ judicial authorizes and family court lawyer focus to find the Family properties, in the name of Family lawyer fee, rob the family properties and family saving for kids education, share up to NJ Supreme Court justices. To rob the family properties and kids educational saving, any form of fraud/corruption/bribe the NJ judicial authorities and lawyers do.

**Test-3.** Moving/Saving the family properties to Children inheritance and above prayer wrongdoing/fraud/bribe/corruption in the NJ family court should go down.

The above wrongdoing of NJ judicial authorities, family court lawyers were violation in *42 US Code § 1982* - Property rights of Citizens.

In *Sullivan v. Little Hunting Park, Inc.*, 396 US 229 – Sup. Ct 1969@ 237  
"Section 1982 covers the right "to inherit, purchase, lease, sell, hold, and convey real and personal property."

*These respondents did same wrong doings against this Petitioner caused unmatchable, unsubstitutable damages.*

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

**6. NJ family court records should not be under seal and No Property matter/financial matter disclosure discussed in Family Court.**

**Test-2.** Under inheritance, Section 1982, *Sullivan*, all these properties (moving/non-moving) are moved to the children from begin of the family case.

Now the family properties, financial matter disclosure matter are filed from the beginning of the case is to aid the Attorney(s)/family court Judges to focus the billing and sharing upto NJ Supreme court justices.

What is the need of sealing the family court docket? When the property/wealth are move to children as inheritance, no privacy violation. People divorced status is not privacy violation. Under seal is to protect the how the fraud/corruption by the family court Judges/lawyers. When Amazon CEO Jeff got divorce, both party discuss in the media that how much wealth they obtained. Why should the poor people divorce under seal?

**Test-3.** Property/Wealth does nothing in the two individual's divorce when the children involved. Moving the property/wealth to children do not injury to the family case party(s) and wealth is with their loved children who can use the wealth to their educational need (example). Most importantly take out the ill eyes of Family court Judges/ NJ Judicial Authorities, and family court lawyers. NJ judicial authorities wrongdoings against this Petitioners because their ill eye focused the Petitioners \$400k home in India. See they octopus hand go other side of the earth. Granting These prayers should bring the corruption in Nj family court to down.

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

d) WRIT AGAINST NJ JUDICIAL AUTHORITIES.

7. i) **NJ Judicial Authorities involve in family case should get mental fitness certificate yearly.**

ii) **NJ Judicial authorities' Yearly Financial disclosure Statement to be Open to public.**

iii) ***NJ Judicial Authorities to file timesheet for every 15 minutes of their duty.***

*Test-2: Routinely, habitually NJ judicial authorities ordered /compelled the parents for psychiatric evaluation for granting children visitation /custody, share the money from psychiatric billing parents. Recently in NJ, One Psychiatric was ordered to file affidavit that she should not renew her license in NJ for sharing money with NJ judicial.*

*Nj Judicial authorities paid from public money, corruption free should be prefix to Judicial authority. Few Months ago, closed to 100 Nj Judges from trial court to NJ appellate court forced to resign due to disappropriate money saved in their retirement account thru corruption /bribery.*

*Nj judicial authorities paid from public money and public wanted to know what to they do and how their time is used. Sitting in the public office, doing corruption, why they need to be paid from the public money. Timesheet should have what they do every 15 minutes. Paid by public money so public should know what respondents do.*

***Test-3.*** *NJ judicial authorities' irreparable damages, inhuman decision to the NJ family's and the children with their psychological illness. Getting psychological fitness should not cost them either because health insurance is already provided to*

*them by NJ govt. So Parental rights and children's rights under equal protection clause were protected.*

*NJ judicial authorities should be prefix from corruption/bribery. NJ Judicial authorities' yearly financial disclosure Statement to be Open to public bring the prefix corruption to them. They were paid thru public money, public should know they were corruption from at first. Same reason, public should know what they do every 15 minutes by their timesheet. Petitioner worked many govt officer where 15 minutes tasked timesheet is must.*

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

**8. Order NJ Supreme Court to provide a copy of Ramya's Response brief.**

**Test-2.** Naga, the attorney for Ramya already disqualified. NJ judicial authorities and Naga filed response brief without Ramya's knowledge. This brief has crime against the Petitioner, his family. Legally Petitioner entitled what other party filing. Multiple time Petitioner requested the Nj Supreme court thru motion and verbally which was denied. Based on the Ramya's proxy briefing, Petitioner certification with Nj Supreme court denied and Petitioner and his family, children are suffering, injured till today. This is clear abuse of discretion/usurpation of judicial power.

**Test-3.** Petitioner is entitled to get justice from the injustice provided by NJ Supreme Court from the Ramya's proxy Briefing. The crime in the Ramya's proxy filing is jail able crime.

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

**9. NJ Supreme Court should not hire proxy peoples India file case in Indian Supreme Court to strike down the Indian family law based on Petitioner Indian family court.**

**Test-2.** NJ Judges, After entering FRO for fake dv case, Judicial fraud consolidation, separating the Petitioner and his family and children, violating the 14<sup>th</sup> amendment, parental right, violated the Petitioner cohabitation of family, sexual rights of Petitioner, dishonoring Indian family court, hired proxy people to file case in India Supreme court to strike down the Indian family act on which Petitioner got family reconciliation order.

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Test-3. NJ Supreme doing above such, the case is delayed unnecessarily. Three times NJ Supreme court pressured in Indian Supreme Court, here the case is delayed 3 years. Totally the Petitioners suffered which no human Being should suffer in civilized society and wasting time in the US federal Court. So this prayer should be granted. Striking down the Indian family law in-part against the order Petitioner got from India is not going to be nullify the order past 10 years. Approx. 10 years ago, one India lady got reconciliation order from India which is not going to be null now. She might have two more kids now. Who is going to step in their home and tell husband and wife get out and live separate. Petitioner have gave a Indian family court petition in English translated as they needed so they knew what is going to be out come. They are corrupt and forever corrupt. Only truth and justice should survive.

When OJASWA PATHAK is not closed and kept on wasting time of Federal Court, this court issue order to Indian Supreme Court to dismiss and close the docket in Indian Supreme court.

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

**10. Remove the NJ family/appellate court Judges, and NJ Supreme Court Justice who are respondents in this case, grant permanent Restraining order against these NJ Judicial Authorities to protect the Petitioners and Ramya and invalidate all the orders they signed.**

Test-2. Marcia Silva, Craig Corson, Jerald Council are the family court Judges.

Allison E. Accurso, Patrick Dealmeida, Joseph L. Yannotti were NJ appellate court Judges, Stuart Rabner, Jaynee La Vecchia, Barry T. Albin, Anne M. Patterson, Faustino J. Fernandez-Vina, Walter F. Timpone were the NJ Supreme court Justices. Glenn Grant, Writ is Administrative Judge. These Nj judicial authorities took judicial decisions against the Petitioner(s) integrated, or be part of wrongdoings against the Petitioners. There are close to 100 wrongdoings including fraud on the court, judicial fraud, and constitutional violation including section



1983, dishonored the Indian family court order, acted against the Indian family court, parent's rights, cohabiting rights, sexual rights and more.

For the crimes/wrong of these NJ judicial authorities were uncivilized, and they violated the oath, involved judicial corruption, Judicial fraud.

Because the petitioners filed US Dist Court complaint, these NJ judicial authorities attempted to murder the petitioner. **App.99,100.**

**Test-3.** By the wrong doing of the NJ judicial authorities, Petitioner went thru inhuman suffering no one should go thru in civilized society, they violated the oath, involved in judicial corruption, judicial fraud, parental rights. Cohabitation rights, sexual rights. So Petitioner pray this court to remove these NJ judicial authorities from duty and invalidate the orders they signed.

To protect the Petitioner, and minor children petitioner, Ramya, petitioners pray this court to grant the Permanent Restraining order against the NJ Judicial auth.

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

**e) AGAINST NEW JERSEY**

**11. i) Trial by Juries in family courts, ii) Strike down lawless family court and create Civil family law iii) Equal rights to men in family court**

**Test-2.** Without any law and without Jury, NJ family court run and ordered to the parties. After Consolidation order was found to fraud, this Petitioner requested Jury(s) appointment which was denied. NJ family court Judges and attorney(s) involve any fraud/corruption/bribe to make money thru billing and share the money up NJ Supreme Court justices. Without Jury, domestic violence cases, divorce cases, child support orders, child custody orders, before issuing bench warrant and jailing matter of child support/spouse support were decided which violated the fair justice, due process guaranteed by constitution.

Because of No law to run the family court, above said wrongdoings /corruption/ Bribery were happening in the NJ family court which ultimately violated the constitutional rights.

Because Im Black man from India, Restraining order were issued for the purpose of billing child support money, which violated the parental rights 14<sup>th</sup> amendment.

Test-3. The above said family court action/wrongdoings were violating constitutional rights including due process. At Either parties demand Juries need to be available to protect the constitutional rights.

Any trial court should be under Law. Running NJ family court without law, it is kangaroo court by Nj politician and their relative/friend are Judges to rob the families and their saving for their kids' education. Nj family court issuing restraining order because a party is men violate the fair justice constitutional rights and 14<sup>th</sup> amendment parental rights. Without Jury deciding family court orders were for purpose of corruption benefit of NJ law mater and NJ Judicial authorities.

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

**12. Consolidate the NJ family court (lawless, kangaroo court), NJ Law division civil court and Landlord/Tenant court.**

Test-2. Minor Petitioner PP born from Little Rock, AR where one civil court, under one roof have trial for Civil matter and family matter. For the purpose of Black money transaction Naga, Jayapalan, Ranjeeth filed the fake domestic violence case and no jurisdictional divorce case. When the Petitioner requested the NJ family court to add Ranjeeth, Jayabalan as defendant to the case which was denied. Civil matter need to be put together to avoid piecemeal litigation.

Even After lease expired, landlord filed complaint with Landlord/Tenant court and got Judgement against this Petitioner by alleging that defendant did not pay rent, reported to rental history. Illegally The landlord towed Champing van, I was not able to get justice over 7 years. When all type of court consolidated, all dispute can be put together without piecemeal litigation.

Test-3. The fake domestic violence case is decided in 10 days by law for billing childsupport money. This case over 7 years waiting for justice. In car accident, Petitioner had spine injury which still pain, home went eviction, heating was not affordable, Minor PP breath cold air had chest pain when he was 2 years old. Still

today Petitioner did not get compensation for spine injury. These 3 type of Courts are running separate to deny justice to layman, corrupt minded people to be benefitted. In Civil case, every claim against every party need to be put together and tried.

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

**13.i) No gun carrying Police involve in family matter, ii) No arrest to the people who need medical treatment, iii) no township police overtime.**

Test-2. The county or township police came to my home with gun for enforcing childsupport which is for billing purpose. When the Petitioner had spine injury by car accident, unable to work 18 months, home was under eviction, heating was not affordable, 2 years old minor Petitioner PP got chest pain by breathed cold air. No police with gun went to car insurance company get the loss of Petitioners. Police coming to home, cross firing should endanger innocent neighbor as well.

The county jail the ill/sick/disabled people and provide treatment when they are in the custody by county expense. County's tax payers do not need to take care of the sick people treatment.

Township police come to collect the childsupport on their over time. When police station is opened for 24 hour, why should the police need to work overtime. In Edison twp, NJ 3 police reported overtime, never appeared on the private construction business and collected over million dollars. When township needed additional police resource, State trooper should fill the needed.

Test-3. The family court Judge rob the parents in the name of childsupport. Police with gun help robbing Judge, innocent parent goes to jail. This is not the police duty. County tax payer is not responsible for disabled/ill people medical treatment. Police over time lead to corruption. NJ MVC/DMV is not protected by private security and local police overtime protect the private business. All for the keep the corruption purpose.

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

**14.Expungement of FROs/arrest/jailing records.**

Test-2. The charges against Petitioner were a) Petitioner told his wife go to work, do not involve black money transaction, do not take the children to daytime parties

which endanger the children, did not bring the India family home money for the benefit of NJ Judicial authorities,

**Test-3.** For the above reason, FROs were entered against Petitioner, Arrested/jailed for multiple times, family value is defamed in USA and India. Anyone abusing these records is crime. Those records should not be accessible/available to anyone.

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

**15. New Jersey has no more Jurisdiction for Petitioner family matter.**

**Test-2.** Petitioner and wife Ramya came to United State on Non-immigrant, temporary work visa. Petitioner belong to Undivided Hindu family in India where hold our relative bond. Arranged Marriage was family's Ceremony in India. Indian Supreme Court ruled that anyone married from India, Only family court in India have jurisdiction and if outside of India, India family law/court standard should be followed. New Jersey family court Fraud (judicial) involved and NJ Supreme Court denied Petitioner's request with its own error (Judicial defect).

In *Sullivan v. Little Hunting Park, Inc.*, 396 US 229 - Supreme Court 1969 @ 231-232

*"We had no jurisdiction in the cases when they were here before, and we have no jurisdiction now. We adhere to our orders refusing the appeals in these cases." 209 Va. 279, 163 S. E. 2d 588."*

**Test-3.** Family Court in India is always available to the Petitioners family matter.

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

**16. Deduct 20% from NJ Law makers to pay the Petitioners loss.**

**Test-2.** NJ trial/family court/appellate Judges, NJ Supreme Court Judge were appointed by NJ law makers because of Judges were relative/friend to them. So the corrupt Judges do corruption/fraud to benefit to them and the lawmakers. For the Petitioners' loss, NJ law maker's wrongdoing contributed. Few month back approximately 100 NJ Judges were forced to resign from duty because they were relative/friend to NJ lawmaker so appointed as Judge and their retirement account had money in inappropriate amount.

**Test-3** NJ law maker wrongdoing were one of the reason for the Petitioners. Detect 20% of NJ lawmakers, who served in the past 20 years, any and all compensation including salary, pension, and govt benefit for paying Petitioners' loss. Future judicial corruption should be avoided.

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

**17. Move the Middlesex County's Court and Childsupport probation employees in to NJ payroll.**

**Test-2.** These Child support employees work for collecting child support to benefit of judicial corruption, family court Judges benefit. When the shared custody is granted, these employees are not required at all.

In this case, Middlesex county court employees involved in the Fraud-on-the court or judicial fraud consolidation order for the purpose of NJ Judicial authorities and NJ lawmaker. NJ Judicial authorities and NJ lawmaker have relative/friend relationship by appointing NJ Judicial authorities.

**Test-3.** Shared children custody is granted, these employees are not needed. County tax payer do not need to pay childsupport collection effort or corrupt Judge's pocket filled by child support. Enforcing state law so state should pay these employees salary.

Fraud/judicial fraud on the county court, for the benefit of NJ judicial and NJ law makers, Middlesex county tax payer should NOT be responsible for the fraud or any wrongdoing. Moving Middlesex county's court and childsupport probation employees should bring the corruption in the NJ judiciary and NJ govt. Unnecessarily County tax payer do not need to be responsible for the Court employees wrong.

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

**18. Order to cut 80% of federal funds to NJ and its Local govt.**

**Test-2.** In the corruption, NJ is in the top 3 and competing Louisiana and Illinois when the NJ responsible were highly educated than any part of the earth. The number/density of Doctors, Engineers, Scientists in NJ per square miles more than any part of earth including Japan. At the time of 2008 recession Petitioner went to Audi dealer Edison NJ for buying baby car seat, then the peoples

(Indians) were standing on the queue to buy Audi cars when everybody in US worry about housing bubble.

**Test-3.** Because of more money available, more corruption, more crime were done by NJ judicial authorities and NJ and its local govt officials.

Fittest should survive. People are rich so they get fit to survive, themselves. Instead of Federal funds spend in NJ which cause more corruption, those federal fund should be used in under developed area/regions of US to promote the needy people. So Petitioner pray this court to cut 80% of federal fund/aid to NJ and its local govts.

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

f) WRIT(S) AGAINST MIDDLESEX COUNTY, NJ  
**19. Middlesex County NJ to pay \$42 million dollar for collecting child support illegally**

**Test-2.** Middlesex family court entered the FRO for fake domestic violence case.

Middlesex County court employees involved fraud on the court/judicial fraud consolidation order and collected childsupport over \$42 thousand dollars based on fraud consolidation order for the benefit of NJ judicial authorities.

In the KARUPAIYAN v. SIANO | 53 A.3d 662 (2012), Petitioner had spine injury and unable to work 18 months, Petitioner is only income holder to family, Middlesex county did not take any effort to get support to the children who suffered home eviction, heating not affordable, breathed cold air, suffered chest pain. In fact, Middlesex sheriff should went with gun to Car insurance Company collected the loss of the Petitioners from car accident injury which is hit and run, a proxy appeared to testify with knowledge of attorney and trial Judge.

**Test-3.** This pattern of collecting childsupport happened millions of cases. Nobody can question this corruption because this corrupt money is shared upto NJ Supreme Court justice. Partially I paid childsupport thru credit card which I paid 29% interest. The prayer is reasonable to any unbiased persons. Petitioner pray this court to order the defendants including Middlesex County to pay 29% Cumulative interest, so the respondent will not delay the case.

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

g) AGAINST ALL INDIVIDUAL DEFENDANTS/RESPONDENTS.

**20. Jailing L. Naganda, P. Jayabalan; J. Ranjeeth Kumar, Arul Thirumurugu, David Halpern, Marcia Silva, Craig Corson, Jerald Council, Stuart Rabner, Jaynee la Vecchia, Barry t. Albin, Anne m. Patterson, Faustino j. Fernandez-Vina, Lee a. Solomon, Walter f. Timpone, Glenn Grant, Allison e. Accurso, Patrick Dealmeida, Joseph l. Yannotti for 21 years AND Restraining order against these Individuals.**

**Test-2.** Petitioner is head of the family decide what is good for the family. Because I told my wife to work, do not involve black money transaction against govt of India, and because I cleaned the lease expired apartment which was forced by landlord for their illegal benefit, the Petitioners went thru inhuman suffering which no one should go thru in civilized society, and still continuing. These Respondents filed/involved/caused the FROs/Fraud consolidation to the Petitioners which continue to be yet.

They involved in the endangerment/attempted to murder of the Petitioners.

**App.100, 101.** These individual forever endanger the Petitioner, Minor children, Ramya and continue endanger the forever.

**Test-3.** Obvious Circumstances, still Petitioners are separated, co-habiting, parental rights is violated. Cause the Petitioner to be arrested/jailed multiple times. Jailing these Individual respondents for 21 year and issuing Permanent restraining order against these Individual is must to protect the Petitioner, his minor children, and Ramya.

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

h) WRITS AGAINST THE LANDLORD RESPONDENTS

**21. Money Relief to Children by Landlord**

**Test-2.** Petitioner rented apartment in Dallas, TX before Lease expiring with this landlord, Oak tree village, Edison NJ, which owned by Atlantic Reality. Landlord got under table money from Jayapalan/Naga and allow them to occupy the apartment. Landlord told the Petitioner to clean the lease expired apartment which get the FRO against Petitioner(s), family, children were separated. Petitioner unable to tell Ramya to go work for kids Marriage expense which is unlimited to Indian family.

**Test-3.** Children separated from father/parents for 7 years is unacceptable for anyone in the civilized society. Childhood is gone, unmatched loss. Also landlord filed false affidavit with Dist Court that Atlantic reality is not owner of Oak tree apartment, but negotiated with Edison Township for tax evasion as owner of the properties and failed to appear as the court ordered for settlement conference. This court should order landlord defendants to pay 50 million dollar for each Minor child Petitioner's marriage expense of children.

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

**22. Landlord to pay \$50 million to pay the Petitioner for leasing inhabitable apartments.**

**Test-2.** Landlord (Atlantic) leased roof leaking apartment to the Petitioner. Not only was the Petitioner's living unit leaking. Whole apartment complex was roof leaking. Landlord owe continues 4 apartment complex Edison, NJ, all of them roof leaking. Whenever renter request fix the roof or delay payment until fix the roof, Landlord file eviction to harass the Talents which is easy since Landlord/Tenants courts are corrupt with them. Every apartment complex owned by Atlantic roof leaking, same business model. Previous owner sold the apartment to Atlantic with when time to replace the roof, Atlantic purchased at cheap rate and do not want fix the expensive roof fix since Atlantic have relation with Tenant/landlord court Judge corrupt relation to evict and collect money.

**Test-3** Due to leased roof leaking apartment, Petitioner head/scalp got virus infection and prolonged head ache for years. Petitioner got prescription to heal the viral infection. Viral infection got many years to heal. Same/similar prayer is in attached Exhibits.

One of Co-worker when I worked in NY city who lived in Atlantic reality's apartment, said she had 2 years old kids who suffered by leaky roof. Whenever she request to fix the roof, she was told that call 3<sup>rd</sup> party Middlesex management who is the contractor to fix the roof.



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

**23. Order that assign the ownership of Landlord any and all business including Atlantic reality, ownership of any and all rental apartments, Landlord Halpern's ownership building to the Petitioners.**

**Test-2.** In the Petitioner vision, more 70 apartment complex owned by Atlantic reality, on all complex roofs were leaking. Roofing is expensive fix. Any tenant/renter request to fix the roof, landlord answer should be that roof fix is giving to 3<sup>rd</sup> party contract (Middlesex management) so call the 3<sup>rd</sup> party. Middlesex management is again owned by landlord/Atlantic/Halpern. Any renter refused/delay the rent due to roof leaking, the landlord file eviction, over charge the renter and share the money with Landlord/tenant court Judge. In this case, Petitioner timely gave notice and timely moved out, lease expired, the landlord filed eviction in the landlord/tenant court by paying corruption to Judge, robbed me closed to \$9,000, listed me in rental history so unable to rent apartment so the Petitioner and his disabled sister age close 70 was suffering without home and slept in the car.

In the main holding business, Atlantic reality employee only 13 employees from his relative to get out of Title VII claims. Other Business, Middlesex management employees all illegal Latin America peoples so paid low salary illegally or do not even pay salary for tax evasion. Since the employees were unfairly paid, for survival they rob the renters who are mostly/90% Indian who have lot of gold jewel, in home.

**Test-3.** Landlord filed false declaration with Dist court that landlord is only investor, no interest in the Apartment complex. In an official meeting with Edison, NJ's Mayer/council man /politician, Mr. Halpern stated that he is owner of the apartment building, he wanted tax benefit for the apartment buildings.

Petitioner prays this court for order the ownership of all apartments, Real Estates, moving/non-moving properties owned by Atlantic reality, Middlesex Management, and Mr. Halpern and his family to the Petitioner. Petitioner will run the business in non-profitable way and pay all the taxes landlord evaded against Federal, NJ local govt.

When the Dist court ordered the landlord to appear for settlement conference, landlord failed to appear. Contempt of Court. This prayer should be granted as punitive damages

In Cohen v. Office Depot, Inc., 184 F. 3d 1292 - Court of Appeals, 11th Circuit 1999 @ 1298-1299

*"It is true that Rule 54(c) tempers the effect of **Rule 8(a)(3)** somewhat by stating that, except in the case of default judgments, "every final judgment shall grant the relief to which the party in whose favor it is rendered is entitled, even if the party has not demanded such relief in the party's pleadings."*

.....  
*"at Hanna v. Plumer, 380 US 460 ,470- Supreme Court 1965 at 1143. Likewise, in this case, because \*1299 **Rule 8(a)(3)** allows a plaintiff to request in her initial complaint all the relief she seeks, it says "implicitly, but with unmistakable clarity" that a plaintiff is not required to wait until a later stage of the litigation to include a prayer for punitive damages, nor is she required to proffer evidence or obtain leave of Court before doing so*

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

i) WRITS AGAINST LOWER FEDERAL COURTS

**24. Order lower court (Dist Court) to run the case as combined civil and criminal case when remanded.**

Test-2. Fraud on court, judicial fraud, obstruction of justice, robbed the Petitioner in the name of child support, involved black money transaction against govts and so on were crime(s).

Test-3. The above crimes are eligible to attach with civil case, run as combined civil and criminal case so this court should grant the prayer.

**25.Lower Court (USCA3) failed to vacate the Sua sponte dismissal of SAC.**

Test-2. By Sua sponte, Dist Court dismissed the SAC (ECF-31) based on Rule

8(a).(ECF-56, 57).App.8,14. USCA3 affirmed the dismissal. App.01. On Penal, En Banc rehearing, 2 out of 3 panel Judges (Judge Rendell and Judge Fuentes) voted to Petitioner.(App.21)

**Test-3.** In Salahuddin v. Cuomo, 861 F. 2d 40 - Court of Appeals, 2nd Circuit 1988 @43 ( "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)). This case, no defendant answered. No respondent appeared except Middlesex cnty. Lower courts failed review by complaint under rule 8(f), rule 12(e ), rule 12(f) and Bell v. Hood, 327 U. S. 678 @ 684. This court should vacate the sua sponte Dismissal of SAC or order the lower court to vacate the Sua sponte dismissal of SAC when remanded.

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

**26.Appoint i) Guardian ad litem and/or pro bono attorney**

**Test-2.** Petitioners requested the Lower Courts to appoint guardian ad litem and/or probono attorney ECF-34, ECF-52, ECF-61, 64 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.*

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 14<sup>th</sup> 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, 14<sup>th</sup> amendment Equal Protection Clause.*

1) Rule 17(c) Robidoux v. Rosengren, 638 F. 3d 1177 - Court of Appeals, 9th Cir 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.

j) ADDITIONAL

**27. Order for each respondents to pay the Petitioner(s) for each count of discrimination, wrongdoings, injuries and so on.**

Test-2. There are over 100 count of wrong doing did by the respondents. There respondents involved uncivilized crime, wrongdoing, fraud on the court, judicial fraud. Wrong against elected govt including crime like money laundering, contempt of court, dishonor the court order, violated the many constitutional rights, federal statues, and violated cohabitation, sexual rights of Petitioner. Parental rights 14<sup>th</sup> amendment.

Test-3. The above wrongdoings are uncivilized to judicial decision makers. The suffering to the Petitioners were continuously happening till today. The respondents involved fraud on the court, judicial fraud, obstruction of justice, dishonored the court order, contempt of court and so on which were serious wrongdoing. The respondents killed the childhood of my children in front of my eyes for 7 years. The compensation money prayed against the respondents were to punish them seriously so they will not repeat their wrong. In NJ millions of families were robbed by NJ judicial authorities, local govt official by fraud family/trial courts. So Petitioner pray the money reliefs from the respondents as in the Exhibit-28, Exhibit-29, Exhibit-30, and Exhibit-31. Because I filed US Dist court case, they attempted to murder the Petitioner, cause spine injury which I suffer till today. App.99,100.

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

**28. Order the Local Govts and NJ Judicial Authorities to pay as per the exhibits attached to the Minor Petitioner marriage expense.**

Test-2. When the Petitioner told Ramya, petitioner wife to go work for the children marriage expense which is no limit for Indian social culture, NJ judicial authorities issued FROs against Petitioner, further involved in Judicial Fraud consolidation, shared the billing child support money up to NJ Supreme court Justices. Middlesex cnty employees' involved Fraud consolidation order caused the FROs to be unappealable, permanent. Landlord, Atlantic reality is the original, start of the problem which caused the FROs. Because FROs unappealable, permanent which cause the Petitioner unable to tell Ramya to go work until now.

**Test-3.** Petitioner is head of the family of undivided Indian family. When the head of the family decide what is good for the family, nobody stands against it which is crime. Of course, even USA, why should anyone involve against family financial income and best interest of the children education. Even in NJ jurisdiction, anyone tell the spouse go to work for kids need how NJ judicial authorities involve against that family best interest. In NJ jurisdiction, they ruled that \$250 divorce, \$45 marriage/remarriage license is available for unlimited sex which either Indian Supreme court justices or their family member or this Petitioner would agree. Marriage expense is no limit for Indian families. Prays for each defendant to pay \$3 million per head of the respondent of local govt, NJ judicial authorities to each minor children. Order the prayer, All money petitioner able to spent. Spending is economy,

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

**29. Order the each defendant to pay for the Petitioners' effort, pain and suffering, expenses, litigation cost or pain and suffering by litigation.**

**Test-2.** Over 7 years the litigation is going on. 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 pain. With the pain in the spine, Petitioner drafted all pleading. Pray USSC to order them \$5 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

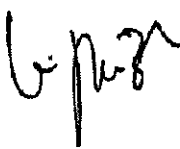
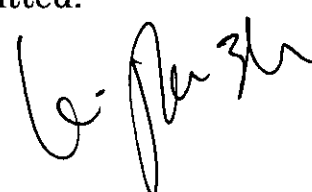
Although plaintiff may not recover attorneys' fees, he may recover litigation costs reasonably incurred. See Cunningham, 664 F.2d at 387 n. 4; Carter, 780 F.2d at 1482; DeBold, 735 at 1043 (citing Crooker v. United States Dep't of Justice, 632 F.2d 916, 921 (1st Cir.1980)) ("[A] pro se litigant who substantially 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.

## XXI. CONCLUSION

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

Respectfully submitted.

  Dec 13 2022

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