

No. 23-1120

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In The  
**Supreme Court of the United States**

DABETH MANNS,

*Petitioner,*

v.

U.S. BANK NATIONAL ASSOCIATION AS TRUSTEE FOR  
BANC OF AMERICA FUNDING CORPORATION FOR  
MORTGAGE PASS-THROUGH CERTIFICATES 2007-03,

*Respondent.*

ON PETITION FOR A WRIT OF CERTIORARI  
TO THE DISTRICT OF COLUMBIA  
COURT OF APPEALS

**SUPPLEMENTAL BRIEF**

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## **SUPPLEMENTAL BRIEF FOR PETITIONER**

The present Supplemental Brief is humbly submitted to call attention to an intervening matter not available at the time of the initial filing, pursuant to: this Court's Rule 15.8, this Court's correspondence to Petitioner (Manns) dated June 07, 2024, and the in-absentia Response from Respondent's legal counsel at the calendar date and time of filing this Supplemental Brief. Specifically, the Respondent's subsidiary servicing company known as Computershare/Specialized Loan Servicing, LLC ("SLS") is now known as Newrez LLC ("Newrez") DBA (doing business as) Shellpoint Mortgage Servicing ("Shellpoint").

The aforementioned entities are not named as an original party but have a stake in the outcome. Manns requested from Newrez the identity of the creditor(s)/investor(s) of record for the discharged disputed debt alleged. As of the calendar date and time of filing this Supplemental Brief, there has been no response.

Prior to this Supplemental Brief and pursuant to Supreme Court Rule 29, Manns submitted an Erratum Letter by postal mail to opposing counsel and to this honorable Court. The said Erratum Letter specified and corrected Manns' typographical error in the Petition for Writ of Certiorari: the word 'million' was changed to the word 'billion' on Page 20, Paragraph 1, Line 5 of the Petition for Writ of Certiorari.

An unbound copy of the Petition for Writ of Certiorari (showing the singular revision aforementioned) was enclosed as Supplemental Material to the Erratum Letter and sent to both opposing counsel and this honorable Court. It was received by this honorable Court on May 24, 2024. In addition, an accompanying record during lower Court proceedings demonstrated opposing counsel declared the matter to be closed as of September 22, 2022 (i.e., multiple days before the appellate Court ruled on Manns' motions to recall the mandate and conduct a hearing/rehearing en banc).

This is relevant because in the accompanying record, opposing counsel directed Manns to the loan servicer which is the Respondent's parent company US Bancorp subsidiary affiliate (Computershare/Specialized Loan Servicing LLC). It was to no avail because the Respondent (not its servicing company) has the authority and responsibility to address legal challenges, prove accounting validity with verifiable granular fiscal data, and correct errors of accounting inaccuracy to assure the alleged principle debt owed is lawful.

Pursuant to Supreme Court Rule 29.6, Manns acknowledges that Respondent's parent company (US Bancorp) is a publicly traded enterprise owned by its shareholders including large institutional asset management companies: Vanguard Group, BlackRock, State Street, JPMorgan, and Mitsubishi UFJ Financial Group Ltd.-Investment Banking Arm.

1. The current "without" prejudice dismissal

status means that re-hearing the Respondent's claim would further burden and abuse the civil actions process pertaining to legacy foreclosures in the Court system.

2. The current "without" prejudice dismissal status is a result of the judiciary overlooking constitutional provisions, statutes, ordinances, and regulations by strictly relying on stare decisis and case law doctrine which hindered Manns from receiving due process and equal protection under the law.

3. The current "without" prejudice dismissal status means the Respondent has infinite privilege to bilk Manns by bringing the claim against her in the future which renders her severely prejudiced.

4. The current "without" prejudice dismissal status is a result of the judiciary categorically dismissing Manns' counter claims "with" prejudice and denying her multiple pleadings for a status hearing, judiciary examination of verifiable material evidence, required joinder (or impleading) of parties, and/or oral argument. This led to skewed judgments granting the Respondent's pleadings for foreclosure action, summary affirmance and moreover case dismissal "without" prejudice.

## CONCLUSION

For the foregoing reasons, and those stated in the previous filings, the Petition for Writ of Certiorari should be granted.