

ADDENDUM A

NOTE: This order is nonprecedential.

United States Court of Appeals for the Federal Circuit

In re: RAJ K. PATEL,
Petitioner

2023-113

On Petition for Writ of Mandamus to the United States
Court of Federal Claims.

ON PETITION AND MOTION

PER CURIAM.

ORDER

Raj K. Patel petitions for a writ of mandamus asking the court to direct the United States Court of Federal Claims to docket his complaint submitted to that court on December 1, 2022. ECF No. 2-1 at 1. Mr. Patel also moves to proceed *in forma pauperis*, ECF No. 3, “for leave to serve the President directly,” ECF No. 6-1 at 1, and to expedite, ECF No. 9.

In October 2022, Mr. Patel filed his third complaint at the Court of Federal Claims asserting breach of a contract with the Presidents of the United States “about living under the stress weapon.” Complaint at 52, *Patel v. United States*, No. 22-1446 (Fed. Cl. Oct. 3, 2022), ECF No. 1. On

November 17, 2022, the Court of Federal Claims dismissed Mr. Patel's complaint. The court also issued an anti-filing injunction directing that the clerk of that court "accept no further complaints from [Mr.] Patel without a motion for leave explaining how the complaint raises new matters properly before" that court. *Patel v. United States*, No. 22-1446, slip op. at 1 (Fed. Cl. Dec. 9, 2022), ECF No. 16.

On December 1, 2022, Mr. Patel submitted his fourth complaint at the Court of Federal Claims with a motion for leave to file the complaint as a new matter. On January 5, 2023, the Court of Federal Claims denied Mr. Patel leave and directed the submission be returned to him, explaining that his "justification for his new cause of action . . . is conclusory and lacks enough specificity to enable the [court] to determine whether Mr. Patel's claims potentially fall within the subject matter jurisdiction of" that court. *Patel v. United States*, No. 23-7028, slip op. at 1-2 (Fed. Cl. Jan. 5, 2023), ECF No. 1. Mr. Patel's petition asks us to compel the docketing of that complaint.

Mr. Patel separately appealed from the November 2022 judgment of the Court of Federal Claims but raised no challenge to the court's anti-filing injunction. In a separate order issued today, we have affirmed the Court of Federal Claims' judgment in all respects. *Patel v. United States*, No. 2023-1325 (Fed. Cir. March 7, 2023). Because Mr. Patel presents no coherent argument here regarding how the allegations in his returned complaint are new matters that fall within the Court of Federal Claims' jurisdiction, he has not shown entitlement to having his complaint docketed.

Accordingly,

IT IS ORDERED THAT:

(1) The petition is denied.

IN RE: PATEL

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(2) All pending motions are denied as moot.

FOR THE COURT

March 7, 2023
Date

/s/ Peter R. Marksteiner
Peter R. Marksteiner
Clerk of Court

ADDENDUM B

NOTE: This order is nonprecedential.

United States Court of Appeals for the Federal Circuit

IN RE: RAJ K. PATEL,
Petitioner

2023-113

On Petition for Writ of Mandamus to the United States
Court of Federal Claims.

ON PETITION FOR PANEL REHEARING AND REHEARING EN BANC

Before MOORE, *Chief Judge*, NEWMAN, LOURIE, DYK,
PROST, REYNA, TARANTO, CHEN, HUGHES, STOLL,
CUNNINGHAM, and STARK, *Circuit Judges*.

PER CURIAM.

ORDER

Raj K. Patel filed a second corrected combined petition for panel rehearing and rehearing en banc [ECF No. 15]. The petition was referred to the panel that issued the order, and thereafter the petition for rehearing en banc was referred to the circuit judges who are in regular active service.

Upon consideration thereof,

IT IS ORDERED THAT:

The petition for panel rehearing is denied.

The petition for rehearing en banc is denied.

FOR THE COURT

April 25, 2023
Date

/s/ Peter R. Marksteiner
Peter R. Marksteiner
Clerk of Court

ADDENDUM C

No. _____

In The

United States Court of Appeals for the Federal Circuit

IN RE RAJ K. PATEL,

from all capacities,

Petitioner.

PETITION FOR A WRIT OF MANDAMUS

**PRO SE PETITION FOR A WRIT OF MANDAMUS TO THE UNITED STATES
COURT OF CLAIMS TO DOCKET A NEW CIVIL ACTION
AGAINST THE UNITED STATES FILED ON DECEMBER 1, 2022 BY RAJ K. PATEL**

28 U.S.C. § 1651

T.E., T.E. Raj K. Patel (*pro se*)
Indiana | Georgia | New Jersey
6850 East 21st Street
Indianapolis, IN 46219
Marion County
rajp2010@gmail.com
www.rajpatel.live
317-450-6651

2,277 words

December 27, 2022

CERTIFICATE OF INTEREST

I, THE EXCELLENT, THE EXCELLENT Raj K. Patel (pro se), am appearing without counsel. Giving Full Faith to the United States Constitution, I use the Authority of my omnipresent Styles and Office in these proceedings into which I avail myself. U.S. const. art. IV, § 1 & amend. XIV, & art. VI, § 1 referring to the Treaty of Paris (1783) & Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784.

I have completed five (5) out of the six (6) semesters of my juris dr. candidacy at the U. of Notre Dame L. Sch. in South Bend, IN., where I was enrolled from August 2015 to November 2017, and I have completed sixty-eight (68) out of the ninety (90) credit hours for a juris dr. candidacy at the Notre Dame L. Sch.

Such, I have completed the minimum number of credit hours required by the accrediting Am. B. Ass'n ("A.B.A.") to allow a law school to accredit me a juris dr. degree.

Amongst the grades in my juris dr. academic courses I received at the Notre Dame L. Sch., I received an A-/A in contracts law, an A-/A in civil procedure, and a B/A in constitutional law, while under Weapon S. In the summer of 2016, I worked as summer associate with the City of Atlanta Law Department in Atlanta, GA. In the summer of 2017, I worked as a summer associate at Barnes & Thornburg LLP in Indianapolis, IN.

And, I hold a Bachelor of Arts in Poli. Sci. and *cum laude* in Religion from Emory U., Inc. of Atlanta, Georgia, and I attended both Oxford College and Emory College, and graduated, in 2014, with a 3.718/4.0 grade point average with no pass/fail grades.

Emory U., Inc. is ranked as a top-20 or top-25 *U.S. News* Tier 1 best national university, and the Notre Dame L. Sch. is ranked as a *U.S. News* Top 25 best law school in the United States.

I was Student Body President of the Brownsburg Cmty. Sch. Corp. from 2009-2010 and Student Body President of Emory U., Inc. from 2013-2014. I was also the Notre Dame L. Sch. Student B. Ass'n Rep. to the Ind. State B. Ass'n from September 2017 to November 2017. All jurisdictions are "local" and with an "international" constituency.

Each time I was elected Student Body President, I attained thenceforth omnipresent Styles ("THE EXCELLENT" for each election) which are protected by both the Privileges & Immunities Clause and Privileges or Immunities Clause of the United States Constitution. U.S. const. art. IV, § 2, cl. 1 & amend. XIV, § 1, cl. 2. See generally *Federalist* 80 & *Printz v. United States*, 521 U.S. 898, 918 (1997) quoting *Principality of Monaco v. Mississippi*, 292 U.S. 313, 322 (1934).

I am well read in the material law. I have not received legal advice or counsel from anyone else for this case.

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IN THE UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

In Re Raj K. Patel, from all capacities,

Petitioner.

No. _____

Dated: December 27, 2022

**PRO SE PETITION FOR A WRIT OF MANDAMUS TO THE UNITED STATES
COURT OF CLAIMS TO DOCKET A NEW CIVIL ACTION AGAINST THE
UNITED STATES FILED ON DECEMBER 1, 2022 BY RAJ K. PATEL**

I, T.E. T.E. Raj K. Patel (*pro se*), respectfully move this United States Court of Appeals for the Federal Circuit to issue a writ of mandamus to the United States Court of Federal Claims to docket a new civil action lawfully filed on December 1, 2022. Addendum A. 28 U.S.C. § 1651. Fed. R. App. P. 21. Fed. Cir. R. 21. 28 U.S.C. § 1491(a). 28 U.S.C. § 1295(a)(3).

The Supreme Court said that *pro se* documents are to be “liberally construed” and should be held to “less stringent standards than formal pleadings drafted by lawyers.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007).

I use my Constitutional Privileges, honors, and rights of knowing from my undergraduate and law school, juris doctor candidacy, educations, and political offices and from reading law outside of formal schooling for the writing and discussions, arguments, and motions of these filings, and my presumptions of regularity from my political offices, *see* Certification of Interest. *Hollingsworth v. Perry*, 133 S. Ct. 2652, 2667, 2670-72 (U.S. 2013) (“unique legal status”). The case is a part of State affairs from each of my capacities working alone and together in permutations. *Poindexter v. Greenhow*, 114 U.S. 270, 290

(1884) (“the distinction between the government of a State and the State itself is important, and [shall] be observed.”) (underline added); *Id.* at 290 (“in common speech,...to say “L’État c’est moi.””). See also *Swann v. Adams*, 385 U.S. 440, 447 (U.S. 1967); *Kelly v. United States*, 826 F.2d 1049, 1053 (Fed. Cir. 1987); *Palantir USG, Inc. v. United States*, 904 F.3d 980, 995 (Fed. Cir. 2018); *Carey Indus. v. United States*, 614 F.2d 734, 736 (Fed. Cir. 1980); *Voge v. United States*, 844 F.2d 776, 784 (Fed. Cir. 1988) (State affairs include Military and Nat’l Security); and *Richey v. United States*, 322 F.3d 1317, 1323 & 1327 (Fed. Cir. 2003) (presumption must be rebutted by records evidence suggesting that the executive’s decision is arbitrary and capricious).

This court may re-characterize this Petition for a Writ of Mandamus as needed, including making this into an emergency petition. *Castro v. United States*, 540 U.S. 375, 381 (2003) and *Neitzke v. Williams*, 490 U.S. 319, 331 (1989).

Oral argument be waived.

THE ISSUE PRESENTED

May this United States Court of Appeals for the Federal Circuit issue a writ of mandamus to the United States Court of Claims for abusing its discretion by not commencing the new civil action against the United States filed on December 1, 2022 by Petitioner-Raj K. Patel, who is also the plaintiff in the complaint-at-bar from the court below?

THE FACTS NECESSARY TO UNDERSTAND THE ISSUE PRESENTED BY THE PETITION

- I. Raj K. Patel is a natural-born citizen of the United States.
- II. There is no applicable filing bar in the United States Court of Claims to prevent the filing of a new complaint. *Cf. Patel v. United States*, No. 1:22-cv-1446-LAS (Fed. Cl. 202_), Dkts. 14 (Nov. 17, 2022) & 16 (Dec. 9, 2022).

- III. I filed a new *pro se* complaint with the Clerk of the United States Court of Claims to commence a new civil action, per R.C.F.C. 3 & 77(a), against the United States-Department of Treasury.
- IV. I sent in the complaint in via *pro se* intake e-mail, ProSe case filings@cfc.uscourts.gov, to the Clerk of the United States Court of Claims.
- V. When I called the Clerk of United States Court of Claims' office, a male who identifies as the supervisor for the Clerk of the Court of Claims said that they had received my complaint and that it was under review.
- VI. I re-sent the complaint in on December 9, 2022, after the anti-filing order was updated so that the Chief Judge of the United States Court of Claims does not need to approve new complaints. *Compare Patel v. United States*, No. 1:22-cv-1446-LAS (Fed. Cl. 202_), Dkt. 14 (Nov. 17, 2022) *with Id.*, Dkt. 16 (Dec. 9, 2022).
- VII. The same individual mentioned in ¶ V said that the complaint was still under review, during the week of December 19, 2022.
- VIII. This petition for a writ of mandamus follows.

THE REASONS WHY WRIT SHALL ISSUE

"The Privileges and Immunities Clause, the First Amendment, the Fifth Amendment, and the Fourteenth Amendment" all independently guarantee right of access to the courts of the United States, including the United States Court of Claims. U.S. const. art. IV, § 2; *Id.*, amends. I, V, & XIV; 42 U.S.C. § 2000bb-3(a); and *Christopher v. Harbury*, 536 U.S. 403, 415 n. 12 (2002) cited by https://constitution.congress.gov/browse/essay/artIV-S2-C1-11/ALDE_00013787/. Congress has left it up to the judicature to see the enforcement of these rights, particularly of those protected by the Privileges and Immunities Clause. U.S. const. art. IV, § 2 and *United States v. Harris*, 106 U.S. 629, 643-44 (1883) cited by <https://constitution.congress.gov/browse/essay/artIV-S2-C1->

4/ALDE 00013780/. This United States Court of Appeals for the Federal Circuit “may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.” 28 U.S.C. § 1651(a). “An alternative writ or rule nisi may be issued by a justice or judge of a court which has jurisdiction.” 28 U.S.C. § 1651(b). 42 U.S.C. § 1981. This United States Court of Appeals for the Federal Circuit has “exclusive jurisdiction...of an appeal from a final decision of the United States Court of Federal Claims.” 28 U.S.C. § 1295(a)(3). “This court has strictly construed its jurisdiction in harmony with its congressional mandate...Substance, not form, controls our determination. Implicit in our mandate is the authority to recharacterize pleadings which would improperly evade the intent of Congress.” *Chemical Eng’g Corp. v. Marlo, Inc.*, 754 F.2d 331, 333 (Fed. Cir. 1984). “[T]he power of the courts of appeals to issue writs of mandamus...to issue writs exists where an appeals court has either present or prospective jurisdiction.” *In re Roberts*, 846 F.2d 1360, 1364-65 (Fed. Cir. 1988) citing *LaBuy v. Howes Leather Co.*, 352 U.S. 249, 254-55 (1957). This Court of Appeals may also issue “supervisor mandamus.” *In re Roberts*, 846 F.2d at 1365 citing *Schlagenhauf v. Holder*, 379 U.S. 104 (1964), *Will v. United States*, 389 U.S. 90 (1967), and *Kerr v. United States Dist. Ct.*, 426 U.S. 394 (1976). *But cf. In re Cray Inc.*, 871 F.3d 1355, 1359 (Fed. Cir. 2017) (elements for writ of mandamus to a district court or executive branch). *Contra. Bobula v. United States Dep’t of Justice*, 970 F.2d 854, 859-60 (Fed. Cir. 1992) (elements of a district court to issue mandamus under 28 U.S.C. § 1361).

First, the writ of mandamus to the C.F.C. is necessary or appropriate in the aid of this United States Court of Appeals for the Federal Circuit in its jurisdiction because without a complaint docketed in the United State Court of Federal Claims this United States Court of Appeals for the Federal Circuit will not be able to exercise its appellate jurisdiction, to decide whether the law was properly applied to me, the party demanding relief

and who is the party seeking the Privilege of the Protection of the United States. *Quinn v. United States*, 349 U.S. 155, 160-61 (1955) & *Harris*, 106 U.S. at 643-44. The complaint-at-bar from the C.F.C. consists of a short and plain statement to be substantiated under the Big Tucker Act, 28 U.S.C. § 1491(a), with a pleaded claim above \$10,000.00 in money damages. *Loveladies Harbor, Inc. v. United States*, 27 F.3d 1545, 1554 (Fed. Cir. 1994) (*en banc*) (To recover against the government, a plaintiff must identify a “substantive right created by some money-mandating constitutional provision, statute or regulation that has been violated...”); *Simanonok v. Simanonok*, 918 F.2d 947, 950-51 (Fed. Cir. 1990); R.C.F.C. 8; and 28 U.S.C. § 1491(a). This United States Court for the Federal Circuit has also decided that the Court of Federal Claims, with appellate review to this Court, shall have exclusive jurisdiction over Big Tucker Act claims. *Simanonok*, 918 F.2d at 950-51. The Supreme Court of the United States has also ordered that this Court is to exercise its exclusive appellate jurisdiction over complaints with Big Tucker Act Claims and non-Tucker Act Claims. *In re Roberts*, 846 F.2d at 1365 (internal citations omitted); 28 U.S.C. §§ 1491(a) & 1295(a)(3) and *see also Chemical Eng’g Corp.*, 754 F.2d at 333 (“this court held it had jurisdiction under § 1295 to make the final determination of whether the district court correctly decided its own jurisdiction under § 1338. To hold otherwise...would cause our jurisdiction to turn on the decision reached by the lower tribunal,...a result viewed as “absurd” in light of the clear mandate of Congress.”). And, a time has come for this Court to effectuate its supervisory authority over the Court of Claims to ensure this Court’s precedent, and the Supreme Court’s precedent, are not without clout. *C.P.C. v. Nosco Plastics, Inc.*, 719 F.2d 400, 401 (Fed. Cir. 1983) (“Our jurisdiction to hear the appeal on the merits in this case is not affected by the present denial of a motion to disqualify based on conjecture.”). *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992); *Denton v. Hernandez*, 504 U.S. 25 (1992); *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007); and *Ashcroft v. Iqbal*, 556

U.S. 662 (2009). This Court must take the measure to issue mandamus to the Court of Claims so that it may continue to use its rights to determine its own jurisdiction and administer vertical precedent. 28 U.S.C. § 1295; U.S. const. amend. V; & *Chemical Eng'g Corp.*, 754 F.2d at 333. Lastly, this United States Court of Appeals for the Federal Circuit, a court with national jurisdiction, and its judges will not be able to serve me, the plaintiff of the complaint below, as their constituent. 28 U.S.C. § 453 & U.S. const. art. IV, § 2. If this writ of mandamus is not issued, then the court must break custom and act *sua sponte*. R.C.F.C. 3. 28 U.S.C. § 1491(a).

Second, the issuance of a writ of mandamus by this Court of Appeals for the Federal Circuit to the Court of Claims is agreeable to the usages and principles of law in order to preserve the legal rights of the Petitioner. U.S. const. art. IV, § 2; 42 U.S.C. §§ 1981 & 2000bb *et seq.*; 28 U.S.C. § 1491(a); *King v. United States*, 182 Ct. Cl. 631 (Fed. Cir. 1968); and *Harris*, 106 U.S. at 643-44 cited by https://constitution.congress.gov/browse/essay/artIV-S2-C1-4/ALDE_00013780/. Mandamus is proper because all legal complaints have a first right of appeal, per the Fifth Amendment's Due Process protection against the Federal Government, and a notice of appeal will not otherwise satisfy Petitioner's, who is also the Plaintiff in the not-docketed complaint below, legal right of first appeal. U.S. const. amend. V & 28 U.S.C. § 1295(a)(3). In fact, by not filing and docketing the complaint, the "tribunal of first instance," which, here, is the Court of Claims has not afforded me, the Petitioner, Due Process at all, and a writ from this Court will cure that deficit. *Cf. Ohio v. Akron Park Dist.*, 281 U.S. 74 (1930). By issuing the mandamus, this Court of Appeals for the Federal Circuit will protect its practice of stare decisis of material laws and preserve the uniformity of decisions. In fact, the Court of Claims is the only "court of the United States" with jurisdiction, and both it and this Court must exercise jurisdiction to preserve Petitioner's legal rights and satisfy the Congressional mandate to

protect the right of access to court. *King v. United States*, 182 Ct. Cl. 631 (Fed. Cir. 1968); U.S. const. art. IV, § 2; and *Harris*, 106 U.S. at 643-44 cited by https://constitution.congress.gov/browse/essay/artIV-S2-C1-4/ALDE_00013780/. But cf. *Chambers v. United States*, 196 Ct. Cl. 186 (Fed. Cir. 1971). The Founders, and Congress, made the protection our rights dependent on an independent judiciary, to shield us from executive and political tyranny and even a judge's own free will. Federalist 78; U.S. const. art. VI, § 1 citing the Decl. of Indep. (1776); *Quinn*, 349 U.S. at 160-61; and *Harris*, 106 U.S. at 643-44 cited by https://constitution.congress.gov/browse/essay/artIV-S2-C1-4/ALDE_00013780/. This Court of Appeals for the Federal Circuit is an Article III court, a completely new and American invention and constituting of judges with lifetime appointment and guarantee without the reduction of salary, whereas the Court of Claims is an Article I court, a mimic of the Old World non-independent judicial process whose judges are subject to re-appointment every fifteen (15) years and not sufficiently constitutionally independent. U.S. const. art. III and C. of Conduct for U.S. J.J. So, this Court of Appeals for the Federal Circuit will act agreeable to the usages and principles of the law of the United States Constitution to ensure that this independent court and judges may compel lower court judges and protect the Petitioner's rights against and during possible political chaos. *Id.* Like this Court of Appeals for the Federal Circuit, the Court of Claims for its judicial functions must not use its "will" to set its own agenda; in other words, this Court of Appeals for the Federal Circuit must act to ensure that the litigants, Congress, and appellate courts are setting the agenda and tasks for the Court of Claims and not its judges, clerks, or personnel. Federalist 78. C. of Conduct for U.S. J.J. See also 18 U.S.C. §§ 241 *et seq.* & 1346 *et seq.*

THE RELIEF SOUGHT

1. Writ of mandamus to the Court of Claims to file and docket the complaint filed by Raj K. Patel on December 1, 2022.
2. Other remedies which the court might deem fit, such as 42 U.S.C. § 1988, as applied to me, and include in the writ of decide the complaint according to law.

Respectfully submitted,

/s/ Raj K. Patel
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 Marion County
 317-450-6651 (cell)
rajp2010@gmail.com
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J.D. Candidate, Notre Dame L. Sch.
 President/Student Body President, Student Gov't Ass'n of
 Emory U., Inc. 2013-2014 (corporate sovereign 2013-
 present)
 Student Body President, Brownsburg Cmty. Sch.
 Corp./President, Brownsburg High Sch. Student Gov't
 2009-2010 (corporate sovereign 2009-present)
 Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind.
 St. B. Ass'n 2017
 Deputy Regional Director, Young Democrats of Am.-High
 Sch. Caucus 2008-2009
 Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-
 2010
 Vice President of Fin. (Indep.), Oxford C. Republicans of
 Emory U., Inc. 2011-2012
 Intern, Marion Cnty. Clerk Elizabeth "Beth" White for Sec'y
 of St. for the St. of Ind. 2014

CERTIFICATE OF COMPLAINT

The foregoing filing complies with the relevant type-volume limitation of the Federal Rules of Appellate Procedure and Federal Circuit Rules because the filing has been prepared using a proportionally-spaced typeface and includes 2,277 words. Fed. R. App. P. 21(d)(1).

Respectfully submitted,

/s/ Raj K. Patel
T.E., T.E. Raj K. Patel (*pro se*)
6850 East 21st Street
Indianapolis, IN 46219
Marion County
317-450-6651 (cell)
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www.rajpatel.live

Dated: December 27, 2022

CERTIFICATE OF SERVICE

The service has been made by the Clerk of the Court of Federal Claims, pursuant to RCFC 77 and Chief Judge Elaine Kaplan via e-mail and FedEx:

THE HONORABLE ELAINE KAPLAN, CHIEF JUDGE
THE UNITED STATES COURT OF FEDERAL CLAIMS
Howard T. Markey National Courts Building
717 Madison Place, NW
Washington, DC 20439
202-357-6400
ProSe case filings@cfc.uscourts.gov

CLERK OF COURT
THE UNITED STATES COURT OF FEDERAL CLAIMS
Howard T. Markey National Courts Building
717 Madison Place, NW
Washington, DC 20439
202-357-6400
ProSe case filings@cfc.uscourts.gov

Dated: December 27, 2022

Respectfully submitted,

/s/ Raj K. Patel
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6850 East 21st Street
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In The United States Court of Federal Claims

Form 2
Cover Sheet

ADDENDUM A

Plaintiff(s) or Petitioner(s)

Names: Raj K. PatelLocation of Plaintiff(s)/Petitioner(s) (city/state): Indianapolis, IN

(If this is a multi-plaintiff case, pursuant to RCFC 20(a), please use a separate sheet to list additional plaintiffs.)

Name of the attorney of record (See RCFC 83.1(c)): pro se

Firm Name: _____

Contact information for pro se plaintiff/petitioner or attorney of record:

Post Office Box: _____

Street Address: _____

6850 East 21st Street

City-State-ZIP: _____

Indianapolis, IN 46219

Telephone Number: _____

3174506651

E-mail Address: _____

rajp2010@gmail.comIs the attorney of record admitted to the Court of Federal Claims Bar? ☐ Yes ☐ Non/aNature of Suit Code: 528

Select only one (three digit) nature-of-suit code from the attached sheet.

Agency Identification Code: TRENumber of Claims Involved: 11Amount Claimed: \$208,000

Use estimate if specific amount is not pleaded.

Bid Protest Case (required for NOS 138 and 140):

Indicate approximate dollar amount of procurement at issue: \$ N/A

Is plaintiff a small business?

☐ Yes☐ No

Was this action proceeded by the filing of a

☐ Yes☐ No

Solicitation No. _____

protest before the GAO?

If yes, was a decision on the merits rendered?

☐ Yes☐ No

Income Tax (Partnership) Case:

Identify partnership or partnership group: N/A

Takings Case:

Specify Location of Property (city/state): N/A

Vaccine Case:

Date of Vaccination: N/A

Related case:

Is this case directly related to any pending or previously filed ☐ Yes ☒ No

case(s) in the United States Court of Federal Claims? If yes, you are required to file a separate notice of directly related case(s). See RCRC 40.2.

Nature-of-Suit Codes for General Jurisdiction Cases

100 Contract – Construction – (CDA)	206 Tax – Excise	348 Military Pay – Reinstatement
102 Contract – Fail to Award – (CDA)	208 Tax – Gift	350 Military Pay – Relocation Expenses
104 Contract – Lease – (CDA)	210 Tax – Income, Corporate	352 Military Pay – Retirement
106 Contract – Maintenance – (CDA)	212 Tax – Income, Individual	354 Military Pay – SBP
108 Contract – Renovation – (CDA)	213 Tax – Income, Individual (Partnership)	356 Military Pay – Other
110 Contract – Repair – (CDA)	214 Tax – Informer's Fees	500 Carrier – transportation
112 Contract – Sale – (CDA)	216 Tax – Preparer's Penalty	502 Copyright
114 Contract – Service – (CDA)	218 Tax – Railroad Retirement/Unemployment Tax Act	504 Native American
116 Contract – Supply – (CDA)	220 Tax – TEFRA Partnership – 28:1508	506 Oil Spill Clean Up
118 Contract – Other – (CDA)	222 Tax – Windfall Profit Overpayment – Interest	507 Taking – Town Bluff Dam
120 Contract – Bailment	224 Tax – 100% Penalty – 26:6672 – Withholding	508 Patent
122 Contract – Bid Preparation Costs	226 Tax – Other	509 Taking – Addicks & Barker Reservoirs
124 Contract – Medicare Act	300 Civilian Pay – Back Pay	510 Taking – Personalty
125 Contract – Affordable Care Act	302 Civilian Pay – COLA	512 Taking – Realty
126 Contract – Realty Sale	303 Civilian Pay – Disability Annuity	513 Taking – Rails to Trails
128 Contract – Subsidy	304 Civilian Pay – FLSA	514 Taking – Other
130 Contract – Surety	306 Civilian Pay – Overtime Compensation	515 Unjust Conviction and Imprisonment
132 Contract – Timber Sale	308 Civilian pay – Relocation Expenses	516 Miscellaneous – Damages
134 Contract – Other	310 Civilian Pay – Suggestion Award	518 Miscellaneous – Lease
136 Contract – Other – Wunderlich	312 Civilian Pay – Other	520 Miscellaneous – Mineral Leasing Act
138 Contract – Protest (Pre Award)	340 Military Pay – Back Pay	522 Miscellaneous – Oyster Growers Damages
140 Contract – Protest (Post Award)	342 Military Pay – CHAMPUS	524 Miscellaneous – Safety Off. Ben. Act
200 Tax – Allowance of Interest	344 Military Pay – Correct records	526 Miscellaneous – Royalty/Penalty Gas Production
202 Tax – Declaratory Judgment – 28:1507	346 Military Pay – Correct/Reinstate	528 Miscellaneous – Other
204 Tax – Estate		535 Informer's Reward
		536 Spent Nuclear Fuel

Nature-of-Suit Codes for Vaccine Cases

449 Injury – Hepatitis A	485 Injury – Hemophilus Influenzae	677 Death – Pertussis
453 Injury – Pneumococcal Conjugate	486 Injury – Varicella	478 Death – Polio – inactive
456 Injury – DPT& Polio	490 Injury – Rotavirus	479 Death – Polio – other
457 Injury – D/T	492 Injury – Thimerosal	480 Death – Rubella
458 Injury – DTP/DPT	494 Injury – Influenza (Flu)	481 Death – Tetanus & Diphtheria
459 Injury – Measles	496 Injury – Meningococcal	482 Death – Tetanus & Tox.
460 Injury – M/M/R	498 Injury – Human Papillomavirus	483 Death – Other
461 Injury – Measles/Rubella	452 Death – Hepatitis A	487 Death – Hepatitis B
462 Injury – Mumps	454 Death – Pneumococcal Conjugate	488 Death – Hemophilus Influenzae
463 Injury – Pertussis	470 Death – DPT & Polio	489 Death – Varicella
464 Injury – Polio – inactive	471 Death – D/T	491 Death – Rotavirus
465 Injury – Polio – other	472 Death – DTP/DPT	493 Death – Thimerosal
466 Injury – Rubella	473 Death – Measles	495 Death – Influenza (Flu)
467 Injury – Tetanus & Diphtheria	474 Death – M/M/R	497 Death – Meningococcal
468 Injury – Tetanus & Tox.	475 Death – Measles/Rubella	499 Death – Human Papillomavirus
469 Injury – Other	476 Death – Mumps	
484 Injury – Hepatitis B		

AGENCY CODES

AGR	Agriculture	SBA	Small Business Administration
AF	Air Force	TRN	Department of Transportation
ARM	Army	TRE	Department of Treasury
AEC	Atomic Energy Commission	VA	Department of Veterans Affairs
COM	Department of Commerce	VAR	Various Agencies
DOD	Department of Defense	O	Other
DOE	Department of Energy		
ED	Department of Education		
EPA	Environmental Protection Agency		
GPO	Government Printing Office		
GSA	General Services Administration		
HHS	Health and Human Services		
HLS	Homeland Security		
HUD	Housing and Urban Development		
DOI	Department of the Interior		
ICC	Interstate Commerce Commission		
DOJ	Department of Justice		
LAB	Department of Labor		
MC	Marine Corps		
NAS	National Aeronautical Space Agency		
NAV	Navy		
NRC	Nuclear Regulatory Commission		
PS	Postal Service		
STA	State Department		

In the United States Court of Federal Claims

RAJ K. PATEL, from all capacities

Plaintiff(s),

v.

THE UNITED STATES,

Defendant.

Case No. _____

Judge _____

COMPLAINT

Your complaint must be clearly handwritten or typewritten, and you must sign and declare under penalty of perjury that the facts are correct. If you need additional space, you may use another blank page. A fillable pdf is available at <http://uscfc.uscourts.gov/filing-a-complaint>.

If you intend to proceed without the prepayment of filing fees (*in forma pauperis* (IFP)), pursuant to 28 U.S.C. § 1915, you must file along with your complaint an application to proceed IFP.

- JURISDICTION.** State the grounds for filing this case in the United States Court of Federal Claims. The United States Court of Federal Claims has limited jurisdiction (*see e.g.*, 28 U.S.C. §§ 1491-1509).

28 USC 1491

CARES Act

American Recuse Plan

Etc.

2. PARTIES

Plaintiff, Raj K. Patel, resides at 6850 East 21st Street
(Street Address)

Indianapolis, IN 46219, 3174506651
(City, State, ZIP Code) (Telephone Number)

If more than one plaintiff, provide the same information for each plaintiff below.

n/a

3. PREVIOUS LAWSUITS. Have you begun other lawsuits in the United States Court of Federal Claims? ☒ Yes ☐ No

If yes, please list cases: No. 21-cv-2004-LAS (Nov. 5, 2021); No. 1:22-cv-734-LAS (2021);
No. 1:22-cv-1446-LAS (Fed. Cl. 202)

4. STATEMENT OF THE CLAIM. State as briefly as possible the facts of your case. Describe how the United States is involved. You must state exactly what the United States did, or failed to do, that has caused you to initiate this legal action. Be as specific as possible and use additional paper as necessary.

Defendant has not allocated and given my compensation of emergency compensation which was suppose to be paid to me.

5. RELIEF. Briefly state exactly what you want the court to do for you.

\$208,000; relief statues stated and as the Defendant might find; inherent authority

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1 day of December, 2022.
(day) (month) (year)

/s/ Raj K. Patel

Signature of Plaintiff(s)

No. _____

In The
United States Court of Federal Claims

RAJ K. PATEL,
from all capacities,

Plaintiff

v.

UNITED STATES,

Defendant.

NEW CIVIL ACTION

PRO SE COMPLAINT

T.E., T.E. Raj K. Patel (*pro se*)
Indiana | Georgia | New Jersey
6850 East 21st Street
Indianapolis, IN 46219
Marion County
rajp2010@gmail.com
www.rajpatel.live
317-450-6651

December 1, 2022

CERTIFICATE OF INTEREST

I, THE EXCELLENT, THE EXCELLENT Raj K. Patel (pro se), am appearing without counsel. Giving Full Faith to the United States Constitution, I use the Authority of my omnipresent Styles and Office in these proceedings into which I avail myself. U.S. const. art. IV, § 1 & amend. XIV, & art. VI, § 1 referring to the Treaty of Paris (1783) & Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784.

I have completed five (5) out of the six (6) semesters of my juris dr. candidacy at the U. of Notre Dame L. Sch. in South Bend, IN., where I was enrolled from August 2015 to November 2017, and I have completed sixty-eight (68) out of the ninety (90) credit hours for a juris dr. candidacy at the Notre Dame L. Sch.

Such, I have completed the minimum number of credit hours required by the accrediting Am. B. Ass'n ("A.B.A.") to allow a law school to accredit me a juris dr. degree.

Amongst the grades in my juris dr. academic courses I received at the Notre Dame L. Sch., I received an A-/A in contracts law, an A-/A in civil procedure, and a B/A in constitutional law, while under Weapon S. In the summer of 2016, I worked as summer associate with the City of Atlanta Law Department in Atlanta, GA. In the summer of 2017, I worked as a summer associate at Barnes & Thornburg LLP in Indianapolis, IN.

And, I hold a Bachelor of Arts in Poli. Sci. and *cum laude* in Religion from Emory U., Inc. of Atlanta, Georgia, and I attended both Oxford College and Emory College, and graduated, in 2014, with a 3.718/4.0 grade point average with no pass/fail grades.

Emory U., Inc. is ranked as a top-20 or top-25 *U.S. News* Tier 1 best national university, and the Notre Dame L. Sch. is ranked as a *U.S. News* Top 25 best law school in the United States.

I was Student Body President of the Brownsburg Cmty. Sch. Corp. from 2009-2010 and Student Body President of Emory U., Inc. from 2013-2014. I was also the Notre Dame L. Sch. Student B. Ass'n Rep. to the Ind. State B. Ass'n from September 2017 to November 2017. All jurisdictions are "local" and with an "international" constituency.

Each time I was elected Student Body President, I attained thenceforth omnipresent Styles ("THE EXCELLENT" for each election) which are protected by both the Privileges & Immunities Clause and Privileges or Immunities Clause of the United States Constitution. U.S. const. art. IV, § 2, cl. 1 & amend. XIV, § 1, cl. 2. *See generally* Federalist 80 & *Printz v. United States*, 521 U.S. 898, 918 (1997) quoting *Principality of Monaco v. Mississippi*, 292 U.S. 313, 322 (1934).

I am well read in the material law. I have not received legal advice or counsel from anyone else for this case.

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IN THE UNITED STATES COURT FOR FEDERAL CLAIMS

RAJ K. PATEL, from all capacities,

Plaintiff

v.

THE UNITED STATES

Defendant

No. _____

Dated: December 1, 2022

PRO SE COMPLAINT

I, Raj K. Patel (*pro se*), respectfully move this United States Court for Federal Claims provide me a remedy for monetary remedy for entitled to me by the COVAID relief bills, such as the CARES Act and the American Recuses Plan Act.

Functionally, and within the text of the respective bills, I have been either a sole proprietor, de facto benefit corporation owner, or lawfully unemployed and deserving of these emergency statutes granting monetary compensation.

The Equal Protection Clause of the Fifth Amendment and the Privileges and Immunities Clause of Section 2 of Article IV substantiate jurisdiction of this Court under the Big Tucker Act. 42 U.S.C. §§ 1981-1985 & 2000bb *et seq.* 28 U.S.C. § 1491.

The delay of the claims is due to on-going disability. *See Patel v. United States*, No. 1:22-cv-1446-LAS (C.F.C. 202_) and 28 U.S.C. § 2501, paras. 1 & 3.

Depending on my qualification, and based on what I have heard, I move for a compensation ranging from \$62,400 to \$208,000 but on-going tabulations. *Simanonok v. Simanonok*, 918 F.2d 947, 950-51 (Fed. Cir. 1990).

I use my Constitutional Privileges, honors, and rights of knowing from my undergraduate and law school, juris doctor candidacy, educations, and political offices

and from reading law outside of formal schooling for the writing and discussions, arguments, and motions of these filings, and my presumptions of regularity from my political offices, *see* Certification of Interest.

STATEMENT OF FACTS

- I. In August 2015, I enrolled at the University of Notre Dame Law School.
- II. From August or September 2017 to the time I take a voluntary separation of leave in good standing from the University of Notre Dame Law School, in November 2017, and both the law school and the university administration approved my leave in good standing.
- III. On or around December 7, 2017, I was put on emergency detention at the St. Vincent Stress Center in Indianapolis, Indiana for three days and charged with pointing a gun at another person by the Brownsburg Police Department in Brownsburg, Indiana. The charge is a felony.
- IV. On or around December 20 and 21, 2017, I told the appropriate personnel at the University of Notre Dame Law School about my intentions to re-apply to the University of Notre Dame Law School and very recent change of circumstance...the felony charge.
- V. The University of Notre Dame Law School wrote back to me, "At this point we want to let you know that you will not be readmitted to the University while this charge is pending. Further, you will not be considered for readmission unless the pending criminal charge is favorably resolved." He added, "Certainly you are welcome to keep us informed as the matter works toward resolution."
- VI. On April 30, 2018, the felony charge was dismissed. The police dispose of my gun. Therefore, I entered a protected class status as a person who was formerly charged

with a felony but whose case was expunged and then sealed. *Cole v. Bd. of Trs. of N. Ill. Univ.*, 838 F.3d 888, 895 (7th Cir. 2016) & I.C. 35-38-9-10(b).

- VII. Around the beginning of the COVID-19 pandemic, I started regularly residing back at my residence, my parents' house, at Brownsburg, Indiana 46112.
- VIII. For Fall 2020, I again re-applied for re-admissions. I was again denied re-admissions upon a not-mandatory recommendation by the University of Notre Dame University Counseling Center.
- IX. For Spring 2021, I again re-applied for re-admissions. I was again denied re-admissions upon a not-mandatory recommendation of the University of Notre Dame University Counseling Center.
- X. For Fall 2021, I again re-applied for re-admissions. This time, I was permanently denied re-admissions upon a not-mandatory recommendation by the University of Notre Dame University Counseling Center.
- XI. Since filing my cases, *infra* at pp. A-C, and making efforts to not only to restore my health but also each of my political office's elite, eminent political-social status and identity as a statesperson under our Union Constitution, I have been working in the capacity as a pro se litigation or citizen to benefit me, Raj K. Patel, either as a sole proprietor or a *de facto* benefit corporation. My benefits include dieting, clothes, residences, pursuits, transportation vehicles, intelligence, fashion (broadly construed), celebrity, religious status and life, and many other status and materiality, all which contribute to political and business and social power. In the alternative, I would be a *de facto* social corporation. *See also* Fed. R. Civ. P. 23.2 & 7. All actions are not invalid under Indiana law, California law, Delaware Law, or Georgia law. *See also* R.C.F.C. 23.2.

- A. The investments include my filings, my approved motions to grant in formula status, and my civil litigation efforts are all due and faithful efforts towards one or more of these business entities.
- B. I had to take a \$31,000 loan from my father which is due in 10 years from the signing, to pay off overdrawn credit card debt.
- C. Since the pandemic, I have been living with my parents, at their residence.
- D. From July 2020 to October 2020, I worked for the Indiana University Methodist Medical Plaza in Greenwood, Indiana.
1. I was paid \$15.00 per hour for 40 hours each week.
 2. I made about \$2,400 before taxes, each month.
 3. I made a total of approximately \$7,000. *See* Dkt. 14 at 3, *Patel v. Univ. of Notre Same du Lac*, No. 1:22-cv-01329-JPH-MG (S.D.I.N. 2022).
- E. From August 14, 2021 to August 28, 2021, I worked for my parents at one of their businesses.
1. I was paid \$10.00 per hour for 40 hours each week.
 2. I made about \$400 before taxes, each week.
 3. Not only out of dignities and mental health, as my dad and mom both authorized the December 2017 phone call which took me to the stress center, we could not tolerantly work together, and I needed to apply myself again to ¶ XI business endeavors.
- F. I currently accrue hundreds and thousands of dollars of expenses of credit card debt for the ¶ XI businesses, and any money which I have gotten has not been for gift per se but for qualifying use of my time to spend time with my fellow citizens, who are also my blood relatives and who I have been

litigious with, and their accompanying human persons. This qualifying use of my time can be tabulated to the ¶ XI businesses.

- G. I have not been able to find other work, which I assume because of my lingering law school status and conviction felony charge, which is now expunged. The ¶ XI business alternatives have not generated revenue or profits.
- XII. Congress and the President have passed both the CARES Act and the American Recuse Plan which help individuals and small businesses like me, but I have been unable to claim these benefits because of my disability and cryptic language and forms used by the United States Department of Treasury.
- XIII. Because I have had total collect my Congressional-demanding due money benefits, I am accruing credit card debt and interest at approximately \$25,000-\$30,000, and I have an outstanding loan of \$31,000.00, which I would like to have paid off by now.
- XIV. Nonetheless, I have been sent, COVAID checks of \$1,400 and \$610, by the Defendant-United States-United States Department of Treasury.
- XV. I have also received any of local government benefits which might be handed out to former local government officials.
- A. From 2009-2010, I was the Student Body President of the Brownsburg Community School Corporation ("B.C.S.C.") (corporate sovereign 2009-present) in Brownsburg, Indiana.
- B. From 2013-2014, I was the Student Government Association President of Emory University, Inc. (corporate sovereign 2013-present) in Atlanta, Georgia.

C. Through my heritage, by my blood/legal-parents, I am Top 1% of Americans, in terms of income and cash-on-hand, and Defendant's misfeasance has impacted me a lot, especially psychologically and socially.

XVI. This complaint to this Court for Federal Claims follows.

CLAIMS

Congress has waived sovereign immunity and enacted money-mandating statutes.

One. **CARES Act** - I have not be given the individual relief benefits pertaining to the unemployed, local government benefits, housing and rent benefits, and tax rebates, tax credits, and tax deductions, which I might have benefited from if the ¶ XI circumstance appeared one of Defendant's forms.

a. Relief:

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. § 1981,
- iii. 42 U.S.C. § 2000bb-1, and
- iv. 28 U.S.C. § 1491.

Two. **American Recuses Plan Act** - I did not receive local government benefits, unemployment, and tax credits and refunds but for the ¶ XI categorization problems.

a. Relief:

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. § 1981,
- iii. 42 U.S.C. § 2000bb-1, and
- iv. 28 U.S.C. § 1491.

Three. **United States Religious Freedom Restoration Act, 42 U.S.C. §§ 2000bb *et seq.* -**

The delay and confusion caused by Defendant has burden my free exercise of religion, and even free thinking, about how I, including as described in ¶ 10, will be able to partake in religious, civic, and social engagement, including R.F.R.A. protected donations. 42 U.S.C. § 2000bb-3.

a. Relief:

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. § 1981,
- iii. 42 U.S.C. § 2000bb-1, and
- iv. 28 U.S.C. § 1491.

Four. **Fifth Amendment and/or Fourteenth Amendment, Equal Protection Clause and**

Equity and Fairness - The Constitution demands that I and my ¶ 10 business(es) be treated the equally as the other businesses, whether they are raising revenue or profiting, or not.

a. Relief:

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. § 1981,
- iii. 42 U.S.C. § 2000bb-1, and
- iv. 28 U.S.C. § 1491.

Five. **Article IV, § 2, Privileges & Immunities Clause** - The Constitution demands that

I and my ¶ 10 business(es) be treated the same as the other businesses, whether they are raising revenue or profiting, or not; the concept can be found in few Civil War and Reconstruction Era cases.

a. Relief:

- i. 42 U.S.C. § 1491,

- ii. 42 U.S.C. § 1981,
- iii. 42 U.S.C. § 2000bb-1, and
- iv. 28 U.S.C. § 1491.

Six. **Fifth Amendment, (Substantive and Procedural) Due Process Clause** - The Constitution demands that I and my ¶ 10 business(es) be treated the constitutionally indifferently as the other businesses, whether they are raising revenue or profiting, or not, and that Defendant make the same fair opportunity to claim CARE Act and American Recuse Plan to collect the emergency compensation which the bi-partisan Congress and the President intended for me to receive.

- a. Relief:
 - i. 42 U.S.C. § 1491,
 - ii. 42 U.S.C. § 1981,
 - iii. 42 U.S.C. § 2000bb-1, and
 - iv. 28 U.S.C. § 1491.

Seven. **Americans with a Disability Act** - Given my mental health status, which includes an induced mental disability such as the Havana Syndrome, *see* Compl., No. 1:22-cv-1446-LAS (C.F.C. 202_), the Defendant needs to provide reasonable accommodation to claim these benefits.

- a. Relief:
 - i. 42 U.S.C. § 1491,
 - ii. 42 U.S.C. § 1981,
 - iii. 28 U.S.C. § 1491, and
 - iv. A settlement in the litigation would be sufficient.

Eight. **42 U.S.C. § 1981** - Congress has used its 16th Amendment taxing and other taxing powers to ensure the emergency compensation executed by Defendant-United States-Defendant, and I and my ¶ 10 businesses have been shed of this statutory protection.

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. §§ 1981-1981a,
- iii. 42 U.S.C. §§ 1981 *et seq.*,
- iv. 28 U.S.C. § 1491, and
- v. A settlement in the litigation would be sufficient.

Nine. **COVAID Reliefs and Statutes** - Congress has used its 16th Amendment taxing and other taxing powers to ensure the emergency compensation executed by Defendant-United States-Defendant, and I and my ¶ 10 businesses have been shed of this statutory protection. I had unnecessary endangerment and reduction in life which COVAID was meant to prevent by preventative compensation.

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. §§ 1981-1981a,
- iii. 28 U.S.C. § 1491, and
- iv. A settlement in the litigation would be sufficient.

Ten. **Extreme Emotional Distress** – The Defendant caused extreme emotional distress by creating this unfairness and undue hardships along the way; depending on the recovery, I will have missed an opportunity to accumulate other wealth and freedoms.

a. Relief:

- i. 42 U.S.C. § 1491,
- ii. 42 U.S.C. § 1981,

iii. 42 U.S.C. § 2000bb-1, and

iv. 28 U.S.C. § 1491.

Eleven. **Promissory Estoppel** – I detrimentally relied on the Defendant, both the Congress and the President, to ensure the fairness, indifference, equality, and sameness in treating me and my ¶ 10 business(es) while providing this emergency money.

a. Relief:

i. 42 U.S.C. § 1491,

ii. 42 U.S.C. § 1981,

iii. 42 U.S.C. § 2000bb-1, and

iv. 28 U.S.C. § 1491.

DEMAND FOR RELIEF

WHEREFORE, The Excellent, The Excellent Raj K. Patel, with the interest of upholding the contract with the United States and the Constitution, asks this Court of Federal Claims to enter judgement in his favor and grant either all or some of the following relief¹:

1. Relief described in claims section above and statutory compensatory damages minus any taxes which might be owed; compensation ranging from \$62,400 to \$208,000 but on-going tabulations and future discover in this case.
2. 42 U.S.C. § 1988, as applied to me.
3. Writs necessary to rectify situation and allow for my claims, including my person and my ¶ XI business(es). 28 U.S.C. § 1651.
4. Money shall be adjusted favorably for inflation.

1. *Loveladies Harbor, Inc. v. United States*, 27 F.3d 1545, 1554 (Fed. Cir. 1994) (*en banc*) (To recover against the government, a plaintiff must identify a “substantive right created by some money-mandating constitutional provision, statute or regulation that has been violated, or an express or implied contract with the United States.”).

5. Other remedies which the court might deem fit.

Respectfully submitted,

/s/ Raj K. Patel
 T.E., T.E. Raj K. Patel (*pro se*)
 6850 East 21st Street
 Indianapolis, IN 46219
 Marion County
 317-450-6651 (cell)
rajp2010@gmail.com
www.rajpatel.live

J.D. Candidate, Notre Dame L. Sch.
 President/Student Body President, Student Gov't Ass'n of
 Emory U., Inc. 2013-2014 (corporate sovereign 2013-
 present)
 Student Body President, Brownsburg Cmty. Sch.
 Corp./President, Brownsburg High Sch. Student Gov't
 2009-2010 (corporate sovereign 2009-present)
 Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind.
 St. B. Ass'n 2017
 Deputy Regional Director, Young Democrats of Am.-High
 Sch. Caucus 2008-2009
 Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-
 2010
 Vice President of Fin. (Indep.), Oxford C. Republicans of
 Emory U., Inc. 2011-2012
 Intern, Marion Cnty. Clerk Elizabeth "Beth" White for Sec'y
 of St. for the St. of Ind. 2014

NOT-RCFC 40.2-RELATED SOME CASES**FEDERAL CASES**

1. *Patel v. United States*, No. 2022-1131 (Fed. Cir. May 19/June 2, 2022), *cert. denied*, No. 22-5280 (U.S. 2022).
2. *T.E., T.E. Raj K. Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021).
3. *Patel v. Biden et al.*, No. 2022-5057 (D.C. Cir. June 8, 2022).
4. *Patel v. Biden et al.*, No. 1:22-cv-00394-UNA (D.D.C. Mar. 9, 2022).
5. *Patel v. Chief of Staff, The Executive Offices of the President of the United States*, No. 2022-1962 (Fed. Cir. 2022) (mot. for stay) (filed June 29, 2022).
6. *Patel v. The Executive Offices of the President*, No. 7419 (CBCA June 24, 2022).
7. *Patel v. Biden et al.*, No. 1:22-cv-01658-DLF (D.D.C. June 29, 2022) (pet. for writ of mandamus § 1361).
8. *Patel v. Biden et al.*, No. 1:22-cv-2957-MLB (N.D. Ga. Oct. 3, 2022) (pet. for writ of mandamus § 1361).
9. *Patel v. United States*, No. 1:22-cv-00734-LAS (C.F.C. 2022) (pet. for writ of mandamus § 1651).
10. *Patel v. United States*, No. 2:22-cv-02624-WB (E.D. Pa. 2022) (pet. for writ of mandamus § 1361), *transferred*, No. 1:22-cv-01576-JPH-MG (S.D.I.N. 2022), *dismissed due to filing bar*.
11. *Patel v. United States*, No. 1: 22-cv-1446-LAS (Fed. Cl. 202_).

Federal Courts Without Subject-Matter Jurisdiction for Big Tucker Act Claims

12. *Patel v. Trump Corp.*, No. 20-1513, 141 S. Ct. 2761 (June 14, 2021), *reh'r'g denied*, 141 S.Ct. 2887 (U.S. Aug. 2, 2021).
13. *Doe v. Trump Corp.*, No. 20-1706, 2020 WL 10054085 (2d Cir. Oct. 9, 2020).
14. *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-9936-LGS (S.D.N.Y. May 26, 2020), Dkt. 272.
15. *Patel v. F.B.I. et al.*, No. 1:18-cv-3441-RLY-DML (S.D.I.N. Nov. 13, 2018).
16. *Patel v. F.B.I. et al.*, No. 1:18-cv-3442-WTL-DML (S.D.I.N. Nov. 13, 2018).
17. *Patel v. F.B.I. et al.*, No. 1:18-cv-3443-TWP-MJD (S.D.I.N. Nov. 13, 2018).
18. *Patel v. Trump et al.*, No. 1:20-cv-454-SEB-DML (S.D.I.N. Feb. 19, 2020).
19. *Patel v. Trump et al.*, No. 1:20-cv-758-RLY-MJD (S.D.I.N. Apr. 14, 2020).
20. *Trump v. Vance, Jr. et al.*, No. 1:19-cv-8694-VM (S.D.N.Y. July 9, 2020), Dkt. 45.
21. *Patel v. Patel et al.*, No. 20-2713 (7th Cir. Jan. 21, 2021).
22. *Patel v. Patel et al.*, No. 1:20-cv-1772-TWP-MPB (S.D.I.N. Sept. 1, 2020).

23. *Carroll v. Trump*, No. 1:20-cv-7311-LAK (S.D.N.Y. Oct. 28, 2020), Dkt. 36.
24. *Patel v. Martinez et al.*, No. 3:21-cv-241 RLM-JPK (N.D.I.N. Apr. 8, 2021).
25. *Patel v. The President of the United States Joe Biden et al.*, No. 2:21-cv-01345-APG-EJY (D. Nev. Aug. 9, 2021).
26. *Patel v. United States*, No. 1:21-cv-22729-BB (S.D. Fla. Aug. 12, 2021).
27. *Patel v. United States et al.*, No. 1:21-cv-2219-JMS-TAB (S.D.I.N. Aug. 20, 2021).
28. *Patel v. United States et al.*, No. 1:21-cv-2263-UNA (D.D.C. Sept. 8, 2021).
29. *Patel v. United States et al.*, No. 2:21-cv-4160-NKL (W.D. Mo. Sept. 13, 2021).
30. *Patel v. United States et al.*, No. 2:21-cv-16029-SDW-CLW (D.N.J. Sept. 20, 2021).
31. *Patel v. The United States et al.*, No. 1:21-cv-6553-LTS (S.D.N.Y. Sept. 20, 2021).
32. *Patel v. The United States et al.*, No. 1:21-cv-2250-RLY-MG (S.D.I.N. Sept. 21, 2021).
33. *Patel v. United States et al.*, No. 1:21-cv-11429-LTS (D. Mass. Sept. 24, 2021).
34. *Patel v. Biden et al.*, No. 21-5155 (D.C. Cir. Sept. 27, 2021).
35. *In Re Raj K. Patel*, No. 21-5153 (D.C. Cir. Aug. 6, 2021).
36. *Patel v. Biden et al.*, No. 1:21-cv-1076-TSC (D.D.C. July 2, 2021).
37. *The Excellent Raj Patel v. The United States et al.*, No. 1:21-cv-3335-MLB (N.D. Ga. Oct. 5, 2021).
38. *The Excellent Raj Patel v. The United States et al.*, No. 1:21-cv-3376-MLB (N.D. Ga. Oct. 5, 2021).
39. *Patel v. United States et al.*, No. 3:21-cv-628-RLM-APR (N.D.I.N. Oct. 7, 2021).
40. *Patel v. Biden et al.*, No. 22-cv-465-JMS-MG (S.D.I.N. Mar. 24, 2022).
41. *In Re Raj Patel*, No. 22-mc-00024-TWP (S.D.I.N. Mar. 28, 2022) (2 yr. prejudice from filing before the S.D.I.N.). *Contra*. ECF 31, *Patel v. United States*, No. 22-1131 (Fed. Cir. 2022).
42. *Patel v. The Univ. of Notre Dame du Lac*, No. 49D05-2206-CC-019517 (Ind. Super. Ct., Marion Cnty. 5 2022), *removed*, No. 1:22-cv-01329-JPH-MG, *pending app.*, No. 22-2251 (7th Cir. 202_).
43. *Patel v. Jane Doe, John Doe, et al.*, No. _____ (S.D.I.N. 202_) (*see* Dkt. 10, *In Re Raj Patel*, No. 22-mc-00024-TWP (S.D.I.N. 202_)).

STATE CASES

44. *Patel v. Patel*, No. 32D05-1808-PO-000372 (Ind. Super. Ct. Aug. 21, 2018).

45. *Patel v. The Univ. of Notre Dame du Lac*, No. 49D05-2206-CC-019517 (Ind. Super. Ct., Marion Cnty. 5 2022).
46. *Raj K. Patel v. Univ. of Notre Dame du Lac*, No. 71D07-2209-CT-000356 (Ind. Super. Ct., St. Joesph Cnty. 202_), *pending appeal*, No. 22A-CT-02787 (Ind. Ct. App. 202_).

CERTIFICATE OF SERVICE

The service to the Defendant-United States has been made by the Clerk of the Court of Federal Claims, pursuant to RCFC:

Dated: December 1, 2022

Respectfully submitted,

/s/ Raj K. Patel
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IN THE SUPREME COURT OF THE UNITED STATES

IN RE RAJ K. PATEL, from all capacities,

Plaintiff-Appellant-Petitioner

No. _____

Dated: May 1, 2023

CERTIFICATE OF SERVICE

I certify that I served three copies of the foregoing filing on 05/1/2023 by the method in brackets on the below individuals at the following locations:

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