

No. _____

23-6483

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

JAN 10 2024

OFFICE OF THE CLERK

Joanne Tenetta Antrobus PETITIONER
(Your Name)

vs.

New York City Health + Hospitals Corp et al RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for the Second Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Joanne Tenetta Antrobus
(Your Name)

212 Crown Street #4A
(Address)

Brooklyn, NY 11225
(City, State, Zip Code)

917-671-8146
(Phone Number)

QUESTION(S) PRESENTED

Why did the District Court ignore
entirely my first EEOC Complaint,
Considering only the timing of my second
EEOC Complaint.

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:

*New York City Health and Hospitals
Corporation, David Cheung, Claudia Canosa,
Marianne I. Marcias, Angela Taylor, Jasmin Wu,*

RELATED CASES

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 A 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☐ is unpublished.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 B 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☐ is unpublished.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 _____ 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☐ is unpublished.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 _____ court appears at Appendix _____ 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☐ is unpublished.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 October 13th 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: _____, 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. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was November 3rd 2023.
A copy of that decision appears at Appendix B.

[] 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).

STATEMENT OF THE CASE

On March 15, 2021 the district court (Failla, J.) granted HHC motion to dismiss my ADEA Claims and declined to exercise Supplemental Jurisdiction over my remaining Local Law Claims.

On April 6, 2021 I filed a timely Notice of Appeal. A-260, this Court, therefore has appellate Jurisdiction pursuant to 28 U.S.C. Sec. 1291 because this is an appeal of a final decision and judgment of the district court. By order dated October 7, 2022 this Court appointed an attorney pro bono Counsel Valdi Licul.

This attorney further alleged that HHC's unlawful conduct violated the New York State Human Rights Law ("NYSHRL"), New York Executive Law sec. 290 et seq. and the New York Human Rights Law ("NYCHRL"), New York Administrative Code sec. 8-101 et seq.

REASONS FOR GRANTING THE PETITION

On August 8, 2019 I filed an action in the Southern District of New York alleging discrimination and retaliation in violation of the ADEA and the NYSHRL, A-11-21 which subsequently (Amended Complaint) A-60-71 (Second Amended Complaint) A-22-30 (Amended Complaint) A-154-55 (Third Amended Complaint).

On March 15, 2021, the District Court granted H&K's motion to dismiss. A-218-59.

The District Court's dismissal of my action was erroneous. I believe the district court was slow in afford special solicitude to me as a pro se plaintiff's NYLAG is a "catch-22" because "by providing less than full representation" the organization could ~~and did~~ harm me as a litigant by eliminating the special care otherwise afforded. The District Court Judge (Friedman) told me to have NYLAG help as I told her it is a conflict NYLAG could not do due diligence to me they also represented NYC.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Joanne Tenette Antobus

Date: January 9th 2024