

U.S. Const. Amend. I FOS/FOP

United States Supreme Court

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REQUEST FOR REHEARING

IN Re: RAMSEY RANDALL

No: 23-7452

REQUEST

And Now on this date of August 19th, 2024, I RAMSEY RANDALL (Prose/IFP) comes before this United States Supreme Court under the U.S. Constitution's First Amendment and Supreme Court Rule 44 to request
o Rehearing / Reconsideration of the above numbered Petition for Writ of Habeas Corpus.

In accordance to the clerk issued memo sent to me on August 12th, 2024; received at SCT-PHX on August 19th, 2024; I submit the following reasons/grounds as to why I'm filing this petition for rehearing:

- 1) I believe that I am currently imprisoned in violation of my First, Fourth, Eighth, and Fourteenth Amendment Rights. I was arrested for using protected speech.
- 2) The denial of the Petition to be heard is leaving me without ANY appropriate court of remedy or relief.

- 3) I am actually innocent of any crime which currently has me imprisoned.
- 4) A 2023 U.S. Supreme Court decision dictates that the reason I am incarcerated is prohibited criminally or civilly and the avenues of exhaustion through the state has acted in contradiction to the Supreme Law of the Land.
- 5) My situation and case would/should be classified as EXTRAORDINARY CIRCUMSTANCES mandating this court's EMERGENCY REVIEW and jurisdictional actions to prevent me from suffering further irreparable harms.
- 6) My liberty is an UNALIENABLE right under the Declaration of Independence; and state agents/agencies unfairly stole that from me without Due Process of Law.
- 7) My state remedies have been unnecessarily and unexplicably; as well as, unreasonably delayed out of my control; with my attempts and inquiries to those entities met with no responses.
- 8) My state petition for review appointed counsel is 8 months late in filing a brief to the state court →
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7 cont) in order to progress the review of my appeal of the denial of parole. He has not responded to ANY letters nor phone calls since January of 2024. No extension filed since.

8) The ^{Federal District} ~~US Appeals~~ judges ^{has} ~~has~~ not acted on my request to address the aforementioned concerns as a potential Due Process violation.

9) Although, I DID NOT attend my parole hearing to determine whether or not I was to be granted RE-PAROLE on approximately May 8th, 2024; I have yet to receive ANY decision by the board thru the mail (USPS) in order to proceed with the appropriate state remedy exhaustion.

* I have provided documents to substantiate the dates of when the brief was supposed to be filed by counsel.*

Additionally, in approximately March of 2024, I wrote the attorney and requested he withdraw his appearance as my counsel to allow me to proceed Pro Se in the matter Petitioning to the state court appealing the denial of relief through the PA Board of Probation & PAROLE's Administrative Relief process; and he did not respond nor comply with my request to step down off the case.

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Although I do not understand what the language of "intervening circumstances or controlling effect" means; I do believe that the hinderance of my ability to have my petition to review the PA Board of Parole's denial of my Administrative Relief IS a substantial issue that wasn't in existence or previously presented to this court.

Even more importantly, I believe that such impediment beyond my control affecting my liberty being met with such deliberate indifference; and in essence, being ignored by BOTH my own attorney AND the state and federal courts, should be cause for concern and strict investigation by THIS court with urgency.

The grounds in which I raised are limited to substantial grounds which to my best recollection were not previously ~~raised~~ presented. I certify unto this.

I do so certify that my petition for rehearing is presented in good faith and not for delay. And in such, I respectfully request an expedient review and decision within (48) forty-eight hours due to the EXTRAORDINARY CIRCUMSTANCES of the case in question.

Wherefore, I humbly request rehearing / reconsideration of the Petition for Writ of Habeas Corpus.

United States Supreme Courts

In Re: Randall

o Declaration in Support of
o Petition for Rehearing
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o No: 23-7452
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Declaration

Peace unto the courts,

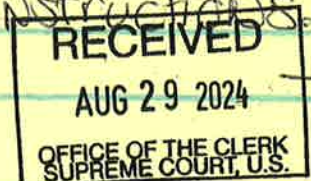
Aug. 19th, 2024

Today I received a notice from the clerk dated from August 12th, 2024 stating that my petition for Re-hearing was incorrect, and that I needed to submit a new one in compliance with Rule 44.

In all honesty, psychologically and emotionally we're so far gone that I truly don't understand or comprehend what it means. Days and dates for me are running together, and the past 2 weeks worth of events have us in a status of uneven kilter. I'm more in the mindset of dying to relieve my life of the compilation of injustices I've suffered; that I truly cannot interpret what the memo is stating that I'm required to do.

I've requested counsel under the ADA and got no response from this court; because appointed counsel is not a right in this setting. We don't understand the explanatory language, and I've learned from past experiences that ~~the court~~ neither the clerk nor the court will "help/assist" (read as clarify) the instructions.

pg 1 of 2.



So in all reality, we are just doing what I comprehend is ~~right~~ accurately described.

Additionally, since I've submitted so much to the court, I have not even remembered I had filed the initial petition for rehearing.

Please understand that I am LITERALLY so psycho-emotionally BURNT-OUT that we aren't being facetious nor condescending. We have no idea what it means for me to: "accompany a certificate stating that the grounds are limited to intervening circumstances of substantial or controlling effect..." OR "What other ~~grounds~~ substantial grounds not previously presented," means in this instance.

None-the-less, we are simply going through the motions of what I can only guess is following your directions.

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

Sincerely,

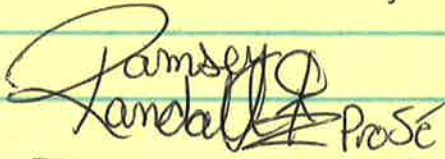

J. Prose



Thus, the petition for re-hearing should be granted.

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

CC: File
POTUS
Congress
US AG GARLAND
PAIDOC/respondents.

Respectfully
Submitted,

RAMSEY RANDALL

U.S. Const. Art. I § 8 — Witness


Robert Hines III

Certificate of Compliance

This petition for rehearing is limited to substantial grounds not previously presented to this court.

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

Signed,

Ramsey
Randall ~~Prose~~

RAMSEY RANDALL



Certificate of Good Faith

I certify that the filing of this petition for rehearing is being made in good faith and Not for delay.

I respectfully request an expedited review and decision within (48) forty-eight hours due to the EXTRAORDINARY CIRCUMSTANCES of this case.

Please and Thank you in advance.

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

Signed,
Ramsey D. Randall Pro Se
RAMSEY RANDALL

Dombrowski v. Pfister 380 U.S. 479 (1965), "A complaint that state officers invoked, and threatened to invoke, criminal process without any hope of ~~success~~ ^{ultimate success}, but only to discourage plaintiff's civil rights activities, states a claim under Civil Rights Act § 1983, which gives a right of action against a person who, under color of state law, subjects another to the deprivation of any rights secured by the Federal Constitution."

"When the plaintiff has alleged an intention to engage in a course of conduct arguably affected with a constitutional interest, but proscribed by statute, and there exists a credible threat of prosecution thereunder, he should not be required to await and undergo a criminal prosecution as the sole means of seeking relief." Babbitt v. United Farm Workers Nat'l Union, 442 U.S. 289 (1979)

"The United States Supreme Court has recognized the right to petition as one of the most precious of the liberties safeguarded by the Bill of Rights." Lozman v. City of Riviera Beach, 138 S. Ct. 1945, 201 L. Ed. 2d 342 (2018) also,

"An arrest deprives a person of essential liberties, but if there is probable cause to believe the person has committed a criminal offense there is often no recourse for the deprivation. At the same time, the First Amendment prohibits government officials from retaliating against individuals for engaging in protected speech."

Liberal Construction - A broad construction. A construction of the words of a contract, either singly or in connection with the subject matter, giving the words all effect so as to carry out the intention of parties.