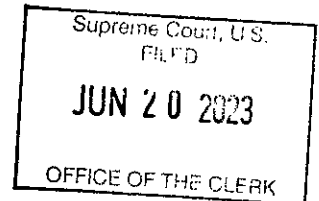


23-5386

No. _____

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES



BRYANT MATTHEW PARKER PETITIONER, PRO SE
(Your Name)

DIRECTOR, VIRGINIA DEPARTMENT
OF CORRECTIONS — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Fourth Circuit Court of Appeals
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

BRYANT MATTHEW PARKER, 1465598
(Your Name)

VADOC CENTRALIZED DISTRIBUTION CENTER
3501 WOODS WAY
(Address)

STATE FARM, VIRGINIA, 23160
(City, State, Zip Code)

N/A
(Phone Number)

QUESTION(S) PRESENTED

DID THE FOURTH CIRCUIT COURT OF APPEALS
ERR IN DEFERRING TO THE STATE COURT'S
FINDINGS THAT PETITIONER WAS NOT REPRESENTED
BY HIS STATE-APPOINTED ATTORNEY, DAVID BLANCHET,
WHEN IN FACT THE EVIDENCE IN THE TRIAL
RECORD AND ADDITIONAL EVIDENCE SUBMITTED
BY PETITIONER PLAINLY SHOWS THAT MR. HARGNIE
IN FACT CLEARLY DEMONSTRATED THAT HE WAS
NOT A GENUINE REPRESENTATION AGENT?

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IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

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

OPINIONS BELOW

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix 1 to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the United States district court appears at Appendix 2 to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix 3 to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the Circuit Court Loudoun County, VA court appears at Appendix 4 to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was FEBRUARY 16, 2023

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: MAY 20, 2020, and a copy of the order denying rehearing appears at Appendix 1.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from **state courts**:

The date on which the highest state court decided my case was APRIL 24, 2020
A copy of that decision appears at Appendix 3.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

UNITED STATES CONSTITUTION, AMENDMENT VI

UNITED STATES CONSTITUTION, AMENDMENT XIV

28 U.S.C. § 2254

28 U.S.C. § 1254

LIST OF PARTIES

☒ All parties appear in the caption of the case on the cover page.

☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

- ① ARIZONA VS. FULMANTZ, 499, U.S. 279-309-310 (1991) P.12
- ② BADWIN VS. COMMONWEALTH, 598, S.E. 2d, 754, P.7
43, 43, VA. 115 (2004)
- ③ CONRMAN VS. THOMPSON, 901, U.S. 722, 752 (1991) P.18
- ④ GIDROW VS. WAINWRIGHT, 872, U.S. 335, 344 (1963) P.13
- ⑤ HADNICK VS. TRUET, 443, F. 3d, 348, 359 (4th Cir. 2006) P.18
- ⑥ HOLLAND VS. FLORIDA, 560, U.S. 130 S.Ct. 2549, 177 P.14
L. Ed. (2010)
- ⑦ JOHNSON VS. UNITED STATES, 520, U.S. 461, 462, 60 P.13
117 S.Ct. 1544, 137, L. Ed. 2d, 718 (1997)
- ⑧ MARLES VS. THOMAS, 132, S.Ct. 992 (2001) P.14
- ⑨ MONTANEZ VS. RYAN, 566 U.S. 1 (2012) P.14
- ⑩ SLACK VS. MCDONALD'S, 589 U.S. 473, 484 (2000)

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

- (1) Strickland vs. Washington, 466 U.S. 668, 687-88 (1984) P.7
- (2) U.S. vs. Broughton-Jones, 71 F.3d 1143 (4th Cir 1995) P.7
- (3) U.S. vs. Cronin, 466 U.S. 684, 104 S.Ct. 2039 P.6
980 L.Ed 2d 697 (1984)
- (4) Williams (Ferry) vs. Taylor, 529 U.S. 362, P.12
397-398 (2000)

STATUTES AND RULES

88 U.S.C. 8854(i)
 88 3663 (a) (3)
 Rule 32 (B); (d) (2) (i)

OTHER

STATEMENT OF THE CASE

SEE ATTACHED DOCUMENT

Exhibits

1. HANGETH letter dated MARCH 17, 2016 P.1
2. HANGETH letter dated JANUARY 14, 2016 P.1
3. HANGETH letter dated MARCH 29, 2016 P.3
4. COPY OF SOUTHWESTERN MANUSCRIPT OF SEPT. 30, 13 P.5
5. SOUTHWESTERN MANUSCRIPT OF SEPT. 30, 2013 P.5
6. SOUTHWESTERN MANUSCRIPT OF SEPT. 30, 2013 P.5
7. SOUTHWESTERN MANUSCRIPT OF SEPT. 30, 2013 P.5
8. SOUTHWESTERN MANUSCRIPT OF OCT. 1, 2013 P.5
9. SOUTHWESTERN MANUSCRIPT OF OCT. 1, 2013 P.5
10. HANGETH letter dated JUNE 7, 2016 P.9
11. PETITIONER letter dated MAY 9, 2018 P.9
12. PETITIONER letter dated AUGUST 11, 2018 P.9
13. PETITIONER letter dated SEPT. 2, 2018 P.9
14. HANGETH letter dated SEPT. 13, 2018 P.9
15. HANGETH motion for CLARIFICATION AND/OR WITHDRAWAL DATED SEPT. 13, 2018 P.9
16. COPY OF MEMORANDUM AND DECISION OF CIRCUIT COURT dated MARCH 19, 2019 P.10
17. HANGETH letter dated MARCH 27, 2019 P.10

STATEMENT OF THE CASE

ON JULY 30, 2014, PETITIONER FILED A PRO SE. WRIT OF HABEAS CORPUS IN THE CIRCUIT COURT OF LOUDOUN COUNTY, VIRGINIA. (CIVIL NO. 89290). ON AUGUST 20, 2014, PETITIONER FILED AN AMENDMENT TO HIS PETITION AS CLAIM TWO CHANGING HIS TRIAL COUNSEL. MICHAEL HARDINGTON WITH INAPPROPRIATE ASSISTANCE OF COUNSEL FOR ABANDONING HIS CLIENT DURING THE SENTENCING PHASE OF HIS TRIAL AND FAILURE TO FILE A DIRECT APPEAL AS REQUESTED.

ON FEBRUARY 24, 2015, THE CIRCUIT COURT ENTERED AN ORDER GRANTING PETITIONER LEAVE TO AMEND HIS HABEAS PETITION. THE COURT GRANTED A MOTION TO APPOINT DAVID WARDH, AS STATE HABEAS COUNSEL AND ORANED AN EVIDENTIARY HEARING TO RESOLVE ISSUES RAISED IN PETITIONER'S CLAIM TWO OF HIS PRO SE. HABEAS (EX1).

ON JANUARY 17, 2016, ALMOST A YEAR AFTER HIS APPOINTMENT, MR. WARDH, NOTIFIED PETITIONER THAT THE EVIDENTIARY HEARING WAS SCHEDULED FOR APRIL 18, 2016. (EX2).

ON MARCH 29, 2016, MR. WARDH, NOTIFIED PETITIONER THAT MR. HARDINGTON

had refused to submit an Affidavit Confirming
Petitioner's 7th claim. Mr. Wancey Brown
stated in his letter that the Assistant
Attorney General had agreed to a delayed
direct appeal and because the appeal had
been granted the evidentiary hearing
was no longer necessary. (EX. 3)

During the period from Feb. 24, 2015
to March 29, 2016, Petitioner had no
direct contact with Mr. Wancey. Mr.
Wancey never met with Petitioner to
discuss any of his claims in his prose,
hears, in particular he never discussed
Petitioner's claim 7th and more importantly
he never discussed the cancellation of
the evidentiary hearing.

Mr. Wancey, as duly appointed counsel
for Petitioner states hears and not
just for the purposes of the evidentiary
hearing as subsequent evidence will
establish, Mr. Wancey had a duty to
meet with Petitioner, discuss and
advise Petitioner on the merits of his
prose, hears. Mr. Wancey had a duty
to correct and/or enhance any errors
or omissions in the prose, hears
and submit an amended Petition on
behalf of his client to the State hears

more. As Petitioner's evidence will show, Mr Hargrett did not perform any duties with reference to Petitioner, Pro Se, habeas.

HAD MR HARGRETT fulfilled his obligations, he would have known that Petitioner's claim was not just for the failure to file a direct appeal (which in and of itself is ineffective assistance of counsel). He would have known that following Petitioner's sentencing hearing the Court had granted Mr Harrington, a 90 day stay. And that during this 90 day stay, as Petitioner's evidence will show, Mr Harrington actually abandoned Petitioner.

HAD MR HARGRETT met with Petitioner prior to the cancellation of the evidentiary hearing, he would have known of the colorable claim against Mr Harrington. He would have also known that under NO CIRCUMSTANCES did Petitioner want the hearing to be cancelled. The hearing was Petitioner's opportunity to confront Mr Harrington not only with the failure to file the direct appeal, but more importantly, with Mr Harrington's abandonment during the 90 day stay. Mr Hargrett was a well-known hanger

to the order of restitution and asking the court for an opportunity to review the documents the prosecution claimed to have. Mr. Harrington raises no objection tells the court that he will review them at the end of the hearing and then asks the court for a 90 day stay.

Immediately following the hearing, Mr. Harrington met with Petitioner while he was still in the holding cell at the courthouse. Mr. Harrington tells Petitioner that he will get the documents from the prosecution, discuss them with Petitioner and approach the court with Petitioner's objections. Following this meeting, Petitioner never saw Mr. Harrington again. Despite numerous attempts by Petitioner and his family, Mr. Harrington never responded to his worst for assistance. Mr. Harrington had abandoned his client during the 90 day stay.

To Petitioner's state and federal habeas, he has argued that Mr. Harrington's abandonment occurred during a critical phase of his trial, a "structural error" as set forth in U.S. vs Cronk, 466 U.S. 648, 80 L.Ed. 2d 657, 104 S.Ct. 809 (1984).

Upon research for his state and federal habeas, petitioner learned that prior to accepting a plea, a defendant must be advised of a restitution order. Per Rule 11(e) and U.S. vs Broughton-Jones, 71 F.3d 1110, 3663 (11th Cir. 1997). Per Rule 32(b) and (c)(2)(ii), restitution must be disclosed in a pre-sentence report with particular emphasis on the defendant's financial ability to repay the amount of the restitution.

Because Mr. Harrington had abandoned petitioner during the 90 day stay, petitioner was deprived of an opportunity to challenge the restitution order. Baldwin vs. Co., 589 S.E.2d 754, 43 VA. 115 (2004). By depriving petitioner the opportunity to petition the sentencing court, petitioner's right to due process was violated.

Mr. Harrington's representation was constitutionally deficient as set forth in Strickland vs. Washington, 466 U.S. 668 80 L.Ed.2d 674, 104 S.Ct. 2052 (1984), and under the "advice of counsel" criteria of U.S. vs Crowe.

MR HARGRETT KNEW NOTHING OF THE FAILURES OF MR HARRINGTON, BECAUSE HE DID NOT CONSULT WITH DIRECTOR PRIOR TO THE CANCELLATION OF THE EVIDENTIARY HEARING.

FURTHERMORE, FOLLOWING THE CANCELLATION OF THE HEARING, MR HARGRETT, OBVIOUSLY, CONSIDERED THAT HIS REPRESENTATION WAS TERMINATED.

IN MR HARGRETT'S MARCH 17, 2013 LETTER, HE PLAINLY STATES:

"AS YOU PROBABLY ARE AWARE, I HAVE BEEN APPOINTED BY THE LUDLOW COUNTY CIRCUIT COURT TO REPRESENT YOU ON THE ISSUE OF HANNA'S CORDON THAT YOU FILED, PRO SE."

BUT IN CONTRAST, MR HARGRETT'S LETTER DATED MARCH 29, 2013, SUGGESTS THAT HE CONSIDERS HIS REPRESENTATION WAS ENDED:

"I AM NOT INTERESTED IN REPRESENTING YOU ON THE DIRECT APPEAL. HOWEVER, I WOULD BE WILLING TO REPRESENT YOU ON THE APPEAL OF YOUR HANNA'S PETITION SHOULD THE COURT APPOINT ME TO DO SO."

It is at this point, March 29, 2016, Mr. HANGETH unprofessionally withdraws his representation. He does not notify the court, nor does he constructively notify his client, both critical mistakes on his part and fatal to petitioner's state habits. (EX 10)

From March 29, 2016, to September 13, 2018, petitioner has no contact with Mr. HANGETH. Petitioner writes Mr. HANGETH on several occasions, but gets no response. (EX 11, 12, 13, 14)

On September 13, 2018, petitioner receives a letter from Mr. HANGETH (EX 14), with a "motion for clarification and/or motion to withdraw as counsel" of record. (EX 15)

"It is unclear whether the court appointed me to represent you at the evidentiary hearing only?"

On Mr. HANGETH's motion to withdraw, he asks the court to back-date his request to April 12, 2016, a clear indication that on that date he had consciously made a mistake and unprofessionally withdrawn his

representation.

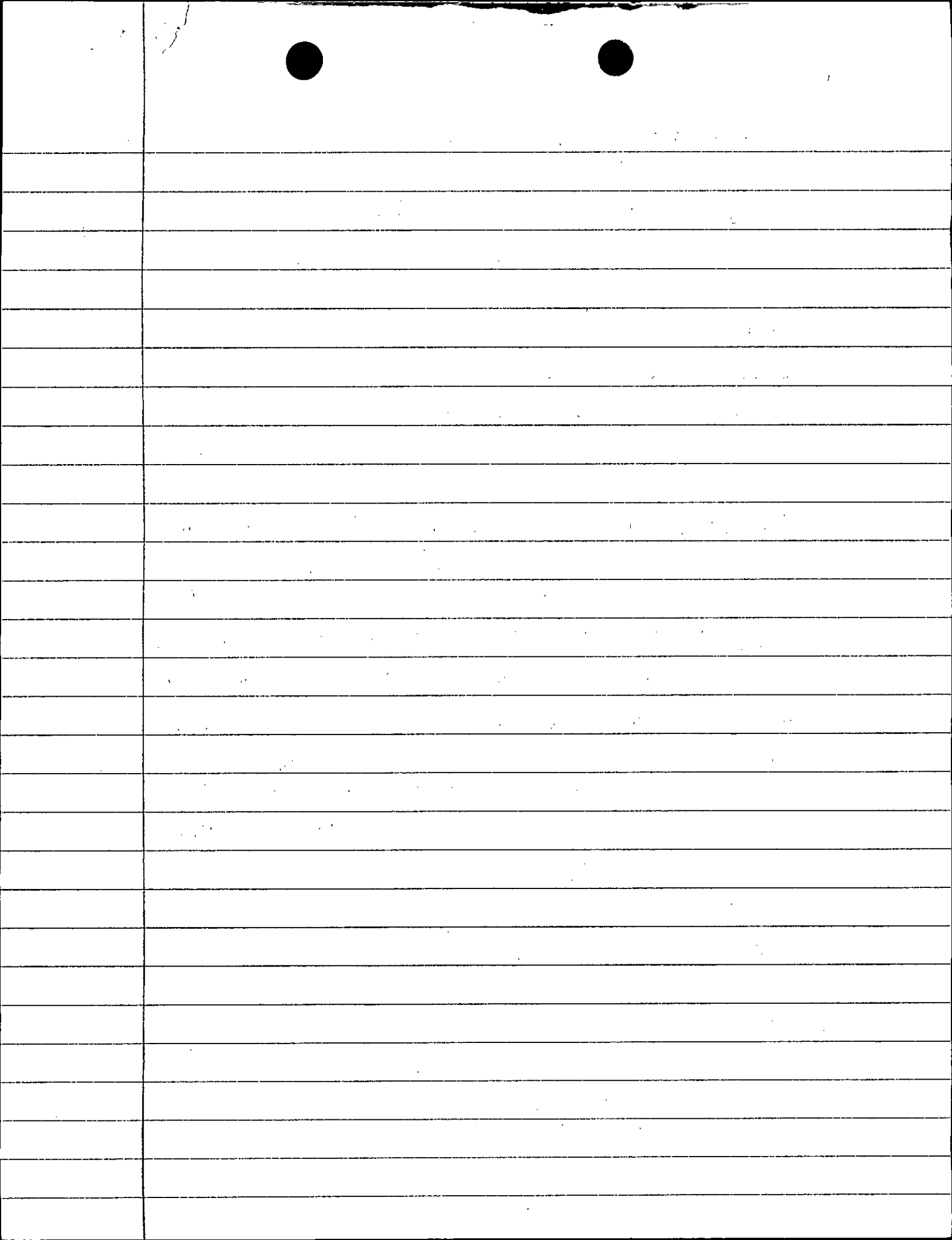
ON MARCH 13, 2019, THE STATE HONORS COURT dismissed PETITIONER'S STATE HONOR (EX 16)

CONTRARY TO MR. HANRAH'S BELIEF THAT THE COURT BELIEVES THAT PETITIONER IS ACTING PROSE, THE COURT FAULTS PETITIONER FOR FILING AMENDMENTS WHILE BEING REPRESENTED BY COUNSEL. THE COURT THEN CLARIFIES MR. HANRAH'S REPRESENTATION:

"MR. HANRAH HAD NOT BEEN APPOINTED JUST FOR THE EVIDENTIARY HEARING ONLY, BUT TO PETITIONER'S HONORS IN GENERAL"

THE COURT DOES NOT BACK-DATE HIS WITHDRAWAL AS REQUESTED, THUS CONFIRMING THAT MR. HANRAH'S REPRESENTATION COVERED A (4) YEAR PERIOD FROM FEB. 24, 2015 TO MARCH 13, 2019 (EX 17)

FROM THE EVIDENCE IN THE RECORD AND THAT SUBMITTED BY PETITIONER, IT IS CRISTAL CLEAR THAT MR. HANRAH'S REPRESENTATION WAS NOT JUST IN EFFECTIVE, IT WAS NON-EXISTENT.



REASONS FOR GRANTING THE WRIT

I. THE FOURTH CIRCUIT COURT OF APPEALS MISAPPLIED THE STANDARDS OF STICKLAND VS. WASHINGTON WARRANT THIS COURT REVIEWED

BOTH THE DISTRICT COURT AND THE FOURTH CIRCUIT MISAPPLIED THE STANDARDS OF STICKLAND IN THEIR REVIEW OF MR. HARGRETS REPRESENTATION. PETITIONER PROVIDED AN ADEQUATE AMOUNT OF EVIDENCE THAT MR. HARGRETS WAS APPOINTED TO ASSIST PETITIONER WITH HIS STATE HEARINGS, THAT SPENDING A PERIOD OF (4) YEARS, MR. HARGRETS HAD NO CONTACT WITH PETITIONER AND AS A RESULT HAD PETITIONER NO ASSISTANCE WITH HIS STATE HEARINGS.

PETITIONER ARGUES THAT THE PROPER STANDARD OF REVIEW IN ASSESSING MR. HARGRETS REPRESENTATION SHOULD BE UNDER THE PRINCIPLES OF CROWTHER, RATHER THAN STICKLAND. MR. HARGRETS UNPROFESSIONAL WITHDRAWAL WAS "A DENIAL OF COUNSEL" AT A CRITICAL STAGE OF HIS CASE, A "STRUCTURAL ERROR" THAT AFFECTED THE FRAMEWORK

///

WORK THAT WHICH WAS ADMITTED AT TRIAL, AND THAT WHICH WAS PRESENTED AT THE POST-CONVICTION STAGE. WILLIAMS (TERRY) VS. TAYLOR, 529, 362, 397-398 (2000)

THESE FACTUAL ISSUES REQUIRE THE ATTENTION OF THIS COURT TO REVIEW THE FOURTH CIRCUIT'S POLICY OF IGNORING EVIDENCE WHILE PERFORMING DEPENDENT ANALYSIS.

THE STATE COURT'S PREVIOUS DETERMINATION WAS UNREASONABLE, IN THAT IT FAILED TO EVALUATE THE TOTALITY OF THE AVAILABLE EVIDENCE.

BECAUSE THE FOURTH CIRCUIT COURT OF APPEALS APPEARED TO THE DISTRICT

SIMILAR TO THOSE FOUND IN THREE IMPORTANT
SUPREME COURT DECISIONS WHICH QUALIFY
THE PERFORMANCE OF AN APPOINTED HANES
COUNSEL:

(1.) MARTINEZ VS RYAN, 566 U.S. 1 (2012)

(2.) MADLES VS THOMAS, 132 S.Ct. 972 (2012)

(3.) HOLLAND VS FLORIDA, 560 U.S. 1305, Ct.
2549, 177 L. Ed. (2010)

PETITIONER IN HIS FEDERAL HANES ASKED
THE U.S. DISTRICT COURT FOR THE EASTERN
DISTRICT OF VIRGINIA, AND THE FOURTH
CIRCUIT COURT OF APPEALS TO REVIEW THE
PERFORMANCE OF HIS APPOINTED STATE
HANES COUNSEL, DAVID HARGRETH.

BROWN VII OF HIS HANES;

" DAVID HARGRETH, ASSIGNED TO ASSIST
MR PARKER, WITH HIS STATE HANES
CHARGING INEFFECTIVE-ASSISTANCE-
OF-TRIAL COUNSELS, ROBERT UERWAL AND
MICHAEL L. HARRINGTON NEWSPERSONAL
INEFFECTIVE ASSISTANCE OF COUNSEL
WHEN HE PROVIDED NO ASSISTANCE.
DURING AN INITIAL-REVIEW COLLATERAL

~~Proceeding~~ in violation of the Sixth and Fourteenth Amendments to the Constitution of the United States.

Both courts characterized the claim as "a free standing claim of ineffective assistance of counsel." This assessment misinterprets Petitioner's claim, by conveniently ignoring the "no assistance" statement. Petitioner throughout his state habeas and his federal habeas provided the court with ample evidence of Mr. Haraghe's failure to assist with Petitioner's state habeas.

Although Petitioner asked the District Court to review his claim not under the light of ineffective assistance but to interpret his claim of "no assistance" as abandonment. The court rejected this claim.

"Parker cannot bring a '2254 claim of ineffective assistance of counsel on any ground, including abandonment."

When Petitioner argued that pursuant to Martinez vs Ryan, Mr. Haraghe's abandonment was itself ineffective assistance of counsel. The District Court following the lead of Newsome's motion to dismiss, reject Petitioner's claim, arguing that Petitioner

NOT JUST HIS TRIAL COUNSEL, MICHAEL HARRINGTON, WAS NOT SUBSTANTIAL. THIS ARGUMENT IGNORES THE FACT, IN THE RECORD, THAT THE STATE BARBERS COURT HAD FOUND MR HARRINGTON'S DEFECTIVE PERFORMANCE SUBSTANTIAL ENOUGH TO ORDER FOR AN EVIDENTIARY HEARING AND APPOINT COUNSEL.

FURTHERMORE, IT WAS THE RESPONSIBILITY OF MR HARRINGTON TO PURSUE PETITIONER'S CLAIMS AGAINST MR HARRINGTON. HAD MR HARRINGTON INFORMED HIS DUTY TO ASSIST PETITIONER WITH CLAIMS AGAINST HIS TRIAL ATTORNEY, HE WOULD HAVE KNOWN THAT MR HARRINGTON NOT ONLY FAILED TO FILE A REQUESTED DIRECT APPEAL, BUT MORE FORMAL, AND AVOIDED HIS OBLIGATION THE 90 DAY STAY, WHICH IS HOW, AS ORDERED PETITIONER THE RIGHT TO CHALLENGE THE RESTITUTION ORDER. DENYING PETITIONER TO APPROACH THE TRIAL COURT WITH HIS OBJECTIONS TO THE RESTITUTION ORDER AND ESTABLISH HIS INABILITY TO REPAIR THE AMOUNT OF THE RESTITUTION WITHIN THE ALLOTTED TIME WAS A CLEAR VIOLATION OF DUE PROCESS. Baldwin vs. Commonwealth, 598 S.E. 2d 754, 43 VA. App 115 (2004). MR HARRINGTON HAD A DIRECT BARE CASE AGAINST MR HARRINGTON; IF HE HAD ONLY DONE HIS JOB.

Instead, Mr. Hargrett allowed the Evidentiary hearing to be cancelled without consulting with his client. Petitioner's deprivation to confront Mr. Harrington with his allegations, then, without notice to the court or to his client, Mr. Hargrett withdraws his representation.

Petitioner has provided the courts with the letters he received from Mr. Hargrett over a 4 year period, these letters confirm without a doubt that Mr. Hargrett had unconscionably withdrawn his representation following the cancellation of the Evidentiary hearing. Mr. Hargrett's representation failed both prongs of Strickland and was a "denial of counsel" under the lens of Crowie.

If a state court has adjudicated a petitioner's claims on the merits, a federal court may grant a petition for a writ of habeas corpus under "2854, only if the state court proceedings (1) resulted in a decision that was contrary to, or involved an unreasonable application of clearly established

a right to counsel in state habeas proceedings.
without exceptions"

Contrary to the District Court's assertion
that there are no exceptions to counsel.
The Supreme Court found in Martinez vs
Thomas that:

"in the habeas context, there
is no essential difference
between a claim of attorney
feelon however foreclosed and a
claim that an attorney had
essentially abandoned his client."

(Quoted, I joined by Roberts, CH. J. and
Kennedy, Breyer, Alito, Sotomayor and
Kagan, JJ)

When an attorney abandons his client
without constituting notice and/or
lack of the will, he severs the
principal-agent relationship. An attorney's
withdrawal, whether proper or improper,
terminates the lawyer's authority to act
for his client.

Under "the ineffectiveness or
incompetence of counsel during
state or federal collateral post-

(16)

time ... state collateral habeas corpus to

201

MOST UNLIKELY CHAIN-CHAIN OF EVENTS THAT,
WITHOUT NOTICE, EFFECTIVELY DERIVED
DEFINITION LEGAL REPRESENTATION. UNDER
THESE UNUSUAL CIRCUMSTANCES, I AGREE
THAT DEFENDERS PROSECUTOR DEFAULT
IS OVERCOME."

CONCLUSION

FOR THE REASONS STATED, THIS COURT MUST
GRANT A WRIT OF CERTIORARI TO HOLD THE FOURTH
CIRCUIT COURT OF APPEALS ACCOUNTABLE FOR FAILURE
TO PROPERLY APPLY THE LAWS OF THIS COURT.

CONCLUSION

PETITIONER DRAWS TO THE COURT TO GRANT HIM THE
RELIEF HE SEES, OR ANY SUCH NAMED THE
HONORABLE COURT DEEMS APPROPRIATE
The petition for a writ of certiorari should be granted.

Respectfully submitted,

Raymond M. Pake, PRO SE

BREXIT MATTHEW PAKER 146598

Date: 28 DAY JULY 2023