

No. 22-7782

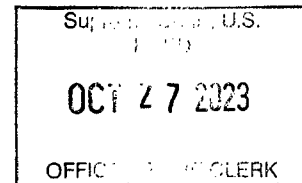
ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES

STEPHANIE MORGAN,
Petitioner,

vs.

PRIME WIMBLEDON SPE, LLC, et al.,
Respondents,

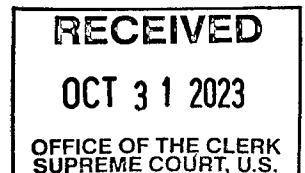


On Petition For Writ Of Certiorari To
Oregon Supreme Court, Case No. S069744
Court of Appeals No. A176581
Multnomah County Circuit Court No. 21LT02536

PETITION FOR REHEARING

Stephanie Morgan, Pro Se Petitioner
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IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR REHEARING

Petitioner, Stephanie Morgan, respectfully petitions the United States Supreme Court for a rehearing of this Court's October 2, 2023, Order denying the petition for a writ of certiorari to review the judgments from the Multnomah County Circuit Court No. 21LT02536; the Court of Appeals No. A176581; and, the Oregon Supreme Court No. S069744.

REASONS FOR GRANTING THE PETITION

This Court's Rule 44.2 authorizes a petition for rehearing based on "intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented." The substantial grounds not previously presented are found within. A female should live free of fear of being sexually assaulted. A female should live securely in a home, even owned by a property management company. A female, who is SEXUALLY ASSAULTED by an employee of the property management company she rents an apartment from, who then is diagnosed with PTSD due to that incident, who then is forced into MENTAL HEALTH COUNSELING, should have the right to privacy, and the authority to allow strangers into her home in order for she to feel safe and secure, when they are forced to stay at home and conduct all business and health activities from home by the state's government they reside in and by the Federal government. In March 2020 the United States of America experienced something never seen in the 21st Century, it was the COVID-19 Pandemic. Stay-at-home orders and Shutdown orders were set out and occurred for most, if not all, businesses, medical facilities, schools, grocery stores, etc., forcing citizens to conduct from home activities all citizens of the United States need to be able to live, and were used to conducting outside of the home. The State of Oregon ordered

SHUTDOWNS and their residents to STAY HOME as early as March 2020 and did not lift those orders until June 30, 2021. The US Federal Government lifted theirs as recently as May 11, 2023. The incident ruled on by the Multnomah County Circuit Court No. 21LT02536; the Court of Appeals No. A176581; and, the Oregon Supreme Court No. S069744, occurred in May of 2021, after both the State of Oregon and US Federal Government Shutdown Orders and Stay-at-Home Orders were in effect, and prior to both ever being lifted. A female, a single mother of a minor child, and a victim of sexual assault by a former Oregon property management employee, who is ordered and forced to stay-at-home, should be given the right to privacy to conduct Medical Mental Tele-Health appointments in a private place. This case is ideal to address in an unprecedented time of COVID-19 shutdowns and a boom of Mental Health Disabilities. Mental health awareness is a healthcare issue in this nation, and is also a social justice issue in this nation, and so are female sexual assault rights. As Americans, we have a right to access treatment for our mental health disabilities, and when access to mental resources are blocked it can cause a major mental breakdown issue, and a breakdown in our society. Mental health awareness and resources needed to be in full-tilt and increased during the COVID-19 shutdowns, when medical facilities shut their office doors and many American were confined to do their business from home. The COVID-19 Emergency was just lifted May 2023 by the United States Government, so this is a recent and important issue. Many Americans were forced into participating in tele-health communication. Even though an American is living in an apartment, where the landlord has the right of entry, during Mental Health Tele-health appointment conducted at home, the tenant should have the right to privacy and have the option for the landlord to return at a later date. Many Americans are

homeless due to landlords finding an advantage to take, where the tenant has no resource to help them out of. The landlord was aware of my mental health disability and purposely aggravated it and refused to extend the protective rights, and reasonable accommodation, any United State citizen suffering from a mental health disability is entitled to. The Fourteenth Amendment grants United State's Citizens the right to live with their mental health disability without infringement from a landlord or a governing state. Ignoring there was a mental health tele-health appointment being conducted, and the reasonable accommodations on file, were how the landlord, and the State of Oregon, infringed on the Petitioner's rights as a tenant. The Fourteenth Amendment clearly states, "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Like millions of other Americans, petitioner's normal daily living activities were interrupted and upended when COVID-19 shutdowns spread across the nation. Also like millions of other Americans, petitioner made her home in an apartment building.

Exhibits supporting Petitioner's rights presented to the Multnomah County Circuit Court No. 21LT02536; the Court of Appeals No. A176581; and, the Oregon Supreme Court No. S069744:

1. Reasonable Accommodations- Petitioners exhibits 101, 102, 104, 110.
2. Building Code Violations- Petitioners exhibit 111.
3. Entry Notices Plaintiffs exhibits 6, 9.
4. Correspondence regarding maintenance needed, reminder of reasonable accommodations, entry times Plaintiffs exhibits 2, 4, 7, 10, 11.

The question presented is:

Whether COVID-19 shutdowns, along with proof of a Mental Health Disability and Reasonable Accommodations on file with the landlord, allow the tenant privacy, and bar the landlord from discriminating against a tenant's mental health disability and reasonable accommodation, and disallow the landlord from entry, during a Mental Health Psychology Tele-Health appointment, which the landlord was properly notified of prior to posting of the maintenance notice which led to the eviction, for purposes under the authority of the United States Code's Housing Protections, U.S. Dept. of Health and Human Services, Americans with Disabilities Act, Violence Against Women Act, Center For Disease Control guidelines, Housing Urban Development guidelines, and Privacy Act, including all laws governing right to privacy, and the Fourteenth Amendment to the Constitution, purposes.

CONCLUSION

For the foregoing reasons, and those stated in the petition for writ of certiorari, the United States Supreme Court should grant rehearing, grant the petition for writ of certiorari, and review the judgments previously entered relating to this case from the Multnomah County Circuit Court No. 21LT02536; the Court of Appeals No. A176581; and, the Oregon Supreme Court No. S069744.

Respectfully submitted this 27th day of October, 2023.


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IN THE SUPREME COURT OF THE UNITED STATES
CERTIFICATE OF PRO SE PETITIONER

As Pro Se Petitioner, I hereby certify that this petition for rehearing is presented in good faith and not for delay and is restricted to the grounds specified in Rule 44.2

Respectfully submitted this 27th day of October, 2023.


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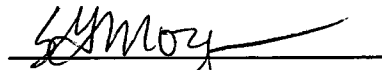
MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following courts:

Multnomah County Circuit Court No. 21LT02536
Court of Appeals No. A176581
Oregon Supreme Court No. S069744

I declare under penalty of perjury that the foregoing is true and correct.
Executed on 27th day of October, 2023.


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DECLARATION IN SUPPORT OF
MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

I, Stephanie Morgan, am the petitioner in the above-entitled case. In support of my motion *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefore; and I believe I am entitled to redress.

1. The only source of income or money coming into petitioner's household is the following listed sources-

Income source	Average monthly amount during the past 12 months	Amount expected next month
Employment	\$500.00	\$1,200.00
TOTAL MONTHLY INCOME-	\$500.00	\$1,200.00

2. Employers for past two years-
Amazon Portland, Oregon September 2022 to February 2023; May 2023 to July 2023;
July 2023 to October 2023.

No prior employer, attended college fulltime to receive bachelor degree from Portland State University.

3. No cash on hand at time of signing, only use debit/credit, at this time my checking account is overdrawn.
4. Assets- Motor vehicle, 2007 Chevrolet Tahoe \$1,000 value if sold to private owner and \$500 if scrapped to a junk yard, recently totaled on October 16, 2023.

5. My son, Robert Morgan, 20, is a person who relies on me for support while he finds permanent work after attending college fulltime.

6. Average monthly expenses-

Rent/Hotel	\$650.00
Telephone	\$80.00
Food	\$200.00
Clothing/Laundry	\$80.00
Transportation (bus, gas)	\$300.00
Insurance (auto)	\$60.00
Extras	\$40.00

TOTAL MONTHLY EXPENSES- \$1400.00

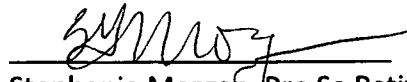
7. Expect any major changes to monthly income or expenses or in your assets or liabilities during the next 12 months- No, we have been homeless since the writ of possession issued in the eviction case in October 2021. We currently live in campsites, hotels, room rentals, etc.

8. I have not paid an attorney, or anyone else for services in connection with this case.

9. Other reasons I cannot pay the costs of this case- I owe \$80,000.00 in federal student loans, I have over \$10,000.00 in credit debt that has gone into collections, and owe about \$25,000.00 in attorney fees to Prime Wimbledon if this case is not decided in my favor. I am on the brink of filing chapter 7 bankruptcy.

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

Executed on 27th day of October, 2023.


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