

No. 23-7644

IN THE
Supreme Court of the United States

SEKOU KEITA,

Petitioner,

v.

GIANT FOOD LLC,

Respondent.

**On Petition for a Writ of Certiorari to the
United States Court of Appeals
for the Fourth Circuit**

PETITION FOR REHEARING

SEKOU KEITA

Pro Se

7710 Maple Avenue

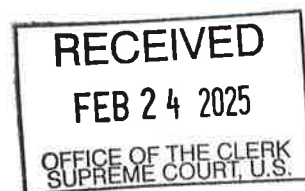
Apt. 1110

Takoma Park, MD 20912

(202) 809-7478

skeita57@gmail.com

February 20, 2025



PETITION FOR REHEARING

The petitioner petitions the Supreme Court for a rehearing after procedural errors in Fourth Circuit, issues with respondent's counsel in this case against Giant Food LLC.

- **Procedural error in Fourth Circuit:** The Fourth Circuit Court failed to acknowledge a timely filed petition for rehearing en banc which contained critical evidence supporting the appellant's claims. This oversight constitutes a significant procedural error that warrants a rehearing.
- **Respondent Counsel Issues:** the respondent Counsel failed to file a requested brief in opposition due to lack of Supreme Court bar membership and did not comply with the Supreme Court notice, this conduct justifies a rehearing.

The petitioner emphasizes multiple times in the petition for rehearing en banc that the petition must be granted due to violations of federal statute 18 U.S.C SECTION 1621 (PERJURY). The evidence was provided. Appendix E section A in the Certiorari Petition.

A discrimination and retaliation claims made by the petitioner; Title VII of the Civil Rights Act of 1964, Title 42 U.S.C SECTION 1981. The material of evidence is under the Clerk custody. Forcing the petitioner to retake the test when he shouldn't. The deposition of Michael Brenton "Mike" the director of Giant Asset Protection, provides direct evidence of discrimination and retaliatory practices. This evidence is crucial in demonstrating violations of Title VII of the Civil Rights Act of 1964 and Title 42 U.S.C.

The petition for writ of certiorari, which was denied, was filed in the Supreme Court of the United States on March 26, 2024, and entered the docket on June 5, 2024. The court informed the respondent, via the petitioner, that the case was filed. According to Rule 15.3, the brief in opposition is due by July 5, 2024.

The respondent's Counsel filed a Waiver on November 26, 2024, stating that he cannot file a brief because he is not a member of the United States Supreme Court. The Counsel initiated to inform the Court about his lack of bar membership, when the petitioner refiled the petition on November 25, 2024, after the Court had denied the motion of petitioner for leave in forma pauperis on October 28, 2024.

The Court did not deny the petition of certiorari but requested the petitioner to refile the same petition in accordance with Rule 33.1.

Rule 15.1 states that a respondent may file a brief opposing a petition for a writ of certiorari, but it is mandatory only in capital cases or **when requested by the Court** (see Rule 14.1(a)).

The Court requested this brief, with a specified due date. The Counsel could ask the Court to extend the due date and apply with the clerk under the provision of the Rule 6 or ask the respondent to hire another eligible attorney to respond to the petition.

This Counsel has not responded to the petition or complied with the Court notice. This Counsel's conduct justifies granting a rehearing and granting the petition of writ of certiorari.

This case involved lying under oath and discrimination, which impacted the petitioner mentally and morally.

The questions of the petition of certiorari to the Court are based on the precedents.

Considering these circumstances cited above, the petitioner respectfully request that this Court grant the petition for rehearing, grant the petition for a certiorari, and reverse the judgment of the Fourth Circuit or set the case for full merits briefing and argument.

Petitioner could not append the exhibit and other documents related to this case such for financial reasons. Those documents are under the custody of the Clerk of the Supreme Court.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sekou Keita", written over a horizontal line.

SEKOU KEITA

Pro Se

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CERTIFICATE OF PETITIONER

The grounds are limited to intervening circumstances of substantial or controlling effect or to other substantial grounds not previously presented.

Pursuant to this Court's Rule 44.2 Petitioner certifies that the petition for Rehearing is restricted to the grounds specified in the Rule. Petitioner certifies that this petition is presented in good faith and not for delay.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sekou Keita", is written over a horizontal line.

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