

**IN THE SUPREME COURT OF THE UNITED STATES**  
**PETITION FOR WRIT OF CERTIORARI**

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

The Order of the Third Circuit of Appeals to review the merits of is attached hereto in writeable format, denying Motion by Appellant to Stay Appeals pending Supreme Court Review of This Court’s January 6, 2023, Order and to File Reply Brief 30 Days After, dated January 9, 2023.

A separate order of the Third Circuit Court of Appeals to review the merits appears at Appendix (“App.”) A, dated January 6, 2023. There is no opinion to publish. I also attach, and incorporate herein and repeat by reference the petition I submitted for filing on February 6, 2023, and all the appendices thereto, which I repeat and incorporate herein, and the In forma Pauperis therein, I attach and file herewith.

**JURISDICTION**

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254 and 28 U. S. C. § 2101(e)(f).

**CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

Pertinent statutory provisions are reprinted in the appendix to this brief, App 1-a to my original Petition under 28 U.S.C. § 1254 (e).

**STATEMENT OF THE CASE**

**I. Plea to the Honorable Justice Samuel Alito, Junior**

One judge may grant a stay pending review by the entire Court of my petition to stay the Third Circuit's proceedings pending review on the two disciplinary proceedings, one where the reviewing Court is a party the Third Circuit, US Supreme Court No. 22-6584, and the other the Disciplinary proceeding brought in retaliation of this Civil rights case and my exercise of my private right to petition, to private religious beliefs, private exercise of fundamental rights without persecution and witness intimidation against me by the state. 42 USC Section 1985 (2). *Citing, New York Times Co. v. Jasclevich*, 439 U.S. 1331, 99 S. Ct. 11, (1978).

Please stay the proceeding below immediately to safeguard my life, license(s) to practice law, liberties and eternal life. US Amend I, V. There is no harm to the public or opposing counsel. Whereas I face irreparable loss and diminished health and possible death should I not be afforded time to care for my life, health as I defend my eternal life, licenses and liberties. I draft in haste to assert my rights so they are not lost with the passage of time.

On or about February 6, 2023, I submitted the attached Application to the Honorable Justice Alito to accept my Petition for Writ of Certiorari before judgment to the Third Circuit, Case Number Case Numbers 22-8037 and 22-2079 Order to vacate a denial of a stay pending this Honorable Court's determination or denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case, should it be received more than three days after the date I mailed it, the due date. (3DI 138). I thought I may only have 30 days to appeal the order. It appears I was wrong and I could plead it before the conclusion of the case, so long as the issue was not moot. 28 U.S.C. § 2101 (e) provides "An application to the Supreme Court for a writ of certiorari to review a case before judgment has been rendered in the court of appeals may be made **at any time before judgment.**" (emphasis intended). *See, Air Line Pilots Assn., Int'l v. UAL Corp., Fed. Sec. L. Rep. (CCH) P 95209, Fed. Sec. L. Rep. (CCH)*

¶ 5209, 114 Lab. Cas. (CCH) ¶ 2027, 897 F.2d 1394, Fed. Sec. L. Rep. (CCH) ¶ 95209, Fed. Sec. L. Rep. (CCH) P95209, 133 L.R.R.M. (BNA) 2863, 114 Lab. Cas. (CCH) P12027, 1990 U.S. App. LEXIS 3764 (7th Cir. 1990).

On February 7, 2023, I filed Appellant Plaintiff Meghan M Kelly's Motion to stay the Proceeding until the conclusion of the appeal of this Court's Order at 3DI 131 Order denying a stay. I further move the Court, for good cause for permission to file the "Reply to Opposing Counsel's Brief" motion 30 days after the stay is lifted Petition for Writ of Certiorari before judgment pursuant to 28 U.S.C. § 2101 (e) to the United States Court of Appeals for the Third Circuit, Case Number Case Numbers 22-8037 and 22-2079 to vacate a denial of a stay pending this Honorable Court's determination or denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case. (3DI 138).

I had surgery as a teenager. I must rest and drink gallons of water in order not to harm my health or die. This is an inconvenience upon others, but I assert my right to live despite that inconvenience. I do not feel well at all. I have religious objections to healthcare and mental healthcare. I believe people go to hell for referring people to charities or businesses to buy products or pay professionals under the guise of helping them. I believe people go to hell for blaming hurting people for not paying for products or professionals when they suffer or die. It is my religious belief business greed is the lawlessness spoken of in the bible leading to hell without repentance. It is my religious belief courts may save people from hell by helping the blind see. I believe people go to hell for being blinded to care for their own. They are prevented from seeing clearly to discern the harm or oppression they cause others by doing what they are trained to do, what their bosses require, or the minimal they are hired to do. I believe courts save

people from hell correcting them from business and organizational activities which oppress, kills, or harms other precious people for mere position, profit or power.

I believe charities, not for profits and businesses who receive grants or government contracts are in danger of damnation in hell for enslaving people to pay debt and debt interest to the private federal reserve for what the bible calls unjust gains in the fixed, subpar, not free economy. I believe criticism helps us improve and saves people from hell too. Criticism, pointing out errors and correcting one another is what the bible calls salt. It drives out pride with humility, teaching us to care for others, not exploit them for profit. I believe criticism and free speech not money innovates. I believe money stifles innovation by creating an incentive not to improve products or services so entities may gain more unjust gains in violation of US Amend XIII, and my religious beliefs US Amend I. Should this Court think my religious beliefs are repugnant, I will respect this Court. I love a lot a people who disagree with my beliefs. I will always respect them. I trust in God, not people I love though. I have a private right to believe differently and exercise my religious beliefs so as not to violate my belief in Jesus. The state finds my religious beliefs as a reason to prosecute me. (Citing, Petition at 7, August 23, 2021 Letter.)

I demonstrate a (1) reasonable probability that four Justices of Supreme Court would vote to grant certiorari in case because it determines whether a professional must sacrifice her private fundamental rights to petition, to religious belief, to exercise belief, to associate as a Christian to buy and sell as a professional; (2) a significant possibility that Supreme Court would reverse judgment below since it is not normal for the State to send its agents including the Delaware Supreme Court's arm's, another Delaware Judge from the court of common pleas to commit witness and party intimidation against me in violation of 42 USC Section 185 (2) during Kelly v

Trump, and blatant procedural due process violations during both *Kelly v Trump* and the disciplinary matter to cause me to forgo my right to petition and top affect the outcome, to seal my petitions', to prevent discovery, to fire material witnesses and to collude with the Defendants to conceal state misconduct, den me the opportunity to perform discovery, call witness, to have access to my records in No 541, to appoint counsel despite my assertion of my right to self-represent per my religious exercise under the 1<sup>st</sup> and my 6<sup>th</sup> amendment right, despite no motion filed by opponent, to persecute me for my faith in Jesus Christ, not money as guide and God; and (3) likelihood of irreparable harm, assuming correctness of applicant's position, if judgment is not stayed. *Packwood v. Senate Select Comm. on Ethics*, 510 U.S. 1319 (1994).

The harm towards me is harm to physical health and loss of fundamental rights, loss of the opportunity to be heard because of substantial burden poverty creates to my access to the courts, and my religious belief against debt. I incorporate herein by reference my In forma Pauperis outlining my religious belief people go to hell by creating debt and owing debt. This is my genuine. I believe many people go to hell, which makes me so sad. I keep myself holy and separate. *Matthew 7:13-15, Luke 13:23-28, Isaiah 10:22*. I should not be compelled to go to hell in order to practice law or for the mere opportunity to privately petition the courts to safeguard my religious belief and exercise of belief in Jesus Christ.

My reply to the Defendants response is due February 24, 2023. Yet, I do not feel and do not want to die for my faith in Jesus. Please grant me a reprieve. This may cause other jurisdictions to stay their decisions too. Please do not compel me to harm my health and potentially die for the convenience of those who do not care for me. Please help me, even if you find my religious-political beliefs repugnant. Even if the Third Circuit grants my plea, and I go back to the Delaware District Court, I require rest due to my surgery I had as a teenager which I

discuss and refer to below. I assert my right to live and not harm my health or diminish my years for the lusts of the state. This Honorable Court's grant of a stay may help fend off the incessant papers in other reciprocal cases, especially the PA State Disciplinary case where I have been retired since 2018. Please help me. I repeat my arguments I presented to the Court on February 6, 2023 below.

## **II. Background of the DE-Disciplinary Matter and DE Civil rights Case with argument a stay is required to preserve my life and health**

This case arises from Defendants, the Delaware Courts and the arms of the Court interference in my RFRA law suit against former President Donald J. Trump in an attempt to intimidate me a to cause me to forgo my case based on the Defendants disdain for my religious-political beliefs contained in my speech, in my petitions, or poverty. (Docket Item of the District Court "DI" DI 2-4, Third Circuit Docket Item "3DI" 3DI )

I initially brought Kelly v Swartz, et al, on or about October 25, 2021, for equitable relief, and **damages** caused by the Delaware disciplinary counsels', court members' and the State's interference in my Religious Freedom Restoration Act lawsuit ("RFRA") against former President Donald J. Trump (referred to as "Kelly v Trump"), in violation of 42 USC §§§ 1983, 1985, 1988. I sought claims for emotional distress, First Amendment violations, loss of employment opportunities, or other economic harm, and harm to my reputation. (DI 2-4, 3DI-118-4, Complaint in the District Court with Exhibits thereto).

I also sought claims for Defendants' selective prosecution in bringing a disciplinary action against me to demean my reputation by placing me on inactive disabled to conceal Defendants' misconduct in collusion with the Delaware Supreme Court, and to punish me for

exercising the right to access the courts and First Amendment rights, based on Defendants disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. Id.

I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from *Kelly v Trump*. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and *Kelly v Trump* due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85, Attached January 24, 2022 Motion to Amend the Complaint at 3DI-43 App. C). The District Court never made a ruling on my motion(s) to amend the Complaint, unless App. B was meant to rule on those outstanding motions too. I have a right to amend the Complaint once before the service of the Complaint. FRCP 15. (App. C,D,F,G,H,I,K, incorporated herein by reference). The Complaint has not been served. I reserved the right to amend my complaint in my Brief on appeal, as a matter of right, and in other cited documents prior to the District Court rendering an order which is the basis of this appeal. (3DI-98, App D), and Id).

The facts are changing constantly, Patricia Swartz left the ODC and is working for the state at another arm's office. Two of the judges I sought to add to the law suit are leaving the Delaware Supreme Court possibly to evade the law suit per the attached motion to recuse the

Honorable Justice Reeves, I incorporate herein by reference. (3DI-128, App. E) In Motion(s) for reargument in the District Court, I pled my need to amend the Complaint to include the Delaware Supreme Court members as Defendants in the proceeding since the evidence shows they violated my procedural due process in both *Kelly v Trump* and in the Delaware Disciplinary proceeding and actively secretly concealed evidence material to my case in both proceedings to fix the outcome. (DI-20, DI-21,DI-23,DI-34, DI-35, DI-36, DI-39, also see DI 58)(Citing App. C, D, F, G, H, I, J, K). I showed evidence of harassment and bad faith malicious prosecution. I even wrote the Delaware District Court a letter concerning new and additional information by Office of Disciplinary Counsel Patricia Swartz's bad faith prosecution brought to harass me and attaching documents to show she sought to fix the outcome to persecute me for my individual private religious beliefs and to cover up mistakes and misconduct instead of correcting them. (DI 29 for example App. L)

Defendants disciplinary Order caused reciprocal law suits to be filed against me in 1. the state of PA, 2. District Court for the Eastern District of Eastern District of PA, 3. Delaware District Court, and 4. Third Circuit Court of Appeals. Any determination by the United States Supreme Court on the appeal of the Original Disciplinary case will affect the 4 other disciplinary cases and material issues in this civil rights case. A stay in this cause, would set precedent for the other cases to stay in order not to duplicate work, issue conflicting judgments, or cause a substantial needless burden to my access to the courts due to poverty and religious beliefs against debt by having to fight 6 law suits at once relating to the same subject matter. (App. H,I, J, K,L,M,N,U, P,Q,W). I incorporate my motion for permission to file in forma pauperis filed herewith simultaneously with this petition outlining my genuine religious beliefs against debt. I also incorporate herein by reference my Motion in the before the PA Supreme Court to exempt



potential costs by PA-ODC and other fees, taxes or costs, which outlines my religious beliefs against debt. (App. V, 3DI-123-2).

The Third Circuit Court kindly held I may proceed on the original record in this Court reducing the need to file a complete appendix. (3D-24) This Court also kindly held, “Appellant need not conform to structure of a formal brief and may submit one principal brief not to exceed 45 pages.” (3D-67) I incorporate my appellate brief and all documents referred therein by reference. (3DI-98, App. D )

I do not want to risk eliminating my right to access to the courts to prevent irreparable injury in the form of the Defendants infringement upon my free exercise of religious-political belief, exercise, speech, association or my right to petition on grievances. Nor do I desire to lose my property interest in my Delaware license to practice law. A lawyer’s right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state’s disagreement with my religious-political beliefs contained in speech in religious-political petitions. So, I write with haste. Rights imperfectly asserted under the duress of days to file, are better than waiving rights for failure to file.

In my motion and corrected motion for an extension of time I indicate the importance of having people as opposed to automation to correct filing errors by the Court. I believe Court staff and judges will be reduced in number to be eliminated as schemed by participants in the World government summit and World economic forum by automation of standardized professions, including the practice of law. (3DI-95-96) I also pointed to other filing errors by other courts. Id. Errors are not the problem. Failure to correct them or retaliation against those who point them out or make them, is the problem. The Disciplinary case was brought in

retaliation against me for asking the Court to correct government violations of my Constitutional right to freely exercise my religious-political beliefs, religious-political beliefs, speech, association, by exercising my right to petition to safeguard these rights from government infringement. On the record I point to retaliation by the courts, including yet not limited to the Delaware Supreme Court to correct its own or its agent or the government's agent as a problem. (DI 2 exhibit labeled, A-4, A-5, App C, D, F, G, H, I, J, K, L, R, S, T, Z, AA, BB, CC). Instead of addressing my petitions, the Delaware Supreme Court concealed them by sealing my petitions, terminating two of the Court staff I complained and prevented me from performing discovery to prevent me from discovering additional fraudulent acts to cover up its misconduct by fixing the proceeding it participated in. The retaliation discourages citizens, including me, from exercising their right to access to the courts to petition the courts to correct the Court's own errors or violations of law or errors by its arms or agents. This is one reason for this case. (DI. 2-4, 43, See, Dec 11, 2020 letter not attached to 3DI 98);(App. D, R,S,T,Z,AA,BB,C).

I also note, the Third Circuit Court chilled my meaningful access to the courts by discouraging me from contacting the Court more than once a day in an Order in retaliation for my motions to correct the Third Circuit's record to prevent irreparable prejudice against me. The Court also discouraged me from correcting motions, as other lawyers do in the common course of filing pleadings, especially in emergencies. The Third Circuit threatened me with sanctions which violate my religious beliefs in Jesus against debt in order to chill my exercise of petitioning in this case to defend my exercise of First Amendment rights and my property interests in my licenses. US Amend I, V (3DI-90). During that time, my case manager was out on the civil rights case, and my case manager was out on the other case before the Third Circuit.

I note with prejudice that the Third Circuit's Order I sought reconsideration from is based on a false assumption, a misleading statement, that appears to be made in bad faith to cover up the Court's error that I filed an emergency motion when the record shows I mailed in the documents I sought to remove from the record. ( 3-DI 86-90). There is proof of postage. (3DI 87-10-11) I incorporate by reference my petitions to correct the filings, and related motions including but not limited to (3DI 87-88).

This is unacceptable. The courts are not above the Constitution. The Courts' goal is not to safeguard its mere appearance of justice by compromising actual justice which guarantees injustice. The Courts are not a business. Judges should not be concerned with their appearance or their self-serving desire to market their value or legitimacy, which eliminates impartiality by making the court's focus on fickle fads, and pleasing the mob, and doing what serves their seats instead of doing what is right, impartially under Constitutional law.

I desire to safeguard the integrity of the Courts by requiring they do not sacrifice people, and their individual exercise of their Constitutional rights, as the Defendants seek to sacrifice me for the exercise of my rights. I seek to preserve the integrity of the courts not destroy them. I do not seek to destroy this Court or the Third Circuit Court of Appeals or the Delaware Chancery Court or the Delaware Supreme Court, but I do seek to hold them to the letter of the Constitutional law. If I am disparately treated in bad faith to fix the outcome or to throw out my case in various forums for the mere convenience of the court, and with malice and disdain towards me for my religious-political beliefs, speech, association or petitions, than others also may be unlawfully chilled by the Courts from exercising their right to access to the courts in defense of fundamental rights. US Amend I, V, XIV (DI 2-4) Such precedent in my case creates a danger to the public to serve mere business greed, profit, power and position, not good by

respecting all without disparate treatment based on income or belief. I object to misleading statements noted on the Third Circuit's record made with intent to chill my exercise of the right to petition, even to petition to make corrections, in defense of my fundamental rights, or to prejudice my appeal. (3DI-77-90).

The Delaware Supreme Court placed my license on inactive, disabled on August 11, 2022, and denied my motion for rehearing on multiple issues.

The evidence shows the Delaware Supreme Court and Chancery Court or their members or agents incited or participated in the conspiracy to interfere, harass, or pressure me to forgo my case against former President Donald J. Trump, and substitution of President Biden for Donald J. Trump to protect my free exercise of religion, speech, and association from a government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoinder of Executive Order No. ("Ex. Or.") 13798, maintained and reestablished by President Biden by his enforcement of E. Or. 13798, and President Biden's enforcement of E.Or.13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. 13199, Jan. 29, 2001, as revoked by Ex. Or.13831, May 3, 2018; Ex. Or.13279, Dec. 12, 2002, as amended by Ex. Or. 13559; No. 17, 2010; Ex. Or.13559; Nov. 17, 2010; Ex. Or. 13831, May 3, 2018 and Biden's enactment of Ex. Or. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations based on a bought or bartered for partnership between government and religion, not based on safeguarding freedom from forced government religion or forced relationships with religious entities to gain the bartered for government support through such religious entities.

The money in the bought, not free union of church and state, is one reason why religious-political attacks seemed to increase in recent years. President Biden's Valentine's Day Executive Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to be bestowed to religious organizations like churches in other countries.

The Chancery Court and Delaware Supreme Court's agents' or members' interference in *Kelly v Trump*, and participation in retaliation against me in instigating a petition to disbar me as an active attorney for the exercise of Constitutionally protected rights were motivated by their member's or agent's desire to suppress or demean or disapprove of my petitions, religious beliefs, speech, political associations, and or poverty in violation of the First Amendment applicable to Defendants pursuant to the Fourteenth Amendment and in violation of 42 USC § 1985(2)(b) and 42 USC§ 1983. While my claims for the state's witness and party intimidation against me, including sending Court of Common Pleas Judge. Kenneth S. Clark to threaten me to cause me to forgo my appeal to the Delaware Supreme Court at the request of members of the Delaware Supreme Court, my retaliation claims by the State for my petitions relating to bar dues and *Kelly v Trump* remain. *Id.* Requiring the case be dismissed would insidiously and in bad faith time bar my claims, essentially making courts above the law allowing the whims of individual judges without restraint in terms of the Constitutional limits of state's conduct to preserve the liberties under the First Amendment. (3DI-128-4, the complaint, App. Nevertheless, a stay is required to prevent until the original Disciplinary proceeding is appealed to this Honorable Court to prevent irreparable injury to me in terms of loss of my right to exercise fundamental rights and my health. My case is also important to outline the limits judges may conduct themselves, not by self-regulation or by third party regulation which creates

injustice and partiality towards those who regulate individual judges, but by the Constitutional limits of a case and controversy by law suit or impeachment.

The August 23, 2021 letter the District Court refers to in his memorandum refers to both the Chancery Court and the Delaware Supreme Court private-religious-political pleadings or petitions as the reason for the Defendants' petition against me to disbar me as an active lawyer based on my faith in Jesus, per paragraph 7, in the petition. (App. D,F,H,I,J,K,L,R,S,T,AA,BB, CC,) Though it is remarkable that the District Court offers assurance of the Delaware Supreme Court's jurisdiction on State, the Delaware Supreme Court, and officer's own own interference and witness tampering in Kelly v Trump in violation of Procedural Due Process and section 1985, and misconduct in the disciplinary proceeding, including concealing material evidence pleadings and witnesses and committing due process violations in violation of the 1<sup>st</sup> and 14<sup>th</sup> amendment which shock the conscience. (App F,G,H,I,J,K,M,L)

I am very upset. My religious belief and my religious exercise of belief is the most important thing in my life, and is more important than money or material gain. I should not be attacked by the individuals within the courts because they find my religious beliefs repugnant, nor should I be compelled to violate my belief in order to buy and sell as an attorney by force, not government forced choice in violation of US Amend XIII and I, in contravention of my religious beliefs.

The Delaware Supreme Court may initially have had pure motives, concern for poverty by reporting my poverty to Judge Clark and the arms of the Court. Those motives appeared to sour since the Delaware Supreme Court never responded to my second letter relating to relief from lawyer registration fees. (3DI-6, DI-2) The Court cited a case in its disciplinary order where another lawyer contested bar dues and lost.

The Delaware Supreme Court agent ignored my requests to attend a Delaware CLE, which was unusual for her, and appeared to be in conspiracy to retaliate against me and black ball me from participating in activities open to Delaware barred lawyers, based on the petition Defendants brought against me concerning my belief in Jesus. (DI-2, 3 DI-6)

In addition, one of the Delaware Supreme Court justices came into the law library and asked for federal court jury instructions, I believe to prepare to sue me or help a court agent sue. (3DI-6)

The evidence shows a member of the Chancery Court appeared to seek to sabotage my case by preventing me to almost miss my filing deadline, and by instructing me to cross off local counsel's address to prevent service, to prevent my case going forward based on her disagreement with my political, religious beliefs or to cover up mistakes or misbehavior. The same staff member appeared to write on my October 5, 2021 praecipes, and underline the praecipes I drafted on October 12, 2021 to testify and be a witness without cross examination for the appellate justices, instead of filing them as I presented them, unmarked. I did not want her to get into trouble. Delaware Supreme Court agent Attorney Robinson signed off on her, Arline Simmon's termination form as well as Katrina Kruger. I did not want the court to fire two people then prevent discovery and my request to call Arline as a witness to cover up the State court's misconduct. (DI 2-4, Citing 3 DI-6, DI 58, App. K attached praecipes, regarding the need to amend as a matter of right, and firing of two court staff to prevent their material testimony prior to District Court's Order at DI 59).

In April, 2020, Judge Kenneth S. Clark of the Court of Common Pleas interrogated me at BJs a bulk grocery store, located in Millsboro, DE in a threatening matter, apparently backed by

the Office of Disciplinary Counsel (“ODC”), disapproving of my religious beliefs and law suit against Trump and bar due petitions. (DI 2-4, Citing 3DI-6, App. D,R,S,T).

The evidence, if accepted as pleaded shows the Delaware Supreme Court through its members or agents instigated the ODC’s proceeding against me which creates manifest prejudice against me, or at the least the appearance to instigate the disciplinary proceeding against me, giving the appearance of lack of partiality, and inability to grant me a fair trial in the disciplinary matter.<sup>1</sup>

To worsen the matters, the Delaware Supreme Court sealed my petitions in Kelly v Trump regarding to the Court’s members, arms and agents due process violations (App. R,S, T) I attach here and incorporate herein as App. R and S.to prevent the pleadings to be used in m defense in the planned retaliatory disciplinary proceeding against me brought in bad faith, fraud and collusion to demean my character rather than to improve the administration of justice by correcting, not concealing procedural defects by firing staff and sealing pleadings in secret to collude in the outcome of the disciplinary proceeding to demean my character. (App.C, D,F,G,H,I,J,K,L, R,S,T,Z,AA,BB,CC). I attached file and serve’s proof the pleadings were sealed during Kelly v Trump. Id.

---

<sup>1</sup> US Const. Amend I, XIV (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) (“Petitioner is entitled to a neutral and detached judge in the first instance.”); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) (“excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error. ....“Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party...”); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).



The District Court is the only Court that may address the state's intimidation and interference of me a witness and party in *Kelly v Trump* to cause me to forgo my case.

The District Court is the only trial Court which may determine whether both *Kelly v Trump* and the disciplinary Order are void for procedural due process defects that shock the conscience and deny me any fairness offered to most other claimants, despite the State Court's bad faith recitation of the rules, the fixed, fraudulent transcript which did not accurately transcribe my testimony. (See, *May v. Anderson*, 345 U.S. 528, 537 (1953) "It is void ... if it denies due process of law."); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments " are void for lack of due process of law, or should be set aside for error.").

The District Court is the only Court which may issue relief for damages, nominal and equitable relief including reinstating my license, or an order requiring I not violate my religious beliefs in exchange with the fundamental right to petition, or additional relief I request once afforded the opportunity to amend the complaint as a matter of right.

The State proceeding has concluded. Albeit there is an appeal before the United States Supreme Court. The District Court did not analyze any of the substance of my complaints or motions, and has abstained under *Younger*. So, the Third Circuit's review on appeal is limited as to whether *Younger* applies at this time, not the merits of my complaint and motions.

In my brief at 3DI-98, App. D, I argued in *Younger* does not require abstention to my case. There is no state case to abstain from. The state case has concluded. There is no bar. Even if there was a case: 1. *Younger* does not apply to my claims for damages. The Court erred by dismissing instead of staying the case 2. *Younger* does not apply to federal constitutional claims in the or ancillary claims I had no opportunity to assert on the state forum. For example,

42 U.S.C.A. §§§ 1983, 1985, 1988 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate 4. The Court erred in denying my motion to amend the complaint to include procedural and substantive due process violations, equal protections violations, and other conduct and claims that required I add the Delaware Supreme Court and the members to my complaint on January 24, 2022. (DI 43, App. C) I should be granted leave to amend the complaint, to correct any defects or arguments relating to a Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rights, and government punishment for the exercise of my rights, including the right to petition. 5. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession (3DI-98, App D)

I submitted a writ of certiorari to this Court appealing the Delaware Disciplinary case and a Third Circuit reciprocal Disciplinary case No.22-6584. (App. O and P). The Delaware petition was not accepted, as of Saturday February 4, 2023, I am not in receipt of the letter regarding why it was not filed. Upon information or belief upon talking with my case manager. It is because I filed a Motion for leave to add additional words, attached hereto and incorporated herein, prior to not simultaneously with my petition. (App .P ).

On or about On or about January 4, 2023, I filed a Motion for a Stay (3DI-129), with a letter noting corrections (3DI-130) I incorporate herein in its entirety.

I filed two Motions for a stay in the Delaware District Court. (3-DI. 95-4 pages 1-183, also see App. U). The District denied my latest motions. App. B.

Per the attached Order, dated January 6, 2023, the Court granted my petition for an extension in the amount of 45 days, but denied my request for a stay. (3DI 131, 3DI-126, App. A, App. N).

The Third Circuit abused its discretion by denying my Motion for a stay in the civil case until the Delaware State Court discipline decision and Third Circuit of Appeals discipline decision is determined by the US Supreme Court or until a writ of petition for Certiorari was denied, under the extraordinary circumstances.

I respectfully request this Court pursuant to Supreme Court Rule 23 order the civil rights proceeding stayed pending an outcome before this Court or denies review for both the Third Circuit and the Delaware Disciplinary proceeding, which is based on the same subject matter.

The balance of the equities and case law regarding parallel proceedings show the Third Circuit Court committed clear error of law, assuming all facts pled are deemed true as required, clear error of law, creating manifest injustice against me. I am not practicing law. I am acting as a private person standing up for my right to live, exercise First Amendment private speech, First Amendment private religious belief, First Amendment private exercise of religious belief, First Amendment right to association, First Amendment private exercise of the right to petition without government persecution, but for the exercise of my First Amendment rights, no matter if the State finds my belief in Jesus Christ illogical. It is not for the state to dictate who or what I worship, and my God teaches you can serve God and money. Do not seek material things what you will eat or what you will drink, seek the kingdom of God. (*Citing, Bible, Matthew 6:24-34*).

### **III. EXTRAORDINARY CIRCUMSTANCES WARRANT A STAY**

Extraordinary circumstances warrant a stay. Other Courts in disciplinary law suits against me have simply ignored my Motions regarding a stay. The District Court for the Eastern District of PA ignored my motion for reargument on its denial for a stay. (3DI-119-1). The PA Supreme Court refused to docket two motions, a second motion, and my motion to exempt any fees, costs or taxes by the state through opposing counsel. (3DI- 122 and 123 and all sub-sections. (App. V, W, X, Y) I am threatened with harm to health and even possible death due to severe dehydration should this court not accommodate me by granting me time I require to sustain my life and health in addition to defending my liberties before the Courts. ( App.DD, EE). I have religious objections to healthcare and mental healthcare. Due to bad health care, I received as a teenager, I am required to drink gallons of water and rest in order not to faint, harm my health or die. None of the Courts or disciplinary counsel care. (V,W,X, Y,DD, EE). I noticed all courts ignore my asserted requirement. I am not hiding it. I assert my right to live. I became so weak due to getting steamrolled and having to defend my faith in Jesus without government persecution that I actually collapsed at the post office causing the postal service lady to enter my information incorrectly delaying delivery by a day to PA ODC. I pled about this in another Court. I also sought relief from the PA ADA administrator because I did not want to die in order to stand up for something more important than my life here, my faith in God. Id. The state representatives denied relief in the form of time. In other reciprocating lawsuits the Courts, the state through disciplinary counsel cared not about broken computers, broken printers, lack of resources, lack of transportation and my severe allergies with anaphylactic shock towards many toxins, or fainting because I require time to drink gallons not cups of water and rest. I have sincere religious objections to health care and mental healthcare.

I will likely overturn the Delaware Supreme Court decision on appeal for procedural due process violations. (App. C,D,F,G,H,I,J,K,L,R,S,T) It is not normal for Courts to conceal evidence in the accused favor my pleadings to fix the outcome. Nor is it normal to terminate Court staff witnesses, preventing their discovery to conceal Delaware Supreme Court collusion of concealing material witnesses necessary to my defense. The State forums disparately denied me of orders by ignoring motions or rendering email orders, lying by stating notice is sent out on a date I was not served and no opposing counsel was appointed yet, and other blatant procedural due process violations based on disdain for my religious political beliefs, speech, affiliation and petitions.

The Defendants are allowed to think my beliefs are repugnant. Even if they think my religious beliefs are offensive, people who have beliefs that allegedly repugnant are protected by the First Amendment from government persecution for their religious beliefs, speech, petitions, exercise of beliefs and affiliation. US Amend I, XIV.<sup>2</sup>

My beliefs are genuine. I believe in Jesus but I do not want to be persecuted by the government through government agents or government incitement of private conduct which selectively targets me based on unconformity with government religious belief.

Any determination by the US Supreme Court will affect this case, albeit I seek relief for state interference and procedural due process violations in Kelly v Trump too. The fact I have an appeal naming the Court below as a party creates a conflict of interest too.

---

<sup>2</sup> *Tate v. Cabbage*, 210 A.2d 555, 557, (1965), (“It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings.”)

There is evidence the Delaware Supreme Court retaliated against me for two petitions in January 2020 and February 2020, as well as petitions in *Kelly v Trump*. The statute of limitations will soon expire to seek relief for the retaliations against me for petitioning the Court for relief on bar dues. See, *Crane v. Fauver*, 762 F.2d 325 (3d Cir. 1985). I must be afforded meaningful opportunity to plead in the civil rights case without waiving my right to an opportunity to be heard in the other five related disciplinary law suits against me, but for suing the President to preserve the wall between religion and state.

**IV. Case law shows federal courts have no discretion to dismiss a parallel case. but are required to stay. A stay is required because I asked for money damages, nominal damages and equitable relief like voiding *Kelly v Trump* not available in the state Forum.**

A stay is required since I requested relief not afforded in the state forum, including but not limited to monetary relief and relief under 42 USC § 1985 for the Defendants' interference in *Kelly v Trump*, in addition to relief relating to In the Matter of Meghan Kelly Case No 22-58. (DI 2-4, 20-21,34-43, 50-58., App C,D,F,H,I,J,K,L).

Only the federal Court may hear certain claims for First Amendment violations, emotional distress, loss of employment opportunities, witness interference under 1985, other economic harm, and harm to my reputation. (DI 2-4).

My claims for damages and other equitable relief were unavailable in state court. The State Court has no power to void *Kelly v Trump* during the disciplinary proceeding.

In *Deakins v. Monaghan*, the Supreme Court held only that "the District Court has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the

state proceeding.”<sup>3</sup> Since the United States Supreme Court indicates the District Court has no discretion and must stay and may not dismiss my civil rights case, the Delaware District Court

---

<sup>3</sup> *Citing, Deakins v. Monaghan*, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988) “In reversing the District Court's dismissal of the claims for damages and attorney's fees, the Court of Appeals applied the Third Circuit rule that requires a District Court to stay rather than dismiss claims that are not cognizable in the parallel state proceeding.”); *See also, Brindley v. McCullen*, 61 F.3d 507 (6th Cir. 1995); *See also Quackenbush v. Allstate Ins. Co.*, 517 U.S. 706, 719 (1996) (“we have applied abstention principles to actions ‘at law’ only to permit a federal court to enter a stay order that postpones adjudication of the dispute, not to dismiss the federal suit altogether.”); *Lewis v. Beddingfield*, 20 F.3d 123, 124 (5th Cir. 1994). (It was proper to stay rather than dismiss the federal suit because the damages could not be claimed in the criminal prosecution.); *Jones v. Prescott*, 702 Fed. Appx. 205, 209 (5th Cir. 2017) (Younger abstention does not apply to federal suits seeking only money damages) (citing *Alexander v. Ieyoub*, 62 F.3d 709, 713 (5th Cir. 1993)); *See also, Boyd v. Farrin*, 575 Fed. Appx. 517 (5th Cir. 2014); **Third Circuit:** *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at \*4 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (A court “has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”); *Abbott v. Mette*, No. CV 20-131-RGA, 2021 WL 327375, at \*3 (D. Del. Jan. 31, 2021), report and recommendation adopted, No. 20-CV-131-RGA, 2021 WL 1168958 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (“As a general matter, assuming that a federal court has jurisdiction over a case, the federal court's “obligation to hear and decide [the] case is virtually unflagging.” *Sprint Commc'ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013) (internal quotation marks and citation omitted); *Crane v. Fauver*, 762 F.2d 325 (3d Cir. 1985) (“District court should have retained jurisdiction over correctional officers' civil rights action arising out of their discharge, even if it properly declined to exercise jurisdiction over federal claims, and stayed action pending outcome of related state proceeding where officers were relegated for prudential reasons to state proceeding which could only afford them dismissal of charges and back pay, with attorney fees only to extent that back pay award was reduced by interim earnings, but officers sought constitutional damages and attorney fees, and new complaint upon termination of state proceedings may have been time-barred.”); *Williams v. Hepting*, 844 F.2d 138, 145 (3d Cir. 1988) (The Third Circuit held, “Accordingly, we hold that the district court should have stayed instead of dismissed without prejudice Williams' failure-to-investigate and suggestive pretrial identification claims. Because these particular federal court claims for damages seek relief that is unavailable in Williams' ongoing state proceedings, the allegations should be stayed pending the outcome of his state court appeal on the underlying conviction.”); *Nimer v. Lichfield Twp. Bd. of Trustees*, 707 F.3d 699 (6th Cir. 2013) (Younger abstention applies to § 1983 damages claims, but district court must stay rather than dismiss federal suit; in other words district court has no discretion to dismiss federal suit); *Carroll v. City of Mount Clemens*, 139 F.3d 1072 (6th Cir. 1998) (when federal suit seeks damages and Younger is invoked, federal suit should be stayed, not dismissed; this likely will be a formality, given probable preclusive effect of state court decision); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at \*8 (S.D. Ohio Mar. 7, 2022) (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case

abused its discretion as a matter of law, as a matter of fact, creating manifest injustice against me in the elimination of the opportunity to be heard in the only forum which may offer me relief. US Amend I.

“Federal district court must stay rather than dismiss claims that are not cognizable in parallel state proceeding.” *Deakins v. Monaghan*, 484 U.S. 193, 202, 108 S. Ct. 523, 529–30, 98 L. Ed. 2d 529 (1988) I made it clear to the District Court, I pled defamation, Constitutional injury and emotional distress, by pleading damages, albeit unartfully in my original Complaint. (DI 2, 34-35). In addition, I showed my intent to seek nominal damages, damages, and equitable relief too. (D.I. 43, 58, 69-75, 77-79, App C.D, 3DI-118-4).

A court must stay claims for monetary relief that cannot be redressed in the state proceeding, and may not dismiss the case. *Citing, Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at \*4 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021); *See, Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at \*1 (S.D. Ohio Mar. 7, 2022).

Staying this action is required. *See, Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct.*

---

rather than treat each form of requested relief differently.”); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at \*3 (S.D. Ohio July 27, 2021) (Court “stayed until the conclusion of the state disciplinary proceedings, rather than be dismissed.”), *citing, Kalniz*, 699 F. Supp. 2d at 975 (explaining that where a plaintiff is bringing constitutional civil rights claims in a federal court case in which *Younger* abstention was proper, the stay protects against the possibility that the statute of limitations could deprive the plaintiff of the opportunity to present the merits of her damages claims); *see also Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001) (and cases cited therein); *Yamaha Motor Corp. v. Stroud*, 179 F.3d 598 (8th Cir. 1999) (when damages are sought in § 1983 action subject to *Younger* abstention, and damages are not available in pending state proceeding, federal action should be stayed, not dismissed); *Night Clubs, Inc. v. City of Fort Smith*, 163 F.3d 475 (8th Cir. 1998) (when § 1983 complaint seeking damages is subject to *Younger* abstention, federal action should be stayed rather than dismissed).



*of Ohio*, No. 1:18CV645, 2021 WL 3173311, at \*3 (S.D. Ohio July 27, 2021); *Watkins v. Ohio Dep't of Educ.*, o. 2:21-CV-04482, 2022 WL 672565, at \*8 (S.D. Ohio Mar. 7, 2022); (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”).

**V. A stay is required to prevent increased potentially needless costs from creating an obstacle to my access to the Courts in defense of my first amendment rights, and the compelled violation of my religious belief against indebtedness, duplicity of judgments, and potentially conflicting judgments coming before this honorable court, loss of my 14<sup>th</sup> amendment property interest in my license and loss of my private right to exercise First Amendment right to private religious belief, private religious exercise, private exercise of m right to petition, private right to associate and other harm**

The Denial of a stay creates a risk of loss of my fundamental rights to religious belief, religious exercise of beliefs, political and religious speech, association and the right to petition to the courts to address grievances to safeguard my exercise of religious belief without state persecution but for disagreement with my religious-political speech contained in my petitions,

The denial creates potential duplicity in judgments, creating needless work and loss of resources, substantially burdening my access to the courts, creating an obstacle so great as to deny me access to the courts to defend my license and exercise of fundamental rights, given my poverty and religious objection to debt.

The public is at danger, should my case not be overturned by setting precedent other professionals may lose their ability to buy and sell for exercise of their right to petition, or to hold the government to the Constitutional law.

The denial jeopardizes my health and life. My health has diminished. I require time to maintain my health and life, in light of my specific permanent weakness related to a past surgery, which Defendants and all courts in related litigation have been apprised of, even the Delaware

Chancery and Supreme Court. Without time to accommodate my weaknesses my health will diminish further, jeopardizing my life. (App DD, EE) My life is jeopardized in a different manner. People talked about shooting me for my religious-political private beliefs, private speech and private petitions. Please refer to the Facebook exhibit and see my present sense impression or excited utterance concerning people talking about shooting me. (App. FF) Also refer to my motions to vacate the District Court Order where I indicated the police who helped me by going to look at my car with substance thrown at it due to my private religious-political speech did not make a police report. (App. F).

Fighting multiple cases relating to the same issues at once creates a substantial burden upon my access to this court and the US Supreme Court on appeal, due to time constraints, my poverty and religious beliefs against debt. (*Bible, Romans 13:8*). I require a stay from this Court in order to seek a meaningful opportunity to appeal the Delaware disciplinary order with the US Supreme Court.

A determination on appeal by the US Supreme Court of the original disciplinary matter may lead courts to vacate pending disciplinary proceedings.

A stay is required to protect my meaningful access to the courts, this court and other courts.

The additional law suits have increased costs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs.

I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental rights.

I am utterly poor. A stay is required to prevent a substantial burden and obstacle to my access to the Courts, and compelled violation of my religious belief against debt, in contravention to my First Amendment right to access to the Courts applicable to the State via the 14th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.") *Citing, e.g., Pryor v. Brennan*, 914 F.2d 921, 923 (7th Cir. 1990); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations."). Because this case implicates the [Constitutionally protected] right of access to the courts," in defense of my First Amendment rights of speech, religious belief, religious exercise, and association, the government's decision to grant a stay, based on poverty, is still determined under a strict scrutiny basis test. *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” Douglas, 372 U.S., at 357-358

I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religious-political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian, without government incited persecution, but for my exercise of fundamental rights.

The Delaware Disciplinary proceeding and determination against me creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work at a law firm. The State of Delaware’s conduct harms my reputation to make me less attractive to other employers by harming my prospects of employment by the libelous published accusations against me. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness is protected.

Fundamental First Amendment rights of speech, belief, exercise of belief, and association are implicated, in this case. Thus, this Court must have a compelling reason to deny my request for a stay of the proceeding to prevent irreparable to me, narrowly tailored to meet the important justification.

There is no compelling reason to deny my request for a stay. Defendants are not prejudiced, nor is the public. Nor is any justification narrowly tailored to meet any compelling reason. This Court must grant a stay to prevent an obstacle to my access to the courts. This Court may stay the case, with no prejudice, while potentially avoiding needless work for the court, the appellate courts and the parties.

However, I face an undue burden should this court deny my request for a stay of the proceeding. I risk loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

#### **VI. Factor 1, Interest of the Court**

The Court has a strong interest in judicial efficiency. Staying this action could restructure the proceeding in this Court because collateral estoppel could prevent re-litigation of issues adjudicated on appeal in the original matter and in the civil rights proceeding. In addition, should the US Supreme Court vacate the original disciplinary proceeding, this case may be vacated as well. Thus, the interests of the Court weigh in favor of a stay, to prevent needless waste of judicial resources by a superseding US Supreme Court decision.

#### **VII Factors 2, 3, and 4, Defendant's Interests, third parties' interests and the public's interest**

There is no prejudice towards the Defendants, third parties or the public by a delay, should a stay be granted. I agree not to practice law in this jurisdiction, without this court's authorization. I require time and meaningful opportunity to not only defend myself on appeal in the original proceeding, before needlessly continuing in the civil rights case.

I require time to preserve my life and health too.

The public and third parties are not harmed by a stay. Yet, the public may be harmed if a stay is not granted, by setting a precedent that the state may eliminate Constitutional liberties in a government compelled exchange for the license to buy in sell in a profession. Every citizen, holding a license, may lose Constitutional rights or be in danger of being adjudicated disabled, for merely believing differently than the state, or for standing up for their religious-political beliefs in Court, should I not be granted meaningful opportunity to contest the original case on appeal to the US Supreme Court and in the civil rights case.

I have good cause to contest the decision of the Delaware Supreme Court to place me on disabled inactive, as punishment for my exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and my exercise of the right to make religious-political petitions. The Delaware Disciplinary proceeding is defective on its face. The record shows evidence of fraud, and collusion. The Court was not partial, but instigated the proceeding against me and colluded with the state.

The Delaware Supreme Court's members concealed evidence in my favor to prejudice the fixed outcome against me in aid of the Delaware ODC. The Court denied my requests for opportunity to perform discovery and for adequate time to prepare to hide the fact they

terminated two court staff who are material to my case. The Court also secretly sealed four of my pleadings in Kelly v Trump that were material to my defense. (App. D, R,S,T,Z,AA,BB,CC)

The Record also evidences the State's violations of my opportunity to be heard on ignored motions. The state ignored my motions to perform discovery, opportunity to prepare and present my case, opportunity to call and cross examine witnesses in the sham proceeding brought to cover up state Court misconduct and to punish me for the exercise of my First Amendment rights.

The State Court also criticized me for noting outside circumstances as evidence of disability in its August 10, 2022 Order, while finding those circumstances, including, but not limited to vulture attacks against me and my property, to be legitimate reasons for granting an extension of time. (DI 77 Internal-Exhibit D incorporated herein by reference)

Despite having good cause to contest this reciprocal proceeding. I lack time and resources to appeal the original DE disciplinary proceeding, and the civil rights case. I am unemployed, unable to seek to return to my former law firm. I am left impoverished. My parents indicated they are not able to help me as much as they would like, during this economic downturn. My parents indicated they are actually disappointed with me. They would like me to contribute more. They have indicated they intend to cut off my inheritance. I love my parents more than money, but I love God more and have to stand up for my faith in Jesus without government persecution. Then others even future generations may no longer be free from government compelled belief should I not have courage now.

In the interest of justice, this court must not sacrifice my meaningful opportunity to be heard in all cases, by denying a stay. This court must preserve the right for my meaningful

opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

I plead with this court to grant a stay to grant me time to argue legal justification to overturn the original Delaware Order on appeal, albeit the procedural defects still permit me to argue the order is voidable before the District Court.

**VIII. Factor 5, Prejudice against me is Great, Irreparable injury which may be prevented by a stay, balance of equities favor granting me a stay by overturning the Third Circuit's Order**

The prejudice against me should a stay remain denied is great in the form of harm to health, substantial burden upon my access to the courts, additional loss of my fundamental rights and licenses. I also face the risk of other hardships, related to the loss of the opportunity to work at my former law firm, or any law firm to earn a living in my profession.

I have good cause to contest the decision the Delaware Supreme Court made in placing me on disabled inactive. but for the exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and to make religious-political petitions. Yet I am impoverished. I lack time and resources to fight both the appeal and the civil rights case and other potential reciprocal cases simultaneously. I will face irreparable injury if a stay is not granted. *Hilton v. Braunskill*, 481 U.S. 770 (1987). The balance of the equities require a stay be granted.

Please safeguard my opportunity to petition the courts in defense of my life, health, liberty, license, and eternal life. It is the opportunity to be heard pursuant to the Fifth Amendment applicable to the Federal Courts I seek to protect, not the guarantee of justice.



Human judges are special in that they are more powerful than Congress or the President in that they may lay down selfish desires and the desires of men or the masses to do what is right, by love. They are special in that they may reflect the image of God by love unconditionally, even for those they disagree with or whose ideas they may think are bad or repugnant like mine.

Are human judges perfect? No. It is the mere opportunity to petition them without foreclosure based on religious-political beliefs or poverty which must be protected in order not to violate the 5<sup>th</sup> Amendment Equal Protections component as applied to me as a party of one. I am impoverished, with unique religious-political beliefs. If I am not free to petition, than others may no longer be free in future generations.

**IX. Time is required in the interest of national security to protect the Courts by preventing their self-regulation or third-party regulation in a different appeal**

Upon information and belief, there is an agenda to eliminate fiat currency to cover up the ponzi scheme by how money is coined by enslaving people to debt and debt on interest, not merely in the US, but around the globe. This violates not only the US Amend XIII, but my religious beliefs against debt, and interest on debt. <sup>4</sup> Justice in the courts based on truth, not profit, material gain or fads is a command in my religion. *Matthew 23:23, Amos 5:15.*

---

<sup>4</sup> *Matthew 6:12*, (“And forgive us our debts, as we also have forgiven our debtors.”); *Matthew 6:14-15*, (“For if you forgive other people when they sin against you, your heavenly Father will also forgive you. But if you do not forgive others their sins, your Father will not forgive your sins.”); (*Deuteronomy, 15:1* “At the end of every seven years you must cancel debts.”); (See also, *Matthew, 18:21-35*. Debts once forgiven will be remembered if we do not forgive others.); (Jesus teaches "What good will it be for someone to gain the whole world, yet forfeit their soul? Or what can anyone give in exchange for their soul?" *Matthew 16:26*.); (Jesus teaches us do not seek after material things, “but seek first his kingdom and his righteousness, and all these things will be given to you as well.” *Matthew 6:30-33*.); With regards to eternal treasure we are commanded to share his word without pay as without pay we received the gift of the way to eternal life, through the word. *Matthew 10:8*); *Ezekiel 18:13*, (“He lends at an interest

I hope the Attorney General may use a bribery statute, such as 8 U.S.C. § 201, or somehow seek a writ of mandamus against Secretary Janet Yellen pursuant 31 U.S.C. § 5112 (k) to coin money without debt or interest to pay off all debts to prevent the elimination of fiat currency and the dollar, replaced by an electronic currency that will eliminate freedoms with use down the line. This is a temporary fix. I have some other ideas based on US Amend XIII and my unique religious beliefs against debt.

This scheme to eliminate fiat currency will be used to eliminate judges first, before eliminating elected officials. Upon information and belief, the transition to eliminate fiat currency is a mere step in a greater scheme that must be unraveled to preserve the courts who preserve and maintain our Constitutional liberties.

I have run out of time, but I attached information relating to not only elimination of fiat currency, but alluding to elimination of people judges. App GG, HH, II, JJ, KK, LL, MM, NN, OO. There are people at the World Government Summit and World Economic Forum speaking of eliminating people lawyers and people judges, not for convenience but to eliminate the rule of law to allow their unbridled business greed to reign. That is lawlessness. Without preserving the

---

and takes at a profit. Will such a man live [By live, I believe it means losing eternal life in the second death should he not repent]. He will not! Because he has done all these detestable things, he is put to death; his blood will be on his own head.”); *Deuteronomy* 23:19, (“Do not charge your brother interest on money, food, or any other type of loan.”); *Proverbs* 28:8, (“He who increases his wealth by interest and usury lays it up for one who is kind to the poor.”); (*Exodus* 22:25, (“If you lend money to one of my people among you who is needy, do not treat it like a business deal; charge no interest.”); *Deuteronomy* 15:2 “This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD’s time of release has been proclaimed.”); (*Leviticus* 25:36-37, "Do not take interest or any profit from them, but fear your God, so that they may continue to live among you. You must not lend them money at interest or sell them food at a profit.") and *Exodus* 22:24-26).

impartiality of the courts, unregulated to the partialities of those who seek to control them, we are not free, but for sale products. My case is not to destroy the Courts and those who attacked me, but to uphold the impartial rule of law, which maintains the integrity of the courts before the public. I am sad about the two court staff who were fired. That was wrong of the Delaware Supreme Court to eliminate them, to eliminate their testimony as evidence in my cases. (DI 58, App K).

In China there are already peopleless courts for allegedly small claims. App. KK. The Delaware Courts misbehaved and are in need of guidance, not destruction. I am sad two staff were fired to conceal their testimony. Courts mustn't be partial to the appearance of justice only to give into temptations to commit the greatest of injustices by persecuting me in violation of my exercise of fundamental rights merely because I believe God is God, not money.

Justice is not to be controlled by fickle peer pressured fads or the desire for productivity and material gain, which would result in elimination of freedom and human sacrifice for money. I disapprove of the article regarding productivity of the courts. Justice is a matter of truth, of upholding free liberties, not selling them by barter or exchange in the name of productivity. (App. NN). Please uphold justice in my case to improve the integrity of the courts.

## **X. CONCLUSION**

Wherefore, I pray this Court grants this petition, vacates the order below under and grants any relief this court deems just.

Dated: 2/11/2023

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693

US Supreme Court Number 283696