

Appendix E

SUPREME COURT OF PENNSYLVANIA

IN THE MATTER OF A MEMBER	§	No. 2913 DD3
OF THE BAR	§	No. 118 DB 2022
	§	(Supreme Court of Delaware, No. 58,
	§	2022)
MEGHAN M. KELLY,	§	Attorney Registration No. 202268
Respondent.	§	(out of state

Respondent Meghan Kelly's

Second Motion to dismiss for lack of subject matter jurisdiction

Respondent Meghan Kelly, pursuant to Pa.R.D.E., Rule 201 (1)(3), Pa.R.A.P., Rule 911, Pa.R.A.P., Rule 341, or any applicable rule, pro se files a Second Motion to dismiss for lack of subject matter jurisdiction, and avers as follows:

1. This Honorable Pennsylvania Supreme Court held “Lack of subject matter jurisdiction may be raised at any time by parties or sua sponte by Supreme Court.” *Daly v. Sch. Dist. of Darby Twp.*, 434 Pa. 286, 252 A.2d 638 (1969); (Also see, *Martin v. Zoning Hearing Bd. of W. Vincent Twp.*, 230 A.3d 540, 545 (Pa. Cmmw. Ct. 2020) “Questions of subject matter jurisdiction may be raised at any time, even on appeal, by the parties, or by the court on its own motion.” (emphasis intended, especially with regards to questions of the case law PA-ODC cites, which are distinguished from this case)); Also see, Hudson v. Com, 830 A.2d

594, 598 n.7 (Pa. Cmmw. Ct. 2003), *Citing, Dep't of Transp., Bureau of Driver Licensing v. Gelormino*, 636 A.2d 224 (Pa.Cmwlth. 1994).

2. There are questions of the law regarding subject matter jurisdiction. I argue this Court does not have subject matter jurisdiction. There is no basis in law or case law to create subject matter over me, a lay person in PA with no longer admitted to this bar, as retired. Since questions of law or fact relating to subject matter jurisdiction may be brought at any time, I alert this Court today of issues of law.

3. Pursuant to Pennsylvania Rules of Disciplinary Enforcement ("Pa.R.D.E."), Rule 201 (1)(3), this Honorable Supreme Court has jurisdiction over,

"(1) Any attorney **admitted to practice law** in this Commonwealth. [I am not admitted to practice. I am retired.]

(3) Any **formerly admitted attorney, with respect to acts prior to suspension, disbarment, administrative suspension, permanent resignation, or transfer to or assumption of retired or inactive status...**

PA ST DISC Rule 201

4. In 2017, I registered as inactive with the Pennsylvania bar to reduce licensure fees. In 2018, I filed to retire my license to prevent costs. I have remained retired since 2018.

5. If I seek to be admitted to practice law, I would be required to petition this court to restate my active license to practice law. See, Pa.R.D.E., Rule 218

(a)(2)

6. Pa.R.D.E., Rule 218 (a)(2) provides in relevant part

“An attorney may not resume practice until reinstated by order of the Supreme Court after petition pursuant to this rule if the attorney was... (2) retired, on inactive status or on administrative suspension if the formerly admitted attorney has not been on active status at any time within the past three years” PA ST DISC Rule 218 (a)(2).

7. I have been retired for more than 3 years. So, I am not admitted to practice law at this time.

8. Once I apply for admission, if I apply for admission to the Pennsylvania Bar, PA-ODC shall have the opportunity to contest my application at that time, pursuant to Pa.R.D.E., Rule 218 (c)(2). The issue of my admission to the bar is not ripe for adjudication.

9. A cloud on my license with the label of disabled will not only pose a problem for me in regaining admission to practice in Pennsylvania, it will also create an obstacle for me in regaining employment with my former law firm, a real estate law firm. They do careful background checks since they deal with escrows relating to the sale of real estate.

10. While there is no guarantee the law firm will take me back in light of this litigation, it is the opportunity, the free choice I seek to protect from the certain forced choice the law firm would not take me back should I fail to overturn the original disciplinary action by the civil rights case in the Delaware District Court or by the appeal of the original disciplinary matter or by reciprocal discipline by this Court in light of the circumstances.

11. I am prejudiced by this Court's exercise of authority over this case where it has no subject matter. This Court improperly denied my application for a stay causing a substantial burden upon me to my access to other Courts, causing threat of additional irreparable injury in terms of loss of First Amendment Rights, property interests in my licenses and other harm. I incorporate herein by reference in its entirety my motion for a stay, exhibits thereto, my motion for an extension of time to respond to opposing counsel's answer in response to my motion for a stay, with exhibits thereto, and my motion to exempt fees, including fees by the Office of Disciplinary Counsel under Pennsylvania Rules of Disciplinary Enforcement 208(g).

12. This Court lacks subject matter jurisdiction because the conduct the Delaware Supreme Court disciplined me for occurred while I was retired in PA. It allegedly occurred in 2020 or 2021. See The petition at 7, and the August 23, 2021 Letter I previously submitted on the record to confirm Delaware Office of

Disciplinary Counsel's admitted reasons to bringing a disciplinary law suit against me in Delaware.

13. I was not practicing law on behalf of another, at the time of the conduct. I acted pro se while filing private petitions with Delaware courts in defense of my religious exercise of beliefs from a government incited substantial burden upon my exercise of belief in Jesus Christ by the establishment of government religious belief. I have not practiced law on behalf of another since 2016.

14. Delaware Supreme Court disciplined me for petitioning the Court to defend my exercise of my right to access to the courts in defense of my exercise of First Amendment rights, including my religious-political beliefs, religious-political speech, exercise of religious beliefs, association and to cover up Delaware Court agent or arms' misconduct. US Amend I, XIV.

15. This conduct occurred after my retirement from this Honorable Court's Bar.

16. The cases Office of Disciplinary Counsel (hereinafter "PA ODC") cite in his Answer objecting to my motion to dismiss based on this Court's lack of subject matter jurisdiction are distinguished from this case.

17. The Pennsylvania Supreme Court is a court of limited jurisdiction, based on its Constitution and statutes. The jurisdiction of this Court over retired and inactive attorneys is specifically limited to conduct that occurred before or after the attorney was placed on inactive or retired status, or if the attorney is an active member of the bar all, conduct may be reviewed, regardless of whether it occurred while an attorney was retired. These clearly written exceptions do not grant this court jurisdiction over me. PA ST DISC Rule 201. This Court's jurisdiction does not extend to reciprocally disciplining me for conduct which occurred during 2020 or 2021, while I was retired.

18. PA-ODC's outlandish assertions relating to resignation to this bar are offensive. The rules are the same for retirement as resignation. To restate this Court has jurisdiction over, "formerly admitted attorney, with respect to acts prior to suspension, disbarment, administrative suspension, permanent resignation, or transfer to or assumption of retired or inactive status." Citing, Pa.R.D.E., Rule 201(3), (Emphasis is intended to show the rules on subject matter jurisdiction for retired and permanently resigned attorneys are the same).

19. PA ODC appears to use upper case letters in his Answer and make irrelevant arguments in bad faith by seeking to trap me by offering permanent resignation to increase costs of readmission and the possible requirement of retaking the bar.

20. Pa.R.D.E., Rule 204 (c) provides, “An attorney who has permanently resigned from the practice of law in this Commonwealth pursuant to subdivision (a) or (b) of this rule may not be reinstated under the Enforcement Rules and must seek readmission to the bar pursuant to the Pennsylvania Bar Admission Rules.”

21. PA ODC also used upper case letters inappropriately in an attempt to compel my free will to the forced will of the state to forgo my defense of my First Amendment rights against the original disciplinary Court for persecuting me for my exercise of First Amendment religious beliefs in Jesus, and the exercise of the right to defend my beliefs in court without government incited private or government persecution but for the state of Delaware’s disagreement with my private individual religious belief in God as guide, not money, material gain or business greed. (*See, Matthew 6:24*, “No one can serve two masters. Either you will hate the one and love the other, or you will be devoted to the one and despise the other. You cannot serve both God and money.”); (*John 2:16* “To those who sold doves he said, “Get these out of here [the place of worship]! Stop turning my Father’s house into a market!” I believe this shows that those who do business or their profession under the guise of worship of God are not welcome in heaven.); (*See Genesis 3*, I believe toiling in the soil is one punishment for original sin to humble the proud. I do not believe work is not the purpose of life.); (*See, Matthew 6:1-4* “Be careful not to practice your righteousness in front of others to be seen by

them. If you do, you will have no reward from your Father in heaven. [I believe this means they will go to hell should they not repent. I believe people go to hell for fundraising and organized charity without repentance. Jesus teaches true charity is at a worldly loss for a Godly gain], “So when you give to the needy, do not announce it with trumpets, as the hypocrites do in the synagogues and on the streets, to be honored by others. Truly I tell you, they have received their reward in full. But when you give to the needy, do not let your left hand know what your right hand is doing, 4so that your giving may be in secret. Then your Father, who sees what is done in secret, will reward you.”)

22. This Honorable Court must not violate case and controversy requirements merely because PA-ODC opposes the arguments I make against attorney self-regulation and third-party regulation in other courts to defend his job at the cost of sacrificing my Constitutional rights and the Constitution as supreme law. *Citing, the Supremacy Clause, Article VI, Paragraph 2 of the U.S. Constitution.*

23. I filed Motions contesting the Constitutionality of attorney self-regulation and regulations by professionals on Board’s with the Delaware Supreme Court. Self-regulation and third-party regulation create injustice by tempting lawyers to be biased towards professions, money and business, while selling the

souls and freedom of individuals as opposed to upholding the Constitutional laws that protect individuals to serve position, profit and power.

24. Freedom of thought and speech are greater innovators than money and bought or bartered compelled narrow standards of professionals who do not allow diverse views. Protecting the beautiful disorder freedom of diverse speech, beliefs and thoughts is necessary and required under the First Amendment.

25. Protecting those who believe differently than the standard conformed beliefs may help people learn from those with diverse views, and may help people correct others or even the majority whose views may be in error. Even mistaken beliefs must be protected. It may also help people to learn to care about those they may not want to be inconvenienced to care about. There is danger when the standard beliefs by government backed professionals, the government or others do not allow challenge or diverse beliefs. The danger is stagnation to growth, worse products and services, and elimination of free thought by forced conformity under the threat of economic, physical or social harm.

26. This danger is particularly great as applied to me because I am being disciplined in Delaware for the exercise of private, not professional exercise of Constitutionally protected First Amendment rights. Should the discipline not be

overturned, other professionals may face the choice between their freedom of religious belief and the right to buy and sell as a professional.

27. PA ODC cannot violate the Constitution to serve his own seat as Office of Disciplinary Counsel merely because my arguments to the other courts may affect his job as regulator of attorneys. I think the case PA ODC cites relating to the unauthorized practice of law is a good reason for him to maintain his position despite my Constitutional arguments. In *Bisher v. Lehigh Valley Health Network, Inc.*, 265 A.3d 383, 389 (Pa. 2021), this Honorable Court concluded “that pleadings unlawfully filed by non-attorneys are not void ab initio.”

28. PA ODC has the important job of correcting those who may unknowingly practice law without a license should they continue and create public harm. Albeit, it would be unjust to correct those who were not in need of correction who committed harmless error.

29. Non attorneys may in bad faith practice law to gain profit, as title companies appeared to be doing and allegedly are still doing in Delaware. The reason why I ran for office in 2018 is because I discovered title companies practiced law without a license. The title companies allegedly are messing up on the chain of title at times, and causing the state to lose tax revenue.

30. PA ODC also attended Duquesne School of law. My Grandpop Robert Kelly attended Duquesne School of Law in his 40s, around my age, late in life. My little cousin Patrick Kelly, and my Uncle Luke Kelly also attended Duquesne School of law. My parents and my aunts also attended Duquesne, but not the law school.

31. The Law School is located near this Court in Pittsburgh, PA.

32. Merely because I make a complaint to an entity, Duquesne School of Law or the Courts to improve my situation which improves conditions for others, does not mean I am attacking to destroy the entity I seek relief from. I asserted petitions to improve conditions.

33. PA ODC or this Court must not assume jurisdiction in which there is none because I mentioned the retaliation by Duquesne Law School in my petitions to other courts. (I incorporate herein by reference exhibits 1 and 2, a newspaper article, and a letter to the Honorable Master of the Delaware Chancery Court referring to my complaints to Duquesne School of law. On an unrelated matter, in the letter I opposed deregulation as lawlessness. I now support deregulation in favor of congress drafting laws, not unelected bureaucrats who maintain more power than those in elected positions.)

34. This Honorable Court cannot violate the Constitutional limits of its own limited subject matter jurisdiction, or violate the Constitutional limits of case and controversy requirements by proceeding in this matter out of self-interests relating to the marketing of a business because this Court finds my religious beliefs harmful for positions, power or profit. Article III, Section 2, Clause 1.

35. Justice is not for sale or a matter of barter or exchange. Justice is a matter of truth as applied to the law. If justice is a business to buy, those with something to barter are free to purchase their freedom, while the rest of us are slaves in violation of the 13th Amendment. US Amend XIII.

36. The vote and our two branches of representative government, the executive and legislative branches, do not remove Constitutional freedoms of the people, essentially sacrificing individual Constitutional liberties for the mob's desires.

37. The Courts safeguard freedom by preventing individuals and individual liberty from being sacrificed by the executive and legislative branches to entities or the majorities or the minority in power's illusion of the greater good.

38. The vote does not grant us a democracy. It offers a Republic. The courts give us a democracy in our democratic-republic by safeguarding freedom of the individual from the majority and entities. With the United States Supreme

Court examining voting rights in *Moore v. Harper*, this December 7, 2022, I am concerned of instigated or staged citizen unrests due to the misleading propaganda that the vote gives us freedom. I believe it is you, judges on the benches which give us freedom, not the vote. Even when I disagree with decisions like *Citizens United*, I still uphold the institution of the courts. We are not barbarians using armies with weapons or bribing or extorting our forced will upon others. We use independent courts that should remain impartial, not partial towards professions or businesses or costs or money at the cost of not seeing clearly to render fair just decrees.

39. The Courts are special, and need not be perfect to uphold the Constitutional laws that make us freer. Nevertheless, the Court must not violate the law to serve its own interests, including the mere appearance of the profession.

40. This Court's rules do not grant jurisdiction to it over attorneys who were retired and inactive while the conduct occurred reciprocating courts disciplined them for, unless the attorney falls under one of its exceptions, including becoming an active member of the bar. I do not fall under any exception. This Court does not have subject matter jurisdiction.

41. The Constitution requirements of a case and controversy, and preempts this Court's exercise of jurisdiction over me where there is none. Citing,

Article III, Section 2, Clause 1, U.S.C.A. Const. Art. 6, cl. 2. (Also see *Wisconsin Dep't of Indus., Lab. & Hum. Rels. v. Gould Inc.*, 475 U.S. 282, 106 S. Ct. 1057, 89 L. Ed. 2d 223 (1986) (“National Labor Relations Act preempted Wisconsin statute debarring certain repeat violators of the Act from doing business with the state”)).

42. There is no case, no injury in fact, no causation or damages fairly traceable to the injury. My license is already retired. I am not permitted to practice law in PA without application to this court for permission. There is no case, controversy, harm or remedy for any alleged injury before this Court. Should I reapply, PA ODC may bring up any past discipline at that time. It is not ripe for adjudication and greatly prejudices me. PA ODC’s far reaching irrelevant comment that Pa.R.D.E., Rule 217(d)(3) may require fiduciary services in a stretch to find a remedy. Pa.R.D.E., Rule 217 (d)(3) does not apply to me. I have no clients in PA. I do not recall ever practicing law in PA. (Citing, Answer at Footnote 2.)

43. This Court’s rules do not grant jurisdiction to it over attorneys who were retired and inactive while the conduct occurred reciprocating courts disciplined them for, unless the attorney falls under one of its exceptions, including becoming an active member of the bar. I do not fall under any exception. This Court does not have subject matter jurisdiction.

44. The cases PA-ODC cites do not support subject matter jurisdiction over me or my retired license.

45. With regards to *In the Matter of Charles D. Septowski*, No. 19150 DD3, Pa. Supreme Court Order 9/25/13, the attorney participated in misconduct prior to his placement on inactive status in January 1, 2010 or his alleged retirement status with PA. (Citing, Answer page 4-5, See Exhibit 3, incorporated herein by reference and its entirety and the video of the Texas disciplinary proceeding located at <https://www.youtube.com/watch?v=bgloVn94IGY>)

46. This Court has jurisdiction over attorneys who were active during the course of the conduct attorneys were disciplined in other jurisdictions. Attorney Septowski participated in misconduct in 2009 before he was inactive or retired status to practice law before this Court. His case is distinguished from mine, and aligns with this Court's Pennsylvania Rules of Disciplinary Enforcement. (Exhibit 3. Also see the news tv video clip I mailing to you separately on December 5, 2022.)

47. With regards to other cases PA-ODC cites in his Answer, the orders of discipline attached hereto and incorporated herein in its entirety under Exhibit 4, appear to have been filed as a matter of routine by PA-ODC, without argument concerning the nuanced facts. *Citing, In re Hunt*, 2824 Disciplinary Docket 3, at

*1 (Pa. Nov. 12, 2021) and *In re McIntosh*, No. 1835 Disciplinary Docket No. 3, at *1 (Pa. Oct. 11, 2012); *In Matter of Stanton*, No. 1693 Disciplinary Docket No. 3, at *1 (Pa. Aug. 2, 2011); *In Matter of Vassar*, No. 1294 Disciplinary Docket No. 3, at *1 (Pa. Sep. 24, 2007). The attorneys in those matters did not contest the Order for reciprocal discipline. In each of those court's orders, with the exception of *In Matter of Vasser*, the PA Supreme Court noted no response was filed before entering reciprocal discipline.

48. That does not mean that the Pennsylvania Supreme Court has subject matter jurisdiction. It means the PA Supreme Court did not analyze facts not yet before it. By failing to answer, the attorneys did not defend their case based on lack of subject matter jurisdiction. The PA Supreme Court does not know if the facts occurred prior to the accused attorneys' placement on inactive or retirement in any of the cases where the Respondent Attorneys failed to respond. The cases PA-ODC cites are distinguished from this case.

49. For *In Matter of Vassar*, No. 1294 Disciplinary Docket No. 3, at *1 (Pa. Sep. 24, 2007), I could not find the 2008 Order PA-ODC cites to confirm the conduct warranting discipline occurred prior to the inactive or retired status or whether he failed to respond. It may be under seal.

Wherefore I pray this Court dismisses this case for absence of subject matter jurisdiction.

December 6, 2022

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Retired Bar No. 202268, INACTIVE, not
practicing law on behalf of another

Exhibit 1

post-gazette

post-gazette

Lifestyle

Sunday

Lifestyle

Consumer

Tech

Zoo

Car Reports

Car Buyers' Guide

Get post-gazette.com
on your PDA.

Helping you with consumer questions. Cutting through red tape.

**Lawrence Walsh: Rat is
unwelcome study partner**

Wednesday, June 29, 2005

By Lawrence Walsh, Post-Gazette Staff Writer

A pregnant rat running between your legs in your bedroom isn't conducive to studying for final exams.

That's what Meghan Kelly said happened to her in early May in her 10th-floor apartment in Brottier Hall at Duquesne University. The 20-story building was formerly known as Citiline Towers and the Cricklewood Hill Apartments.

"I haven't been able to get a good night's sleep since it happened," said Kelly, a law school graduate now studying for the bar exam next month.

She said the rat ran under a bed and into a hole beside the heating and air-conditioning unit in a bedroom.

Kelly notified the university. The university sent an exterminating company to inspect her room. It found no evidence the rat had taken up residence in the apartment, but it put out traps to capture any transient rodents.

Then Kelly found a baby rat in a trap. She again called the university. The exterminator returned for another inspection, but found no signs that mama rat had made herself at home. They again set out traps.

After successfully passing her law school exams last month, Kelly began studying for the bar exam. Law school graduates must pass the two-day test to obtain a license to practice law in Pennsylvania.

Unnerved by her encounter with the pregnant rat, Kelly said she tried to

sleep as best she could. She initially thought a tapping sound she heard next to the head of her bed came from a heating and cooling unit. Then she thought it might be a rat trying to get out.

She called the Allegheny County Health Department. She also contacted the Pittsburgh Post-Gazette.

Dennis Lauria, a county environmental health specialist, inspected her apartment last Tuesday. He ordered the university to place rat glue traps under the heating and cooling units in each room. The traps are designed to trap rodents by attracting them to the sticky surfaces that prevent them from moving after they step on them.

Lauria also ordered the university to repair a hole in the ceiling of a hallway closet in Kelly's apartment. Although he found no evidence of rodents in her unit, he found some on the ground level of the building.

He found "rodent droppings, carcasses, rub marks, chewed areas or burrows" in the garage. He also noticed that rodents could crawl under the closed garage doors. He ordered the university to "rodent-proof the garage doors" and to "remove food sources, harborage areas and eliminate entries."

Lauria also said the garbage storage area had garbage on the floor. He ordered that it be cleaned up and that bait stations be placed in the garbage storage and receiving areas. He found rat ground burrows about 20 feet from the two garage doors, one of which is open during the day to provide egress and ingress for employees and workers renovating the building.

At Kelly's invitation, I accompanied Lauria on a reinspection of her apartment yesterday. He found mouse droppings and mouse hair on a glue trap under one of her heating and cooling units. "I'll add that to my report," he said.

During a reinspection of the ground level of the building, Lauria said building employees had done a lot of clean-up work since his first visit. There was no garbage on the floor of the garbage receiving and storage areas. But at least one rat had entered the garage. Visible evidence of its presence was near a trap that had been sprung.

Although Lauria gave the university until July 12 to comply with the orders he issued last week, he said employees already had corrected most of them.

He was impressed with the steel strips attached to the bottom of one of the garage doors to keep out four-legged trespassers.

"We take this matter very seriously," said Bridget Fare, a university spokeswoman. "We started addressing it the day after [Kelly] notified

Exhibit 2

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

December 11, 2020

Register in Chancery
Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

RE: Meghan Kelly v. Donald J. Trump, et. al, Case No. 2020-
Master PWG

Thank you/New Supreme Court Order

Dear Honorable Master Patricia Griffin:

Thank you for your letter. I thought I was going to get into trouble with you. Instead, you bestowed me kindness and mercy.

It made me teary eyed with unexpected joy by your kind act.

Usually, when I ask for help, I get into trouble from those I ask.

When I was in law school, I had rats in my apartment during my final exams and bar exams. I asked the Christian law school I leased the apartment from, Duquesne, for help. They did not help me. Instead, they increased my rent. The newspapers helped me, and the tv station helped me.

Did I get rescued out of the situation? No. But they remain my heroes because they did the right thing. That is more important than winning or losing. See attached under Exhibit A.

REGISTERED CHANCERY
GEORGETOWN DELAWARE
2020 DEC 11 P 12:52

During my Delaware Bar Exam studies at Weidner Law School, my dorm ceiling leaked water all over my bar materials. I asked for help from Weidner and reached out to the Board of Bar examiners. I got scolded by the administrator of the bar in a private room instead.

When I ran for office as a democrat, the democrats did not help me, and appeared to sabotage my run, per my complaint which is an exhibit to the brief.

You know who did help me? The press. They allowed me to share my ideas on paper, impartially, just as they allowed the other side to do the same.

That is why the press is my hero. I lost, but they gave me, the voiceless a voice.

You are my hero too. Winning or losing is not most important, doing the right thing is. Allowing all people, regardless of wealth, poverty, political party, religion, race or place of origin an opportunity to seek justice, which is never guaranteed, is the right thing.

Thank you for doing the right thing for a peon like me, by affording me the opportunity to sue the most powerful man in the world. It is not me I have faith in. It is you (God too), the court system, democracy, and the pursuit of justice. Our system of government recognizes how imperfect man

is, by instilling checks and balances which limits the three imperfect branches. So, none would proudly assert imperfect dominion. Each branch remains humbled at the prospect of potential correction, your potential edification. No branch, nor any human is perfect. None are God but God.

I am sorry if I let the Court, democracy and God down in this case. If I should fail to plead sufficiently, I will just get right back up and try to do the right thing again differently with humility.

I am kind of getting used to falling down now, but I am not used to those in authority helping me up, as you have done by your letter, and as the Delaware Supreme Court has done by allowing for pleadings to be filed by email too, per Order Number 6. Exhibit B.

I emailed Brenda McKinnon, in the upper Delaware Chancery Court my brief and the exhibits attached thereto on Monday December 7, 2020 completed at 10:20 AM. I mailed the Court everything on Monday December 7, 2020, and the post office indicated it was received on December 8, 2020 at 8:17 am. Exhibit C.

But she has not been able to confirm receipt yet. So, I may have to file again in your office.

I forwarded the E-mailed filed documents to Katrina Krugar, and asked for her to please hang onto them and standby in case upper Delaware continues to have trouble receiving the documents.

For your convenience, I am also dropping off a set of the filed documents to possibly ease in filing in case upper Delaware needs help. If not, in case I succeed, it would be good for you to have a copy too.

If the Upper Delaware Court needs help filing, would you please help them and me by filing it on the December 7, 2020 date, 10:20 AM, with only one court stamp confirmation on the Brief to alleviate the burden on the Court. The Court need not stamp every document.

Should my case remain alive, the Delaware US Attorney General will likely seek to remove my case to the federal court since he knows my concerns about driving and mailing.

I do not regret putting my foot into my own mouth. I believe that your Court will save not only America, but the World. You do not need me for this Court to do so.

I think whichever Court hears my case, they will have power to save the world too, just not as much power as you, and the Delaware Chancery Court.

I believe the Courts will be our heroes in history. I believe their words are more powerful than weapons. The impartial rule of law is more powerful than reign by those with money, power and connections without restraint called enforceable laws.


We are not a nation of sword fights, gun duels and fist fights. We are a nation of laws that limits all people, with more limits on those with power in the government, to make the common man, even a peon like me, somehow more equal to the most powerful person in America, the President.

The limits on our Constitutional freedoms in the form of laws, makes us all more free.

The fact Americans must respect (to an extent) the freedoms of others, and, in turn, others must do the same by honoring such limits, makes us all more free.

Lawlessness is not freedom. Deregulation is not freedom. It is anarchy.

Thank you,


Meghan Kelly, Esquire
Pro Se, Bar # 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 988)

CC. Attorney General William Barr, Esq.