No			

#### IN THE SUPREME COURT OF THE UNITED STATES

In the Matter of Meghan Kelly in the Supreme Court of Pennsylvania Meghan M. Kelly, Petitioner

V

Office of Disciplinary counsel, aka Pennsylvania Disciplinary Counsel On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania

Petitioner Meghan Kelly's Application to Justice Alito for Leave for an extension of time to file a petition for writ of certiorari to appeal the Pennsylvania Supreme Court dated February 28, 2023 in the amount of 60 days

I Meghan Kelly, Esq. pursuant to United States Supreme Court Rules 13(5), 22, 30 and Fed. R. App. P. 2 in the interest of justice for good cause move this Honorable United States Supreme Court for an extension of time to file a writ of Certiorari to appeal the reciprocal decision of the Pennsylvania Supreme Court to place my attorney's license to practice law on disabled inactive, due to extraordinary circumstances, where I face immediate irreparable injury in terms of loss of my First Amendment rights, and loss of my 5<sup>th</sup> and 14<sup>th</sup> Amendment property interests in my licenses to practice law. *See, Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976) (plurality opinion)" (" [t]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.")

#### ORDER BELOW

1. The order of the Pennsylvania Supreme Court to review the merits appears attached hereto, dated February 28, 2023. There is no opinion to publish.

## JURISDICTION

2. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254 or in the alternative under 28 U.S.C. § 1253.

## **PARTIES**

3. The parties are named in the caption. The party for whom an extension is being sought, is Meghan Kelly, pro se applicant.

# STATEMENT OF THE CASE

- 4. The date the Petition is due is on or about May 29, 2022.
- 5. I respectfully request an extension in the amount of 60 days to appeal the Pennsylvania reciprocating Order placing my license on inactive disabled but for my religious beliefs, religious political beliefs, and religious political speech contained in my private petitions. US Amend I, V, XIV.
  - 6. The new due date would be on or about July 28, 2023.
- 7. A Delaware Order placed my license on inactive/disabled, but for my exercise of First Amendment rights, including but not limited to my private religious-political beliefs contained in my private Religious Freedom Restoration Act ("RFRA") petitions against former President Donald J. Trump, attached hereto and incorporate herein as Exhibit 1. All exhibits referred to herein are incorporated herein to be restated and included in their entirety.
- 8. I am a Christian. I have not exchanged my First Amendment private religious beliefs, First Amendment private right to exercise my religion, private right to petition to safeguard those beliefs or First Amendment private speech contained in defense of those beliefs for the mere license to buy and sell as an attorney. Nor have I exchanged a license to practice law for my private freedom of religious and political association as a private person with a mere license to buy and sell. US Amend I, V, XIV.

9. My religious beliefs may be repugnant to the state, but I am allowed to keep myself separate by not sinning just because sin is labeled popular, marketable and good. The First Amendment protects my right to be separate and holy. I believe people go to hell for blindly telling others to trust in man and man's creation or work. See, Romans 1:25 ("They exchanged the truth about God for a lie, and worshiped and served created things rather than the Creator ") I believe most healthcare and mental healthcare examinations and treatments are sin leading to harm and damnation in the fires of hell. I have sincere religious objections to healthcare, mental healthcare and deference to professionals, experts or scientists. I believe people mislead others to harm and potential damnation in the fires of hell for teaching others to blindly trust in man, scientists, professionals or experts or man's creation, studies, products, services, science, theories and technology. I believe teaching the people not to use their free will, their own brains, by reliance on those who exploit them for profit, position or power misleads them to harm and hell by making mere man and man's creation God. Teaching people to pay a professional or pay for a product to eliminate problems, teaches them money to pay for products and services is savior and God in place of God. Jesus teaches you cannot serve God and money. Matthew 6:24. I seek to serve God. The professionals have become demi-gods in the secular worship of pleasure, profit and positions at the cost of human sacrifice, unrestrained by the rule of law. The government partnerships with professionals eliminate freedom in our fixed, forced, not free local, state, national and global economies. Only the courts protect individuals and individual freedom from being sacrificed under the guise of the common good, or the lie of collective permission through the vote, or the mob's reign of lusts or fickle fads. If courts defer to experts, professionals or scientists, the professionals' standards and norms are left uncorrected when they make harm people or create subpar products or services. This Court should be arbiter

of the truth, not to be bartered for by partial boards. I also believe attorneys like my opponent should be granted authority to stop non-attorneys from practicing law without a license. I ran for office in 2018 because non-attorneys were practicing law without a license taking advantage of attorneys and harming the public. See Exhibit 1, complaint Kelly v Democrats. I find it odd that the states do not sue those who do not have permission to practice law on behalf of another while only suing those with permission, a license. There really is an attack on the courts, and lawyers to eliminate the rule down the line I discuss in another case. Exhibits 11, 12 I seek to preserve the rule of law by *inter alias* limiting judicial control to the purview of the constitution 1. Cases and controversies or impeachment. See, U.S. Const. amend. XIV, § 1, Art. II. § 4.1. Upon information and belief, the courts and lawyers will be eliminated under slow takeover by banks judging with penalties and reward, declaring their will be done under the veil of the law. The end plan appears to be to eliminate governments to eliminate laws that restrain entities from oppressing, enslaving to control, killing, stealing or human life or health for their material gain. This lawlessness based on lusts, business greed, is what I believe is the mark of those enslaved by sin, the mark of the beast spoken of in the Bible unrestrained by love or the just rule of law to save their souls from hell. I believe that people judges have the power to save lives and eternal lives through court correction which prevents condemnation in the fires of hell. Amos 5:15, *Matthew* 23:23.

10. I believe judges should humbly judge the professionals. Allowing professionals to be their own judge through Board proceedings makes injustice the aim. The focus of the board and disciplinary counsel is not on justice. Their partial focus is on profit, position, and marketing at the cost of sacrifice of individual liberty. Allowing professionals to judge themselves often leaves them uncorrected by the courts when they oppress, enslave, kill, steal or

destroy human life and health for convenience and material gain. It is human sacrifice. I believe business greed is the mark of lawlessness leading to hell spoken of in the bible. (*Revelation* 13:16-17, *Revelation* 19:20-21).

- 11. People within their own field or in Boards bartering for favor by position have partial interests to serve their position, popularity, profit and power as opposed to impartially serve justice by truth.
- 12. I also believe people go to hell for organized volunteering, charity, fundraising and the like, should they not repent. See Exhibit 1, internal exhibits 50-51 as well as Kelly v Democrats. I believe children are taught to give into temptations to sin, including fundraising, where they have the evil eye by looking at others for what they may extract for material gain under the deception of alms. *Matthew* 6:1-5, *Matthew* 6:23. I believe kids are more likely to be damned to hell should they die since they have fewer opportunities to repent. See *John* 3. See *Ezekiel* 9 to confirm little children will be damned to hell for not caring to think in order to love, for their unconcern same as old people. I do not believe Mother Theresa will escape hell. She disobeyed Jesus in *Matthew* 6:1-4. When I ran for office in 2018, I learned how evil fundraising is. I seek to repent of sin, including volunteering, organized charity and the like which is evil not good. It is not true charity per Jesus Christ. The intention is not relevant. Jesus teaches many people try to follow Jesus by doing what they believe is right. They think they follow Jesus, but they are led astray doomed to the fires of the second death per *Luke* 13 23-28.
- 13. I believe people are enslaved to sin and death in hell should they not repent by doing what they want or what people want to be enslaved by those who entice their desires by threat of harm or reward, not free in Jesus Christ.

- 14. I believe a lot of things people praise are evil. I keep myself separate. I should be allowed to petition the courts when government incited attacks cause economic, physical and social harm upon my person as I did in *Kelly v Trump*. I should not be punished for standing up for my belief in Jesus Christ, based on the disdain of the court for my private petitions, private religious beliefs, private religious speech and for the exercise of the right to petition based on government incited attacks against me for my diverse genuinely held religious beliefs. Someone talked about shooting me for my perceived religious-political affiliation, based merely on my stickers on my vehicle. A person actually shot into the home of a Delawarean I care about for his alleged political or religious beliefs. (Exhibit 6, See the police notice therein) The Bible teaches me not to be conformed to the world, to be holy and to be separate. Obviously, others do not have to conform to my dictates or beliefs. They may do as they choose within the limits of the law. However the law protects my freedom to believe Jesus and to exercise my belief, despite the inconvenience or discomfort my exercise of faith causes the state. The Delaware Disciplinary proceeding stems from almost 20 years of State compelled violation of my asserted religious petitions, most sensitively was Kelly v Trump and petitions from payment of par dues which I paid in a timely fashion in 2021. Please see Exhibit 1. I was also punished by the state for petitioning the State for help during the bar studies. I was punished for exercising my right to petition and foreseeably lost about 2 million dollars of expected income if I remained at my first law firm for the state's retaliation for my exercise of the right to petition the state for grievances, even non-religious prior to being barred in Delaware.
- 15. The Delaware Order has caused additional courts to place my license on inactive disabled, causing multiple law suits, including this Pennsylvania law suit for which I seek additional time to appeal. I have been fighting reciprocating courts. I require time to prepare a

writ of certiorari to prevent irreparable injury to me in the form of loss of First Amendment rights and my property interest in my license. US Amend V, XIV.

- 16. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fifth and Fourteenth Amendments, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs.
- 17. I must be afforded meaningful access to the courts by the allowance of additional time 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, including my First Amendment right to petition to defend my genuinely held, albeit unpopular religious beliefs. I do not want people to go to hell. I do not want to mislead them by disobeying Jesus.
- 18. The Delaware Disciplinary Counsel in collusion with members of the Delaware Courts brought a disciplinary action in interference with Kelly v Trump, Supreme Court number 22-5522, in an attempt to cause me to forgo my case and appeal.
- 19. Delaware Disciplinary Counsel in interference with my Religious Freedom Restoration Act law suit, Kelly v Trump, sent me the attached letter dated August 23, 2022, incorporated herein **as Exhibit 2**, indicating my religious political beliefs, contained in my speech in the petitions gave them concern about my mental fitness to practice law. You may certainly read the petitions they lament about in Exhibit 1. I am not ashamed of my faith in Jesus no matter if it does not make sense. I am ashamed of my typos, as I have been writing my private personal petitions under duress without adequate resources or time. I must assert rights

to prevent waiver. Perfection is not the standard for individuals to be protected for their private religious beliefs.

- 20. During my private law suit Kelly v Trump, a Delaware Court staff wrote on one preaecipe and directed me to cross off the address of another praecipe to prevent service to local counsel. Delaware Court of Common Pleas Judge Kenneth Clark threatened me in public at the behest of the Defendants in the Civil rights case to cause me to forgo my lawsuit. I discovered the Delaware Supreme Court members actively petitioned the interference in Kelly v Trump to cause me to forgo my petition. The Delaware Supreme Court provided information only they knew to Judge Clark or the agents who requested he interfere with my Religious Freedom Restoration Act law suit. During the case I thought it may only be Judge Seitz. However in February 2021, long after this court denied my petition for cert, the clerk confirmed my suspicions. The entire court reviews such petitions, and appeared to incite the witness tampering and violations of my 1st Amendment right in Kelly v Trump and other rights. Long after the case closed I discovered the Court sealed my petitions regarding procedural due process violations. See Exhibit 1. Please see Exhibit 3, containing information provided from the file and serve representative the Delaware Court contracts with. The chart shows the Delaware Supreme court sealed two of my motions without giving me notice or an opportunity to be heard to prevent this court from seeing it on appeal, and to fix the future planned disciplinary proceeding against me to conceal the misconduct of the court and the court's agent contained in the motions attached in Exhibit 1, by demeaning my credibility.
- 21. In Petition at 7, attached hereto and incorporated herein as **Exhibit 4**, the Delaware Disciplinary Counsel inappropriately asserted it was improper for me to cite the bible

in defense of my religious belief in my Religious Freedom Restoration Act petition against former President Trump.

- 22. I sought to safeguard my free exercise of religious belief from harm created by the establishment of government religion by filing Kelly v Trump. My religious beliefs were in issue. It was appropriate for me to state my religious beliefs. It was appropriate for me to explain how the establishment of a government compelled religious belief to conform with the way of sin which differed from my religious belief created a substantial burden upon my free exercise of religion. The establishment of government religion creates the threat of government incited economic, physical or societal peer pressured conformity of worship.
- 23. The Delaware Supreme Court not only concealed and sealed two motions I required as material to my case in Kelly v Trump, in the Delaware Disciplinary cases, in the civil rights case, and in reciprocal cases, the members of the Delaware Court also concealed material evidence by firing two court staff Arline Simmons and Katrina Kruger to conceal their testimony in all of the cases. I care about these two people. I did not want them to lose their job by the collusion of the Delaware Supreme Court whose agent Staff Attorney Robinson, Superior Court Judge of Delaware Robert Robinson's wife, signed off on their departure forms.
- 24. The Delaware Supreme Court thirdly, concealed evidence material to my defense in this case, the civil rights case, the Delaware Disciplinary case where it refused confirm my pleadings invoking the 1<sup>st</sup> and 6<sup>th</sup> right to self-represent so as not to violate my religious beliefs were filed. The Court refused to provide the docket or pleadings in a case against me where the Court violated my asserted 1<sup>st</sup> and 6<sup>th</sup> Amendment right to self-represent in the matter number 541. The appointed counsel was not provided with my full filings.

- Disciplinary proceeding to fix the sham original disciplinary proceeding against me. I was denied meaningful access to the courts, per the attached Reply to the ODC's response to my objections I incorporate herein by reference in its entirety, as **Exhibit 5**. I was denied the opportunity to prepare, perform discovery or cross examine witnesses, as well as other rights. I was compelled to attend a hearing sick, as I recovered from what I believed was the shingles.
- 26. I require an opportunity to draft documents in the civil rights case. I require time due to workload in other matters, and to prevent six additional lawsuits. I incorporate an affidavit discussing this issue as **Exhibit 6**. Courts obstructed my access to other courts by denying accommodations in the form of a stay or additional time causing the loss of my First Amendment right to petition, under the circumstances of my unique case. Please disregard my bad idea concerning the Contracts clause therein. The contracts clause relates to the states not the federal government, and it appears federal and state pay, pensions and social security if the Courts do not overturn case law. I am quite devastated at the loss of the right to petition causing losses of my fundamental rights and property interests in license.
- 27. The Orders against me prevent me from working at the occupation of my choice. I am impoverished, and have been without means for basic needs at times during the litigation. I obviously am limited in my ability to research due to lack of funding to drive to the law library or to secure Westlaw or Lexis, albeit I have been granted interim temporary passwords at times. At one point during the law suits I placed my tags off my vehicle as insurance was unaffordable. Exhibit 6. I also have health needs that require accommdations so I do not harm my health or die. I have alerted all courts of my needs for accommodations by providing them internal Exhibit 43 contained in the attached Exhibit 6. My health has suffered, and I am not okay. My hands are

bleeding due to severe dehydration. My mouth is dry and I am quite weak. I assert my private right to live and not die for the convenience of the governments or the courts. I require time to rest, exercise, and drink gallons nut cups of water. I lose five pounds of water weight every month and sometimes collapse or faint due to dehydration if I am not afforded time I require. I require time to stay alive and not harm my health for the convenience or the material gain of others. My souls is not for sale for others to gain the world. Jesus scolds us, "what profits a man to gain the world to lose his eternal soul [by sacrificing others] in the second death]."

- 28. My eye has been injured and has been improving. I lost vision and was scared. I have religious objections to healthcare and examinations, and went to the doctors. I rejected the prescribed medication as dangerous. See Exhibits 6 and 7, incorporated herein.
- 29. I have lost one of my friends, Bill Jones and require time to mourn too per the obituary contained in Exhibit 7.
- 30. I had family stay too. My parents and family get upset and do not want to hear about law suits. They are old. I do not want them to die of a heart attack. They are coming back for a week or two or longer next month.
- 31. I had little things come up like jury duty I sought an excuse from due poverty and religious reasons, per the letter attached to Exhibit 7.
- 32. There are a lot of issues in the PA case where I may pick and choose or waive them, including lack of meaningful access to petition in the case below and obstruction in other cases by denial of time by stays or otherwise. Exhibit 8, Exhibit 9. I was not afforded the meanigful ability to argue the procedural due process defects before the PA Supreme Court that denied me a fair and impartial opportunity to be heard in the original disciplinary case or the PA

Supreme Court case below. I objected and at all times maintained my objections to the inaccurate prejudicial transcript of the Delaware hearing where my testimony was not transcribed accurately. The reporter placed odd made up words in my mouth I did not say. I was not afforded time or means to rewrite the deeply flawed transcript. The errors were fatal and too voluminous to fix. There were too many Constitutional defects other than the mere transcript to discuss due to the inadequate amount of time opposing counsel denied me below.

- 33. Additionally, the PA Supreme Court refused to docket my petitions to safeguard me form the government compelled religious violations against debt, 13<sup>th</sup> Amendment involuntary servitude to money and the threat of debt creating a barrier so great as to deny me the First Amendment right o petition but for their decision not to accommodate or even consider my request. Exhibit 10.
- 34. I argued there is no case or controversy in my unique case. There is no injury or harm to the state. There is no standing. Further there is no subject matter jurisdiction.
- 35. The state of Pennsylvania opens up the floodgate to frivolous law suits to adjudicate and waste judicial resources to serve their lust for power and position over lawyers their particular rules do not grant them jurisdiction over. Pennsylvania Supreme Court held "Lack of subject matter jurisdiction may be raised at any time by parties or sua sponte by Supreme Court." *Daly v. Sch. Dist. of Darby Twp.*, 434 Pa. 286, 252 A.2d 638 (1969); (Also see, *Martin v. Zoning Hearing Bd. of W. Vincent Twp.*, 230 A.3d 540, 545 (Pa. Cmmw. Ct. 2020) "Questions of subject matter jurisdiction may be raised at any time, even on appeal, by the parties, or by the court on its own motion." (emphasis intended, especially with regards to questions of the case law PA-ODC cites, which are distinguished from this case)); Also see,

Hudson v. Com, 830 A.2d 594, 598 n.7 (Pa. Cmmw. Ct. 2003), Citing, Dep't of Transp., Bureau of Driver Licensing v. Gelormino, 636 A.2d 224 (Pa.Cmwlth. 1994).

- 36. Pursuant to Pennsylvania Rules of Disciplinary Enforcement ("Pa.R.D.E."), Rule 201 (1)(3), the Pennsylvania Supreme Court has jurisdiction over,
  - "(1) Any attorney **admitted to practice law** in this Commonwealth. [I am not admitted to practice. I am retired.]
  - (3) Any formerly admitted attorney, with respect to acts prior to suspension, disbarment, administrative suspension, permanent resignation, or transfer to or assumption of retired or inactive status...
- 37. In 2017, I registered as inactive with the Pennsylvania bar to reduce licensure fees. In 2018, I filed to retire my license to prevent costs. I have remained retired since 2018. In 2018, I ran for local House of Representatives in the District 39 in the state of Delaware due to non-attorneys practicing law without a license.
- 38. If I seek to be admitted to practice law, I would be required to petition the PA Supreme Court to restate my active license to practice law. See, Pa.R.D.E., Rule 218 (a)(2).
  - 39. PA Rule and Pa.R.D.E. Rule 218 (a)(2) provide in relevant part
  - "An attorney may not resume practice until reinstated by order of the Supreme Court after petition pursuant to this rule if the attorney was... (2) retired, on inactive status or on administrative suspension if the formerly admitted attorney has not been on active status at any time within the past three years" PA ST DISC Rule 218 (a)(2)."
- 40. I have been retired for more than 3 years. So, I am not admitted to practice law at this time.
- 41. Once I apply for admission, if I apply for admission to the Pennsylvania Bar, PA-ODC shall have the opportunity to contest my application at that time for conduct occurring prior to my retirement, pursuant to Pa.R.D.E., Rule 218 (c)(2). The issue of my admission to the

bar is not ripe for adjudication. Should I apply for admission, it appears any conduct may be considered as to whether my admission should be granted. Once admitted to practice law with the permission of the PA Supreme Court in that jurisdiction, any conduct may be used for discipline. I do not have permission to practice in PA. I am retired.

42. If my conduct occurred while I was admitted to practice law, even though I am retired now, the PA rules would have jurisdiction. I recall there is case law where retired judges and attorneys are disciplined for conduct that occurred while they were actively practicing based on statutory authority. That is not the case as applied to me. My case is distinguished. I have never practiced law on behalf of another before the Pennsylvania Supreme Court's jurisdiction that I am aware of. There is no case and controversy or interest in removing the state of Pennsylvania's statutory laws to allow the punishment of my person because of my beliefs in Jesus Christ in not violating God's laws by sacrificing people for the mark of lawlessness leading to hell in the bible convenience, productivity, avoidance of costs, profit and marketing of position. This makes the practice of law lawless lusts a matter of compromise as opposed to a matter of discerning the truth to correct the wrong doer while helping the victim of another person's sins heal. My belief the focus on collective conformity at the cost of human sacrifice under the guise of what Jesus calls "moth and rust" is savior in place of God's word as guide saving our eternal lives, is not punishable and is protected by the Constitution from state violations of my First Amendment private right to 1. religious beliefs, 2. exercise of beliefs, 3. petitioning to defend my religious beliefs, 4.. private speech defending my religious exercise and belief. US Amend I. Disparately and selectively persecuting me by disciplining me as labeling my faith in Jesus a disability by taking away my potential ability to buy and sell, even in other jurisdictions by needlessly disparaging my character unless I confirm what I believe is

lawlessness in the eyes of God, the mark of the children of the devil, also known as what God refers to the mark of the beast or the mark of the whore is an abuse of discretion and is an unconscionable violation of my First Amendment right to religious belief and against involuntary servitude to Satan and death in hell by making money and material gain God in order to buy and sell untampered by the rule of love written on the hearts of those saved from hell, or the just rule of law by Constitutional restraints on governments partial lusts. See, *Jeremiah* 3:3, *Jeremiah* 31. It also violates the Equal Protections Clause of the First and Fourteenth Amendment as applied to me as party of one.

- 42. A cloud on my license with the label of disabled will not only pose a problem for me in regaining admission to practice in Pennsylvania, it will also create an obstacle for me in regaining employment with my former law firm, a real estate law firm. They do careful background checks since they deal with escrows relating to the sale of real estate.
- 43. Given I have a myriad of issues in this cas to research with 6 law suits against me, with possibly 6 more coming down the pipe, but for holding the President of the United States to the Constitutional provisions against the establishment of government religion, I require time.
- 44. The issues I may appeal on are important to the public. Whether people are no longer free to exercise religious beliefs in order to buy and sell is an important issue, especially when courts seek to restrain the ability to buy and sell based on religious beliefs, even when their rules do not grant them jurisdiction.
- 45. Justice Alito I do believe judges are being targeted by unjust regulations to control you and the courts to demean you making you constantly under the microscope to eliminate you in order to automate lawyers and judges down the line. Automation will eliminate

every individual liberty by compelling all to fit into standardized norms with no freedom to think, act or believe outside the lines of the box that automation places us in I require time to prevent the elimination of the rule of law. I am arguing this in the Delaware District Court. I desire time to safeguard the rule of law by safeguarding the judiciary while requiring they adhere to the constitution limited to the purview of 1. Cases and 2. Controversies. In my cases I seek to uphold the impartiality of the courts not to destroy them, even if the courts privately disagree

with my private-personal religious beliefs.

45. Attached please find exhibits 11 and 12 incorporated herein where I refer to my

belief of a schemed government overthrow that may be unraveled by the courts dissolving

partnerships with private entities and coining and distributing money lawfully instead of in

violation of the 13th Amendment and equal protections clause of the 5th. I outline a way to

correctly coin in my initial complaint in the DE District Court to safeguard freedom not to

eliminate it by control and government backed and compelled involuntary servitude.

46. On May 3, 2023, I asked opposing counsel for her position, but he evaded

answering by sitting on it for days. Then he required more information . I do not have time to go

back and forth with him by his intentional tactic to distract me from this case and other cases to

obstruct my meaningful opportunity to access other courts as he did in the case below.

Wherefore I pray this Court grants my motion.

Dated May 6, 2023

Respectfully submitted,

/S/Meghan Kelly

Meghan Kelly, Esquire

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US Supreme Court Bar No. 283696, not lawyering

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