

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

William Muhr

Petitioner

v.

Dawna Braswell

Respondent

ON APPLICATION FOR AN INCREASE IN WORD LIMIT
TO FILE PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES

ON PETITION FOR A WRIT OF CERTIORARI TO
THE COLORADO COURT OF APPEALS
PETITION FOR WRIT OF CERTIORARI

William Muhr, Petitioner

11975 Hanging Valley Way

Colorado Springs, Co 80921

719-648-6230

TO HONORABLE JUSTICE NEIL M. GORSUCH, U.S. SUPREME COURT:

This request is to file Braswell, in a combined petition, with a combined word limit of 18,000 (9,000 words for each petition combined into one Petition for Certiorari).

Petitioner-Father hereby respectfully sends his SECOND AMENDED request to submit a combined Petition for a Writ of Certiorari in BRASWELL with 18,000 words

On Monday, March 27, 2023 the undersigned combined his amended request for extension of time and word limit into one request for two cases combined into one petition. (The request was amended to sign the previous request before a notary). The undersigned received a call today at noon from Mr. Redmond Burns saying the requests are timely but I should re-send the requests separately.

Petitioner hereby timely files his SECOND AMENDED REQUEST with a notarized signature on the proof of service, which amends the previous COMBINED amended requests mailed to this honorable court on 3/27/2023 and 3/22/2023.

Pursuant to this Court's Rules 13.5, 22, 29 (2)(Document mailed on or before last day for filing) Ru.29 (5) (Notarized Proof of Service), Ru. 30.1 (Computation of time when deadline falls on weekend) and Rules 30.2, 30.3, and 33(d), Petitioner respectfully requests that the time to file its COMBINED Petition for Writ of Certiorari in this BRASWELL matter TO 18,000 WORDS for both Petitions combined into one.

The Court of Appeals issued its opinion on June 2, 2023 *In Re Parental Responsibilities Concerning M.M., a Child, and concerning Kristin Lee, Appellee, and William Muhr, Appellant*, Colorado Court of Appeals, Case Nos. 20CA2066, 21CA0504 & 21CA0793, Opinion Issued by CHIEF JUDGE ROMÁN, Cert. Denied in 22SC0561, 1/23/2023. Mandate entered **1/23/2023**.

The Petition for Writ of Certiorari in *Lee* would be due on **Monday April 24, 2023**. Petitioner is filing this Second Amended Application more than ten days before that date (See S. Ct. R. 13.5.) and more than 15 days before requesting an increase in the word count under S.Ct. Rule 44 (d). [S.Ct.Ru. 29(2), Effective on date of mailing is timely if document was mailed on or before last day for filing; S.Ct.Ru.29 (5); S.Ct.Ru. 30.1, Computation of time when deadline falls on weekend].

The above Respondents take no position on Petitioner's request. The Respondents herein are represented by counsel, but their counsel have not participated in any appeals before the Colorado Court of Appeals nor the Colorado Supreme Court. No Answer Briefs were filed in any appellate case involving the *Braswell* and *Lee* matters herein.

Background

The undersigned Petitioner requests to file a Petition for Certiorari that combines two parental responsibility cases (*Braswell* and *Lee*) into one Petition for Certiorari with 18,000 words.

After the trial court disqualified himself from handling the *Braswell* and *Lee* cases, a day later he picked his favored successor to handle both cases. Thus, the

same trial court successor judge that decided *Braswell* also was the same judge that decided *Lee*. Thus, this Petition for Certiorari combined the cases (*Braswell* and *Lee*) into one Petition because the Colorado Court of Appeals in *Lee* adopted the Colorado Court of Appeals ruling in *Braswell*, that a highly prejudiced judge with a conflict of interest may pick his favored successor to decide your case and made that ruling fully applicable to the *Lee* appellate decision.

Also, the trial court in *Braswell* made an unconstitutional and unprecedented income determination that violated due process and made that unconstitutional income determination for child support applicable to *Lee* by collateral estoppel principles.

The unprecedented income determination ruling in *Braswell*, also applied to *Lee*, prevents Petitioner from keeping up with child support payments, with massive accumulating support arrearages. No father could afford to pay child support based on the unprecedented income determination made in *Braswell* that was then applied to *Lee* in violation of 14th Amendment. Thus, major important rulings in *Braswell* were applied to *Lee*.

The undersigned is allowed 9,000 words per petition but combining both cases into one, Petitioner drafted a Petition for Certiorari comprising 18,000 words.

Completing the Petition (combining 2 petitions into one with 18,000 words) will render your review easier for everyone's benefit. If granted, the undersigned will have counsel representing the undersigned before your honorable court,

because these issues have monumental national importance involving American families.

The *Braswell* Petition is due Monday 4/10. The *Lee* Petition is due Monday 4/24. The undersigned would like to file one combined petition for *Braswell* and *Lee* comprising 18,000 words on 4/24, when *Lee* is due. Today, I have provided rough draft of that combined Petition by attachment to the separate request for enlargement of time to file *Braswell* so you can get a better idea of the critically important issues raised by these two cases that this court should decide.

This Petition for Writ of Certiorari combines two decisions regarding American families, *Braswell*, and *Lee*, from the Colorado Court of Appeals, COA. The COA in *Braswell* held that the trial court Chief Judge Bain (J.Bain), who was prejudiced and previously disqualified himself, nonetheless remained “with jurisdiction” to issue additional orders after his disqualification **“to assign the case to Judge Miller once he (J.Bain) had recused.”** (*Braswell*-COA Opinion, ¶s24-27 Appendix 1). The COA in *Lee*, then held, **“We agree with that division’s analysis and disposition of the issue (*in Braswell*) and thus adopt it here.... We hold that Judge Bain... (after he had disqualified himself and was deemed interested and prejudiced) did not err in entering an... order reassigning the case to the successor judge, Judge Miller.”** (*Lee*-COA Opinion, ¶s12-13, Appendix 4). Thus, six COA judges have decided that, throughout Colorado’s 22 judicial districts and in its COA, any prejudiced, disqualified Chief Judge with a conflict of interest, remains with jurisdiction to pick

the judge or judges that he desires to decide your case. *Braswell*-PFC, Pgs. 6-18; *Lee*-PFC, Pgs. 8-18. . Special interest groups in Colorado and its judiciary now have the appearance and ability to influence the outcome of every case.

There was no transparency to the parties regarding why the prejudiced judge (J.Bain) with a conflict of interest, who disqualified himself, later picked the one successor that he wanted to decide the *Braswell* and *Lee* cases. Colorado holds itself out as an impartial institution. However, all parties to litigation in Colorado are now subject to having their case presided over and decided by a judge who is personally picked by another judge who is prejudiced and has a conflict of interest.

When these important cases, *Braswell*, and *Lee*, were finally appealed to the COA in December 2020 for “Equal Justice Under Law,” the Chief Judge, J.Román, at the COA did *not* disclose his close relationship with disqualified J.Bain, who presided over both cases in the trial court. The Chief Judge in the COA, did *not* disclose, pursuant to the mandate of Colorado Chief Justice Directive 95-01 itself (Introductory ¶ and ¶13), that he has been personally meeting regularly at least every 90 days with prejudiced J.Bain in the years 2020, 2021, and 2022 and, and thereafter, and even before and throughout his involvement with both of these cases. The Chief Judge of the COA, who was prejudiced and interested, then picked his favored panel to decide the *Braswell* case and *assigned himself* to the *Lee* case.

Chief Judge Román, with a prohibited conflict of interest, then issued an opinion of first impression, and without jurisdiction, that considerably expanded his own powers as Chief Judge of the COA by ruling that “chief judges,” like J.Román

himself, who are prejudiced and have a clear conflict of interest, may still assign your case to whomever they chose over all other available judges.

In a case of first impression, J.Román then interpreted Colorado law to confer onto himself (and J.Bain) these unique, unfettered powers to assign cases to other judges in the COA and to himself, to decide your case, even when he has a prohibited conflict of interest and an appearance of bias. Chief J.Román of the COA has thus prevented Petitioner to have his cases decided in the COA free of taint and the appearance of partiality. Thus, these two cases are inexorably intertwined with the COA in *Lee*, relying on the decision in *Braswell*, to issue its Opinion:

LIKELY QUESTIONS TO BE PRESENTED FOR REVIEW

Facts: Six Colorado Court of Appeals (COA) judges have decided that, throughout Colorado's 22 judicial districts and in its COA, any prejudiced, disqualified Chief Judge with a conflict of interest, remains with jurisdiction and unfettered powers to pick the judge that he desires to decide your case. All parties to litigation are now subject to having their case presided over and decided by a judge who is personally picked by another judge who is prejudiced and has a conflict of interest. Special interest groups and the judiciary now have the appearance and ability to make highly partisan judicial assignments to influence the outcome of every case.

Question 1. Whether Petitioner's 14th Amendment rights to due process and equal protection were violated when Colorado allowed disqualified, prejudiced Chief Judges with a conflict of interest to pick whatever judge they want to decide Petitioner's case?

Facts: At the initial parenting hearing on 6/17/16, the judge, with actual bias, found that Petitioner is a fit father, and signed her order on 9/15/16 finding, "*(E)ach party has demonstrated an ability to care for their... daughter.*" Yet, her Order did not allow M.M. to share any overnights, holidays, or special days with her dad during the most critical bonding and formative years of her life. The order did not allow Petitioner to travel with M.M. to visit his family or to practice his religion. It did not mandate that Ms.

Lee allow M.M.'s dad to be involved in major decisions for M.M.. The 9/15/16 Order, made final on 10/26/20, added more constraints.

Question 2. Should a constitutionally minimum due process standard be established for the initial parenting hearing to protect fundamental liberty interests to raise children?

Facts: Years ago the parties wanted to end this litigation. If Ms. Lee never brought this action, the state could not inject itself into our lives without criminal conduct. However, the trial court would not let us end the case, even with an agreement benefiting M.M..

Question 3. Whether Colorado violated the parties' 14th Amendment rights by refusing to enforce their custody agreement?

Question 4. Whether remedies shall be afforded to vindicate harm suffered from the violation of inalienable constitutional rights to parenting and to deter future violations?

The jurisdiction of the U.S. Supreme Court is invoked under 28

U.S.C. §1257(a).

The date on which the highest state court decided the *Braswell* case at

Appendix 1 (Opinion): April 28, 2022.

A timely Petition for Certiorari in *Braswell* was filed on 9/22/2022 and **denied on 1/9/2023**. A copy of the 1/9/2023 order denying the Petition for Certiorari in *Braswell* is at **Appendix 2** and its mandate in *Braswell* issued on 1/17/2023, at **Appendix 3**.

The date on which the highest state court decided the *Lee* case at **Appendix 4** (Lee-COA Opinion): June 2, 2023.

A timely Petition for Certiorari was filed on 10/20/2022 in *Lee* and was denied **1/23/2023**. A copy of the order denying the Petition for Certiorari in *Lee* is at **Appendix 5**; and its 1/23/2023 mandate is at **Appendix 6**.

Petitioner is filing this Application in BRASWELL to increase the word limit of 9,000 words for each petition combined into one Petition comprising 18,000 words.

The undersigned would have the authority under Rule 33 (1)(g) to a word limit of 9,000 words for each Petition.

However, the undersigned can only effectively combine both the *Braswell* and *Lee* cases into one Petition for Certiorari.

Accordingly, the undersigned, to clarify any uncertainty with the word limits for Petitions per (1)(g) under the circumstances, is respectfully requesting, with an abundance of caution, that he may have *up to* the 9,000 word limit under Rule 33(1)(g) for each petition even though both cases must be and have been combined and addressed into one Petition for Certiorari comprising 18,000 words.

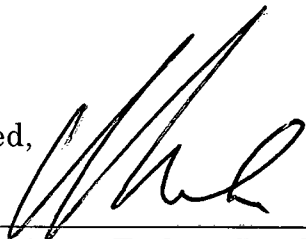
The undersigned finds no authority that prohibits him from consolidating these two cases into one Petition for Certiorari, for the reasons set forth herein, but does respectfully request permission to consolidate the two cases into one Petition for Certiorari with a filing deadline for BRASWELL of Monday April 24, 2023 (requested in separate application) and a total of 18,000 words.

The undersigned combined both cases into one Petition for Certiorari limited to only 9,000 words as limited by Rule 33(1)(g) but has been unable to constrain his petition down to 9,000 words to address the issues raised in both cases and effectively present his request. A draft of the Combined Petition for Certiorari was attached to the SECOND AMENDED request for enlargement of time filed

separately today, containing approximately 18,000 words for both the *Braswell* and *Lee* petitions combined into one Petition for this court's convenience and consideration.

WHEREFORE, Petitioner hereby requests to file the **Braswell case, in a combined petition, comprising 18,000 words.**

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Muhr', written over a horizontal line.

/s/ William Muhr, Petitioner-Father, Pro Se

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

William Muhr

Petitioner

v.

KRISTIN LEE

Respondent

ON SECOND AMENDED APPLICATION FOR AN INCREASE IN **WORD LIMIT**
TO FILE PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES

ON PETITION FOR A WRIT OF CERTIORARI TO
THE COLORADO COURT OF APPEALS
PETITION FOR WRIT OF CERTIORARI

William Muhr, Petitioner

11975 Hanging Valley Way

Colorado Springs, Co 80921

719-648-6230

TO HONORABLE JUSTICE NEIL M. GORSUCH, U.S. SUPREME COURT:

This request is to file LEE, in a combined petition, with a combined word limit of 18,000 (9,000 words for each petition combined into one Petition for Certiorari).

Petitioner-Father hereby respectfully sends his SECOND AMENDED request to submit a combined Petition for a Writ of Certiorari in LEE with 18,000 words

On Monday, March 27, 2023 the undersigned combined his amended request for extension of time and word limit into one request for two cases combined into one petition. (The request was amended to sign the previous request before a notary). The undersigned received a call today at noon from Mr. Redmond Burns saying the requests are timely but I should re-send the requests separately.

Petitioner hereby timely files his SECOND AMENDED REQUEST with a notarized signature on the proof of service, which amends the previous COMBINED amended requests mailed to this honorable court on 3/27/2023 and 3/22/2023.

Pursuant to this Court's Rules 13.5, 22, 29 (2)(Document mailed on or before last day for filing) Ru.29 (5) (Notarized Proof of Service), Ru. 30.1 (Computation of time when deadline falls on weekend) and Rules 30.2, 30.3, and 33(d), Petitioner respectfully requests that the time to file its COMBINED Petition for Writ of Certiorari in this LEE matter TO 18,000 WORDS for both Petitions combined into one.

The Court of Appeals issued its opinion on June 2, 2023 *In Re Parental Responsibilities Concerning M.M., a Child, and concerning Kristin Lee, Appellee, and William Muhr, Appellant*, Colorado Court of Appeals, Case Nos. 20CA2066, 21CA0504 & 21CA0793, Opinion Issued by CHIEF JUDGE ROMÁN, Cert. Denied in 22SC0561, 1/23/2023. Mandate entered **1/23/2023**.

The Petition for Writ of Certiorari in *Lee* would be due on **Monday April 24, 2023**. Petitioner is filing this SECOND AMENDED APPLICATION more than ten days before that date (See S. Ct. R. 13.5.) and more than 15 days before requesting an increase in the word count under S.Ct. Rule 44 (d). [S.Ct.Ru. 29(2), Effective on date of mailing is timely if document was mailed on or before last day for filing; S.Ct.Ru.29 (5); S.Ct.Ru. 30.1, Computation of time when deadline falls on weekend].

The above Respondents take no position on Petitioner's request. The Respondents herein are represented by counsel, but their counsel have not participated in any appeals before the Colorado Court of Appeals nor the Colorado Supreme Court. No Answer Briefs were filed in any appellate case involving the *Braswell* and *Lee* matters herein.

Background

The undersigned Petitioner requests to file a Petition for Certiorari that combines two parental responsibility cases (*Braswell* and *Lee*) into one Petition for Certiorari with 18,000 words.

After the trial court disqualified himself from handling the *Braswell* and *Lee* cases, a day later he picked his favored successor to handle both cases. Thus, the

same trial court successor judge that decided *Braswell* also was the same judge that decided *Lee*. Thus, this Petition for Certiorari combined the cases (*Braswell* and *Lee*) into one Petition because the Colorado Court of Appeals in *Lee* adopted the Colorado Court of Appeals ruling in *Braswell*, that a highly prejudiced judge with a conflict of interest may pick his favored successor to decide your case and made that ruling fully applicable to the *Lee* appellate decision.

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because these issues have monumental national importance involving American families.

The *Braswell* Petition is due Monday 4/10/2023. The *Lee* Petition is due Monday 4/24/2023. The undersigned would like to file one combined petition for *Braswell* and *Lee* comprising 18,000 words on 4/24/2023 when *Lee* is due.

Today, I am providing this honorable court, with this request to increase the **WORD LIMIT IN LEE**, a rough draft of that one Petition for Certiorari that combines both cases so you can get a better idea of the critically important issues raised by these two cases that this court should decide.

This Petition for Writ of Certiorari combines two decisions regarding American families, *Braswell*, and *Lee*, from the Colorado Court of Appeals, COA. The COA in *Braswell* held that the trial court Chief Judge Bain (J.Bain), who was prejudiced and previously disqualified himself, nonetheless remained “with jurisdiction” to issue additional orders after his disqualification “**to assign the case to Judge Miller once he (J.Bain) had recused.**” (*Braswell*-COA Opinion, ¶s24-27 Appendix 1). The COA in *Lee*, then held, “**We agree with that division’s analysis and disposition of the issue (in *Braswell*) and thus adopt it here.... We hold that Judge Bain... (after he had disqualified himself and was deemed interested and prejudiced) did not err in entering an... order reassigning the case to the successor judge, Judge Miller.**” (*Lee*-COA Opinion, ¶s12-13, Appendix 4). Thus, six COA judges have decided that, throughout Colorado’s 22 judicial districts and in its COA, any prejudiced,

disqualified Chief Judge with a conflict of interest, remains with jurisdiction to pick the judge or judges that he desires to decide your case. *Braswell*-PFC, Pgs. 6-18; *Lee*-PFC, Pgs. 8-18. . Special interest groups in Colorado and its judiciary now have the appearance and ability to influence the outcome of every case.

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Question 1. Whether Petitioner’s 14th Amendment rights to due process and equal protection were violated when Colorado allowed disqualified, prejudiced Chief Judges with a conflict of interest to pick whatever judge they want to decide Petitioner’s case?

Facts: At the initial parenting hearing on 6/17/16, the judge, with actual bias, found that Petitioner is a fit father, and signed her order on 9/15/16 finding, “*(E)ach party has demonstrated an ability to care for their... daughter.*” Yet, her Order did not allow M.M. to share any overnights, holidays, or special days with her dad during the most critical bonding and formative years of her

life. The order did not allow Petitioner to travel with M.M. to visit his family or to practice his religion. It did not mandate that Ms. Lee allow M.M.'s dad to be involved in major decisions for M.M.. The 9/15/16 Order, made final on 10/26/20, added more constraints.

Question 2. Should a constitutionally minimum due process standard be established for the initial parenting hearing to protect fundamental liberty interests to raise children?

Facts: Years ago the parties wanted to end this litigation. If Ms. Lee never brought this action, the state could not inject itself into our lives without criminal conduct. However, the trial court would not let us end the case, even with an agreement benefiting M.M..

Question 3. Whether Colorado violated the parties' 14th Amendment rights by refusing to enforce their custody agreement?

Question 4. Whether remedies shall be afforded to vindicate harm suffered from the violation of inalienable constitutional rights to parenting and to deter future violations?

The jurisdiction of the U.S. Supreme Court is invoked under 28

U.S.C. §1257(a).

The date on which the highest state court decided the *Braswell* case at

Appendix 1 (Opinion): April 28, 2022.

A timely Petition for Certiorari in *Braswell* was filed on 9/22/2022 and **denied on 1/9/2023**. A copy of the 1/9/2023 order denying the Petition for Certiorari in *Braswell* is at **Appendix 2** and its mandate in *Braswell* issued on 1/17/2023, at **Appendix 3**.

The date on which the highest state court decided the *Lee* case at **Appendix 4** (Lee-COA Opinion): June 2, 2023.

A timely Petition for Certiorari was filed on 10/20/2022 in *Lee* and was denied 1/23/2023. A copy of the order denying the Petition for Certiorari in *Lee* is at **Appendix 5**; and its 1/23/2023 mandate is at **Appendix 6**.

Petitioner is filing this **SECOND AMENDED APPLICATION** in LEE to increase the word limit of 9,000 words for each petition combined into one Petition comprising 18,000 words.

The undersigned would have the authority under Rule 33 (1)(g) to a word limit of 9,000 words for each Petition. However, the undersigned can only effectively combine both the *Braswell* and *Lee* cases into one Petition for Certiorari.

Accordingly, the undersigned, to clarify any uncertainty with the word limits for Petitions per (1)(g) under the circumstances, is respectfully requesting, with an abundance of caution, that he may have *up to* the 9,000 word limit under Rule 33(1)(g) *for each petition* even though both cases must be and have been combined and addressed into *one Petition* for Certiorari comprising 18,000 words.

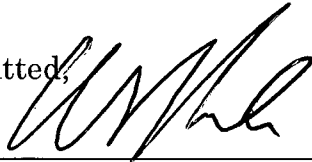
The undersigned finds no authority that prohibits him from consolidating these two cases into one Petition for Certiorari, for the reasons set forth herein, but does respectfully request permission to consolidate the two cases into one Petition for Certiorari with a filing deadline for LEE of Monday April 24, 2023 (requested in separate application) with a total of 18,000 words.

Regarding the undersigned's request to submit the LEE PETITION FOR CERTIORARI WITH 18,000 WORDS, the undersigned combined both cases into one Petition for Certiorari limited to only 9,000 words for each case as limited by

Rule 33(1)(g) but has been unable to constrain his petition down to 9,000 words to address the critical issues raised in both cases and effectively present his request. A draft of the Combined Petition for Certiorari is attached to this **SECOND AMENDED REQUEST IN LEE** to increase the word limit to 18,000 words for both the *Braswell* and *Lee* petitions combined into one Petition for this court's convenience and consideration.

WHEREFORE, Petitioner hereby requests to file the LEE case, on 4/24/2023 in a combined petition, comprising 18,000 words.

Respectfully submitted,



/s/ William Muhr, Petitioner-Father, *Pro Se*