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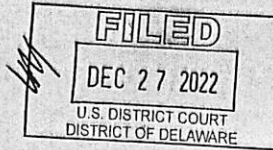


Exhibit 1

LM
FILED
DEC 27 2022
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

SUPREME COURT OF PENNSYLVANIA

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

Respondent Meghan M Kelly’s **Second Motion for a stay** due to circumstances increasing prejudice and harm, new facts arising necessary to my defense of reciprocal order, and additional questions that require answers in order to defend myself in response to the reciprocal order **in the alternative a continuance of 6 months**

I, Respondent Meghan M. Kelly, move this Court to stay this proceeding, until conclusion of both Respondent’s originating disciplinary proceeding as well as the civil rights proceeding Kelly v Swartz, et al. Case Number 21-1490, until final non-appealable determinations are made or the time of appeal has lapsed. Respondent further moves the Court, for good cause, for permission to file the “for cause” motion 30 days after the stay is lifted, and in the alternative a continuance of 6 months I aver.

1. On November 8, 2022 this Honorable Court ordered:

“AND NOW, this 8th day of November, 2022, the Application to Waive Costs is dismissed as moot. The Motion to File Unconforming Pleadings is granted. See Pa.R.A.P. 124(b). The Motion to Stay the Proceeding is denied. Respondent is afforded an additional 30 days from the date of this Order to inform this Court of any grounds against the imposition of the identical or comparable discipline in this Commonwealth.” (Hereinafter “Reciprocal-Order” or “Order”)

2. New and additional facts necessary to my defense of reciprocal-order was recently discovered.

3. Additional questions I require answers necessary to my defense must be ascertained in order that I may defend my retired license, and related interests.

4. This Court must afford me procedural due process to prevent additional retaliation based on the Delaware Supreme Court, Court agents and the Delaware Office of disciplinary counsel's selective application of discipline against me in retaliation for the exercise of my First Amendment right to religious belief, First Amendment right to exercise religious belief, First Amendment right of association, First Amendment right of speech, 14th Amendment right to access to the courts, with religious-political-poverty animus which is a violation of the Equal Protections Clause. US Amend I, XIV.

5. The Delaware disciplinary proceeding violates my First Amendment right to the free exercise of religion, belief, speech, association and petition, by indicating my religious beliefs contained in my religious restoration act petitions are evidence of a mental disability. (Petition at 7, August 23, 2021 letter Exhibits 1 and 2). The Delaware Supreme Court impermissibly conditioned my license to practice law on the surrender of my protected exercise of Constitutional rights.

6. States may not inactivate my duly earned license to practice law nor can they deny me my retired Pennsylvania license to practice law as a consequence of exercising my freedom of religion, speech, association, the right to petition, equal protection and other federally protected rights which supersede, preempt and limit the state's power. The state may not condition the exercise of a Constitutional liberty, upon the loss of a state earned and my entitled benefit in my Delaware active license to practice law or retired Pennsylvania license to practice law.¹

¹ U.S. Const. art. VI., § 2; See, *Minn. Ass'n, Health Care v. Minn. Dept.*, P.W, 742 F.2d 442, 446 (8th Cir. 1984); "To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." Citing, *Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963); See, *Jones v. Board of Education*, 397 U.S. 31, 34 (1970); "The

7. I must be afforded an opportunity to overturn the Delaware order on appeal and in the civil rights case in order to conserve resources and to prevent this court from creating an obstacle so great as to deny me access to the courts, even its own court.

8. Conditioning the loss of my property interest in my active or retired license to practice law on my decision to exercise of Constitutionally protected conduct to petition to safeguard my private-religious-exercise of beliefs, private religious-beliefs, private religious-political-affiliation, and private religious-political-professional association is unconscionable. The precedent set by the Delaware Supreme Court will chill other people from exercising their right to access the courts to address grievances they believe to have been committed against them by the government, which essentially making government above the law, should it not be overturned.²

9. I must be afforded an opportunity to gather accurate information for my defense to show that the disciplinary proceeding in Delaware **was not fair, but fixed** with members of

doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established.” *Citing, E.g., Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v. Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Trucking Co. v. Railroad Comm'n*, 271 U.S. 583, 593-594; see *Van Alstyne, The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); *Comment, Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: (“One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.”); See, *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970), (“Neither the state in general ... is free to prohibit any kind of expression because it does not like what is being said.”)

² See, *Barry v. Barchi*, 443 U.S. 55, 65 n.11 (1979); “State law has engendered a clear expectation of continued enjoyment of a license absent proof of culpable conduct by the [me. I, have] asserted a legitimate ‘claim of entitlement’” *Citing, Perry v. Sindermann*, [408 U.S. 593, 601](#) (1972); see *Board of Regents v. Roth*, [408 U.S. 564](#) (1972); *Bell v. Burson*, [402 U.S. 535, 539](#) (1971); *Goldberg v. Kelly*, [397 U.S. 254](#) (1970).”

the Delaware Supreme Court exhibiting bias and collusion. I recently discovered the DE Supreme Court covered up my pleadings regarding due process violations in *Kelly v Trump* to prevent the US Supreme Court's review, a mistrial and to actively participate in prejudicing the case against me in the Delaware on or about December 1, 2022. It appears a member of the Court accessed the docket the date of the preliminary hearing, as opposed to merely sealing it on that date. The members of the Delaware Supreme Court appeared to cover up evidence material to my defense which was not accessible on the record in the Delaware preliminary hearing or the Delaware Board proceeding.

10. I must be afforded an opportunity to show I was denied basic procedural due process rights at the Delaware proceeding in contravention of the 1st and 14th Amendment protections that others similarly situated are afforded.³ On or about December 1, 2022, I discovered the Delaware Supreme Court sealed documents in *Kelly v Trump*

11. Due process requirement of fair trials before impartial tribunals extends to administrative tribunals as well as courts.⁴

³ *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005) (The Third Circuit held, "A judgment may also be void if a court "acted in a manner inconsistent with due process of law."); (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.").

⁴ US Const. Amend I, V. (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 eof 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); *Montgomery Tp. v.*

12. Pursuant to Pa.R.D.E., Rule 216 (c) provides:

“(c) Upon the expiration of 30 days from service of the notice issued pursuant to the provisions of subdivision (a) of this rule, the Supreme Court may impose the identical or comparable discipline or transfer to disability inactive status unless Disciplinary Counsel or the respondent-attorney demonstrates, or the Court finds that upon the face of the record upon which the discipline is predicated it clearly appears:

(1) that the procedure was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process;

(2) there was such an infirmity of proof establishing the misconduct as to give rise to the clear conviction that the Court could not consistently with its duty accept as final the conclusion on that subject; or

(3) that the imposition of the same or comparable discipline would result in grave injustice, or be offensive to the public policy of this Commonwealth.” PA ST DISC Rule 216

13. The new facts and questions relate to all three of these defenses this Court requires I respond to by December 23, 2022.

14. I also require a stay as other new facts have arisen increasing the harm towards me in terms of exacerbating a substantial burden due to costs of time and resources as to deny me access to the courts, compelled religious violations against indebtedness, risk of loss of life and health, should a stay or a continuance be denied.

Com., Bureau of Social Sec. for Public Employees, 449 A.2d 841, 68 Pa.Cmwlth. 525, 1982; *Bruteyn v. State Dental Council and Examining Bd.*, 380 A.2d 497, 32 Pa.Cmwlth. 541, 1977; *Begis v. Industrial Bd. of Dept. of Labor and Industry*, 308 A.2d 643, 9 Pa.Cmwlth. 558, 1973; *Straw v. Com. Human Relations Commission*, 308 A.2d 619, 10 Pa.Cmwlth. 99, 1973; *First Nat. Bank of Pike County v. Department of Banking*, 300 A.2d 823, 7 Pa.Cmwlth. 603, 1973; *Gaudenzia, Inc. v. Zoning Bd. of Adjustment of City of Philadelphia*, 287 A.2d 698, 4 Pa.Cmwlth. 355, 1972; *W. J. Dillner Transp. Co. v. Pennsylvania Public Utility Commission*, 107 A.2d 159, 175 Pa.Super. 580, 1954, appeal dismissed 75 S.Ct. 580, 349 U.S. 903, 99 L.Ed. 1240; See, *Peters v. Kiff*, 407 U.S. 493, 502 (1972), *Overruled in Gregg v. Georgia*, 428 U.S. 153, 169 (1976), on other grounds.

15. Without delay, I attempted to file a series of motions requiring a stay or more time which were rejected by this Court. This Court took additional time before apprising me of rejections which caused additional prejudice to my defense.

16. I contacted the Court concerning the delay given the dire irreparable injury I face. The Court delayed further in making determinations.

17. The Clerk Nicole Traini (hereinafter "Clerk") appeared to argue on behalf of PA-ODC by making meritless arguments regarding resignation, representation of counsel, and other discussions which showed bias in favor of PA-ODC.

18. Early on the Clerk seemed to trivialize the placement of my retired license on inactive disabled as not having influence in DE or beyond.

19. My ability to seek to regain employment in my former firm would be eliminated by PA's placement of my license on inactive disabled. In addition, it would be additional government persecution against me based on my exercise of Constitutional rights. The states do not have a license to violate federal and constitutional law under the shield of governing businesses, including the practice of law. This essentially requires licensed attorneys or those who retired their licenses to exchange their First Amendment liberties and other Constitutional protections in order to be afforded the opportunity to buy and sell as a lawyer.

20. I by no means desired to waste the courts time by filing motions this court would reject. Our case manager recommended I file an amended motion for a reargument for a motion for a stay. I thought the Motion to amend my motion for reargument filed on December 13, 2022 would be accepted. This Court denied me an opportunity to be heard on this motion in violation of the 1st and 14th Amendment by failing to submit it. (Exhibit 3)

21. This Court also violated my right to be heard in defense of my Constitutional liberty, property interests, life and eternal life when it refused to docket the attached letter, I incorporate herein by reference in its entirety. (Exhibit 4) The letter outlines my circumstances. The rejection of the letter prevents me from an opportunity to plead my circumstances before the Court unless this Court accepts this pleading. US Amend. I, XIV.

22. New circumstances arose exacerbating irreparable injury to me in terms of creating obstacles so great as to deny me access to the courts to defend my liberty, exercise of Constitutional rights, my life and interests related to licenses. My computer broke. My internet has been experiencing problems, my printer needed repairs, and my health is suffering.

23. My poverty and costs associated with 5 reciprocal law suits against me and one civil rights case have also increased. Each court has unique legal issues to address with unique rules. I require time to draft documents to plead my defense so I am not denied meaningful participation in this court proceeding, and other court proceedings.

24. I intended to include motion to exempt costs by the state through opposing counsel. Costs and fees, including fees relating to the transmittal of the record violate my religious belief against debt, servitude to Satan in violation of the 13th Amendment and damnation in hell by making money my guide, as opposed to God. It is my religious belief Jesus teaches you cannot serve money and God. *Matthew* 6:24. Jesus also teaches the fact people were too concerned with earning money to pay bills and care for their own to care to love God and others is guilt. *Matthew* 13. Jesus teaches putting family first is guilt leading to hell. *Matthew* 10:34-39

25. I asked opposing counsel his stance on additional motions. The government through its arms should not compel me to violate my religious beliefs against debt in order to exercise my right to be heard, or cause me to forgo my 1st and 14th Amendment rights. I should be afforded time to draft necessary motions.

26. 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. I have religious objections to healthcare and mental healthcare.

27. I believe people sin when they thoughtlessly refer people to doctors, mental health specialists or professionals to pay to fix their problems misleading others to exploitation to serve greed. Many professionals are rendered above the law. Their standards are the letter of the law Courts wrongly adhere to in determining whether workers performed the requisite duty of care. This creates poor products, bad services and evil businesses that are left uncorrected when they harm people for profit.

28. I believe that courts can save lives and eternal lives by correcting people paid to perform business who ignorantly or indifferently kill, steals, oppresses or destroys human life and health for the bottom line. *Matthew 23:23, Amos 5:15.*

29. I have strong religious objections to healthcare and mental healthcare. I believe people sin by blindly doing what they are trained to do, told to do, paid to do without choosing to see clearly to care about the potential harm they cause towards those they profess to serve. I believe people sin for teaching others to trust professionals in place of God. I believe business

greed, conditionally caring is the mark of lawless lusts stemmed in no salvation from hell in people, without repentance.

30. In an exhibit, I incorporate heroin as Exhibit 6, I previously provided to this Court, the US Supreme Court, the Delaware Board, Delaware Chancery, and Delaware Supreme Court I stated:

“Due to the surgery referred herein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight each month. This is still a challenge. I must assert my right to live because people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. ‘I am not my own’ Other people are loved by God too.”

31. I had surgery more than 20 years ago, and I have to assert my right to live. I am very dehydrated, dangerously so now, and it has lasted beyond a week. I must be afforded time, an accommodation to sustain my life and health.

32. I used to drink a big gallon of water at the gym. Since the Delaware Supreme Court prevents me from returning to my former firm, I cannot afford to go to the gym. I have not been able to drink water or take time to care for my body as I should because of the time required to attend to this case and related proceedings.

33. Dehydration is serious. In undergrad at UD, I fainted during a class due to dehydration. When I awoke, no one was there but me. I was so embarrassed to discover I peed my pants, but at least I was not dead. Having enough water, and time to care for myself is required. It is not a disability to be human with individual unique limits. Nevertheless, I assert the ADA act’s requirements for access to the courts and accommodations, if applicable,

nevertheless. (42 U.S.C. §§ 12181- 12189)⁵ I should be afforded an accommodation to sustain my life and health as well as my licenses and liberty interests. The accommodation of a stay or more time does not prejudice opposing counsel or the Courts. Instead, it will likely prevent duplicity in work, requiring time I need to defend my liberty and sustain my life.

34. My First motion for additional time in the amount of 45 days to response to the PA-ODC's motion was denied.

35. This Court granted a second motion in the amount of 14 days, which is not sufficient under the circumstances. I am prejudiced.

36. After everything was rejected, I alerted the Clerk I would draft a new motion given the new facts and circumstances necessitating a stay and at least a continuation.

⁵ "Congress has abrogated states' sovereign immunity for cases that arise under Title II of the ADA if they implicate the "fundamental right of access to the courts." *Tennessee v. Lane*, 541 U.S. 509, 533-534 (2004)." *Reed v. Illinois*, No. 19-1164, at *4 (7th Cir. Jan. 9, 2020); *McDonough, Petitioner*, 457 Mass. 512, 519 n.16 (Mass. 2010) ("The United States Supreme Court has concluded that Title II of the ADA applies "to the class of cases implicating the fundamental right of access to the courts," and as such "constitutes a valid exercise of Congress' § 5 authority to enforce the guarantees of the Fourteenth Amendment" on the States. *Tennessee v. Lane*, 541 U.S. 509, 533-534 (2004) (ADA validly applies to States to extent that State court facilities are so constructed as to bar physical access to courts by individuals with disabilities)."); 42 U.S.C. § 12182 "(i) **Denial of participation**. It shall be discriminatory to subject an individual or class of individuals on the basis of a disability or disabilities of such individual or class, directly, or through contractual, **licensing**, or other arrangements, to a denial of the opportunity of the individual or class to participate in or benefit from the goods, services, facilities, privileges, advantages, or accommodations of an entity."

42 U.S.C. § 12182 (a) "No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation."

37. The Clerk understands my computer broke, and I noted I would draft a motion without delay for a continuation.

38. The Clerk cited the November 8, 2022 order that no further extensions would be considered, as to discourage my filing. And yet in other cases Courts state the same or similar language and still grant time to prevent manifest injustice and avoid procedural due process violations. See for example, *Mir v. Bureau of Pro. & Occupational Affs.*, No. 2557 C.D. 2015, 2016 WL 6407477, at *3 (Pa. Commw. Ct. Oct. 31, 2016).

39. Under my unique conditions denial of a stay is prejudicial and creates manifest prejudice towards my ability to plead.

40. My faith in Jesus and my ability to worship and exercise belief by the dictates of my conscience without government incited public or private persecution, but for my religious belief, is important to me to protect. Please grant a stay. I am tired. I need rest and water, but I cannot forgo the eternal rest in Jesus because of the limits of my body.

41. 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.

42. There is no prejudice towards the Plaintiff, 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 am retired in this jurisdiction. I require time and meaningful opportunity to not

only defend myself on appeal in the original proceeding, but also to present my case in the civil rights proceeding.

43. 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.

44. 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.

45. The Delaware Disciplinary proceeding is defective on its face. The record shows evidence of fraud, and collusion. (Exhibit 5). The Court was not partial, but instigated the proceeding against me and colluded with the state.

46. The Delaware Supreme Court's members concealed evidence in my favor to prejudice the fixed outcome against me in aid of the Delaware ODC. (Exhibit 5) 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.

47. 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. I incorporate herein by reference my Reply to the DE-ODC's Response to my Objections to the Board's decision, excluding the voluminous exhibits, as Exhibit 5.

48. Despite having good cause to contest this reciprocal proceeding. Additional investigation is required. I lack time and resources to duplicate the investigation should a stay be denied. 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 down turn. My parents actually indicated they may cut me out of their will because they have helped me this past year to a greater extent than my siblings.

Procedural Background of this case

49. This reciprocal proceeding was brought on or about August 30, 2022, in response to the Delaware Supreme Court's decision to place my license to practice law on disabled inactive on August 10, 2022.

50. I received a letter from this Court, dated August 30, 2022, concerning notice of discipline.

51. On September 21, 2022, this Court filed notice and an Order.

52. On or about October 7, 2022, I sent the Court by US mail, *Respondent Meghan M Kelly's Motion to stay the Proceeding until the conclusion of both Respondent's originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations*

are made or the time of appeal has lapsed. Respondent further moves the Court, for good cause for permission to file the "for cause" motion 30 days after the stay is lifted, with attachments I incorporate herein in its entirety. The Court received and filed this motion on October 12, 2022, almost a week later.

53. I followed up with the assigned case manager on the Court's receipt of my Motion to stay the proceeding. The case manager indicated that things would be expedited given the nature of my case. I thought in my mind this was even before the Court granted me an opportunity to be heard on the motion for a stay, to slow down the case, as if the Court has already made a finding even before reading my motion.

54. The Court's determination without granting me an opportunity to be heard on my motion for a stay does violate my right to be heard. US Amend. I and XIV.

55. Denial of the stay denies me of time I require for meaningful access to the courts in defense of my First Amendment rights and property interest in my retired license and other interests which may be affected should that interest be changed.

56. Denial of the stay denies me of time I require to protect my property interest in my retired license, which will affect other property interests and my ability to work as an attorney in Delaware should I be placed on reciprocal discipline, even if the Delaware decision is vacated.

57. This Court and the public have no interest in my retired PA license.

58. I am not admitted to this bar. I must seek readmission before I am licensed and given permission to practice law before this Pennsylvania Bar and this Honorable Court.

59. The October 8, 2022 Order denying my application of a stay violates my meaningful access to the courts in violation of the 14th Amendment and the First Amendment rights I seek to defend.

60. On October 17, 2022, Pennsylvania Disciplinary Counsel Anthony P. Sodroski, Esquire (Herein referred to as "PA ODC") provided an answer to my motion for a stay.

61. On October 18, 2022, PA ODC supplied a supplemental answer containing the status of the matter in my federal civil rights case where I seek inter alias to overturn the original disciplinary order.

62. On October 19, 2022, I filed Respondent Meghan Kelly's Motion for good cause to waive court costs by the Clerk and this Court including costs under Pennsylvania Rules of Disciplinary Enforcement 208, record, transcript fees, filing fees and other costs, I incorporate herein by reference.

63. On October 26, 2022, I filed a Motion to File unconfirming documents pursuant to Pa.R.A.P. 105(b), I incorporate herein by reference.

64. On October 26, 2022, PA ODC filed an Answer in response to my motion to waive costs, including costs by the ODC. The ODC's answers evade the fact I asked this Court to waive costs by the state's agent the ODC too. So, his response is not in opposition, but misleads the Court, unless the Court finds my motion was not specific.

65. My motion for reargument on the costs and the prohibition against 13th Amendment and compelled religious violations are more specific. It is against my religious beliefs to owe debts by forced will. I believe it leads to damnation in hell, as I previously tried to convey to PA-ODC and this Court in my pleadings.

66. My religious beliefs are private and do not conform to the religious beliefs of entities or the majority of others. My religious beliefs are genuine.

67. I will love and respect others who hold different religious-political beliefs. I will not encourage beliefs that I believe misleads people to harm and hell because I care about people. I do not want other people to lose eternal life. I can love others and believe differently. I can love others and disagree with them. Holding beliefs of my own does not make me dangerous, nor does sharing my genuine religious beliefs with others. I am not in government. It would be wrong should I use God's name for political vanity. I am a private citizen.

68. On November 3, 2022, I filed Respondent's Motion for an extension of time to respond to PA Disciplinary Counsel's Answer in opposition to my Motion for a stay, I incorporate herein by reference in its entirety.

69. On November 6, 2022, I filed Respondent's Motion to dismiss the disciplinary proceeding, without prejudice for lack of subject matter jurisdiction, I incorporate herein by reference.

70. On November 7, 2022, PA ODC filed an answer in opposition of my motion to file unforming documents.

71. On November 7, 2022, PA ODC filed an answer in opposition to my motion for a stay.

72. On November 7, 2022, I filed an Application to Amend the Application to Dismiss, I incorporate herein by reference.

73. On November 8, 2022, this Court entered an Order, I incorporate herein as reference and attach as Exhibit 7, which held:

“the Application to Waive Costs is dismissed as moot. The Motion to File Unconforming Pleadings is granted. See Pa.R.A.P. 124(b). The Motion to Stay the Proceeding is denied. Respondent is afforded an additional 30 days from the date of this Order to inform this Court of any grounds against the imposition of the identical or comparable discipline in this Commonwealth.”

66. On November 8, 2022, the Court dismissed my Motion for an extension of time in the amount of 45 days to respond to PA ODC’s answer in Opposition to Motion for Stay dismissed as Moot.

67. On November 10, 2022, PA ODC filed an Answer Opposing Respondent's Motion to Dismiss.

68. On November 10, 2022, PA ODC filed a separate Answer to Respondent's Application to Amend Respondent's Motion to Dismiss.

69. On November 12, 2022 I filed corrections by submitting *Respondent Meghan Kelly's Motion to correct errors in her Motion to Dismiss* filed on or about November 6, 2022, I incorporate herein by reference.

70. The November 8, 2022 Order did not address all my requests. I sought to waive costs by PA ODC too under Pennsylvania Rules of Disciplinary Enforcement 208 (g), in addition to court costs, other costs and transcript fees for appeal, in order not to be compelled to violate my religious beliefs, cause a substantial burden upon my access to the courts or compelled to involuntary servitude in violate of US Amendments I, XIII, and XIV. This Court erred by ordering my motion was moot.

71. On or about November 15, 2022, I filed Respondent Meghan M Kelly's Motion for reargument on this Court's indirect denial of my motion for a stay to prevent a government compelled obstacle to my access to other courts in defense of irreparable injury to my life, First Amendment liberty interests, my license, and eternal life and a denial of my motion to exempt costs as moot, I incorporate herein in its entirety. I accidentally submitted arguments I drafted for another reciprocating disciplinary Court, the District Court for the Eastern District of PA. This Court did not indirectly deny my motion.

72. I also argue denial of the time a stay is also affecting my health, in light of my need for time to drink water and rest due to harmful healthcare against my person in my youth that I alleviate by taking needed time to sustain my health and life. (See Exhibit 8, my letter to the Clerk of the Third Circuit referring to my surgery in my youth, dated December 2, 2022. I am not misleading this Court when I state I need time and rest to prevent harm to my health. I am not ashamed of being weak. My weakness does not make me unworthy of work as an attorney who desires to return to her former firm to perform real estate settlements.) (See, Exhibit 6, containing evidence of my surgery, and a state of Delaware proposal to improve our harmful healthcare and a federal proposal to reduce costs of healthcare.)

73. I am not able to get adequate rest and fluids because of the increase in workload and other stress caused by this needless litigation.⁶

⁶ Please note, the Delaware Disciplinary Counsel cared naught about my health and compelled me to attend a hearing ill, recovering from the shingles. They were concerned with my religious political beliefs. They note, my references to the Bible and my belief that courts are for correction as reasons finding me unworthy to hold an active Delaware license to practice law. See Exhibit 6.

74. This improvident law suit creates an obstacle to my access to other courts in defense of my First Amendment rights and property interests in my license to practice law.

75. On November 18, 2022, PA ODC filed an Answer Opposing my application for reconsideration on my denial to waive costs and motion for a stay.

76. On November 19, 2022, I filed Respondent Meghan M Kelly's Motion to supplement the record with new and additional information and to correct an error in belief, I incorporate herein by reference in its entirety.

77. On November 21, 2022, I filed Respondent Meghan M. Kelly's Motion for an exemption from the requirement to serve paper copies of pleadings with this Court pursuant to Pa. R.A.P. 105 and permission to serve this Court electronically, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness

78. On November 29, 2022, I filed a Motion for an extension of time to file a response to the Court's Order dated October 8, 2022.

79. On November 30, 2022, the Court granted my motion and extended the deadline to December 23, 2022.

80. This extension is not an adequate amount of time to defend my license under the facts of this unique case.

81. On December 5, 2022, I submitted Respondent Meghan Kelly's Response to Office of Disciplinary Counsel's Answer opposing dismissal of the disciplinary proceeding for lack of subject matter jurisdiction.

82. On December 5, 2022, I also filed the certificate of service and a letter containing video exhibits on memory sticks I mailed to this Court and PA ODC. This was rejected, but I hope this Court accepts it on receipt because I incorporate it in an accepted pleading.

83. The Court rejected both items I filed on December 5, 2022.

84. I knew that questions relating to subject matter may be brought at any time, and there remained questions about subject matter jurisdiction. *See, Daly v. Sch. Dist. of Darby Twp.*, 434 Pa. 286, 252 A.2d 638 (1969) (“This Honorable Pennsylvania Supreme Court held “Lack of subject matter jurisdiction may be raised at any time by parties or sua sponte by Supreme Court.”); (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)); *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).

85. So, I immediately drafted a Second Motion to Dismiss which included additional information relating to the facts concerning why failing to dismiss harms me and regarding legal issues. I filed the Second Motion to Dismiss on December 6, 2022, I incorporate herein by reference. This Second Motion to dismiss is different from the First Motion to Dismiss.

86. I face immediate irreparable injury and am asserting rights, without perfection in order not to waive them. I saw I referred to the video clip evidence in the incorrect paragraph and minor typos.

87. I drafted a Second corrected Motion to dismiss based on lack of subject matter jurisdiction to correct the reference to the video exhibit and to correct minor typos, I incorporate herein by reference.

88. On November 29, 2022, I filed a Motion for an extension of time to file a response to the Court's Order dated October 8, 2022.

89. On November 30, 2022, the Court granted my motion and extended the deadline to December 23, 2022.

90. This extension is not an adequate amount of time to defend my license under the facts of this unique case. I am prejudiced and denied meaningful opportunity to defend my retired license, related interests, and Constitutional interests.

91. A stay is required in order that I may acquire necessary to my defense.

92. A stay is also required to prevent needless duplicity of work when such information may be obtained in an open forum the civil rights case.

93. A stay is also required to prevent prejudice by a compelled denial of my Constitutional right to be heard in one forum in exchange with another.

94. A stay is also required to prevent prejudice by a compelled denial of my Constitutional right to religious belief against indebtedness and an economic substantial burden so great as to create a denial to access to the courts, when evidence and testimony may be gathered in one court rather than duplicating the same work in multiple courts

95. I should not be compelled to forgo the due process right to be heard in one forum in exchange with another.

96. A stay is required in order not to protect my life and health, and to prevent irreparable loss to my liberty interests, licenses and other interests.

97. The original order very likely will be overturned on appeal or in the civil rights case. Nevertheless, I asked for a continuation in the alternative. The Public, the Court and PA-ODC has no interest somehow more important to my potential loss to access to the courts, fundamental rights and loss of interests in licenses retired and others.

98. The amount of time this court extended is not enough for me under the circumstances.

II. Procedural Status on Delaware Disciplinary Order and Third Circuit Order with new and additional information with argument

99. I intend to appeal the Third Circuit reciprocal order, Eastern Doistrict of PA's reciprocal weird order, and the Delaware Supreme Court's original order.

100. I am an active member of the United States Supreme Court's Bar. I may be sued in a reciprocity law suit by the United States Supreme Court Rule. I am grateful the Supreme Court is not suing me now.

101. I do not have the time I require to effectively defend myself in this Case by an extension to December 23, 2022 either.

102. This Court must afford me adequate amount of time to plead affectively before this Court, the civil rights case and before the United States in order not to compel me to waive my right to defend myself, and lose the right to exercise my First Amendment rights of belief, exercise of belief, speech, association, the right to petition, and my property interests in my licenses to practice law. (See, US Amend I, XIV); (PA ST 2 Pa.C.S.A. § 504); (*Balfour Beatty*

Const. Inc. v. Department of Transp., 783 A.2d 901, Cmwlt.2001. Adjudicatory action may not be taken validly by a judicial or administrative tribunal except upon a hearing wherein each party has an opportunity to cross-examine witnesses, to introduce evidence on his own behalf, and to make argument.); (*Pennsylvania State Athletic Commission v. Bratton*, 112 A.2d 422, 177 Pa.Super. 598).

103. I assert my right for a meaningful opportunity to defend my license, and First Amendment liberties, without compelled economic and religious substantial burdens.

104. I am impoverished. The original disciplinary order prevents me from seeking to return to my former law firm where I would perform real estate settlements.

105. An order by this Court placing me on reciprocal discipline would prevent my opportunity to seek to return to my position even if the original Delaware Disciplinary Order is vacated.

106. I asked PA ODC if I could be placed back on retired status should this court place me on reciprocal discipline. I do not want to seek to be restated or admitted. I cannot afford the filing fees. It is against my religious beliefs. I do not have money to pay this Court to reinstate my retired status should the discipline be overturned on appeal to the US Supreme Court or in the civil rights case. (Exhibit 9). I do not want to be reinstated as active as I cannot afford the costs of bar due. PA-ODC did not respond.

107. I do not have the resources I require to fight all cases simultaneously. The appeal of the original disciplinary findings will likely make this Court's Order moot. I do not know how I will be able to afford postage, paper, ink or transportation to the Court. I need to research and read too.

108. The Unites States supreme Court will likely hear my case either to discipline me as a member or to grant me equality under the law worthy of First Amendment belief, exercise of belief, speech, association and access to the Courts without punishment in violation of the equal protections clause based on disparate treatment with religious-political-poverty animus or denial of substantive and procedural due process of law. US Amend I, XIV.

109. Any decision this Court provides will affect this Court's decision. This case would be dismissed as moot should the Delaware Order be vacated, which will likely occur.

110. A denial of a stay prejudices me, and risks my loss of First Amendment rights, interest in my reputation, my property interest in licenses, and my ability to work.

111. My ability to work as an attorney may be taken away because the Delaware Courts disagree with my belief in Jesus Christ. The Courts will persecute me, not protect me should I face more government incited attacks for my religious-political beliefs, religious-political speech, religious-political exercise, religious-political affiliation and religious-political petitions.

112. Instead of upholding the Constitution, the Delaware Supreme Court and its arms in collusion violate the Constitution to protect the lie of the appearance of justice by the Delaware courts in my cases while creating injustice.

III Procedural Status on the Third Circuit Case with argument

113. Opposing Counsel filed a response to my appeal. I filed a motion objecting to her exhibit. A panel has convened to render an order on the motion. I have to brief a response before the Third Circuit.

IV. Arguments: A stay is required to allow me to gather testimony or other proof concerning procedural due process violations, bad faith, harassment, malicious religious-political-poverty animus and Court collusion in the original disciplinary law suit. This information is necessary to show cause why this Court must not reciprocate.

114. I must be afforded a meaningful opportunity to uncover questions of material fact necessary to my defense in this case regarding procedural due process violations, and other issues. I must be allowed the opportunity to gather testimony and evidence in order to respond to this Court's November 8, 2022 Order.

115. This Court must allow me meaningful opportunity to defend this Court's Order, and PA ODC's law suit against me by allowing me to gather facts, testimony and evidence in defense of my property interest and fundamental rights.

116. I was denied the opportunity to prepare, perform discovery and to call witness in the original disciplinary proceeding, in part because the Delaware Supreme participated in terminating a clerk of Court and a court staff to conceal or hide their testimony material to my defense.

117. This testimony and evidence are best retrieved in the civil rights case

118. Any testimony gathered, or evidence discovered or determinations in the civil rights case, Kelly v Swartz relating to the same subject matter, in addition to other subject matter, as to the State and its agents including the Court's bad faith, harassment, collusion, bias, or fraud, will affect the findings of facts and conclusion of law before this Court.

119. This Court must grant me an opportunity to gather material facts by testimony or otherwise material to my defense in the reciprocating Order by staying the proceeding.

120. As late as **December 1, 2022**, I discovered **additional procedural due process** defects and evidence of the Delaware Supreme Court's **collusion to fix the outcome of Kelly v Trump**. My religious-political petitions in this law suit are the admitted reason the DE-ODC petitioned to place my law suit on disability inactive.

121. There are questions of law that must be addressed. I filed a Motion to amend the complaint on or about January 24, 2022 in the civil rights case, to include additional damages, equitable relief, nominal relief and to add the Supreme Court justices as Defendants in this case.

122. I argued the state agents are not privileged or immune given the facts of my case. I incorporate herein by reference in its entirety A-4, A-5.

123. The unsettled questions require testimony or proof. This Court must stay the case to allow the gathering of facts in the civil rights case. This Court must stay this proceeding to allow me meaningful opportunity to be heard in defense of my retired interest in my license and my First Amendment rights by denying a stay. Citing, US Amend I, XIV.

124. I await for additional information by file and serve that will likely show the Clerk of the Delaware Supreme Court, Lisa Dolph (also referred herein as "Lisa") misrepresented the fact that the complete record is unsealed as the Court Ordered in its September 7, 2022 Order.

125. On September 7, 2022, the Delaware Supreme Court granted my motion to unseal the documents I attach hereto and incorporate herein in its entirety, as Exhibit 10, *Respondent Meghan Kelly's Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the*

law, and 3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th Protections.

126. The Delaware Supreme Court misrepresented my arguments in the September 7, 2022. I wanted the accused to have the choice of an open or closed proceeding to allow more fairness instead of secret fixed proceeding focused on serving business gain not individuals, individual liberty or the public.

127. Professional Boards do not serve or protect the public. Board members are partial to marketing professions, business, material gain and money as the goal of justice, which creates injustice.

128. There are questions of additional procedural due process violations that remain unanswered relating to how the Delaware Supreme Court acted as witness and judge in the Disciplinary proceeding in collusion with the arms or agents of the court.

129. It is notable my pleadings relating to attorney dues caused me to realize that the Supreme Court caused the interference in Kelly v Trump since DE-Lapp referred to them.

130. The Delaware Supreme Court's opinion cited a case regarding bar dues, appearing to value money over Constitutional liberties. *In re Bar of Supreme Court of Del.*, No. 58, at *9 n.14 (Del. Aug. 10, 2022) ("*In re Member of Bar*, 257 A.2d 382, 383 (Del. 1969)")

131. Any substantive or procedural defects in violation of the First and Fourteenth Amendment, collusion, bad faith or bias by the Delaware Courts or arms is relevant to whether this Court should render reciprocal discipline.

132. This court must grant me the opportunity to gather necessary evidence in defense of this reciprocal law suit by granting a stay. US Amend I, XIV.

133. I must be afforded the meaningful opportunity to prepare and present my case by allowing me to subpoena witnesses and cross examining them, and by discovery.

134. My January 15, 2022 motion before the Delaware Board to call a witness before the Board was denied by being ignored in part because the Court discharged that person from the court to protect the court, not the staff member.

135. The Court sought to hide the elimination of two witnesses to collude in fixing the proceeding against me by denying me the opportunity to perform discovery, call witnesses, and cross examine those witnesses.

136. This evidence is more fairly obtained in an open forum in the civil, where witnesses I expect to call Delaware Supreme Court judges.

137. I moved the civil rights court in January 2022, to include the judges as witnesses in an amended complaint, I sought to amend as a matter of right under Rule 15. Albeit, after his third Order, where he ignored this Motion, I moved to amend the complaint at a suspended time. I have since then, moved the court to amend the complaint again to include new and additional information and claims. DI 58 DE District Court, for example.

138. It is preferable and fairer to gather testimony in the civil rights case, rather than a closed forum needlessly increasing costs to the Court, witnesses and the party.

139. I assert my right to call witnesses and gather discovery in this Court even if this Court continues to wrongly deny a stay which prejudices me, for no necessary reason somehow more important than the loss of my fundamental rights and property interests in my license harmed but for my exercise of my rights.

140. The Pennsylvania Supreme Court must grant a stay to protect my 14th and 1st Amendment meaningful access to the courts, from a substantial burden upon me due to my poverty and religious objection to debt. A stay must be granted to allow me to gather facts to show the truth of the matter by facts and law to defend my liberty, life, eternal life and licenses.

141. The evidence shows the Delaware Supreme Court violated proper procedures and was the source of the disciplinary law suit. I incorporate herein by reference in its entirety Exhibits A-4, and A-5 which outline procedural due process violations in Kelly v Trump, and my pleadings showing belief that a Delaware Supreme Court justice incited the attacks by the state against me during Kelly v Trump to cause me to forgo my Freedom of Religion Restoration Act Law suit in violation of federal law, and the Constitution. See 42 USC Section 1985, US Amend I, XIV.

142. In February, 2022, per the email I attached to another pleading before this PA Supreme Court, it appears all of the justices instead of merely one judge instigated or participated in inciting the proceeding against me as witness, judge and jury.

143. The Supreme Court was in receipt of my petitions for exemptions from bar dues.

144. Per DE-Lapp's letter, my request for an exemption from bar dues was the admitted reason this arm of the Delaware Court attacked me in May 2021, in interference with Kelly v Trump. (A-4, A-5, please refer to the letter)

145. The only people in possession of those petitions for relief from bar dues for all attorneys facing economic hardship, not merely me, in order not to violate the Equal Protections Clause of the 14th Amendment by favorable or disparate treatment towards me was DE-ODC's Kathleen Vavala's Uncle at the Delaware Bar Association, Mark Vavala, and the members of the Delaware Supreme Court and their staff.

146. To my knowledge at that time in 2021, no other person was aware of my petitions for bar due exemptions.

147. Albeit a Judge of another Delaware Court, Judge Clark alluded to my economic hardship request when he attacked me in interference of Kelly v Trump.

148. A Court of Common Pleas judge, Judge Clark attacked me first, before DE-Lapp.

149. I alleged in Kelly v Trump I esteemed Judge Clark in my complaint against President Trump. So, it appears members or agents of Chancery or Delaware Supreme Court made a request to Judge Clark. It was someone who read my complaints who incited the attacks.

150. At BJ's a bulk grocery store, sometime in April 2021, Judge Clark appeared to investigate me and threaten me because of my religious-political speech contained in my petitions. (Exhibits, A-4, A-5). If I recall correctly, he feigned concern about money or bar fees. Judge Kenneth Clark also admitted he interrogated me at DE ODC's request.

151. I asked Judge Clark if the DE ODC requested, he contact me. He responded by shaking his head up and down.

152. This Court must grant a stay so as not to violate my right to a fair proceeding to provide arguments on the defenses permitted by Pa.R.D.E., Rule 216 (c) because there are questions of Disciplinary forum partiality and material fact necessary for me to gather to answer this Honorable Court's order in my defense against this reciprocating law suit.

153. This court must allow me opportunity to meaningfully defend myself before this Court in accordance to the 1st and 14th Amendment.

154. I learned of facts material to my defense as late as December 1, 2022. I am not sitting on this. I am not delaying in bad faith. I am seeking to uncover truth.

155. Sadly, I provided inaccurate information to the Delaware District Court I corrected to provide more heinous conduct by the Delaware Supreme Court.

V. New and additional information affecting this Court's Determination arose after this Court's November 8th Order that could not have been discovered by due diligence which is material to this case and to the issue of whether a stay must be granted.

156. The Delaware Supreme Court placed my license to practice law on disability inactive to punish me for my religious beliefs, contained in my petitions and in response to my exercise of my right to access to the Courts to defend my First Amendment exercise of religious belief from a government compelled substantial burden in Kelly v Trump.

157. The Delaware Supreme Court also punished me in retaliation for my petitions to exempt bar dues for all Delaware Attorneys facing economic hardship. In one of its disciplinary orders against my license the Court specifically refers to a case regarding bar dues.

158. Money gathered by bar dues, I paid in 2021 is not more important than preempting Constitutional law, and federal law. U.S. Const. art. VI., § 2.

159. The Delaware Supreme Court erred by violating my First Amendment and other Constitutional rights, to serve the **mere money**, or the appearance of justice while committing grave injustice against me and others, by precedent by instituting a discipline suit against me based on religious-political-poverty animus, by sealing documents without notice or an opportunity to be heard in Kelly v Trump, by denying me meaningful opportunity to plead my case in the disciplinary case, and by firing two court staff to prevent their testimony in my defense.

160. I requested that all attorneys similarly situated be treated the same by affording grace to all, not merely me, so as not to violate the Equal Protections Clause. Citing A-4 and A-5.

161. I paid the Delaware bar due for 2021 in a timely fashion. Citing A-4 and A-5 which includes proof of payment.

162. The state admits that my religious speech contained in my Religious Freedom Restoration Act petitions to safeguard my religious exercise is the source of the disciplinary law suit in the Delaware Office of Disciplinary Counsel's ("DE ODC") letter dated August 23, 2022, and in its petition against me at Paragraph 7, I incorporate herein by reference as Exhibits 1 and

2.⁷ I believe that people sin when they seek money as savior in place of God which is not a popular belief when the world praises what I believe to be the the mark of the beast or lawlessness or damnation without repentance, business greed.

163. Earlier this year the United States Supreme Court granted a government employed coach freedom to exercise religious-speech and religious exercise, without government retaliation or persecution, but for the football coaches exercise of religious belief.

164. The United States Supreme Court in *Kennedy v. Bremerton Sch. Dist.*, 213 L. Ed. 2d 755, 142 S. Ct. 2407 (2022) held, “The Free Exercise and Free Speech Clauses of the First Amendment work in tandem: where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities. U.S. Const. Amend. 1.

165. I am a private not a government actor, like the football coach. I should be offered the same Constitutional protections afforded to private citizens or government citizens acting allegedly in his private capacity, as the court found.

166. I desired to exercise my private Constitutional rights, including but not limited to access to the Courts to defend my exercise of religious exercise from government substantial burden. I let go of the idea of running for office when I received threats to my person and property based on my religious-political belief when I chose to file a law suit against former President Trump. My faith in Jesus is even more important than my desire to draft just laws to

⁷ See, *Mountain Environment v. District Court*, 677 P.2d 1361, 1364-65 (Colo. 1984) “The right to petition has been characterized as one of “the most precious of the liberties safeguarded by the Bill of Rights.” *United Mine Workers v. Illinois State Bar Association*, [389 U.S. 217, 222](#), [88 S. Ct. 353, 356](#), [19 L.Ed.2d 426, 430](#) (1967).”

care for people, while protecting their liberty to say my ideas are bad as opposed to oppress to control, or to control by enticing tempting rewards.

167. Delaware court agents mistreated me and disparately treated me based on political-religious-or poverty animus.

168. I motioned the Court for help concerning the disparate treatment, and the Court not only sealed my pleas for help, it also punished me by instituting proceedings against me in interference of Kelly v Trump, while the case in which I was a party was ongoing.

169. The Delaware Supreme Court also instigated the disciplinary law suit and upon information and belief participated in the preliminary hearing as witness, and judge, to cover up state Court misconduct. (See Exhibits A-3, A-4, A-5)

170. Until around or about December 1, 2022, I believed the Delaware Supreme Court sealed my motions and A-4 and A-5 on the date of the preliminary hearing to fix the outcome by concealing evidence material to my defense.

171. Upon information and belief, I learned the Delaware Supreme Court more heinously sealed these documents during my live case, Kelly v Trump, to prevent a mistrial, and to prevent the US Supreme Court and others from seeing my pleas, and to knowingly prejudice the Delaware disciplinary proceeding against me.

172. According to the Docket provided by Court Link attached to my First Motion for a stay, the Docket was accessed by the Delaware Supreme Court on the date of the preliminary hearing, November 3, 2022.

173. It processes the date of changes or access the next day. If you look at the top of the Court Link document it indicates it was last retrieved on November 4, 2022, meaning it was actually retrieved on November 3, 2022.

174. All of this time I thought the Delaware Supreme Court sealed my petitions relating to the contents in the attached A-4, and A-5 on the date of the preliminary hearing to conceal evidence necessary to my defense.

175. A-4 and A-5, previously incorporated herein and attached hereto, contains two pleadings that the Delaware Supreme Court secretly sealed to conceal my complaints concerning State agent and court agent attacks against me in violation of my procedural due process rights to affect the outcome of Kelly v Trump, as A-4 and A-5.

176. It appears the Delaware Supreme Court or its agent may actually have attended, aided in or participated in the preliminary hearing as witness and judge instead of merely sealing the documents.

177. To my horror, on or about December 1, 2022, I reviewed the attached graph included herein as Exhibit 11, hereto from file and serve.

178. File and serve is the docketing service the Delaware Supreme Court uses.

179. The Delaware Supreme Court sealed pleadings material to my defense to prevent a mistrial and to prevent the US Supreme Court from seeing the procedural due process complaints I made I incorporate and include herein by reference in Exhibits A-4 and A-5, attached hereto.

180. The Delaware Supreme Court also sealed to the documents to collude in fixing the Delaware Disciplinary proceeding against me. The other documents appeared public. It was only the documents necessary to my defense that were hidden.

181. According to the graph the file and serve representative provided, these documents were unsealed after my Board proceeding in response to my complaints to the Clerk of Court.

182. I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State.⁸

183. Third Circuit Judge Bright's, concurring in part and dissenting in part in *U.S. v. Wecht*, 484 F.3d 194, 221, 226 (3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

184. In my case the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state.

"When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure." *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); See *United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

⁸ (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Constitution. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs.*, 800 F.2d 339, 343 (3d Cir. 1986).

185. In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, DI 16, 21, 40, 41, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

186. The Delaware Supreme Court sealed the 4 separate entries or group of entries I noted in Exhibit A-3, including but not limited to:

1. Exhibit A-4, Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just,
2. Internal Exhibit thereto, including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court's staff based on religious belief, political association or poverty; emails,
3. Internal Exhibit, Oct 19, 2020 letter to Patricia Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email,
4. Internal Exhibit, letter dated May 21, 2020
5. Internal Exhibit A-5, Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation,
6. Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship,
7. Internal Exhibit Feb. 5, 2021 letter request for relief from bar dues, my concerns relating to recent US Supreme Court cases;
8. Internal Exhibit, previously sealed pleading Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, and exhibits thereto
9. Internal Exhibit, previously sealed pleading Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto.

187. The file and serve graph indicates *Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just* was sealed on May

27, 2021. It appears to be remaining on seal as of 2:52 PM that date. See Exhibit M Attached hereto incorporated herein.

188. Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter was sealed May 27, 2022, and remains sealed.

189. A-4 and A-5 appear to be sealed at this time too, per Exhibit M.

190. The Delaware Supreme Court Clerk and staff misled me before on multiple occasions. They alleged the documents were unsealed.

191. It is likely, Delaware Supreme Court judges ordered them to tell me this. I must be afforded opportunity to find out the truth concerning why the staff would be directed to misrepresent the truth to me.

192. I alerted DE-ODC of the problem per the attached emails I forwarded to PA-ODC, incorporated herein as Exhibit N.

193. The File and serve staff were not available for additional questions and is out of the office, but there appears to be concealing of documents in the disciplinary matter too.

194. The new procedural due process violations are material to my defense of this Court's reciprocation.

195. I await for additional information from file and serve which is material to my defenses before this Honorable Pennsylvania Supreme Court.

196. I seek additional evidence and answers on bad faith of the Delaware Supreme Court or its arms motive, Delaware Supreme Court partiality towards the state, procedural due

process violations, religious-political animus, collusion to fix the outcome in the original disciplinary proceeding and in Kelly v Trump, and to cover up state misconduct is material to this Court's reciprocal determination.

197. This reciprocating law suit is based on a Delaware Supreme Court Order placing my license to practice law on disability inactive.

198. Any additional information showing the reciprocating Court's Order must not be adopted by this Court is material to this case.

199. New information arose that could not have been discovered with due diligence before this Court's November 8, 2022 Order denying my request for a stay.

200. This Honorable Court must afford me 1st and 14th Procedural due process by modifying its Order pursuant to 42 Pa. Stat. and Cons. Stat. Ann. § 5505 to allow a stay, in light of the new and additional information showing procedural defects in the disciplinary proceeding, bad faith, collusion and the need for me to gather truth to defend myself before this Honorable Court should this case not be dismissed.

VI This Court erred as a matter of law, and as a matter of fact creating manifest injustice against me by denying my Motion to Stay the case, especially in light of additional facts.

201. This Court erred as a matter of law, and as a matter of fact creating manifest injustice against me by denying my Motion to Stay the case, especially in light of additional facts.

201. This Court made no finding of fact that the Court's interest or the public's interest or any other person's interests outweighs the harms towards me by denial of the stay.

202. This Court did not provide a finding on how denial of a stay in this case is somehow more important than the immediate irreparable, real not abstract loss of my Fundamental rights including but not limited to my 1st Amendment right of religious belief, First Amendment religious speech, First Amendment right of religious-political and professional affiliation, First Amendment religious exercise or my interest in my retired license.

203. This Court did not analyze how a change on the status of my retired license will cause hardship should it be placed on disability inactive needlessly or without adequate time for me to defend myself.

204. An Order of reciprocal discipline foreseeably affects my other property interests beyond rendering it more difficult for me to seek readmission to practice law from my retired status.

205. It reenforces additional punishment against me for the exercise of my First Amendment rights so as to chill me and others by precedent.

206. Denying a stay deprives me of meaningful opportunity to be heard making it more difficult to defend my liberty, and license.

207. Should this Court impose a reciprocating order, without granting a stay, it will make it more difficult for me to find work as an attorney in Delaware, even if I am able to vacate the original order.

208. An outcome may also affect my ability to fight in a fairer and open forum where I am more freely able to gather testimony by opposing parties without the costs or duplicity and additional costs for all courts involved.

209. My appeal of the original Delaware disciplinary order or the Civil rights proceeding Kelly v Swartz, 21-1490, will likely make this Court's reciprocal proceeding moot. I seek to move the Delaware District Court to vacate the original Delaware disciplinary order as voidable, due to procedural due process violations and other constitutional violations. (US Amend I, XIV).

210. The source of this Court's potential discipline may be nullified. Therefore, I request this Court conserve its own resources in the interest of justice until completion of the civil rights case and appeal of the original disciplinary matter before the Honorable Supreme Court, or until the time for appeal has lapsed.

211. Proceeding with this disciplinary proceeding without a stay would also cause a substantial burden upon my access to other courts, due to my limited resources in terms of time, money and material.

212. I am unemployed, and I am impoverished.

213. Continuing with this reciprocal proceeding, without a stay before the litigation on appeal of the original disciplinary proceeding and the civil rights case is complete including appeals to the United States Supreme Court or until the time of appeal has lapsed would create an economic burden so great as to deny me access to this court and other courts to defend my First Amendment rights. (US Amend I, V).

214. I also have religious objections to indebtedness. Continuing this proceeding without a stay would force me into likely needless debt requiring I violate my religious beliefs in order to defend my liberty to exercise religious beliefs without government retaliation or forgo my access to the Courts, my First Amendment rights and my property interests in my licenses, and relief from other harm.

215. There is no compelling reason to deny my request for a stay. The public and parties are not prejudiced by my request. I am not practicing law in any jurisdiction. Nor is any justification narrowly tailored to meet any compelling reason. This Court may stay a reciprocal case, with no prejudice, while potentially avoiding needless work for this court, the appellate courts and the parties in related cases.

216. 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.

217. The public may also 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 and 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, which may also be appeal to the Honorable United States Supreme Court.

218. 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.

219. The Delaware Disciplinary proceeding is defective on its face. The record shows evidence of fraud, and collusion. 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. My request to call one of the terminated employees was ignored and indirectly denied.

220. Despite having good cause to contest a reciprocal proceeding by this Honorable Pennsylvania Supreme Court, I lack time and resources to appeal the original DE disciplinary proceeding, the civil rights case, while fending off reciprocal cases, which may also be appealed. I am unemployed. I am 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 down turn.

221. I do not have the time, ability or resources to fight all cases all at once. In the interest of justice, and for good cause, I request this Honorable court preserve the right for my meaningful opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

Wherefore I pray this Court grants this Motion.

Dated: Dec 19, 2022

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire

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Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Retired Bar No. 202268, INACTIVE, not practicing
law

Exhibit 2

W
FILED
DEC 27 2022
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

U.S. COURT OF APPEALS, THIRD CIRCUIT

Meghan Kelly)	Appellate Court
Plaintiff,)	No.: 21-3198
v.)	No. 22-2079
Disciplinary Counsel Patricia B.)	
Swartz, et al.)	District Court
)	No.: 1:21-cv-01490-CFC
Defendants.)	

Appellant Meghan Kelly’s Motion to correct an error in material fact pursuant to Rule 10 (e)(2)

Appellant Plaintiff, Meghan Kelly, respectfully moves this Court to correct an error of material fact pursuant to Rule 10 (e)(2).

1. On or about December 1, 2022, I discovered additional evidence members of the Delaware Supreme Court colluded in the disciplinary proceeding.
2. I did not want to be a hypocrite by providing information not on the record below, since I filed a motion objecting to a document not on the record. (Third Circuit Docket Item (“3DI)
3. So, I filed the new information with the Delaware District Court by affidavit, received Friday December 16, 2022. (I am not sure what the docket number is. I believe it is District Court Docket Item (“DI”) 103. My filing privileges were cut off the date the District Court received the order from the Delaware Supreme Court.)

4. I previously forwarded opposing counsel the new information by email prior to serving them the information simultaneously with the DE District Court below by US mail. (DI 103) Attached, please find proof of postage receipt by the District Court and opposing counsel.

5. In my pleadings before this Court and in the forum below I alleged the Delaware Supreme Court sealed my pleadings on the date of the preliminary hearing (DI 77, 3DI 41, 3DI 98).

6. I was wrong. I write to correct my misunderstanding pursuant to Fed App. Rule 10 (e)(2). (3DI 98)

7. To my utter horror a file and serve representative indicated that the Delaware Supreme Court sealed my pleadings during *Kelly v Trump* in 2021. File and serve is the docketing service the Delaware Courts use. I forwarded this Court the original emails I used to file two of the missing DI items in *Kelly v Trump* Case No 21-119 with the Delaware Supreme Court through the emergency email. (3DI 41-42). I think PACER was down on Sunday, and I electronically filed it the next day. I am sorry for filing it twice. This is the only time I used the emergency email to file.

8. The pleadings the Delaware Supreme Court sealed are necessary for a mistrial of *Kelly v Trump* based on procedural Due Process Violations under the 1st and 14th Amendment applicable to the state, my

defense in the disciplinary proceeding and my appeal to the United States Supreme Court, and my reputation.

9. Attached, please find my Petition of writ of certiorari to review Kelly v Trump No. 21-119. (DI. 4, Exhibit therein)

10. My petition should have been denied because I did not serve United States Attorney General David Weiss.

11. A chancery Court staff wrote on my praecipe. I was not granted a subpoena. I saw she switched pages to eliminate my address and instructed me to initial it on another praecipe to David Weiss. (DI 58, DI 58-2, 58-3, 58-5, 58-6)

12. Nevertheless, the Delaware Supreme Court wrongly made a determination on the merits. (DI 2, DI 4, opinion included therein)

13. The Delaware Supreme Court sealed my petitions, during an active case to fix the outcome and denied me an opportunity to be heard on a complete record on appeal before the United States Supreme Court and the panel, Board of Professional Conduct in state court, and in related cases, including this case. DI 2.

14. The docket numbers that were sealed in Kelly v Trump 2021-119 to conceal the records on review without providing me a notice or an opportunity to be heard are:

Transaction ID 66649842, docket item 21.

Transaction ID 66639035, docket item 16

Transaction item number 66667019, Docket Item 40, appendix A-4,

Transaction item number 66667019 Docket item 41 Appendix A-5.

15. To date, it appears the pleadings I petitioned the Delaware Supreme Court for relief for Due Process violations in *Kelly v Trump* may be unsealed. (DI 103).

16. I apologize, I think I stated on the record below I believed they remain sealed. DI 77. Per the attached graph found at the latest docket item below, which I think is DI 103, I incorporate herein by reference, the Clerk of Court sealed appears to have unsealed it on or about May 17, 2022. On or about May 27, 2021, June 6, 2021, and June 2 and/or 3rd 2021, the Court wrongly sealed the documents relating to procedural due process violations in *Kelly v Trump*.

17. It was not until December 1, 2022, that I discovered the records were unsealed during *Kelly v Trump*, not the date of the preliminary hearing to determine cause. Albeit, there is evidence the members or agents of the Delaware Supreme Court accessed the record and participated in the preliminary hearing I should be allowed to investigate. Please see the attached docket for *Kelly v Trump* filed with the US Supreme Court for that case, and the lexis docket showing the date of access, which is the day

before the date noted in red, the date of the preliminary hearing. I incorporate these by reference. (DI 77, DI 103)

18. Attached, please find two motions, excluding exhibits and Exhibits A-4 and A-5 that were sealed to prejudice my defense in the disciplinary proceeding, I attach hereto and incorporate herein. (DI 4)

19. I do not want any more staff members getting into trouble. I believe the Delaware Supreme Court Clerk of Court Lisa Dolph listened to the direction of the Delaware Supreme Court in making my petitions disappear by seal, as if I never existed and the alleged misconduct in interference with my active case, Kelly v Trump never existed.

20. The documents the Delaware Supreme Court sealed entries include but are not limited to the following documents:

1. Exhibit A-4, Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just,
2. Internal Exhibit thereto, including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court's staff based on religious belief, political association or poverty; emails,
3. Internal Exhibit, Oct 19, 2020 letter to Patricia Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email,
4. Internal Exhibit, letter dated May 21, 2020
5. Internal Exhibit A-5, Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation,

6. Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship,
7. Internal Exhibit Feb. 5, 2021 letter request for relief from bar dues, my concerns relating to recent US Supreme Court cases;
8. Internal Exhibit, previously sealed pleading Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, and exhibits thereto
9. Internal Exhibit, previously sealed pleading Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto.

21. All this time I believed the Court sealed the records on the date of the preliminary hearing. (DI 77). Instead, it appeared the Delaware Supreme Court or its agent acted as a judge and witness by participating in the preliminary hearing as shown by the docket access entry on Court Link. I write to correct my mistaken belief. DI 77, DI 103.

22. These sealed documents and the timing they were sealed are material to my case where I seek relief not only for Defendants conduct in the disciplinary case, but in Kelly v Trump too.

23. The statute of limitations is approaching for a letter I filed which relates to the source of the misconduct by members of the Delaware Supreme Court where I requested relief from Bar Dues for all attorneys facing economic hardship. I alerted the Court to suspected conduct of the Delaware Supreme Court judges on the record, and of my desire to amend the complaint. DI 34, DI 35, DI 36, DI 39, DI 41, DI 58, DI, 69, DI 70-75,

DI 81, DI, 82, DI 85, DI 91. I believe shorten the complaint down the line in a rolling motion, if afforded the opportunity, but that happened after the Court below rendered an order. Id.

24. In one of the DE Supreme Court's opinions regarding placing my license on inactive disabled, a case the court cites points to bar due payments. "In re Member of Bar, 257 A.2d 382, 383 (Del. 1969)" In re Bar of Supreme Court of Del., No. 58, at *9 n.14 (Del. Aug. 10, 2022)

25. I believe First Amendment rights are more important than money and should not be bought, but should be free and safeguarded by the courts.

26. There are outstanding questions on when docket items were unsealed in In the matter of Meghan Kelly 22-58.

27. Overturning *Kelly v Trump* is important, not only to protect free exercise of religious belief, speech and association but also because I have more than one idea to use that case to reverse or prevent an economic crash should one occur.

28. I thought there was hope the courts understood there is more than one way the courts may reverse a planned crash when I saw a historical fact on the United States Supreme Court's web site relating to President Lincoln's Greenbacks attached hereto and incorporated herein. The court

removed it. So, I am concerned I may get into trouble with the United States Supreme Court too should they find my ideas so bad I am unworthy of being an attorney as the Delaware Supreme Court has found.

29. I am concerned about being denied meaningful opportunity to participate in the Courts by denial of time, especially in the reciprocity case. I am concerned about dying during this proceeding if I am not afforded time to drink water and take care of myself.

30. I have notified the Delaware District Court in DI 4, Exhibit 43, the United States Supreme Court, the Pennsylvania Supreme Court, the Delaware Board, and this Court by reference to the Delaware District Court Docket items that I am required to take additional time to drink water and rest in order not to harm my health or die. DI 4

31. I lose five pounds of water weight every month and must drink obscene amounts of water to prevent harm for a week. DI 4. I have not had time to drink water, rehydrate and rest. So my health is jeopardized lasting longer than a week.

32. I do not feel well now at all. I have religious objections to healthcare and mental health care. I believe people sin by telling people to pay professionals to eliminate problems, while ignorantly believing they help people. In my complaint Kelly v Trump I indicated my religious belief

business greed is the mark of lawless lusts misleading many to lose eternal life. DI 4, complaint attached therein. I believe the courts should judge the experts. Experts should not be the judges and thereby allowing the mark of lawless lusts to be the law misleading the many to lose eternal life the last day. I truly believe judges may choose to save lives and eternal lives. See *Amos 5:15*, and *Matthew 23:23*, but see *Isaiah 10:1-4*, regarding unjust decrees that focus on profit.

33. I am writing this before I address the Pennsylvania Supreme Court because I do believe there is an agenda to eliminate the courts down the line.

34. I believe the courts can stop the overthrow of the judiciary. I would like to ask the courts to stop it on my appeal from the Third Circuit reciprocal order. I am not sure if I will be afforded time and opportunity to do so though.

35. Attached, please find an article from Lexis regarding judgeless courts in China.

36. China is not the problem and is not in power, but upon information and belief, is under the control of the World Bank as a debtor.

37. I emailed opposing counsel information relating to the World Economic Forum and World Government Summit where they make

agendas, pretending to fix the problems they create, including the elimination of people judges.

38. The Courts are being manipulated by paid professional experts, a.k.a. businessmen, to be biased towards business greed, profit, productivity by expert's theories, making the business of the experts above the law. Courts can not see clearly to render true justice if they are more concerned with money, costs and productivity than truth under Constitutional law to care for the people they serve.

39. There is a psychological manipulation of the terms "equality" and "equal protections under the law" by propaganda the courts must not be controlled by.

40. The sameness standardization through automation creates is not freedom, fairness or equality under the law, but conformity to the standards within algorithms. It is equally forced conformity not equal protections where I protect your freedom to say you disagree with my ideas. Disagreement and disorder make us smarter because we may learn from one another.

41. Individual judges are special and necessary to protect the freedoms of individuals from being sacrificed to the majorities or entities interests.

42. Judges may protect individual beliefs and exercise of beliefs that do not conform to the standards or the norms or built in algorithms.

43. No individual liberty is protected under our Constitution without the Courts with people judges.

44. If I am afforded time to appeal the Third Circuit's Disciplinary Order, I may assert judges may only be disciplined by impeachment or by law suit not by through standardized control through term limits, self-regulation or third parties because I attached motions relating to the unconstitutionality relating to self-regulation or third-party regulation in that matter. Albeit, my arguments related to regulating attorneys. I desire to extend that to the federal judiciary.

45. This would be a step towards preventing the elimination of people judges as schemed.

46. One reason why I ran for office is because out of state title companies were practicing law without a license, messing up the chain of title, taking advantage of my deceased esteemed college Dick Goll, Esq., and costing the state of Delaware a lot of money. DI 2, DI 4. No one did anything about it. So I cared to try.

47. Automating the practice of law does not create fairness or equality but allows for lawlessness and exploitation of people for profit. In

one of the three books I provided to this Court it discusses the elimination or reduction of lawyer jobs. (DI 3, *The Fourth Industrial Revolution*, page 39-40) This is planned and creates injustice by control not a more fair system.

48. Since, I require water and am feeling quite unwell it is rather important that I alert you there are plans for the court's harm should anything happen to me.

49. The United States Supreme Court has the power to discipline me if it thinks my ideas are bad. I seek an opportunity to be heard not a guarantee of justice. It is the opportunity I fight for.

50. I am a little scared of petitioning the US Supreme Court. Per the attached, writ of certiorari in the footnote on page 20, I indicated I believed the US Supreme Court is misguided in a few decisions including but not limited to *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 130 S. Ct. 876, 175 L.Ed. 2d 753 (2010), *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 140 S. Ct. 2049, 207 L. Ed. 2d 870 (2020), and *Little Sisters of the Poor Saints Peter & Paul Home v. Pennsylvania*, 140 S. Ct. 2367, 207 L. Ed. 2d 819 (2020).

51. I think the US Supreme Court is sacrificing individuals and First Amendment individual liberties to entities without hearts that run on cold hard or electronic cash or conditional labor with no power to do any

good by unconditional love. I have to prove individuals, including individual judges are special, to be protected not sacrificed to entities by automation or otherwise.

52. On an aside, I received a replacement computer on Sunday December 18, 2022. (3DI 119, I noted my limited access).

53. I usually ask opposing counsel her stance before filing, but given it is Sunday, and I may face irreparable injury, I file this immediately.

Wherefore I pray the Court grants my motion.

Respectfully submitted,

Dated December 18, 2022

/s/Meghan Kelly

Meghan Kelly, Esquire
PA retired Number
202268 INACTIVE, not
acting as an attorney
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(Word Count 2,781)

Exhibit 3

LM
FILED
DEC 27 2022
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

Robot justice: China's use of Internet courts

By Tara Vasdani

This article was originally published by The Lawyer's Daily (<https://www.thelawyersdaily.ca/>), part of LexisNexis Canada Inc.

Would it scare you if I said that China has been doing this since 2017?

In December 2019, China has announced that millions of legal cases are now being decided by "Internet courts" that do not require citizens to appear in court. The "smart court" includes non-human judges, powered by artificial intelligence (AI) and allows participants to register their cases online and resolve their matters via a digital court hearing.

The Chinese Internet courts handle a variety of disputes, which include intellectual property, e-commerce, financial disputes related to online conduct, loans acquired or performed online, domain name issues, property and civil rights cases involving the Internet, product liability arising from online purchases and certain administrative disputes. In Beijing, the average duration of a case is 40 days; the average dispositive hearing lasts 37 minutes; almost 80 per cent of the litigants before the Chinese Internet courts are individuals, and 20 per cent corporate entities; and 98 per cent of the rulings have been accepted without appeal.

It is 2020. Your Canadian commercial dispute is paperless. A document management platform sifts through all parties' documents to flag relevant vs. non-relevant documents. A subsequent platform reviews the relevant documents, and tells you that your case has the stronger evidentiary background.

A legal research tool in the meantime is determining whether a shareholder may attract wages for services performed, or simply be paid dividends. It's time to move to summary judgment. An Online Dispute Resolution (ODR) tool reviews your motion materials, your Affidavit (e-signed) and the Responding Record. An AI judge flags a case from 1970 that still applies today and — you win your dispute. The decision can be appealed to a human judge.

Cost savings? Astronomical. A preliminary decision? Within one month. The AI judge's eye for 1970 case law? Well, he's not hungry or tired like your articling student.

China's first Internet court was established in the eastern city of Hangzhou in 2017 and in 2019, it was reported that users completed more than 3.1 million legal activities using the court system from March

through to October. More than one million citizens were registered with the system, along with approximately 73,000 lawyers.

Judicial officials recently invited reporters to the Hangzhou Internet court to see how it operates. In a demonstration, citizens were seen using video messaging to communicate with the AI judges, and the following was observed:

“Does the defendant have any objection to the nature of the judicial blockchain evidence submitted by the plaintiff?” a virtual judge asked during a pretrial meeting. The non-human judge was represented in the system by an image of a man wearing a black robe.

“No objection,” the human plaintiff answered.

The judges “appeared” by hologram and are artificial creations — there is no real judge present. The holographic judge looks like a real person but is a synthesized, 3D image of different judges, and sets schedules, asks litigants questions, takes evidence and issues dispositive rulings.

A Hangzhou court official told China’s state-run CGTN television network that the Internet court system operates 24 hours a day, seven days a week.

In today’s marketplace where almost everything is purchased or transacted online, the potential for this type of court system is significant.

In a previous article (<https://www.thelawyersdaily.ca/articles/11582/estonia-set-to-introduce-ai-judge-in-small-claims-court-to-clear-court-backlog->), I commented on Estonia’s adoption of an AI judge to settle small claims disputes. Prior to that, I commented on the Ontario Superior Court of Justice’s pilot project launched on Feb. 11, 2019, the Digital Hearing Workspace (<https://www.thelawyersdaily.ca/articles/10192/digital-hearing-workspace-pilot-project-one-step-closer-to-court-modernization->) (DHW). The program is currently used to deliver, store, organize and retrieve all documents relevant to a file, electronically. It applies to all Commercial List proceedings, and failure to upload documents to the platform is addressed by a presiding court official.

Combined with an ODR system or AI-powered judges, and considering the backlog of civil and commercial disputes experienced by litigants in Canada, the idea of an AI judge seems to resolve many current issues. And it is not too far from our midst.

The U.S. recently forecasted a time when AI-driven legal assistants might be presenting judges with case law, precedents and the background needed to make a decision. Hear that? Legal assistants.

In 2019, I reviewed a very helpful, and very vanguard legal research AI tool championed by the Toronto-based company, Alexsei.

Tools such as Alexsei use machine learning to identify relevant and up-to-date case law across the web and

scan the Internet to discern lawyers' opinions on cases as identified in their legal blogs. The software then generates a legal memorandum within 24 hours of being asked a legal research question.

China, or Estonia as I reported in 2019, are not the first to mix AI and the law. In the United States, algorithms assist in recommending criminal sentences. The widely popular U.K.-based app DoNotPay, an AI-driven chatbot, overturned 160,000 parking tickets in London and New York a few years ago.

The international deployment of Internet courts is just another step in the saga of the eventual automation of certain legal tasks and processes.

Taken in harmony, the last year in Canada alone saw the adoption of directives within the federal government regarding AI's replacement of mundane administrative tasks; judges' reprisal for the failure to use legal research AI tools to assist in conducting research and saving client legal fees; the DHW, requiring counsel and parties to upload their documents to an electronic filing system; and my personal favourite, Google's Duplex which I hope will arrive into our industry soon.

All in all, I repeat, adopt and reiterate that the legal industry's resistance to the above changes will create great hurdles to lawyers and their staff alike. Modern judiciaries have already begun to expect the employ of legal tech tools by counsel, students and the courts. Should lawyers choose not to live up to the challenge, they could end up with a very disappointed client, potentially large and assessment-worthy client cost consequences and since 2017, an algorithm's reprisal.

Tara Vasdani is the principal lawyer and founder of Remote Law Canada (<https://www.remotelawcanada.com/>). Her practice centres on employment law, civil litigation and remote work. She has been featured in Forbes. She was the first Canadian lawyer to serve a statement of claim via Instagram, and you can reach her directly at tara@remotelawcanada.com (<mailto:tara@remotelawcanada.com>).

Interested in writing for us? To learn more about how you can add your voice to The Lawyer's Daily (<http://www.thelawyersdaily.ca/>), contact Analysis Editor Peter Carter at peter.carter@lexisnexis.ca (<mailto:peter.carter@lexisnexis.ca>) or call 647-776-6740.

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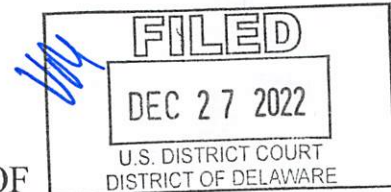
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UNITED STATES DISTRICT COURT IN THE DISTRICT OF
DELAWARE

Meghan Kelly)	Civil Action No.: 1:21-1490 (CFC)
)	
Plaintiff,)	
v.)	
Disciplinary Counsel Patricia B.)	
Swartz, et.al)	
Defendants.)	



CERTIFICATE OF SERVICE OF
PLAINTIFF MEGHAN KELLY'S FIFTH AFFIDAVIT UPDATE
U.S. DISTRICT COURT, DISTRICT OF DELAWARE

I, Meghan M. Kelly, Esquire, hereby certify on Dec. 21, 2022, I had a true and correct copy of the above referenced letter, served via first class mail to Defendants, through their counsel:

Zi-Xiang Shen and Caneel Radinson-Blasucci
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Respectfully submitted,

Dated Dec. 21, 2022

CMeghan Kelly
Meghan M. Kelly
 Meghan Kelly, Esquire
 34012 Shawnee Drive
 Dagsboro, DE 19939
meghankellyesq@yahoo.com
 (302) 493-6693

Under religious protest as declaring and swearing violates God's teachings in the Bible, I declare, affirm that the foregoing statement is true and correct under the penalty of perjury.

Dated: Dec. 21, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)