

23-7576 ORIGINAL
No. 1

In the
Supreme Court of the United States

SOLOMON A. JONES,

Petitioner,

v.

GEORGIA DEPT. OF LABOR et al.,

Respondents.

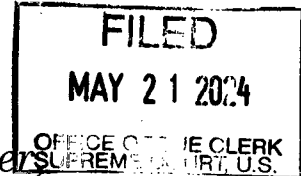
On Petition for Writ of Certiorari:

*Supreme Court of Georgia
Case No. S24A0600*

**PETITION FOR WRIT OF
CERTIORARI**

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May 27, 2024



QUESTIONS PRESENTED

There are six questions that are presented and posed to the Supreme Court of the United States in this *Petition for Writ of Certiorari*:

1. Can unemployment insurance benefits be denied to persons whose employment is terminated through no fault of their own, whether or not they meet some minimum wages earned or hours worked? Should there be laws against an employer intentionally reducing an employee's work hours, such that they do not qualify for benefits? Are employees who are terminated through no fault of their own entitled to the minimum weekly benefit amount or State equivalent?
2. Similarly to the strict laws against price gouging vulnerable people in the aftermath of a natural disaster, should there be laws against the denial of unemployment insurance benefits during and in the immediate aftermath of a pandemic?
3. What actions constitute abuse of sovereign immunity? Regardless of whether sovereign immunity is retained, what remedy should the court provide?
4. Should *Proof of Service* documents be officially filed with the clerk of court before any other action takes place, including the determination of jurisdiction? If not, then at what point in an ongoing lawsuit, where motions, orders, and other actions are concurrently being filed, should it be mandatory that *Proof of Service* documents be officially filed?
5. Do modern times and consideration of another pandemic dictate that service upon an attorney's court-registered email address via the opposing attorney's (or pro se) court-registered email address be considered a universally valid method for service of court documents?
6. Similar to the federal circuit court of appeals, should all state court of appeals automatically accept an *Application to Proceed In Forma Pauperis* that has been granted in the state trial court? Should the form for the *Application to Proceed In Forma Pauperis* be from the state court of appeals?

LIST OF PARTIES
Educational Testing Service

RELATED CASES

- *Solomon A. Jones v. Georgia Dept. of Labor and Educational Testing Service*, No. 22EV006328, State Court of Fulton County State of Georgia. Judgment entered Mar. 2, 2023.
- *Solomon A. Jones v. Georgia Department of Labor et al.*, No. A23E0041, Court of Appeals of the State of Georgia. Judgment entered Mar. 28, 2023.
- *Solomon A. Jones v. Georgia Department of Labor et al.*, No. S23C0832, Supreme Court of Georgia. Judgment entered Sep. 19, 2023.
- *Solomon A. Jones v. Georgia Department of Labor and Educational Testing Service*, No. 2023CV377488, Superior Court of Fulton County State of Georgia. Judgment(s) entered Nov. 9, 2023 (Both *Motion to Dismiss* Granted).
- *Solomon A. Jones v. Georgia Department of Labor et al.*, No. S24A0600, Supreme Court of Georgia. Judgment entered Mar. 5, 2024 & Mar. 27, 2024 (Reconsideration Denied).
- *Solomon A. Jones v. Georgia Department of Labor et al.*, No. A24A1250, Court of Appeals of the State of Georgia. Judgment entered Apr. 4, 2024.

By this court's definition, the following cases are **NOT** related; however, by the Petitioner's definition, the following cases are **ALL** related because your **MILITARY (U.S. MARINES & U.S. ARMY)** is behind all of them and is out of control. I have legally connected and implicated the **U.S. MARINES** in *Jones v. Kankakee County Sheriff's Office et al.* It is imperative that this court watch this case closely until this court has jurisdiction for certiorari because the two main Defendants are police departments and **U.S. MARINES** are involved. The public importance is my challenge to 18 U.S.C. § 3006A and its financial conflict of interest between the public defender and the prosecutor. I also challenge police's use of informants and more. You will never have a case in which someone who challenges all of these things has standing, has properly legally implicated the police and the **MILITARY**, can legally articulate the issues, and has the courage to sue. If I may invoke the Rev. Dr. Martin Luther King Jr.: "Somewhere I read..." civil authority shall be superior to military authority. The **MILITARY** is turning all of your citizens into informants:

- *Jones v. Kankakee County Sheriff's Office et al.*, No. 2:23-cv-02253-CSB-EIL, U.S. District Court – Central District of Illinois (Urbana), Pending.
{*Motioned Dist. Judge recusal based on 2013 Conf. Hear. (police advocate); No PACER access; clerk emails docs; Mag. Judge entered false cause for dismissal (see Mot. to Exer. Supp. Jur.); CA7: Judicial Misconduct (won't send decision by email); Petition for Review (filed blindly); won't send official copy of Emergency Motion or IFP; No PACER access*}
- *Solomon A. Jones v. Educational Testing Service*, No. 3:23-cv-20326-MAS-RLS, U.S. District Court – District of New Jersey (Trenton), Pending.
{*Incorrectly categorized the cause under 42 U.S.C. § 1983; Complaint says 42 U.S.C. § 1981*}
- *The People of the State of Illinois v. Solomon A. Jones*, No. 2023-CM-00000357 (E-File: 23-CM-357), State of Illinois – 21st Judicial Circuit Court (Kankakee County), Pending.
{*False charge because of Kankakee County Sheriff's Office lawsuit above*}
- *Solomon A. Jones v. Extra Space Storage.*, No. 21-C-06918-S7, State of Georgia – State Court (Gwinnett County), Judgment entered Apr. 25, 2023.
{*Trial court entered final judgment when Georgia Supreme Court had jurisdiction*}

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Appendix A: Court of Appeals of the State of Georgia

Exhibit 1:	Number of Pages: 1
Exhibit Description:	<u>Order Denying Appellant’s Motions as Moot</u> [Thursday, April 4, 2024]

Appendix B: Georgia Trial Court (Fulton County Superior)

Exhibit 1:	Number of Pages: 5
Exhibit Description:	<u>Order Granting Defendant-Georgia</u> <u>Department of Labor’s Motion to Dismiss</u> [Thursday, November 9, 2023 – 12:27 PM]

Exhibit 2:	Number of Pages: 1
Exhibit Description:	<u>Order Granting Defendant-Educational</u> <u>Testing Service’s Motion to Dismiss</u> [Thursday, November 9, 2023 – 12:25 PM]

Exhibit 3:	Number of Pages: 2
Exhibit Description:	<u>GDOL Administrative Claims Denial</u> [Friday, February 18, 2022]

Appendix C: Supreme Court of Georgia (Denying Review – Transferring)

Exhibit 1:	Number of Pages: 3
Exhibit Description:	<u>Order Denying Review, Appeal Transferred</u> [Tuesday, March 5, 2024]

Appendix D: Supreme Court of Georgia (Denying Rehearing)

Exhibit 1:	Number of Pages: 1
Exhibit Description:	<u>Order Denying Motion for Reconsideration</u> [Tuesday, March 27, 2024]

TABLE OF AUTHORITIES

Georgia Statutes

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O.C.G.A. § 34-8-194 (1) (H) (2020).....	iv, v
O.C.G.A. § 34-8-223 (b).....	1, 4, 5, 7

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Georgia Statutes Involved

O.C.G.A. § 9-11-5 (b): ...“Delivery of a copy” also means transmitting a copy via email in portable document format (PDF) to the person to be served using all email addresses provided pursuant to subsection (f) of this Code section and showing in the subject line of the email message the words “STATUTORY ELECTRONIC SERVICE” in capital letters. Service by mail is complete upon mailing. Proof of service may be made by certificate of an attorney or of his or her employee, by written admission, by affidavit, or by other proof satisfactory to the court. Failure to make proof of service shall not affect the validity of service.	
O.C.G.A. § 9-11-12 (a): When answer presented. A defendant shall serve his answer within 30 days after the service of the summons and complaint upon him, unless otherwise provided by statute. A cross-claim or counterclaim shall not require an answer, unless one is required by order of the court, and shall automatically stand denied.	
O.C.G.A. § 15-6-21 (b): In all counties with more than 100,000 inhabitants, it shall be the duty of the judge of the superior, state, or city court, unless providentially hindered or unless counsel for the plaintiff and the defendant agree in writing to extend the time, to decide promptly, within 90 days after the same have been argued before him or submitted to him without argument, all motions for new trials, injunctions, demurrers, and all other motions of any nature.	
O.C.G.A. § 34-8-194 (1) (H) (2020) [now § 34-8-194 (1) (E) (2022)] Benefits shall not be denied under this paragraph to an individual for separation from employment pursuant to a labor management contract or agreement or pursuant to an established employer plan, program, policy, layoff, or recall which permits the individual, because of lack of work, to accept a separation from employment;	

PETITION FOR WRIT OF CERTIORARI

The Petitioner, Solomon A. Jones, petitions the Supreme Court of the United States for a *Writ of Certiorari* to review a decision from the Supreme Court of Georgia.

This case is presented to the Supreme Court of the United States for review because of its legal importance to the public. The legal principle of public importance is that **unemployment insurance (“UI”) benefits cannot be denied to persons whose employment is terminated through no fault of their own.**

The premise for this case is set between 2020 and 2021, during the height of the COVID-19 pandemic. During that time period, the Petitioner’s work hours were significantly reduced, and near the end of 2021, his employment was terminated. Within a few months, the Petitioner filed for UI benefits through the Georgia Department of Labor (“GDOL”), but he was denied for not having earned enough wages (a function of work hours). The Petitioner quickly filed an administrative appeal. Although his administrative appeal was acknowledged by an automatic email reply, it was never heard.

The issue of abuse of sovereign immunity arises from the GDOL ignoring and effectively blocking the Petitioner’s only path to his legal right to UI benefits. By not ruling (no grant or denial) on his administrative appeal, the GDOL further blocked the Petitioner’s ability to exhaust all of his administrative appeals and remedies. After his administrative appeal was ignored for more than eight months, the Petitioner filed a lawsuit in **State Court** against the GDOL based on the Official Code of Georgia (“O.C.G.A.”) § 34-8-194 (1) (H) (2020) {now § 34-8-194 (1) (E) (2022)}, which explicitly states that no claimant should be denied benefits based on lack of work or layoff. The GDOL then answered the lawsuit by hiding behind the assertion of sovereign immunity. The lawsuit also joined the Petitioner’s former employer, the Educational Testing Service (“ETS”), on a separate but related issue of Partial Unemployment Insurance benefits (Georgia Emergency Rule 300-2-4-.09 (1) (d), filed by the GDOL with the Georgia Secretary of State on March 16, 2020).

Georgia Emergency Rule Involved

Georgia Emergency Rule 300-2-4-.09 (1) (d):

For partial claim weeks beginning on or after March 15, 2020:

1. All partial claims shall be filed online.
2. An employer shall file partial claims with respect to any week during which an employee works less than full-time due to a partial or total company shutdown caused by the COVID-19 public health emergency; and
3. Any employer found to be in violation of this subparagraph shall pay to the Commissioner for the unemployment fund the full amount of benefits paid to the employee.

OPINIONS BELOW

The *Opinion* of the Supreme Court of Georgia to review the merits appears at Appendix C to this *Petition* and is unpublished. The *Opinion* of the Court of Appeals of the State of Georgia appears at Appendix A to this *Petition* and is unpublished. The *Opinion* of the Superior Court of Fulton County, State of Georgia appears at Appendix B to this *Petition* and is unpublished.

JURISDICTION

The date on which the Supreme Court of Georgia decided the Petitioner's case was March 5, 2024. A copy of that decision appears at Appendix C. The date on which the Supreme Court of Georgia denied the Petitioner's *Motion for Reconsideration* was March 27, 2024. A copy of that decision appears at Appendix D. The jurisdiction of this court is invoked under 28 U.S.C. § 1257 (a).

INTRODUCTION

The **central contested issue** is whether unemployment insurance benefits can be denied to persons whose employment is terminated through no fault of their own. Other factors are: employers intentionally reducing an employee's hours for the purpose of disqualifying them from benefits; the denial of benefits to persons during and in the immediate aftermath of a pandemic; and a State department refusing to rule (grant or denial) on person's claims within a reasonable time frame.

The trial court then ordered the transfer of the case from State Court to Superior Court on the erroneous basis that the claims in the Petitioner's *Complaint* fall under O.C.G.A. § 34-8-223(b); however the aforementioned statute requires a final decision from the Board of Review and no such decision exists in the case.

Lastly, the trial court dismisses the case leaving the Plaintiff with no remedy.

FACTUAL AND PROCEDURAL BACKGROUND

This lawsuit was initiated through certified U.S. postal mail, and it was officially filed with the clerk of court in Fulton County State Court on November 16, 2022. The lawsuit included the following completed documents: an *Affidavit of Indigence*; a *Case Initiation Form*; a *Summons* for the GDOL; a *Summons* for the ETS; a *Marshal's Entry of Service* document for the GDOL; and a *Marshal's Entry of Service* document for the ETS.

The Respondent-ETS filed its *Answer* and its *Motion to Dismiss* on January 5, 2023, and the Respondent-GDOL filed its *Answer* and its *Motion to Dismiss* on January 13, 2023. The Petitioner filed his *Response* to the ETS' *Motion to Dismiss* on January 12, 2023, and he filed his *Response* to the GDOL's *Motion to Dismiss* on February 6, 2023. The GDOL filed its *Reply* in support of its *Motion to Dismiss* on February 22, 2023. On January 17, 2023 the Petitioner filed a *Motion to Produce Proof of Service*. As of the filing date of this *Petition*, no *Proof of Service* documents have been filed.

On March 2, 2023, an *Order* was entered by the Fulton County State Court, transferring the case from State Court to Superior Court. On March 9, 2023, the Petitioner filed a *Petition for Certificate of Immediate Review*. On March 10, 2023 at 10:43 AM, an amended *Order* was entered by the Fulton County State Court, transferring the case from State Court to Superior Court, adding that any costs related to the transfer be waived. On that same day of March 10, 2023 at 12:31 PM, an *Order* denying the *Petition for Certificate of Immediate Review* was entered. On March 15, 2023, the Petitioner filed an amended *Petition for Certificate of Immediate Review*, to match the amended *Order*. On March 28, 2023, the Petitioner filed an *Emergency Motion* with the Georgia Court of Appeals, and it was docketed and denied that same day of March 28, 2023. On April 10, 2023, the Petitioner filed a *Petition for Writ of Certiorari* with the Georgia Supreme Court. The *Petition* was docketed that same day of April 10, 2023 and was denied on September 19, 2023. On November 6, 2023, in place of Fulton County Superior Court Judge Paige R.

Whitaker, Cobb County Superior Court Judge Adele P. Grubbs heard oral arguments regarding Plaintiff's *Petition for Certificate of Immediate Review* and both Defendants' *Motion to Dismiss*. On November 9, 2023, Cobb County Superior Court Judge Adele P. Grubbs granted both Defendants' *Motion to Dismiss*, in separate *Orders*. On January 29, 2024, the Petitioner's direct appeal, based on the belief of abuse of sovereign immunity by GDOL, was docketed by the Georgia Supreme Court. On February 12, 2024, the Petitioner filed his *Appellant Brief*. On March 5, 2024, the Georgia Supreme Court entered an *Opinion* and for a transfer of the case to the Georgia Court of Appeals based on the opinion that their jurisdiction was not properly invoked. On March 11, 2024, the Petitioner filed a *Motion for Reconsideration* based on the fact that its jurisdiction could be invoked from a decision (denial of an *Emergency Motion* on March 28, 2023) from the Georgia Court of Appeals. On March 27, 2024, the Petitioner's *Motion for Reconsideration* was denied. On April 1, 2024 the Petitioner's direct appeal to the Georgia Supreme Court was transferred and docketed with the Georgia Court of Appeals. On April 4, 2024, all of the Petitioner's motions were denied as moot, closing the case. At this point, neither Respondent had filed an *Appellee Brief*. On April 18, 2024, the ETS filed its *Appellee Brief* with the Georgia Court of Appeals. On April 22, 2024, the GDOL filed its *Appellee Brief* with the Georgia Court of Appeals. On April 23, 2024, the Petitioner sent an email to four different people with this court's domain (supremecourt.gov) with subject line "Notice of Intention to File Certiorari".

ENUMERATION OF ERRORS

1. The trial court erred when it did **not** ensure that proper service was had. Prior to any appeal, the trial court never sought that a *Proof of Service* certificate was on file with the clerk of court for either Respondent-GDOL or Respondent-ETS. Furthermore, the Petitioner motioned the trial court for execution of service and the corresponding *Proof of Service* certificates. As of the filing date of this *Petition*, no *Proof of Service* documents are on file.

2. The trial court erred in its *Order* transferring the case from State Court to Superior Court because it applied statute O.C.G.A. § 34-8-223 (b), which requires a decision from the GDOL Board of Review, and no such decision exists in the case.
3. The Georgia Court of Appeals erred when it denied the Petitioner's *Emergency Motion* on the basis that he was appealing the denial of his *Petition for Certificate of Immediate Review*. It should be noted and well understood that the Petitioner did **not** appeal the denial of his *Petition for Certificate of Immediate review*; he appealed the court's *Order* transferring the case from State Court to Superior Court, which is directly appealable.
4. The trial court erred when it granted (A) ETS' *Motion to Dismiss* and (B) GDOL's *Motion to Dismiss* after 90 days. O.C.G.A. § 15-6-21 (b) states that in a county with more than 100,000 inhabitants a judge must decide on any motion within 90 days after oral argument **or** submission without argument. O.C.G.A. § 15-6-21 (d) outlines the penalties if a judge fails to obey subsections (a), (b), or (c) of the aforementioned statute.
 - (A) ETS filed its *Motion to Dismiss* on January 5, 2023 (The Georgia Court of Appeals had jurisdiction for one day (March 28, 2023) within the 90 days following the submission of ETS' *Motion to Dismiss*). Factoring in the time that the appellate court had jurisdiction, ETS' *Motion to Dismiss* should have been decided on or before April 6, 2023. **Cobb County** Superior Court Judge Adele P. Grubbs granted the ETS' *Motion to Dismiss* on November 9, 2023 in **Fulton County** Superior Court.
 - (B) GDOL filed its *Motion to Dismiss* on January 13, 2023 (The Georgia Court of Appeals had jurisdiction for one day (March 28, 2023) within the 90 days following the submission of GDOL's *Motion to Dismiss*. The Georgia Supreme Court had jurisdiction for five months and 12 days (April 10, 2023 through September 19, 2023) within the 90 days following the submission of GDOL's *Motion to Dismiss*). Factoring in the time that both of Georgia's

appellate courts had jurisdiction, GDOL's *Motion to Dismiss* should have been decided on or before September 23, 2023. **Cobb County** Superior Court Judge Adele P. Grubbs granted the GDOL's *Motion to Dismiss* on November 9, 2023 in **Fulton County** Superior Court.

5. The trial court erred when it granted ETS' *Motion to Dismiss* based on the Plaintiff not exhausting his administrative remedies. The ETS is not entitled to the same or similar rules of exhausting administrative appeals and remedies before filing a lawsuit as the GDOL, a State department, is.

ARGUMENT

The Petitioner has filed this *Petition for Writ of Certiorari* with this court, the Supreme Court of the United States, because of the Respondent-GDOL's denial of UI benefits, its subsequent abuse of sovereign immunity, and for the aforementioned enumerated errors.

Hovering over this case is the question of whether or not timely *Answers* were filed by both Respondents. The O.C.G.A. § 9-11-12 (a) states, "...A defendant shall serve his answer within 30 days after the service of the summons and complaint upon him..." The Petitioner has indicated in his *Responses* to both the GDOL's and the ETS' *Motion to Dismiss* and in his *Motion to Produce Proof of Service* that it was not clear if either Respondent filed their respective *Answer* within the statutory allotted time frame and that a default judgment may be appropriate. A *Motion for Default Judgment* should not be filed without *Proof of Service* certificates on file.

Secondly, the trial court erred in its transfer of this case from State Court to Superior Court. The trial court's *Order* stated the reason for the transfer was that, "...sole subject matter jurisdiction over review of claims set forth in Plaintiff's complaint lies with Superior Courts pursuant to O.C.G.A. § 34-8-223(b)..." The title of the aforementioned statute is "Procedure for Judicial Review of Final Decisions of Board of Review". Also, sub-paragraph (b) of this statute begins, "Within 15 days after the decision of the board of review has become final..." Both references to a **final decision** from the **Board of Review** make the trial court's basis for

transferring the case erroneous and ultimately invalid because **no decision of any kind** exists from the Board of Review (secondary administrative appeal). Likewise, **no decision of any kind** exists from an administrative hearing officer (“AHO”) of the Appeals Tribunal (primary administrative appeal). For the aforementioned reasons, O.C.G.A. § 34-8-223(b) is inapplicable to the case.

The most significant problem that arises from this erroneous transfer from State Court to Superior Court is the dangerous precedent it sets for the courts of Georgia. The precedent it sets is that there is no actualized penalty for the State and/or its departments for blocking a person’s legal right to UI benefits; the courts will simply force the State and its departments to follow the already well established guidelines. This deficient adjustment would ultimately leave claimants significantly delayed from their claim and many without a remedy at all, in particular, if they lack the cognitive or financial ability to navigate the administrative appeals’ system and/or the court system. It follows that if a correcting precedent is **not** made in the case, then this would open the door for any departments of a State to ignore and effectively block a person’s administrative claim and/or appeal, leaving said person with no legal recourse or remedy to his or her infringed upon legislative rights.

The Georgia Court of Appeals erred when it inexplicably based their decision to deny the Petitioner’s *Emergency Motion* on the idea that the Petitioner was appealing his denial of a *Petition for Certificate of Immediate Review*. His appeal was from the courts *Order* transferring the case from State Court to Superior Court. Furthermore, the first sentence in the Georgia Court of Appeals’ *Opinion* contradicts their second footnote; the first sentence states, “The plaintiff...has filed an Emergency Motion... challenging the State Court of Fulton County’s order transferring his case to the Superior Court of Fulton County.”; and the second footnote states, “...the denial of a certificate of immediate review is not subject to direct appeal.” Astonishingly, nowhere in the *Opinion* does the Georgia Court of Appeals address whether they thought the trial court’s basis for transferring the

case, O.C.G.A. § 34-8-223 (b), was a correct or an incorrect application of law. Moreover, the basis for the trial court's *Order* and the basis for the Petitioner's appeal were completely ignored.

In addition, the trial court erred in granting both Respondents' *Motion to Dismiss* after 90 days, violating O.C.G.A. § 15-6-21 (b).

Lastly, the trial court erred when it granted ETS' *Motion to Dismiss* solely on the merits. The trial court granted the ETS' *Motion to Dismiss*, citing that the Plaintiff did not exhaust all of his administrative remedies. ETS is not a part of the State of Georgia government, nor is it affiliated with the government in any way to claim sovereign immunity. It appears that the trial court has conflated the GDOL's administrative path for claiming benefits with the ETS as a corporation. Simply stated, the ETS has **NO** entitlement to requiring claimants exhaust any administrative remedy before filing a lawsuit based on denial of UI benefits.

As a footnote and reminder to this court, the Petitioner **did not** and **does not** assert negligence. And thus, all references to the Georgia Tort Claims Act ("G.T.C.A."), by the Respondents, are inapplicable to the case.

WHY CERTIORARI SHOULD BE GRANTED **(REASONS FOR GRANTING THE WRIT)**

The **central legal issue** raised and matter of public importance for granting the writ is that a State's Department of Labor cannot deny benefits to employees whose employment was terminated through no fault of their own and whose work hours were reduced directly before their employment was terminated. To add, there is no case law regarding the denial of benefits through no fault of the employee.

"Georgia, like the other states of the Union, has a strong public policy favoring payment of unemployment benefits to persons unemployed through no fault of their own . . . **the burden is on the employer urging a disqualification for benefits to show by a preponderance of evidence that an applicant for compensation comes within the exception**" claimed by the employer. *Millen v. Caldwell*, 253 Ga. 112, 113 (317 SE2d 818) (1984).

Lastly, the timing of the pandemic should be a factor when considering whether to grant the writ. The timing of the pandemic should also be considered in future denial of benefits claims and cases because it is an injustice on the public without a remedy. Lastly, and the most important reason for granting the writ is that there are persons that do not have the cognizant ability to navigate the court system or even the finances to wait out a State's Department of Labor ignoring their administrative claim. Lastly, for the good of the public, there must be a legal precedent that is known publicly and known well that the denial of benefits from employees whose employment was terminated through no fault of their own is strictly prohibited, regardless of wages earned or hours worked.

CONCLUSION

In conclusion, the Petitioner urges this court to investigate the issues outlined in the "Enumeration of Errors" section of this *Petition* and provide the appropriate remedy. For those reasons, the Petitioner requests that this *Petition for Writ of Certiorari* be granted.

FINAL THOUGHT

The Petitioner would like to leave the Justices of the Supreme Court of the United States with this final thought: From the related-unrelated cases section, *Jones v. Kankakee County Sheriff's Office et al.* gives this court an opportunity to address the inherent financial conflict of interest between the public defender and the prosecutor, which is in part to blame for the rising number of informants. That particular case also gives this court an opportunity to address the lack of laws and regulations surrounding law enforcement's conversion of criminally charged persons to informants and their subsequent use of those informants. Hopefully, congress will draft new and stricter laws forcing the **MILITARY** to come out of the shadows of informants; however, that case is a long way from this court's certiorari jurisdiction. Until that time, it is necessary to try to understand the **MILITARY'S** ultimate goal for this exponential growth of informants. Lastly, if this court does not put a stop to this **MILITARY** operation, then who do you think will?

Solomon A. Jones
(Sign your name)

Solomon A. Jones
(Print your name)

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