

23-5650
No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Lijo Panghat, M.D.
Petitioner,
v.
Dept. of Veterans Affairs
&
University of Maryland,
Baltimore
Respondent

Supreme Court, U.S.
FILED

SEP 22 2023

OFFICE OF THE CLERK

MOTION FOR LEAVE TO PROCEED

IN FORMA PAUPERIS

COMES NOW Petitioner Dr. Lijo Panghat, and requests that the Court permit Petitioner to proceed *in forma pauperis* with regard to this Petition for Certiorari.

Petitioner requests leave to file the attached Petition for a Writ of Certiorari without prepayment of costs and to proceed *in forma pauperis*.

In this Case, Petitioner **had sought leave to proceed *in forma pauperis*** and had then **been granted permission to proceed *in forma pauperis*** in the United States Court of Appeals for the **Fourth Circuit** because of continuing hardships.

As a result of the **illegal blocking** of Petitioner's confirmed employment at a renowned institute by his adversaries (UM), he has been effectively deprived of taking up any employment **for more than seven (7) years**. As the Petitioner has been **continuously denied a job** for several years, the financial burden on him is crushing and he **can't afford**

even a single attorney. He has to prepare his submissions under adverse circumstances, working on his own although he is not trained in law, being a physician. See sworn statement attached herewith ¶¶ 4 to 5.

This persistent deprivation has even **adversely affected Petitioner's basic health** and he has been diagnosed with nutritional deficiency diseases in this period after his unlawful termination. Further, Petitioner's health is **deteriorating**. See Affidavit ¶¶ 6 to 8.

Further reasons have been given in detail in the Affidavit attached herein.

WHEREFORE, for the above-stated reasons and pursuant to Rule 39 of the Supreme Court Rules, Petitioner requests that he be granted leave to file his petition for a *Writ of Certiorari* without prepayment of costs and to proceed *in forma pauperis*.

Respectfully submitted,

Dated: September 21, 2023



Lijo Panghat, M.D.

Pro Se
3120 Saint Paul St.
Apt. 111 E
Baltimore, MD 21218
Phone (Cell): 667-303-7001
email: dr.panghat@gmail.com

Attachments:

- **Affidavit 1:** Affidavit of Dr. Lijo Panghat in support of his Motion for Leave to Proceed *In Forma Pauperis* for filing his petition for *Writ of Certiorari* because of prevailing unprecedented circumstances.
- **Affidavit 2:** Information Requested by the U.S. Supreme Court.
- **Proof of Service**

**AFFIDAVIT OR DECLARATION IN SUPPORT OF MOTION FOR LEAVE TO
PROCEED *IN FORMA PAUPERIS***

I, Lijo Panghat, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

Petitioner **has previously been granted leave to proceed *in forma pauperis* in the**
following court(s):

United States Court of Appeals for the Fourth Circuit, Case No. 22-1772

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during		Amount expected the past 12 months next month	
	You	Spouse	You	Spouse
Employment	\$ 0	N/A	\$ 0	N/A
Self-employment	\$ 0	N/A	\$ 0	N/A
Income from real property (such as rental income)	N/A	N/A	N/A	N/A
Gifts	\$ 0	N/A	\$ 0	N/A
Alimony	N/A	N/A	N/A	N/A
Child Support	N/A	N/A	N/A	N/A
Retirement (such as social security, pensions, annuities, insurance)	N/A	N/A	N/A	N/A

Disability (such as social security, insurance payments)	N/A	N/A	N/A	N/A
Unemployment payments	\$ 0	N/A	\$ 0	N/A
Public-assistance (such as welfare)	\$ 0	N/A	\$ 0	N/A
Other (specify):	\$ 0	N/A	\$ 0	N/A
Total monthly income:	\$ 0	N/A	\$ 0	N/A

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Dates of Employment	Gross monthly pay
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A

3. List your spouse's employment history for the past two years, most recent employer first.

(Gross monthly pay is before taxes or other deductions.)

Employer: N/A

Address: N/A

Dates of Employment: N/A

Gross monthly pay: N/A

Employer	Address	Dates of Employment	Dates of Employment	Gross monthly pay

N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A

4. How much cash do you and your spouse have? \$ 96

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings): Checking and Saving

Amount you have: \$ 3858.7

Amount your spouse has: N/A

Financial Institution	Type of Account	Amount you have \$	Amount your spouse has
Chase Better Banking	Checking	2716.45	N/A
PNC	Virtual Wallet	1142.25	N/A
Nil	N/A	N/A	N/A

If you are a prisoner seeking to appeal a judgment in a civil action or proceeding, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

5. List the assets, and their values, which you own or your spouse owns, and ordinary household furnishings. Do not list clothing

Home	Other real estate	Motor vehicle #1
(Value) \$ N/A	(Value) \$ N/A	(Value) \$ N/A
N/A	N/A	Make and year: N/A

		Model: N/A
		Registration #: N/A

Motor vehicle #2	Other assets	Other assets
Value \$: N/A	Description: N/A	Description: N/A
Make and year: N/A	Value \$: N/A	Value \$: N/A
Registration #: N/A	N/A	N/A
Description: N/A	N/A	N/A

6. State every person, business, or organization owing you or your spouse money, and the amount owed: N/A

Person owing you or your spouse	Amount owed to you	Amount owed to your spouse
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name [or, if a minor (i.e., underage), initials only]	Relationship	Age
N/A	N/A	N/A
N/A	N/A	N/A

N/A	N/A	N/A
-----	-----	-----

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your Spouse
Rent or home-mortgage payment (including lot rented for mobile home)		
Are real estate taxes included? [] Yes <input checked="" type="checkbox"/> [] No	\$ 900	N/A
Is property insurance included? [] Yes <input checked="" type="checkbox"/> [] No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 116	N/A
Home maintenance (repairs and upkeep)	\$ 0	N/A
Food	\$ 175	N/A
Clothing	\$ 6	N/A
Laundry and dry-cleaning	\$ 4	N/A
Medical and dental expenses	0	N/A
Transportation (not including motor vehicle payments)	\$ 35	N/A
Recreation, entertainment, newspapers, magazines, etc.	\$ 7	N/A
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's:	\$ 0	N/A
Life:	\$ 0	N/A
Health:	\$ 0	N/A
Motor vehicle:	N/A	N/A

Other:	\$ 0	N/A
Taxes (not deducted from wages or included in mortgage payments) (specify):	\$ 0	N/A
Installment payments	\$ 0	N/A
Motor Vehicle: \$ 0 \$ N/A Other:	\$ 0	N/A
Credit card (name): N/A	\$ 0	N/A
Department store (name): N/A	\$ 0	N/A
Other:	\$ 0	N/A
Alimony, maintenance, and support paid to others	\$ 0	N/A
Regular expenses for the operation of business, profession, or farm (attach detailed statement)	\$ 0	N/A
Other (specify): None	\$ 0	N/A
Total monthly expenses:	\$ 1243.00	N/A

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

[] Yes

[] No

If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? : N/A

[] Yes [] No

If yes, how much? \$ _____

If yes, state the attorney's name, address, and telephone number: N/A

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

N/A

If yes, how much?: N/A

If yes, state the person's name, address, and telephone number: N/A

12. Provide any other information that will help explain why you cannot pay the costs of this case.

I had been **deliberately blocked** from joining confirmed employment. On account of these malicious actions by my adversaries, I have remained **unemployed for more than seven (7) years**. I had earlier been **determined to be indigent** by the United States Court of Appeals for the Fourth Circuit and I have always been compelled to be **Pro Se during this entire Case**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 21 , 2023

Respectfully submitted,



Lijo Panghat, M.D.

Pro Se

3120 Saint Paul St.
Apt. 111 E
Baltimore, MD 21218
Phone (Cell): 667-303-7001
email: dr.panghat@gmail.com

Date: September 21, 2023

**AFFIDAVIT OF DR. LIJO PANGHAT IN SUPPORT OF HIS MOTION FOR LEAVE TO
PROCEED IN FORMA PAUPERIS FOR FILING HIS PETITION FOR
WRIT OF CERTIORARI BECAUSE OF PREVAILING
UNPRECEDENTED CIRCUMSTANCES**

Case No. _____

**Lijo Panghat, M.D., Petitioner v. Dept. of Veterans Affairs and University of Maryland,
Baltimore, Respondents.**

I, Dr. Lijo Panghat, am over eighteen years of age and have personal knowledge of the facts set forth herein:

1. The lower Courts have committed several serious actions that I believe are unlawful, which must be brought to the attention of the instant Court.
2. This is a self-attested document because I am unable to proceed with getting this document notarized. The reason I state this is that I do not have a State issued I.D. anymore, which is essentially required to be produced at the time of notarization. My State-issued I.D., namely my passport, is not being renewed by the Indian Embassy, in the absence of certain documents that I am unable to produce at present because my adversary UM has I believe illegally and deliberately blocked this.
3. I have already informed the Indian Embassy in writing with a sworn statement about the repeated illegalities committed against me, for which I filed a Case in the Federal Court.
4. The reason for this is that my adversary UM deliberately denied me my confirmed job at Johns Hopkins University, thereby destroying my J-1 Visa.
5. As a result of this continued illegal blocking of my confirmed employment at Johns Hopkins by my adversary UM the financial burden is crushing. I am being effectively denied a job for more than 7 years.
6. This consequent persistent deprivation has adversely affected my basic health. Several blood tests were conducted on me and numerous abnormalities were detected. 'University of Maryland School of Medicine' informed me recently of disease that has 'worsened'.
7. I am of the firm opinion that my health is deteriorating. The relevant documents will be presented to the concerned Indian and American authorities to highlight the needless abuse and harm done to me by UM.
8. The prospect of the Court not setting right these grievous wrongdoings and thus

denying me justice, is indeed a matter of abiding consternation and agony for me because it has seriously affected my means of livelihood and even my health for a protracted period of time.

9. Blocking someone's livelihood on false accusations and fabricated evidence is illegal and I believe a violation of basic human rights and I think is unconscionable cruelty.

10. I am self-attesting this document even though I am not a Notary. However, I have formally informed the concerned Indian authority in writing as to my present constraints and that the matter is currently in Court.

L Panghat

Lijo Panghat, M.D.

Pro Se
September 21, 2023