

IN THE SUPREME COURT OF THE UNITED STATES

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JACQUELYN REAVES  
PO BOX 93  
PELHAM, NORTH CAROLINA 27311

Petitioner,

v.

MONMOUTH UNIVERSITY; JOANNE JODRY; GEORGE KAPALKA; GREY DIMMENA;  
NINA ANDERSON; CHARLENE DIANA; MARYANNE NAGY; FRANCA MANCINI;  
NEPTUNE CITY POLICE; KEITH MITCHELL; MICHAEL VOLBRECHT; EDWARD  
KIRSCHENBAUM; MONMOUTH UNIVERSITY POLICE; JEFFREY LAYTON; WILLIAM  
MCEL RATH; MONMOUTH MEDICAL CENTER; DALE RAFINELLO; ANTHONY  
TRECHTA; AMINA CHOWDHURY; MATTHEW GELLER; VIRGINIA KINNEMAN;  
TRENTON PSYCHIATRIC HOSPITAL; PATRICK ERVILUS; ROBERT WOOD JOHNSON  
UNIVERSITY HOSPITAL; JAMES MCCALLUM; ROBERT CAVELLA; KATIE OZOLINS;  
JACQUELINE SOBOTI

Respondent(s).

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*On Petition of Writ of Certiorari to the Supreme Court from the Third Circuit Court of Appeals  
and District Court*

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**PETITIONERS' REPLY TO RESPONDENT'S BRIEF IN OPPOSITION TO  
PETITION FOR A WRIT OF CERTIORARI**

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## PETITIONER'S REPLY BASED ON MERIT

The questions Petitioner posed for review by the Supreme Court of the United States were not presented in a manner to gain unsolicited insight into John's psyche, and sieve through the presumptiveness of his 'confusion', "rambling" (sic.), and sociopathy. The truth is, John has fanatically represented respondents since 2014 and even threatened Petitioner two months before she was victimized at Monmouth University and Monmouth Medical. Thereafter, his clients conspired to commit several hate crimes against Petitioner that he had knowledge of, which initially involved respondents tampering with and sharing her personal information without her consent or knowledge, thoroughly detailed in her complaint at the district. Moreover, it is not coincidence John's colleague, Melanie Lipomanis, was present in Court when Petitioner was forced to confront charges she did not commit predicated on a false police report his clients colluded to create at the college, in conjunction with a bias investigation and Petitioner's family picture<sup>1</sup>. Considering these and other deliberate omissions in John's recount of culpability, his bewilderment could be extracted from his own deficiency to understand that he and Melanie should be in prison and disbarred by now.

To remind the Court, the actual question(s) Petitioner presented through writ are as follows:

Should respondents be criminally and civilly liable for hate crime(s), false imprisonment, racial discrimination, persecution, emotional distress, and misconduct after intentionally conspiring to commit several misdeeds against Petitioner that violated her body and civil liberties, in the absence of proper investigation, without adequate legal

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<sup>1</sup> *Thompson v. Clark* is a case in which the U.S. Supreme Court recognized a claim for malicious prosecution under the Fourth Amendment when an individual is detained by law enforcement officers without probable cause.

justification, representation, restitution or trial, when individuals who are charged with committing acts of violence against others are awarded a public defender and entitled to trial by jury.

Furthermore, it is justifiable for the Court to hold Petitioner to the same statutory and legal standards as attorneys, entities, and other individuals who have not been dehumanized and excessively drugged antipsychotics against her over the course of two years (which permanently rendered her mentally incapacitated), in addition to the added threats of revictimization by both officers of the law and court, void of legal representation.

Finally, it is defensible for the Court of Appeals to dismiss Petitioner's true and valid claims of bestial cruelty against her based-on "jurisdiction" when there were no jurisdictional defects in her appeal, absent of the Third Circuit properly addressing the issues of dismissal of her complaint at level of the District Court when events that led up to her claims were so egregious they required attention and deserved proper review and action.

The grant of certiorari is warranted since Petitioner's case is a justifiable vehicle to address and resolve legal issues, and the racial degradation she continually underwent in New Jersey absent of legal representation. Respondent's reply only affirms Petitioner was viciously deprived of her rights to date and the district relied on antiquated state law and statute as precedence for dismissal when her case is worthy of redress.

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**I. THERE ARE NO JURISDICTIONAL ISSUES AT THE DISTRICT.**

Respondent Rafaniello did default, however Petitioner never moved the Court for default judgement. Thus, Petitioner has no liability of a stale Order Judge Sheridan created and has failed to rule on over a year later (see Exhibit A) upon denial to stay proceedings.

**II. NEW JERSEY DOES NOT HOLD PRECEDENCE FOR PRIVATE RIGHTS OF ACTION.**

The Supreme Court has established “an implied private right of action” under Title VI, leaving it “beyond dispute that private individuals may sue” to address allegations of intentional discrimination. *Barnes v. Gorman*, 536 U.S. 181, 185 (2002) (quoting *Alexander v. Sandoval*, 532 U.S. 275, 280 (2001)). The Court previously has stated that it had “no doubt that Congress ... understood Title VI as authorizing an implied private cause of action for victims of illegal discrimination.” *Cannon v. Univ. of Chicago*, 441 U.S. 677, 703 (1979) (holding that an individual has a private right of action under Title IX). In *Sandoval*, 532 U.S. at 284-85, the Supreme Court explained the private right of action under Title VI exists for cases of intentional discrimination.

**III. PETITIONER’S CLAIMS ARE SUPPORTED BY THE DOCTRINE OF CONTINUOUS WRONG.**

Under the doctrine, “where there is a series of continuing wrongs,” the statute of limitations will be tolled to the last date on which a wrongful act is committed. *Henry v. Bank of Am.*, 147 A.D.3d 599, 601 (1st Dept. 2017). When the continuing wrong doctrine applies, it “will save all claims for recovery of damages but only to the extent of

wrongs committed within the applicable statute of limitations.” *Id.* (internal quotation marks and citation omitted)<sup>1</sup>.

The application of the continuing wrong doctrine must “be predicated on continuing unlawful acts and not on the continuing effects of earlier unlawful conduct.” *Id.* It therefore distinguishes “between a single wrong that has continuing effects and a series of independent, distinct wrongs.” *Id.* (internal quotation marks and citation omitted)<sup>2</sup>.

Thus, the doctrine is inapplicable where there is one tortious act and “continuing consequential damages” that arise therefrom. *Town of Oyster Bay v. Lizza Indus., Inc.*, 22 N.Y.3d 1024, 1032 (2013).

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<sup>2</sup> Petitioner has been disenfranchised from 2014 to present date.

# EXHIBIT A



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JACQUELYN REAVES,

*Plaintiff,*

v.

MONMOUTH UNIVERSITY, et al.,

*Defendants.*

Civil Action No.:  
22-cv-01782-PGS-RLS

**ORDER**

**WHEREAS** on March 30, 2022, Plaintiff Jacquelyn Reaves commenced the instant action in this Court against twenty-eight defendants, including defendant Dale Rafinello; and

**WHEREAS** Plaintiff effected service of process upon Mr. Rafinello on May 26, 2022 by leaving a copy of the Summons and Complaint at Mr. Rafinello's dwelling house or usual place of abode with a person of suitable age and discretion who appears to be a family member with the same surname as Mr. Rafinello, and Plaintiff has filed proof of service with the Court (ECF No. 57);

**WHEREAS** Mr. Rafinello has not entered an appearance in this case, and he has not answered, moved or otherwise replied to the Complaint within the time prescribed pursuant to Fed. R. Civ. P. 12;

**IT IS** on this 15<sup>th</sup> day of December, 2022;

**ORDERED** that Plaintiff and Mr. Rafinello show cause why default

judgment against Mr. Rafinello should not be entered; and it is further

**ORDERED** that Plaintiff and Mr. Rafinello must respond in writing by January 15, 2023; and it is further

**ORDERED** that oral argument shall be heard on January 31, 2023 at 11:30 a.m. by telephone, and the dial-in number is 888-684-8852 Code 1757868#; and

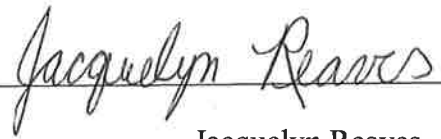
**ORDERED** that the Clerk of the Court shall send a copy of this Order to Mr. Rafinello at the addressed listed in the proof of service. (ECF No. 57).

  
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PETER G. SHERIDAN, U.S.D.J.

## CONCLUSION

Petitioner requests that the Court grant her petition for writ of certiorari.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jacquelyn Reaves". The signature is written in black ink and is positioned above a horizontal line.

Jacquelyn Reaves

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Pro Se

Date: February 26, 2024