

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
v.	§	DISTRICT COURT
United States District Court,	§	Misc. No. 22-45
Eastern District of Pennsylvania	§	Judge, Paul S. Diamond,

**Motion to Reopen Case to Consider pleadings filed July 4, 2023 and July 5, 2023, Motion to Reopen the case to exercise the 1<sup>st</sup> Amendment right to petition under FRAP 40 Motions for reargument on denied motions and another potential motion**

I Meghan Kelly, Esq., pursuant to FRAP 2, 27, 40, my 5th Amendment right to a fair trial to defend and preserve my private exercise of 1st Amendment rights to petition, speech, religious belief, exercise, and association, objection to compelled servitude invoking the 13th or other applicable law move good cause to Reopen Case, closed on 6/30/23 to Consider pleadings filed 6/4/23 and 6/5/23 Motions for Reagument orders denied by this Court on 6/30/23, and permission to file a motion should my motion for reagument of the Order denying a stay be denied and potential permission if needed to request pursuant to 28 USC Section 2106 that my license be placed on disability in order not to have 6 new law suits against me with a guaranteed new one by the US Supreme Court under Supreme Court Rule 8, without prejudice to appeal Denial of the Stay and denial, and any other Order by this Court to prevent irreparable injury in terms of harm to health, loss of property interests, 6 new law suit, loss of licenses, and the right to exercise fundamental rights. I incorporate the entire District Court Docket below and the Third Circuit Court Record by reference to the document or Docket Item, and any exhibits hereto as if fully incorporated herein, and aver”

1. 6/30/23 this Court entered 7 judgments against me near closing time on the 4th of July holiday weekend in this matter and the Kelly v Swartz a Civil rights case 21-3198 (hereinafter referred to as “civil-rights”-case or “21-3198”). I had a horrible holiday weekend. I

called my parents about the order and they threatened to cut off my phone which they did before. I told them this judgment may start up to 6 additional law suits on the different disciplinary order. They reasonably are upset. The denial of a stay, and a denial of more time caused the Clerk to file an Order dismissing the case immediately for failure to prosecute. (Exhibits A, B).

2. The Dismissal-Order denied me fair and reasonable notice under the circumstances, where the Court through my case manager assured me I would be granted time in response to my timely filed motion for an extension, in violation of my right to a fair proceeding under US Amend. V. I was not granted time. (Exhibit C)

3. Dismissal was especially unfair since on 6/2/23, well in advance of the 6/13/23 due date, I filed a Motion for more time to file the brief under prejudice. The Clerk Ordered that I may not exceed 3-pages despite good cause and requirement for more time under my unique situations. The Order effectively chilled my ability to effectively refer to all the facts and case law necessary to defend my 5th Amendment right to a fair proceeding by the threat of the irreparable loss of my private right to religious belief, substantial burden to access to courts and involuntary servitude against my asserted invocation of the 13th Amendment in the attached Motion for reargument on this courts Denial of costs, fees or taxes with leave to reassert the Motion. I reassert the Motion now in full, attached in part, and incorporate my Motion for reargument to vacate an Order, dated 5/19/23 concerning the page-limit threatening Order compelling me to comply or risk violating my religious beliefs, Motion to correct Motion to vacate, and related documents in their entirety. (Exhibits D, E, F, G, H, I)

4. Moreover the order dismissing the case for failure to prosecute was filed the same time as the Order denying an extension and a stay vitiating my 1<sup>st</sup> Amendment right petition this courts denial of motions on reargument under FRAP 4 wherein I intend to file a motion for

reargument or rehearing to effectively assert my claims and Constitutional rights in the Civil rights case, while not vitiating my right to defend my liberties and licenses in this case. The 6/30/23 dismissal order also vitiating my right to petition under FRAP 40 on denial of the recusal of a stay of Phipps or Scirica here and of Judge Scirica in the civil-rights case. I incorporate herein by reference in full, attaching in part Exhibits J through O, including the Motion to expedite. I incorporate the motion for time Phipps granted, and two motions for a stay Phipps denied that effectively deprived me of my First Amendment right to petition the DE Disciplinary appeal on US Supreme Court. I require a stay to safeguard my right my 1<sup>st</sup> Amendment rights to private petition, religious belief, exercise of belief, association and other rights and claims that I may lose forever in DE with no recourse for my claims other than the DE District Court.

5. My petition of the DE-Order to the USSC was denied on my first attempt since I filed the Motion for leave for additional pages prior to the petition instead of simultaneously therewith. (Exhibit P, letter denying petition, stamped first page showing receipt). In the civil-rights case, Phipps denied a stay, and an interim stay pending the US Supreme Court's determination on whether he erred in denying a stay as causing me irreparable injury in terms of loss of the 1<sup>st</sup> Amendment right to petition the DE-Order with the same brief within the time frame the Court gave me to make a second attempt of the exact same Brief. (3DI 49-51). Phipps denial of a stay did deny me my asserted 1<sup>st</sup> Amendment right to petition, causing irreparable injury unless I am permitted meaningful access to the DE District Court case to seek relief even on appeal and hopefully on remand.

6. I sought in good faith to maintain my right to petition in the US Supreme Court before the passage of time made it an impossibility. I filed a motion to expedite my petition prior to judgment of the civil rights case with the highest-court. Docketing delays prevented me

the 5<sup>th</sup> Amendment opportunity to be heard until it was too late. I was deprived of right to petition the DE-state Order and fairly present my claims before the USSC. (See, 3DI 49-50-51-52, Exhibit P, Docket sheet for Civil rights interim appeal).

7. My right to petition to safeguard my fundamental rights and claims was previously denied by this court and Judge Phipps in particular in the civil-rights case. I seek to file a motion for reargument in this case on denial of a stay to prevent additional irreparable injury in terms of loss of fundamental right to petition to sustain my Constitutional claims and liberties and other relief.

8. I seek permission to argue under FRAP 40 a stay must be granted to give me a fighting chance to petition the civil rights case on appeal to the US Supreme Court, and hopefully back on remand before the DE District Court. I have to safeguard my ability to effectively fight the Delaware Supreme Court members and other Defendants in the civil proceeding to defend not merely my licenses but elimination of my 1<sup>st</sup> Amendment right to believe in Jesus Christ and other rights forever while shielding state persecution of me in vindictive retaliation for merely petitioning to assert my rights over a course of about 20 years that will continue should this court not uphold my asserted rights of Constitutional protections.

9. I invoke and do not waive my 1<sup>st</sup> Amendment right to petition under rule 40 to assert and defend my right to private-constitutional rights, not merely my licenses especially my right to petition the state to safeguard my religious belief in Jesus without persecution, as the state has persecuted me for about 20 years.

10. Third Circuit-staff sought to persuade me to file a brief as I asserted in the attached letter. (Exhibit Q) I cannot or I will no longer be free to worship Jesus Christ, exercise

my religious-political beliefs, speak, associate, petition, self-represent, and the state-court may eliminate the religious freedoms of others in addition to me by labeling my religious-belief in Jesus a mental disability, unrestrained by the Constitutional limits to prevent me and other individuals the license to buy and sell, not only through professional boards but through the new economic digital slave system if this Court does not safeguard our liberties. US Amend I, V, VI, XIV.

11. For good cause to prevent manifest injustice against me in terms of the irreparable loss of the First Amendment right to petition under Rule 40 on the 6/20/23 and 6/30/23 denials of motions. I especially seek to reopen the case to present a motion for reargument on this court's denial of a stay to prevent manifest injustice against me under the extraordinary circumstances where a stay is required to prevent irreparable injury in terms of losing my Constitutional protected freedoms in DE forever.

12. I also seek to reopen the case for permission potentially to draft an additional motion to place my license on inactive disabled in order not to vitiate my right to sustain, assert and defend religious belief, speech, association, exercise of belief, petition, right to self-representation and other rights in the civil-rights case, should this court deny me a stay on a motion for reargument or other motions including motion for reargument on the recusal of Phipps and Scirica.

13. A DE Disciplinary order placing my license on disability and activity related thereto caused 6 additional law suits to arise, including the reciprocal proceeding which is the subject of this appeal, Eastern District Court of PA and including the civil rights case, which this court dismissed simultaneously with this case on 6/20/23.

14. The Eastern District Court's Order is different from disability in that it is disbarment. This judgment may start up to 6 additional law suits on the different order on disbarment, including by the US Supreme Court. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability.

15. Additional threats of possible law suits create an obstacle so great as to prevent me a fair opportunity to petition in the Civil-rights case until the conclusion of the proceeding given the voluminous amount of Defendants, poverty creating a substantial burden, health issues and other facts of this case. I ask for a fighting reasonable chance for the opportunity to defend my faith in Jesus Christ and other claims without government persecution.

16. The court of appeals has power to reopen a case to potentially recall and amend its mandate to protect integrity of its own processes and to avoid. See, *Perkins v. Standard Oil Co. of California*, C.A.9 (Or.) 1973, 487 F.2d 672.

17. This Court must allow me the First Amendment right to petition this court to prevent manifest injustice against me under the extraordinary circumstances to prevent irreparable injury to me in terms of the loss of my freedom to exercise private 1st Amendment right to religious belief in Jesus Christ in DE, petition, speech, association, 6th Amendment right to self-defense, under the threat of not being able to buy and sell but for my religious beliefs the state finds repugnant.

18. This is especially necessary since the Eastern District Court appeared to set me up in bad faith to get out of reading voluminous materials relating to about 20 years of the State of Delawares retaliation of my 1<sup>st</sup> Amendment right to petition and its compelled force that I violate my faith in Jesus for its convenience by disregarding my requests for accommodations or

petitions. The Eastern District Court's Order placed my license on disbarred as opposed to disabled by trickery, which will cause additional law suits that will prevent me from asserting my Constitutional rights to religious belief and other rights in

19. Judge Diamond of Eastern District Court of PA appeared to trick me into disbarment to get out correcting the misfiled documents in my case, which included another pro se petitioner's health record. (Exhibit U and V)

20. Judge Diamond of the Eastern District Court of PA knew I have been retired from PA since 2018. That was confirmable public knowledge at the time of the Order. Moreover the District Court cited the public state web site. (District Court Docket Item hereinafter "DI") DI

21. Judge Diamond also knew due to lack of time, poverty and limited means of transportation I could not easily research. I still am prejudiced due to lack of time and resources to research. I cannot afford to pay for Westlaw or Lexis, and I cannot afford to drive to the law library often. I must make my trips count. The trips have been few since I cannot afford gas for many trips.

21. Despite that Judge Diamond ordered me to draft a memorandum of law as to why my retirement in PA would not retire my license in its Court. DI-21. The Court booby trapped me based on an error of fact, an error of law creating manifest injustice against me by using retirement as a reason to disbar me. In response to the Order for a memorandum, while acting under great duress, I fell into the misleading trap of the Court. I filed a letter asking to be placed on retirement, as not admitted in the Eastern District Court of PA District Court to practice because I was confused as to whether I was retired or not. I thought my assumption of retirement might be wrong, but then the Court asked why I should not be retired. DI-22.

22. To my horror, the Court disbarred me instead of placing me on retirement. DI-23. I was surprised because I thought I would be retired.

23. I immediately called the case manager noting my confusion. I asked if this was punishment. I exclaimed my confusion as I thought I would be placed on retirement. She responded no, it was merely placing my license as disbarred due to retirement, not punishment. Gail Olsen said the Court was not disciplining me, per the letter confirming our conversation at DI-24. The case manager knew I was stressed about subpoenaing two terminated Court and other witnesses before it. I care about the two DE staff fired to conceal their evidence in my favor in litigation.

24. Having multiple law suits where Courts sought to discipline me for my faith in Jesus, I drafted a letter confirming our conversation, but remained confused. DI- 24.

25. At the time, just like now, I was under water in other cases with limited capacity to research. After researching I discovered I was not automatically retired since disbarred PA attorneys are not automatically disbarred and may have an office to practice before the Federal courts. *See, Theard v. United States*, 354 U.S. 278, 282 (1957); *Selling v. Radford*, 243 U.S. 46, 49 (1917), *Frazier v. Heebe*, 482 U.S. 641, 648 n.7 (1987); *also see, In re Surrick*, 338 F.3d 224, 231 (3d Cir. 2003), (disbarment by the [s]tate does not result in automatic disbarment by the federal court." *In re Ruffalo*, 390 U.S. 544, 547, 88 S.Ct. 1222, 20 L.Ed.2d 117 (1968)).

26. Judge Diamond booby trapped me by creating the assumption I was retired by asking me to draft a memorandum on why I should not be retired in its court too. I have limited time, resources and ability to research. The Court should not have placed me as disbarred instead of as retired. Moreover it is clear error of law, of fact creating manifest injustice against



me to place me on retirement too, even if the order should be changed. I did not have notice of disbarment, and the Court had reason to believe I did not understand the consequences of retirement. The Court knew I was confused and exploited that confusion to get out of analyzing the voluminous amount of Constitutional issues in the underlying original disciplinary case the reciprocal case is based on. The Orders below violate my 5th Amendment right to notice, and a fair proceeding.

27. The US Supreme Court held in, *In re Ruffalo*, 390 U.S. 544, 551 (1968), “The charge must be known before the proceedings commence. They become a trap when, after they are underway, the charges are amended on the basis of testimony of the accused. He can then be given no opportunity to expunge the earlier statements and start afresh.”

28. I did not know the Eastern District Court would disbar me when I did not draft a memorandum as to why retirement in PA would not retire my license in its Court. I asked the Court be placed on retirement so as not to be barred as active, but I thought I might have been wrong on my assumption of retirement. I was confused without ability to research the issue due to lack of time and resources. It was a booby trap based on a misunderstanding similar to the entrapped lawyer relating to the disciplinary proceeding in *In re Ruffalo*, where I was denied fair notice and a fair and fair opportunity to be heard given my unique situation of facing 6 law suits, limited access to the courts given lack of time, health limitations and poverty creating a substantial burden to my access to the courts and religious belief against debt.

29. While, I do not have easy access to resources, the Judge Diamond should have known retirement in state does not automatically retire my federal license unless specifically drafted in its rules. The rules do not require reciprocal retirement in my case. So, the District Court appears to have set me up to fall which is not fair or just. I gave the court notice I lacked

time and resources to investigate. DI-9. I was under duress having noticed the District Court of my collapse upon the floor of the post office due to lack of time to care for my health to sustain it. I noticed the District Court of my lack of resources to pay for car insurance, and my limited resources too.

30. I did not have the means to research until later. I discovered and realized I must appeal the Eastern District of PA Order or potentially face 6 new law suits. That is important to prevent in order that I may defend my faith in Jesus in the civil rights case.

31. I require an opportunity to file a motion for reargument on denial of a stay to reassert I require a stay to do a good job on this appeal, to prevent 6 new lawsuits, and most importantly to assert my rights without government compelled waiver under forced not free choice in the civil-rights case. It is in the interest of the courts and the public to allow me an opportunity to petition for relief. I do not think this court or other courts desire to waste judicial resources by additional needless cases. I face the irreparable injury in terms of loss of health, life, constitutional liberties and eternal life. This court is apprised of my eye injury and my assertion of time to care for my health. The floaters have noticeably increased due to dehydration. I require opportunity to reargue for time to sustain my life and health too.

32. I have a good argument to overturn the Eastern District of PA's District Court's Order since I was retired from PA since 2018, and thought I was retired from that District Court.

33. I respectfully require leave by reopening the case to make rearguments on denial of time or a stay in order to make arguments why the Court order disbaring me must be overturned with leave to make smaller arguments to appeal which I do not discuss herein, but the

most important matter is to prevent 6 additional law suits by appealing the Eastern District Court's Order disbaring me as retired.

34. I am prejudiced by even appealing the Disbarment order before the US Supreme Court as a required self-incrimination necessary for me to exercise my right to petition. The Eastern District of PA agreed not to report discipline until conclusion of this matter.

35. The US Supreme Court may sue me as a result of the dismissal order placing my license to practice law in the Eastern District of PA as disbarred. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability. Delaware ODC and PA ODC would likely seek to try to sue me through disciplinary proceedings into oblivion while eliminating my Constitutional rights and protections under statutes, demeaning my reputation in vindictive retaliation for petitioning the Court to correct its own violations of procedural due process, and to punish me for the exercise of my 1<sup>st</sup> Amendment asserted right to religious belief, religious exercise, petition, speech, association, 6<sup>th</sup> Amendment violations or other exercise of rights in defense of my life, liberty, licenses and other claims.

36. On 6/8/23, I filed a Motion to recuse Four Judges, Judge Hardiman, Judge Phipps, Judge Honorable Montgomery-Reeves, and Judge Scirica. (3DI-43) I incorporate herein by reference.

45. On 6/9/23 I filed motion for a caveat to her Motion for this Court to recuse Judge Scirica, wherein I moved Judge Scirica for "for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority."

46. I at all times intended to file a Motion for reargument under FRAP R 40.

47. To my horror, on 6/30/23, Judge Phipps participated in 5 judgments against my motions, including my motion for more time and a stay at Third Docket Item Number (“3DI”) 3DI-47

48. My motion to recuse Judge Phipps and Judge Scirca was denied on 6/30/23.

49. I invoke my 1<sup>st</sup> Amendment right to petition to safeguard not only my interests in my licenses but to safeguard my 1<sup>st</sup> Amendment rights to private 1. Petition, 2. Speech, 3. Association, 3. Religious belief, 4, exercise of religious belief, 5. association, and related claims that will be diminished should a stay or other motions for reargument be denied.

50. 6/4/23 I filed the following documents that I incorporate in their entirety, including exhibits, although not attached hereto as Exhibits F-0:

1. Appellant Meghan Kelly’s motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023
2. Petitioner Meghan Kelly Affidavit in Support of Recusal of Judge Phipps, and Judge Scirica
3. Appellant Respondent Meghan Kelly’s Motion for leave to exceed the word and page limit in her motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023

51. 6/5/23, I filed Motion to Expedite Consideration of Appellant Meghan Kelly’s motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023. (Exhibits F-0)

52. I adhered to the 14 day rule limit under FRAP 40. Federal Rule of Appellate Procedure 40 affords me a right to file a Motion for reargument on each of the 5 Orders denied, which is due by or before July 14, 2023. I also seek leave to reopen to consider another potential

motion, as last recourse in order to prevent 6 new law suits, with at least 1 certain one which would create an obstacle so great as to deny me reasonable or fair opportunity to effectively petition to defend my claims in the civil rights case Kelly v Swartz.

53. This appeal relates to the disbarment of my license based on the Eastern District Court's booby trapping me in bad faith based on its knowledge I believed I was retired in their court since I was retired in PA since 2018. I was incorrect.

54. The Court used the fact I was distraught about calling witnesses in a disciplinary proceeding. The Court tricked me to get out of correcting a voluminous amounts of misfiled documents where another pro se claimants' health record was placed on my pleadings. Two pleadings were contained in one. Documents were missing, out of order making it hard for me and the court to refer to some documents, and impossibility to see the missing ones. See Exhibits T and U. The order under the extraordinary circumstances is unfair

55. I request permission to reague a stay is required by reopening this case. I cannot defend this case simultaneously with the civil rights case, and up to potentially six new additional cases on a different order. I need a stay. Denial of allowing me to even present motions of reagment I intend to file will effectively vitiate my private 1st Amendment rights and other rights and claims in DE. I must seek to assert my right to reargue for a stay or time and not waive. There is no necessary purpose narrowly tailored to the Court or the public's interest in denying me the asserted not waived right to petition to defend and not lose my First Amendment rights. There is no harm to the public or the court. My license is currently disbarred, but I face the loss of my private-First Amendment rights, 6<sup>th</sup> Amendment rights and Delaware District Court claims based on the governments' forced not free choice should this court deny my petition.

56. The judgment may start up to 6 additional law suits on the different order on disbarment, including by the US Supreme Court. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability.

57. Additional threats of possible law suits create an obstacle so great as to prevent me a fair opportunity to petition in the Civil-rights case until the conclusion of the proceeding given the voluminous amount of Defendants, poverty creating a substantial burden, health issues and other facts of this case. I ask for leave to petition for a fighting reasonable chance for the opportunity to defend my faith in Jesus Christ and other claims without government persecution.

58. My license is on disbarred status. The Eastern District Court agreed not to share the status until conclusion of the case. There is no harm to this court or the public or anyone by denying a stay unless this court desires to fix the proceeding in the civil rights case based on personal disdain for m political-religious petitions which may be the case since it appears this Court desired to increase burdens by rendering orders against me simultaneously in the two cases.

59. From the record it appears this Court, the District below and the DE-State court threatened punishment in retaliation for petitioning the Court its own correct perceived mistakes or misconduct, which impeded my exercise of the right to petition to defend my claims and constitutional rights effectively. (Exhibit Q, R, S, T, U) This Court misfiled my civil rights documents by including prejudicial information despite the fact I gave the court prior notice the documents related of the DE Order and my reciprocal notice documents. This Court threatened sanctions as I desperately fought against prejudice in defense in my belief in Jesus when this Court placed the disciplinary opinion and documents on the record despite my notice, call and email giving the Court a head's up that the mailed in documents is required under the rules for

me to present for a reciprocal case, arguably in violation of my 5th. I incorporate pleadings to remove the record attached hereto Exhibits Q, R, S, T. I seek to protect the court, even when I file petitions to correct the court.

60. This Court may reopen its mandate to prevent injustice. *Gradsky v. U.S.*, C.A.5 (Fla.) 1967, 376 F.2d 993 , certiorari denied. Manifest injustice will occur should this court reject my plea in that I will not be able to freely worship Jesus without fear of government reprisal, in addition to not being able to buy and sell as a lawyer but for my religious beliefs.

61. The State claims a reason my DE license to practice law on disability inactive is based on my speech containing my religious-political beliefs contained in pleadings against former President Donald J. Trump [Trump] to dissolve the establishment of government religion that created and continues to create a substantial burden upon my religious exercise by eliminating freedom to allow religious exercise to be bought and sold with government backing through a series of executive orders and activity I describe and incorporate herein by reference the pleadings I filed in *Kelly v. Trump* at (Third Circuit Docket Item hereinafter“3DI”) 3DI21-4.

62. The US Supreme Court held in *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991):

“At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law.....We have not in recent years accepted our colleagues' apparent theory that the practice of law brings with it comprehensive restrictions, or that we will defer to professional bodies when those restrictions impinge upon First Amendment freedoms.”

63. This presents a unique important question as to whether I, an attorney may be disciplined for my exercise of the First Amendment right to religious beliefs contained in my state petitions. And, whether my religious belief in Jesus as God not money as God may be

labeled a disability to prevent me from buying and selling as a lawyer but for my religious belief.

*Matthew 6:24*

Wherefore I pray this Court grants this motion.

Dated July 10, 2023

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
Inactive license  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
PRO SE (4,976 words)



Under religious protest as declaring and swearing violates God's teachings  
in the Bible, I declare, affirm that the foregoing statement is true and correct

Dated: July 10, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

# Exhibit A

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CCO-081

No. 22-3372

IN RE: MEGHAN M. KELLY,  
Appellant

(E.D. Pa. No. 2-22-mc-00045)

Present: SHWARTZ, MATEY and PHIPPS, Circuit Judges

1. Unopposed Motion by Appellant Meghan M. Kelly to Vacate order dated 05/19/2023;
2. Unopposed Motion by Appellant to Amend Correct Motion to Vacate to Include Pursuant to Fed. R. App. Proc R 27(b) and Rule 40;
3. Motion by Appellant to for Leave to Exceed Word Limit for Corrected Motion to Vacate Order dated May 19, 2023;
4. Motion by Appellant to Correct the Record, Specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27;
5. Motion by Appellant for Extension of Time to File Brief and Appendix for 120 Days to appeal the lower court's order placing license on disbarred as retired but for religious beliefs, religious political beliefs, and religious political speech contained in petitions;
6. Motion by Appellant Meghan M. Kelly to stay of this proceeding including briefing, with the allowance of 30 additional days, when the stay is lifted at the conclusion of case 21-3198.

Respectfully,  
Clerk/pdb

ORDER

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The motion to exceed word limit is **GRANTED**. The motion to correct the record is **DISMISSED**. All other foregoing motions are **DENIED**.

By the Court,

s/ Paul B. Matey

Circuit Judge

Dated: June 30, 2023

PDB/cc: Meghan M. Kelly, Esq.

# Exhibit B

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 22-3372

In re: Meghan Kelly

(U.S. District Court No.: 2-22-mc-00045)

**ORDER**

Pursuant to Fed. R. App. P. 3(a) and 3rd Cir. Misc. LAR 107.2(b), it is

ORDERED that the above-captioned case is hereby dismissed for failure to timely prosecute insofar as appellant failed to file a brief and appendix as directed. Appellant's brief and appendix was initially due to be filed on May 30, 2023. The deadline was extended until June 13, 2023. Appellant's motions for further extensions of time were denied by Court order entered this date June 30, 2023.

It is

FURTHER ORDERED that a certified copy of this order be issued in lieu of a formal mandate.

For the Court,

s/ Patricia S. Dodszuweit  
Clerk

Dated: June 30, 2023  
PDB/cc: Meghan M. Kelly, Esq.



A True Copy:

*Patricia S. Dodszuweit*

Patricia S. Dodszuweit, Clerk  
Certified Order Issued in Lieu of Mandate

# Exhibit C

(3DI- 42 in 22-3372 incorporated in full, partly attached, Motion for Extension of Time to file Appellate Brief until/for Appeal in the amount of 120 days/Caption correction Change )

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Petitioner Meghan Kelly moves this Court for an extension of time to file her Brief on appeal

I Meghan Kelly, Esq., pursuant to Fed. R. App. P. 2, in the interest of justice I move this Honorable United States Supreme Court for an extension of time to file to appeal the decision of the United States District Court for the Eastern District of Pennsylvania (hereinafter “lower-court”) to place my attorney’s license to practice law as disbarred due to retirement where I face immediate irreparable injury in terms of loss of my First Amendment rights, and loss of my property interests in my licenses to practice law.

1. I incorporate herein by reference in its entirety, Appellant’s motion to vacate Order, dated May 23, 2023, Appellant’s Motion to Correct the Motion to vacate to include the rules, Appellant’s Corrected Motion, Appellant’s Motion for permission to exceed the page limit, Appellant’s Motion to correct the Record under Rule 10 (e)(2)(c), and documents referred therein and attached thereto as Exhibits (Third Circuit Docket item (3DI) 3DI-21 through 3DI 41).

2. The opinion of the Third Circuit Court of Appeals dated November 18, 2022, disbarred me, which may cause 6 additional law suits should I not overturn the Order.

3. I require adequate time to meaningfully petition this Court to prevent 6 additional law suits, and to prevent deprivations of my liberties and licenses based on clear error of law, of fact creating manifest injustice. I respectfully request an extension in the amount of 120 days to



appeal the lower court's order placing my license on disbarred as retired but for my religious beliefs, religious political beliefs, and religious political speech contained in my petitions.

4. A Delaware Order placed my license on inactive/disabled, but for my religious-political beliefs, poverty and exercise of First Amendment rights and my right to due process, without disparate treatment.

5. The Delaware Order placing my license on disability inactive has caused additional courts to place my license on inactive disabled, causing multiple law suits. I have been fighting reciprocating courts. I require additional time to plead in other cases to prevent irreparable injury to me in the form of loss of First Amendment rights, not limited to the right to petition, and my property interest in my license.

6. On Tuesday, May 30, 2023, I timely filed an appeal of a PA reciprocal order, and expect PA ODC to bury me in paper to prejudice my other cases as he did in the state court proceeding. I attach hereto and incorporate herein in its entirety as an exhibit my appeal to the PA Order dated February 28, 2022 placing my license on disability inactive.

7. In the attached petition, I asserted my belief the US Supreme Court erred in decisions, and my belief Justice Alito erred and is misguided by sin, lawlessness. I believe I have a duty to uphold the Constitution when I believe the highest Court violates it. I also believe the courts are in danger. The 2030 plan allows central banks to take over governing, to take over resources to control to eliminate the government. I am in tears because I believe the Courts are our hope of a hero. I am trying to find a way to allow the courts to save us in one of my cases, but I know that the justices may not be pleased that a peon like me seeks to guide their misguided beliefs. Money is not freedom. I seek to uphold the Constitutional limits, the law that

limits governments to safeguards free will by government backed private or foreign partners forced will.

8. I have a civil rights case relating to deprivations of Constitutional liberties independent of the disciplinary order, while I also seek to overturn the DE order as void or voidable due to due process violations. I require time to exercise the First Amendment right to petition and appeal this case.

9. I have an eye appointment, health issues I discussed in my pleadings I incorporate herein, a funeral, time I request to mourn and comfort loved ones, and my family is coming next week for a week or two for a family reunion. I have not seen my dad in years.

10. I am scared to exceed 3 pages due to this Court's Order at 3DI 35. I am compelled to forgo legal citations and arguments due to the order. I hope this suffices, but I am scared as I have a lot to lose should it be denied, my Constitutional liberties, harm to life, eternal life, lost time with loved ones, licenses and avoidance of litigation, potentially 6 more law suits .

11. I agree not to file anything during the additional time frame with the exception of a potential motion for a stay, if required to defend liberties, should this Court grant this petition.

Wherefore I pray this Court grants my motion.

Dated June 2, 2023

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
Inactive license  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(802 words)

# Exhibit D

(3DI-7, Motion by Appellant for permission to exempt PACER fees, to prevent unaffordable costs from becoming a substantial burden upon access to the courts, and compelled violation of religious beliefs against indebtedness in order to exercise right to petition the Court in defense of the exercise of fundamental rights. Certificate of Service dated 12/28/2022, 22-3372)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Petitioner Meghan M Kelly’s Motion for permission to exempt PACER fees, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights

I Respondent Meghan M. Kelly pursuant to Fed. R. App. P. 2, in the interest of justice, move this Honorable Court to exempt PACER fees for electronic filing before this Honorable Court for case number 22-3372, 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, and 3. to prevent compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus. (Citing, US Amendments I, V, XIII).

1. This Court kindly granted me an exemption for PACER costs in Kelly v Swartz, NO 22-3198. (Third Circuit Docket Item (“3DI”) 3DI-21, 24, 25, 30). This Court kindly extended the exemption for PACER fees in Case No 21-3198 too. (3DI 91-92)

2. My PACER Account Number 6975241.

3. I respectfully request an exemption be applied for the duration of this case up until appeal or the time has appealed to the US Supreme Court or until **January 20, 2024**, whichever is longer.

5. I thank the Court and its staff for its help.
6. I agree to send PACER the attached Order or any Order this Court files to exempt PACER fees in this case, should this Court grant my plea.
7. I have been experiencing computer trouble. I downloaded the e-served documents for this matter, but discovered they are no longer available.
8. The costs relating to PACER for second looks are unaffordable.
9. The original disciplinary order from Delaware from which the reciprocal suit by the Eastern District is based adjudicated me inactive/disabled.
10. The Delaware Order prevents me from working as an attorney. I am unable to seek employment at my former law firm where I would be performing real estate settlements. My former law firm is a great law firm McDonnell and Associates. The people there care about their clients and employees above money.
11. I am impoverished and am not allowed to work in my profession.
12. Even if the Order in DE is overturned, the Eastern District's Order may prevent my former firm from rehiring me. They work with others who perform their due diligence to protect clients and the large amounts of money in real estate transactions.
13. The firm does thorough background checks.
14. Having any blemish remaining on my license affecting my credibility or appearance of credibility may deem me unemployable.

15. Since I am poor and unemployed, I do not have money to pay fees. My parents have indicated they have decided to cut off or reduce my inheritance should they die, because of this litigation.

16. It is against my religious belief to go into debt, especially given I am not permitted to work for pay as an attorney in DE. (*See, Bible Romans 13:8*. “Owe nothing to anyone, but to love them”)

17. This Court kindly granted me an exemption previously in order not to compel me to violate my religious beliefs in exchange for access to the courts in defense of my exercise of my First Amendment liberties, my license and related interests.

18. I respectfully request this Court grant me an exemption of PACER fees in this case, too (1). in order not to compel me to violate my religious beliefs in exchange for access to the courts or (2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and (3). to prevent government compelled involuntary servitude to sin by making money savior in place of God.

19. It is my religious belief people should buy and sell by free choice, not by forced choice by artificially man-made government compulsion to be exploited by government backed private or foreign partners in a fixed not free economy. <sup>1</sup>

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<sup>1</sup> By fixed I mean lawlessness, making business through entities the standard of care and the letter of the law. This makes businesses above the law and above Court correction. I desire laws that prevent businesses from killing, oppressing, and destroying human life, liberty and

20. I argue compelled debt in my case not only violates the 13<sup>th</sup> Amendment against involuntary servitude, but violates my private, personal individual religious belief in Jesus, God the father and the holy spirit as guide and God, not money by government compelled force. US Amend I, XIII.

21. I believe the plans under the UN, G-7 and global agenda violates my religious belief against indebtedness to money and material gain as God at a greater more horrific level, and violates my First Amendment right to religious belief. Creating precedent in this case, may prevent the elimination of not only my Constitutional liberty but the liberty of all Americans protected under Constitutional law. I hope to somehow tie that in to other litigation.

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health for material gain. The fixed system allows businesses to be above the law by making the experts and the business's standards above government guidance and correction when they destroy and harm other people's lives and liberty. I desire the Judges to judge, not businesses through experts whose aims are exploiting people for money and material gain. Whereas Courts aim is to protect liberty and lives. US Amend I and preamble. Article III, Section 1 of the Constitution vests the judicial Power of the United States in the United States Supreme Court and the federal Courts. Powers may be waived if not exercised. When this Court's relinquishes its powers, it allows the other two branches to lawlessly rule as opposed to serve by lusts like business greed. The other two branches will sacrifice the people, land and resources to private and foreign powers if left unstopped and unrestrained by the rule of Constitutional law. You have the power and authority to prevent war, economic crash and the dismantling of our government, should someone with standing ask.

22. I believe people teach a lie, despite their ignorance of truth, and sin against God and man for teaching government is a social contract to govern. It is a forced choice upon the populace without a meeting of the minds or consideration. The people's souls are not to be sold by the government through the government backed private or foreign partners to be sacrificed to gain the world. Leaders are charged with caring for the people and protecting their liberty. Misleaders seek to control and exploit for material gain a no longer free people. It is written *Mark 8:36*, "What profits a man to gain the whole world [by money or material gain only to lose his eternal life in the second death to be no more.]"

23. The contract of government is by those governing who agree to more limited liberty in order to the authority to serve, govern and guide.

24. I seek to preserve our government with honesty by seeking to unrig the system of corruptions within by requiring the Courts place checks on the other branches of power and their own when those within branches exceed their Constitutional authority and violate the Constitutional laws that protect the people they are charged to serve, not exploit.

25. There appears to be a societal peer pressured attack against the courts to create lawlessness under the guise of freedom. There appears to be an attack to dismantle the government as opposed to unrig unjust practices which exceeds Constitutional laws that protect the common people.

26. I seek to preserve our system of government by upholding the Constitution and asking the courts to guide those misguided by lusts under the belief of laws.

27. I believe that people serve lawless lusts untamed by love or the rule of law when they seek to do what they want regardless on the impact on other people God loves, untamed by



the rule of law or by love. This lawlessness under the pretty words research, science, study, experts, professions or business allows oppression, killing, stealing and destroying the lives and health of others for the bottom line.

28. I believe we must protect people's seemingly wrong choices too, to disagree with us or think differently. After all we may be the ones who in the dark in need of guidance at times.

29. The diversity in allowing equal protections of the laws is not sameness but equal protections to believe and exercise belief by the dictates of our conscience within limits to protect other people's life and liberty.

30. Equal protections under the law is not the dictates of the equal compelled treatment by the US through the BIS, IMF, World Bank, UN or WHO or other entity to force its sameness under the guise of equality, freedom or sacrificing people's life to gain the world.

31. I believe differently than the UN's collaborative, conditional, conformed agenda which I believe misleads people to harm and I believe damnation in hell by driving out the ability of the people to unconditionally love, under a bank controlled environmental credit and debt system. The stakeholder system gives entities a stake in other people's lives by economic compelled force. A free people are not a piece of property to exploit as chattel for an alleged common interest. US Amend XIII

33. The global agenda violates my religious beliefs against debt, making every human in debt and indebted as stakeholders in someone else's plan, someone else's will which is not free will or God's will but an economically compelled will. It is so horrific. I am sorry if I am unable to discuss it in current litigation. My hope of a hero remains with the Court to unravel the

lawlessness reigned by lusts and desires such as unbridled business greed. I believe there is a plan in the years to come to eliminate the courts to eliminate the rule of law down the line if left unstopped.

34. With regards to my plea, the Government is not permitted to discriminate based on religious belief by denying me access to the courts by requiring my enslavement to debt.

35. Given my poverty, any fee creates a substantial burden to my access to the courts and my religious-belief against indebtedness.

36. I am a Christian, a child of God, a believer of Jesus Christ. I believe people sin by debt, focusing their mind, and life towards the aim of gathering money as savior in place of God's desires.

37. I believe people sin for using money to control others, to do their will, or the government's will by reward, or punishment in terms of fines because I believe this misleads people to hell by making money master, God and guide.

38. I believe there is a difference between unjust decrees and just decrees. Just decrees care for the people, while protecting their liberty within limits so as to protect the liberty of others. Unjust decrees seek to control people by sacrificing individuals or individual liberty for money, material gain, cost, convenience and other superficial unjust reason, under the lie of caring for the many. See *Isaiah*10:1-3. Unjust laws also teach people to blind their eyes by desire for money gain as savior, from seeing clearly to love others beyond their own.

39. I believe the United States Supreme Court is misguided into sacrificing individual liberties and individuals for collective interests of businesses or organizations.

40. Collectively, united by shared interests, we can do no good. Only individuals may do good by unconditional love, reflecting the image of God. Collectively, by shared, united

interest in business or other group or entity, we are enslaved to those who tempt us with reward or threat of harm towards our conditional, collective, interests. Entities are not free to do what is right by its bound unified, conditional, collective aims.

41. The individual is more powerful and may do more good than collective groups, organizations, entities, charities or businesses. Only an individual may lay down his desires, and the desires of men, to think, to know, in order to love, to do what is right to overcome the lusts of men.

42. I believe that the executive and legislative branch give us a republic by representation through the vote. I believe the Courts give us freedom, in the form of a democracy by protecting individuals and individual liberties from being sacrificed by the majority or collective groups through the vote. I believe the courts are our hope of a hero, in protecting independence required to safeguard Constitutional liberties from being sacrificed on a global level. See *Amos 5:15* and *Matthew 23:23*.

43. I am quite concerned how countries are sacrificing independence which gives leaders the freedom to care for their people in exchange for collective, conformed purposes, under the UN, the Paris Accord and other agreements which enslave the people by artificial indebtedness to do the will of collective, conditional groups, substantially burdening freedoms.

44. I believe people go to hell for creating artificial indebtedness which enslaves other people to pay back a debt. That is what the global plans will do if unstopped by the Courts to protect individual liberties. The plans appear to allow central banks, whose shareholders are banks to control the governments by monetary rewards and debts. It is an abomination. The more debt, and the worse off the people are, the more profit on debt interest and debt control banks gain over governments, businesses, people and countries. The banks have incentive to

make people worse off. There appears to be a trend to eliminate the just rule of law in place of the lawlessness spoken of in the bible, through unjust decrees, oppressing, killing, stealing and destroying human life and health to serve business greed, not good. Money and business should not be the law. Money is not freedom, and should not be used by the government to control a no longer free people

45. My case may grant the Court the ability to safeguard individuals and individual liberties of speech, religious belief, exercise, right to petition regardless of poverty or religious or political affiliation.

46. Please help me by removing an obstacle by preventing the foreseeable of added PACER costs upon me. I had no idea I would be fighting potentially 6 cases simultaneously, while I sought to defend my exercise of religious-political beliefs, religious-political speech, religious-political association and my religious-political petitions in the Delaware Disciplinary proceeding. Two Courts have decided not to reciprocate discipline. In 21-3198 I noted 8 cases.

47. These additional law suits have increased costs, and caused me to panic, lose sleep, and gain baby white hairs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

48. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs.

49. I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental rights.

50. Please grant me a PACER exemption until conclusion of this case.

51. I am utterly poor. The costs relating to PACER fees create a substantial burden and obstacle to my access to the Courts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5<sup>th</sup> Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated.”); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification.”) (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) “[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.”)

51. “Because this case implicates the [Constitutionally protected] right of access to the courts, [ and First Amendment rights to free speech, religious belief, association and exercise of religious beliefs] the government’s disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test.” *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

52. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

53. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” *Douglas*, [372 U.S., at 357-358](#)

54. I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religion, exercise of religious and political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian without government incited persecution, but for my exercise of fundamental rights.

55. The Delaware Order against me and the reciprocating Order creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work as a law firm, and harms my reputation to make me less attractive to employers.

56. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. In addition, fundamental rights are implicated.

57. So, the Court must have a compelling reason to deny my request for an exemption of the PACER fees to protect my access to the courts to defend the exercise of my fundamental rights including my religious beliefs narrowly tailored to meet the important justification.

58. There is no compelling reason to deny my request for an extension for a PACER waiver, especially since it will prevent my need to contact the court should the one free glance fail to save.

59. Nor is any justification narrowly tailored to meet any compelling reason. The Court may grant an exemption and has granted an exemption in another case. This has prevented has the need to call the court to confirm documents were received and filed.

60. I face an undue burden should this court deny my request, including loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

61. There is no opposing counsel to request a position on.

62. The United States Supreme Court indicated it is the Court itself I place as the Defendants, which is quite strange.

63. That is how the Court placed the parties on my appeal from the Third Circuit disciplinary Order, in United States Supreme Court No. 22A 478, which relates to one argument of a case and controversy.

Wherefore I pray the Court grants my motion.

Respectfully submitted,

Dated December 28, 2022

/s/Meghan Kelly

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Meghan Kelly, Esquire

DE Bar Number 4968 INACTIVE,  
not acting as an attorney on behalf of  
another

34012 Shawnee Drive

Dagsboro, DE 19939

(302) 493-6693

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)



# Exhibit E

(3DI-17 Reargument of Clerk denial to exempt taxes 3DI-16, 22-3372)



THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Appellant Meghan Kelly’s Motion for reconsideration of Order dated January 17, 2023, with regards denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights

I, Appellant Meghan Kelly pursuant to USCS Fed Rules App Proc R 27(b) and 40 move this Court for reconsideration of its Order dated January 17, 2023 with regards to the denial of costs, based on an error of law, an error of fact to prevent manifest injustice, and I aver:

1. On or about December 23, 2022, I filed a motion to exempt costs due to foreseeable costs creating a substantial burden upon my access to the courts and forced violation of my religious beliefs by threat of indebtedness, I incorporate herein by reference in its entirety Third Circuit Docket Item Number (hereinafter “3DI-“) 3DI-4.

2. I seek to exempt costs 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, and 3.to prevent government compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus,” I incorporate herein by reference in its entirety. (Citing, US Amendments I, V, XIII).

3. The Order at DI 16, and attached hereto provides in part:

“The motion to be exempt from costs is denied without prejudice to renewal once the Court has entered a decision on the appeal, which would include a ruling on whether costs would be taxed against a party. It is noted that no hearings were conducted in the underlying District Court proceedings and, therefore, no transcripts will need to be ordered.”

4. The Clerk erred as a matter of law, and as a matter of fact, creating manifest injustice in denying matters that are not merely procedural until it is too late to assert them.

“[O]nce the Court has entered a decision on the appeal.”

5. I acknowledge, there is no opposing counsel who will move this Court for costs.

6. However, I also seek to exempt all costs, including but not limited to costs by taxable in the District Court, for the Eastern District of PA.

7. Pursuant to USCS Fed Rules App Proc R 39 (e)

“The following costs on appeal are taxable in the district court for the benefit of the party entitled to costs under this rule:

- (1) the preparation and transmission of the record;
- (2) the reporter’s transcript, if needed to determine the appeal;
- (3) premiums paid for a bond or other security to preserve rights pending appeal; and
- (4) the fee for filing the notice of appeal.”

8. It is against my religious belief to go into debt, especially given I am not permitted to work for pay as an attorney in DE. (*See, Bible Romans 13:8*. “Owe nothing to anyone, but to love them”)

9. It is my religious belief people should buy and sell by free choice, not by forced choice by artificially man-made government compulsion to be exploited by government backed private or foreign partners in a fixed not free economy. <sup>2</sup>

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<sup>2</sup> By fixed, I mean lawlessness, making business through entities the standard of care and the letter of the law. This makes businesses above the law and above Court correction. I desire just decrees that prevent businesses from killing, oppressing, and destroying human life,

10. I argue government compelled debt in my case not only violates the 13<sup>th</sup> Amendment against involuntary servitude, but violates my private, personal individual religious belief in Jesus, God the father and the holy spirit as guide and God, not money as guide and savior by government compelled force. US Amend I, XIII.

11. I believe the plans under the UN, G-7 and global agenda violate my religious belief against indebtedness to money and material gain as God at a greater more horrific level, and violates my First Amendment right to religious belief. Creating precedent in this case, may prevent the elimination of not only my Constitutional liberty but the liberty of all Americans protected under Constitutional law. I hope to somehow tie that in to other litigation.

12. I believe people teach a lie, despite their ignorance of truth, and sin against God and man for teaching government is a social contract to govern. It is a forced choice upon the populace without a meeting of the minds or consideration. The people's souls are not to be sold by the government through the government backed private or foreign partners to be sacrificed to gain the world. Leaders are charged with caring for the people and protecting their liberty. Misleaders seek to control and exploit for material gain a no longer free people. It is written

---

liberty and health for material gain. The fixed system allows businesses to be above the law by making the experts and the business's standards above government guidance and correction when they destroy and harm other people's lives and liberty. I desire the Judges to judge, not businesses through experts whose aims are exploiting people for money and material gain. Whereas Courts aim is to protect liberty and lives. US Amend I and preamble. Article III, Section 1 of the Constitution vests the judicial Power of the United States in the United States Supreme Court and the federal Courts. Powers may be waived if not exercised. When this Court relinquishes its powers, it allows the other two branches to lawlessly rule by lusts, including business greed, as opposed to serve people. The other two branches will sacrifice the people, land and resources to private and foreign powers if left unstopped and unrestrained by the rule of Constitutional law. That makes the Courts necessary, at all times. You have the power and authority to prevent war, an economic crash and the dismantling of our government, should someone with standing ask.

*Mark 8:36*, “What profits a man to gain the whole world [by money or material gain only to lose his eternal life in the second death to be no more.]”

13. The contract of government is by those governing who agree to more limited liberty in order to the authority to serve, govern and guide.

14. I seek to preserve our government with honesty by seeking to unrig the system of corruption within by requiring the Courts place checks on the other branches of power and their own when those within branches exceed their Constitutional authority and violate the Constitutional laws that protect the people they are charged to serve, not exploit.

15. There appears to be societal peer pressured attack against the courts to create lawlessness under the guise of freedom. There appears to be an attack to dismantle the government as opposed to unrig unjust practices which exceed Constitutional laws that protect the common people.

16. I seek to preserve our system of government by upholding the Constitution and asking the courts to guide those within government misguided by lusts under the belief of laws.

17. I believe that people serve lawless lusts untamed by love or the rule of law when they seek to do what they want regardless on the impact on other people God loves, untamed by the rule of law or by love. This lawlessness under the pretty words research, science, study, experts, professions or business allows oppression, killing, stealing and destroying the lives and health of others for the bottom line.

18. I believe we must protect people’s seemingly wrong choices too, to disagree with us, the government, one another, and to think differently too. After all we may be the ones who in the dark in need of guidance at times.

19. The diversity in allowing equal protections of the laws is not sameness but equal protections to believe and exercise belief by the dictates of our conscience within limits to protect other people's life and liberty.

20. Equal protection under the law is not the dictates of the equal compelled treatment by the US through the private entity, the Federal Reserve, BIS, IMF, World Bank, UN or WHO or other entity to force its sameness under the guise of equality, freedom or sacrificing people's life to gain the world.

21. I believe differently than the UN's collaborative, conditional, conformed agenda which I believe misleads people to harm and I believe damnation in hell by driving out the ability of the people to unconditionally love. Under a bank controlled environmental credit and debt system the people are conditionally compelled to sacrifice, under the guise of caring for and saving the world, or go without basic necessities of life. The stakeholder system gives entities a stake in other people's lives by economic compelled force. A free people are not a piece of property to exploit as chattel for an alleged common interest. US Amend XIII.

22. The global agenda violates my religious beliefs against debt, making every human in debt and indebted as stakeholders in someone else's plan, someone else's will which is not free will or God's will but an economically compelled will. It is so horrific. I am sorry if I am unable to discuss it in current litigation. My hope of a hero remains with the Court to unravel the lawlessness reigned by lusts and desires such as unbridled business greed. I believe there is a plan in the years to come to eliminate the courts to eliminate the rule of law down the line if left unstopped.

23. With regards to my plea, the Government is not permitted to discriminate based on religious belief by denying me access to the courts by requiring my enslavement to debt. In the forms of costs

24. Given my poverty, any fee creates a substantial burden to my access to the courts and my religious-belief against indebtedness.

25. I am a Christian, a child of God, a believer of Jesus Christ. I believe people sin by debt, focusing their mind, and life towards the aim of gathering money as savior in place of God's desires.

26. I believe people sin for using money to control others, to do their will, or the government's will by reward, or punishment in terms of fines. I believe this misleads people to hell by making money master, God and guide.

27. Per Jesus Christ, "You cannot serve God and money." Bible, Luke 16:13.

28. I believe there is a difference between unjust decrees and just decrees. Just decrees care for the people, while protecting their liberty within limits so as to protect the liberty of others. Unjust decrees seek to control people by sacrificing individuals or individual liberty for money, material gain, cost, convenience and other superficial unjust reason, under the lie of caring for the many. See *Isaiah* 10:1-3. Unjust laws also teach people to blind their eyes by desire for money gain as savior, from seeing clearly to love others beyond their own.

29. I believe the United States Supreme Court is misguided into sacrificing individual liberties and individuals for collective interests of businesses or organizations.

30. I believe I have a duty to uphold the Constitution by guiding the misguided Court from sacrificing individual First Amendment liberties to entities, in order to preserve the courts from being taken over by the entities.



31. Collectively, united by shared interests, we are not free, but slaves to those third parties who entice our collective interests by reward or threat of harm.

32. The individual is more powerful and may do more good than collective groups, organizations, entities, charities or businesses. Only an individual may lay down his desires, and the desires of men, to think, to know, in order to love, to do what is right to overcome the lusts of men.

33. I believe that the executive and legislative branch give us a republic by representation through the vote. I believe the Courts give us freedom, in the form of a democracy by protecting individuals and individual liberties from being sacrificed by the majority or collective groups through the vote. I believe the courts are our hope of a hero, in protecting independence required to safeguard Constitutional liberties from being sacrificed on a global level. See *Amos 5:15* and *Matthew 23:23*.

34. I am quite concerned how countries are sacrificing independence which gives leaders the freedom to care for their people in exchange for collective, conformed purposes, under the UN, the Paris Accord and other agreements which enslave the people by artificial indebtedness to do the will of collective, conditional groups, substantially burdening freedoms.

35. I believe people go to hell for creating artificial indebtedness which enslaves other people to pay back a debt. That is what I believe the global plans will do if unstopped by the Courts to protect individual liberties. The plans appear to allow central banks, whose shareholders are banks to control the governments by monetary rewards and debts. It is an abomination. The more debt, and the worse off the people are, the more profit on debt interest and debt control banks gain over governments, businesses, people and countries. The banks have incentive to make people worse off. There appears to be a trend to eliminate the just rule of

law in place of the lawlessness spoken of in the bible, through unjust decrees, oppressing, killing, stealing and destroying human life and health to serve business greed, not good. Money and business should not be the law. Money is not freedom, and should not be used by the government to control a no longer free people because the government itself is enslaved to debt to pay back the Federal Reserve.

36. My case may grant the Court the ability to safeguard the federal government, individuals and individual liberties of speech, religious belief, exercise, right to petition regardless of poverty or religious or political affiliation.

37. Please help me by removing an obstacle by preventing the foreseeable costs upon me from denying me access to the courts needed to safeguard my exercise of fundamental rights and to prevent the loss of my license as punishment for the exercise of my rights. I had no idea I would be fighting potentially 6 cases simultaneously, while I sought to defend my exercise of religious-political beliefs, religious-political speech, religious-political association and my religious-political petitions in the Delaware Disciplinary proceeding. Two Courts have decided not to reciprocate discipline. In 21-3198 I noted 8 cases.

38. These additional law suits have increased costs, and caused me to panic, lose sleep, and gain baby white hairs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

39. I lack the capacity to pay any costs. I am impoverished and without an income. I lack the right to work in the profession of my free choice.

40. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fifth Amendment, and of which I cannot be deprived

for any whimsical, capricious or unreasonable cause, including the government's disagreement with my Constitutionally protected religious-political beliefs. US Amend I, V.

41. I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental rights, without compelled denial by requiring I pay costs or plea to waive costs when costs may be incurred. US Amend I, V.

42. I am utterly poor. Costs create a substantial burden and obstacle to my access to the Courts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5<sup>th</sup> Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated."); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification)." (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.")

43. "Because this case implicates the [Constitutionally protected] right of access to the courts, [ and First Amendment rights to free speech, religious belief, association and exercise of religious beliefs] the government's disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test." *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

44. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

45. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” *Douglas*, [372 U.S., at 357-358](#)

46. I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religion, exercise of religious and political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian without government incited persecution, but for my exercise of fundamental rights.

47. The Delaware Order against me and the reciprocating Order creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work as a law firm, and harms my reputation to make me less attractive to employers.

48. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious

exercise relating to my religious belief against indebtedness are protected. In addition, fundamental rights are implicated.

49. So, the Court must have a compelling reason to deny my request for an exemption of costs to protect my access to the courts to defend the exercise of my fundamental rights including my religious beliefs narrowly tailored to meet the important justification.

50. There is no compelling reason to deny my request for an exemption. Any costs would be minimal as applied to the federal courts, but would be crushing to me compelling me into slavery, and violations in my beliefs in Jesus, threatening my soul to the fires of hell. What is more important money or Constitutional laws which protect rights of even people like me whose religious beliefs do not conform with the majority?

51. Is it freedom this court protects or does it sell its subjects souls to serve businesses to gain money in violation of US Amend XIII, and US Amend I and V as applied to me.

52. I argue people and individual liberty are not for sale and are more valuable than money. The Courts gain the confidence of the public when it upholds the freedoms they all hold dear for all, not merely those who can buy what is no longer free.

53. There is no justification narrowly tailored to meet any compelling reason to deny me an exemption.

54. I face an undue burden should this court deny my request, including loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

55. There is no opposing counsel to request a position on.

56. I am not feeling so well. So, there is a possibility I might not appeal this case should I continue to worsen without rest, hydration or exercise needed to sustain my health in light of the effects of the surgery I had in my youth.

57. With regards to health care, I have religious objections. In another matter before this Court, I noted I was so concerned about my Aunt Jackie.

58. My cousins moved her to another location. I believe her first assisted living facility drugged her and made her easier to tend like a vegetable. In her new facility she actually walked around whereas she previously was bed ridden. I was scared she was going to die.

59. I believe you must use your brain to go to heaven. I oppose drugs. I oppose all drugs that inhibit or change people's ability to think under the guise of feeling better only to feel nothing because I do not want people to go to hell because they relied on professionals as God. I was scared my aunt would go to hell because she was not able to think clearly due to the poisons the healthcare agents administered to her. I am grateful she is alive. I pray she has eternal life the last day. I cry as I write this.

60. Pursuant to 3d Cir. L.A.R. 27.6, my motion to exempt costs may not be determined by the Clerk.

61. My motion is not ministerial, or merely procedural, but relates to substantive rights, including the possibility of government compelled violations of my First Amendment religious beliefs in order to defend the same religious beliefs which is the source of the original disciplinary matter.

62. FRAP 27 (b) provides, "A party adversely affected by the court's, or the clerk's, action may file a motion to reconsider, vacate, or modify that action."

63. I must be afforded equal access to the courts as a party of one with unique religious beliefs against money as God and guide, without disparate treatment in violation of my First Amendment right to religious belief and right to exercise my religious beliefs, and 5<sup>th</sup> Amendment Equal Protections component applicable to the Federal courts based on disdain for my unique religious beliefs.

64. Denial of an exemption of costs creates a denial to access to the courts in my case.

65. My religious beliefs are genuine.

Wherefore I pray the Court grants my motion.

Respectfully submitted,

Dated January 17, 2023

/s/Meghan Kelly

---

Meghan Kelly, Esquire  
Bar Number 4968, INACTIVE, not  
acting as an attorney  
34012 Shawnee Drive  
Dagsboro, DE 19939  
(302) 493-6693

(word count 3,852)

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

# Exhibit A



UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 22-3372

In re: Meghan M. Kelly  
(E.D. Pa. No. 2-22-mc-00045)

To: Clerk

- 1) Motion by Appellant for leave to appeal in forma pauperis
- 2) Motion by Appellant for permission to use electronic filing and waiver of paper copies to prevent unaffordable costs from becoming a substantial burden upon access to the courts, and compelled violation of religious beliefs against indebtedness in order to exercise right to petition the Court in defense of the exercise of fundamental rights
- 3) Motion by Appellant to exempt costs due to utter poverty and due to foreseeable costs creating a substantial burden upon access to the courts and forced violation of religious beliefs by threat of indebtedness
- 4) Motion by Appellant for extension of time to file a brief
- 5) Motion by Appellant for permission to exempt PACER fees, to prevent unaffordable costs from becoming a substantial burden upon access to the courts, and compelled violation of religious beliefs against indebtedness in order to exercise right to petition the Court in defense of the exercise of fundamental rights

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The foregoing are hereby considered.

Appellant's motion to proceed in forma pauperis is granted. The Court may reconsider in forma pauperis status or request additional information at any time during the course of these proceedings.

The motion for permission to use electronic filing is denied as unnecessary as Appellant already has electronic case filing privileges in this Court. The request for

waiver of paper copies is granted provided Appellant files all papers through the Court's electronic case filing system.

The motion to be exempt from costs is denied without prejudice to renewal once the Court has entered a decision on the appeal, which would include a ruling on whether costs would be taxed against a party. It is noted that no hearings were conducted in the underlying District Court proceedings and, therefore, no transcripts will need to be ordered.

The motion for extension of time to file a brief is hereby construed as a motion to stay issuance of the briefing schedule for ninety (90) days. So construed, the motion is granted. Absent the filing of a new motion to stay, the Clerk will issue a briefing and scheduling order at the expiration of the 90-day period.

The motion for exemption of PACER fees is granted. Appellant Meghan M. Kelly's PACER Account, No. 6975241, shall be exempt from the payment of fees for access via PACER to the electronic case files maintained in the Court of Appeals in Case No. 22-3372. This exemption shall be applied nunc pro tunc to December 23, 2022 and is valid until December 23, 2023 or the issuance of the mandate in No. 22-3372, whichever occurs first. This exemption may be revoked at the discretion of the Court at any time. A copy of this order will be forwarded to the PACER Service Center. It is noted that Appellant has previously been granted an exemption for Case Nos. 21-3198 and 22-2079.

For the Court,

s/ Patricia S. Dodszeit  
Clerk

Dated: January 17, 2023  
PDB/cc: Meghan M. Kelly

# Exhibit B

## EXHIBIT 43

Documents regarding improving healthcare while spending less money, to prevent taking advantage of the sick by killing or concealing illness to serve business greed. More money is the problem not the solution. Just decrees, and justice in the courts are the solution.

1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38<sup>th</sup> District
2. Document, "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal
3. Meghan Kelly's teaching certificate, credibility
4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law

5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

a. History of Western Medicine

b. Economics

c. Medieval Philosophy

d. Psychology courses

6. Evidence of the surgery that inspired me to study healthcare issues.

Due to the surgery referred to therein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight every month. This is still a challenge. I must assert my right to live because many people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. "I am not my own." Other people are loved by God too.

**Your Health is Your Wealth  
You are Priceless. Not a price Tag!**

**Kelly seeks Federal Consideration of Health Care Proposal**

My name is Meghan Kelly. I am an attorney running in the November 6, 2018 race for the House of Representatives seat in the 38th District, which includes Bethany Beach, Fenwick, Millville, Frankford, Ocean View, Selbyville and parts of Dagsboro.

I am running, in part, because I discovered I had a deep passion to change the laws to better serve people. I have had the opportunity to review proposed laws for more than ten years, starting at Richards, Layton and Finger, PA. I have proposed comments on legislation to other attorneys in different bar sections, such as Corporate Law, E-Discovery, Personal and Real Property. Each section votes by majority. Unfortunately, I always get voted out since I tend to seek what serves Delawareans better, instead of what is convenient and profitable to our own practice. So, I continued to look at alternative ways to improve the laws.

I made calls to legislators, met with people, sent emails and letters in an attempt to amend the laws. Unfortunately, I was not successful. Yet, every time I observed corruption, abuse or misuse of power, my desire to improve the laws grew stronger. So, I found myself paying the filing fee to run for office. So, here I am.

I am running for a state legislative position. Nevertheless, the point of this letter is to discuss a suggestion relating to affordable health care that I submitted to our **federal legislators and President Trump's Delaware liaison, Councilman Rob Arlett**, in an attempt to gain their kind consideration at the federal level. Only the federal legislators will be able to address this issue, I will not. I am printing parts of some emails I sent to Rob Arlett in hopes the **federal officials** will reduce the price of health care instead of eliminating care to those who need it the most by rendering it unaffordable.

"...President Trump's initial idea was brilliant. Focus on reducing the cost of care instead of indirectly eliminating care, due to the astronomical cost. I understand your concern about appealing to emotion, but I believe people will die if they cannot afford care, just like many did prior to 1986.

Prior to 1986, Emergency Rooms ("ERs"), were turning away pregnant ladies and people in need of immediate care, due to their lack of insurance and inability to pay. Babies had complications, lots of pregnant moms died. It created public outrage.

So, Congress enacted Emergency Medical Treatment & Labor Act (EMTALA) in 1986, by using its power under Article 1 Section 8 of the Constitution, (the spending power), to require all hospitals with Emergency Rooms accept all patients regardless of their lack of insurance and inability to pay. Congress attached strings to such entities, by requiring the ERs accept all patients if they receive any Medicare or Medicaid, or be penalized financially.

Similarly, Congress can create price ceilings for drugs or health care for any entity receiving Medicare and Medicaid. This will extend to uninsured people as well.

The National Institute of the Health (NIH), is another vehicle the federal government may use to

implement President Trump's initial plan. This entity provides grants and subsidies for drug research. The Federal Government through basic contract law may condition the acceptance of such money upon the drug company's agreement to price ceilings. Should the drug company not honor such ceiling, they may draft a provision requiring the company to pay all such money back in addition to a penalty." (citation to email omitted). Medical providers may still choose to reduce the price of care to stay competitive. The price ceilings prevent entities from rendering people worthless or too expensive to care for.

"Instead of indirectly taking away care from people who cannot afford it, let's make it more affordable for people. So, like you said, Americans can assume more responsibility and autonomy in their own care.

Artificial entities without hearts care more about the bottom line than those they serve, unless caring will affect the bottom line. Congress has the ability to affect the bottom line to reduce the cost of healthcare instead of eliminating care indirectly by making it unaffordable.

Healthcare is an inelastic good, a necessity, meaning no matter how rich or poor you are, you would probably give all you had, including your home, to pay for care to save the life of your child, a loved one, or even your own life. The demand does not change with price. This is an exception to normal market theories of supply and demand dictating prices. Artificial entities will get as much money as they can, at the expense of lives.

The board members are far removed from those they serve. They most likely are thinking about how they can afford to pay for their kid's schooling instead of the individuals they serve. Since they are focused on the bottom line," please use your power federal legislators to affect the bottom. (citations to email omitted). Only you have the power to do so, I will not.

The federal legislators have Medicare, Medicaid, NIH and other mechanisms of federal funding to use as bargaining chips. They should use the bargaining chips to reduce the price of healthcare (and improve care), instead of threatening to reduce Medicare, Medicaid, or take those chips away. What will they have left to bargain with if they take everything away.

Thank you for your kind consideration.

LAW Transcript

# DUQUESNE UNIVERSITY

600 FORBES AVENUE PITTSBURGH, PA 15282-0299

Record as of: 07/18/05

## MS. MEGHAN M KELLY

### DEGREE JURIS DOCTOR

### MAJOR Juris Doctor - Day

### MINOR

Student ID: 0800035

SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS	SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS
02/FAL	LEGAL PROCESS AND PROCEDUR SEMESTER GPA = 2.5000 CUMULATIVE GPA =	LAW	C256	LC	3.00	3.00	7.5000	04/FAL	COMMERCIAL TRANSACTIONS I APPELLATE PRACTICE & PROCE SEMESTER GPA = 3.1667 CUMULATIVE GPA =	LAW	C446	LC+	3.00	3.00	8.2500
	CONTRACTS	LAW	C13	LB	6.00	6.00	18.0000			LAW	C414	LW	0.00	0.00	0.0000
	PROPERTY	LAW	C14	LB+	6.00	6.00	19.5000			LAW	C32	LA-	3.00	3.00	10.5000
	TORTS	LAW	C105	LB	6.00	6.00	18.0000			LAW	C65	LA-	2.00	2.00	7.0000
	CIVIL PROCEDURE I	LAW	C09	LB+	3.00	3.00	9.7500			LAW	C01	LB+	3.00	3.00	9.7500
	CRIMINAL LAW & PROCEDURE	LAW	C87	LC+	4.00	4.00	11.0000			LAW	C144	LA	2.00	2.00	7.5000
	LEGAL RESEARCH AND WRITING	LAW	C129	LA	3.00	3.00	11.2500			LAW	C448	LB+	3.00	3.00	9.7500
03/SPL	SEMESTER GPA = 3.1250 CUMULATIVE GPA =				28.00	28.00	87.5000	05/SPL	COMMERCIAL TRANSACTIONS II SEMESTER GPA = 3.4231 CUMULATIVE GPA =	LAW			13.00	13.00	44.5000
	SEM CAUSE WRONGF CRIM CONV	LAW	C391	LA	2.00	2.00	7.5000								
03/SUL	SEMESTER GPA = 3.7500 CUMULATIVE GPA =				2.00	2.00	7.5000								
	LABOR LAW	LAW	C79	LB	3.00	3.00	9.0000								
	HEALTH CARE FINANCE	LAW	C204	LA	2.00	2.00	7.5000								
	EVIDENCE-SECT B	LAW	C335	LA-	3.00	3.00	10.5000								
03/FAL	SEMESTER GPA = 3.3750 CUMULATIVE GPA =				8.00	8.00	27.0000								
	LAW AND MEDICINE	LAW	C42	LA-	2.00	2.00	7.0000								
	CONSTITUTIONAL LAW -SECT B	LAW	C26	LB	5.00	5.00	15.0000								
	TAXATION	LAW	C10	LB+	4.00	4.00	13.0000								
	CORPORATIONS-SECT B	LAW	C336	LB+	4.00	4.00	13.0000								
	FAMILY LAW	LAW	C76	LA-	2.00	2.00	7.0000								
04/SPL	SEMESTER GPA = 3.2353 CUMULATIVE GPA =				17.00	17.00	55.0000								
	TRIAL COURT CLERKSHIP	LAW	C242	LP	3.00	3.00	0.0000								
04/SUL	SEMESTER GPA = 0.0000 CUMULATIVE GPA =				3.00	3.00	0.0000								
	PROFESSIONAL RESPONSIBLIT	LAW	C36	LP	3.00	3.00	0.0000								
	ESTATES AND TRUSTS	LAW	C429	LB+	3.00	3.00	9.7500								
	TRIAL ADVOCACY	LAW	C91	LA-	3.00	3.00	10.5000								

TOTALS CRED CPT = 86.00 CRED CALC = 80.00 GRD PTS = 257.5000 GPA = 3.2188

\*\*\*\*\*

\* JURIS DOCTOR Degree Awarded on 06/05

\* Majors

\* Minors

\* Specializations

\* Juris Doctor - Day

\*\*\*\*\*

*I studied healthcare law to prevent bad care like the care I received from happening to others.*

MS. MEGHAN M. KELLY  
29 SHAWNEE DRIVE  
DAGSBORO, DE 19939

RAISED SEAL NOT REQUIRED  
This official University transcript is printed on Secured paper and does not require a raised seal

ISSUED TO STUDENT  
Patricia E. Jakub  
University Registrar



Coastal Point

July 20, 2018

# Guest Column

## Representative candidate says health is wealth

By Meghan Kelly, Esq.  
Candidate, Delaware House  
of Representatives, 38th District

My name is Meghan Kelly, Esq. I am a candidate for the House of Representatives in the Nov. 6 race in the 38th District. I am running, in part, because I have a desire to draft laws to create better health care for Delawareans, and I want to persuade the federal legislators to draft specific legislation to reduce the price of care instead of eliminating care to those who need it most by rendering it unaffordable.

I am uniquely qualified to propose solutions in this area as an attorney who studied the history of medicine at University of Delaware, and health care finance and health care law at Duquesne School of Law School. I even received a small scholarship for healthcare law.

So, I thank you for your kind consideration, as I truly care about serving the people in the community I grew up in, and love and protecting their life and health.

This week, I will write about improving health care concerning the state of Delaware. Next week, I will submit a suggestion to our federal legislators regarding making health care more affordable. Instead of reducing the

amount of care, I respectfully urge our federal legislators to reduce the price of care. Only they have the power to do so, I will not.

In Delaware, I specifically want to draft legislation to improve the quality of health care, instead of merely getting massive bad care. Funding is more easily received when health care entities and professionals are researching cutting-edge techniques, which is dangerous for patients since they are still working out the kinks.

Think of the National Institute of the Health (NIH), charities who accept funding from the army and NIH, and private research or health care entities who make money on analysis. So they can use patient's records to sell alleged health care miracles in bulk, based on data. Part of the HIPPA waiver we sign at each doctor's visit allows our information to be used in this scientific research. So, patients may be lawfully used as lab rats.

I want to draft legislation to prevent the abuses we have seen by doctors like Dr. Earl Bradley, who allegedly molested hundreds of children; repeal the involuntary sterilization statute; and make it easier to prevent doctor and health care abuse of patients for a buck...

I want to prevent doctors from prescribing addictive drugs under the facade of benefiting the patient, but in truth to benefit their own pockets, to keep patients coming back for prescriptions for their addiction, not for good health.

I want to stop doctors like the local Delaware doctor who used cutting-edge treatments, hip replacements, on people, including my father. He said everything was fine for years, despite readily available information to the contrary, to cover his own back, instead of serving the patients like my father, the legendary retired teacher, lifeguard and coach Pat Kelly of Indian River High School.

No care is better than bad care. Thus, I desire to create legislation to ensure our health care providers are taking care of the patients, not taking advantage of the patients for profit. Our laws serve money — not people, not patients.

I want to create laws that penalize health care professionals for drugging the elderly at the elderly homes to make them easier to tend, like vegetables. We need to value and respect our elderly, (not keep them in an institution for our convenience). These institutions should

See KELLY page A15

# Kelly

*Continued from page A14*

be developed to serve and respect the elderly, not take advantage of them for a profit.

Now is the time to value human life and health more than money. Now is the time to hold health care professionals accountable for their bad choices to harm instead of heal patients.

I desire to repeal the involuntary Sterilization statute in Delaware under Title 16, Chapter 57 of the Delaware Code. There is too much incentive to sterilize people to use their stem cells for profit and research, instead of a alleged need. Besides, the fact is sterilization is barbaric and arguably violates Delawareans' right to life, liberty and pursuit of happiness, despite the United States Supreme Court decision in Buck v Bell, 274 US 200 (1927).

I desire to amend the medical mal-

practice act. It is very difficult to correct doctors under this act. In Delaware, a patient has two years from the date of the medical provider's misconduct, if a patient is younger than 6, until the patient's sixth birthday. The time may be extended in limited circumstances — for instance, if a doctor left a foreign object in a patient's body.

In addition to the short statute of limitations, in Delaware, you also need to get another health care professional to give an expert opinion concerning the malpractice of the medical provider. This is very tough to get because doctors do not want to give an opinion against a peer when they know they are capable of mistakes or a sloppy job, too.

The requirements of the expert opinion are also hard to meet. So, a lot of lawsuits are kicked out for failure to adhere to the requirements. For instance, if an expert says the doctor's act was a substantial factor in causing the harm, the opinion will get kicked out. In

Delaware, the expert must state the "but for" the doctor's conduct the harm would not have occurred.

Overall, if a doctor messes up on you, you most likely will be out of luck. The longer you wait to pursue legal relief, the tougher it will be for the attorney to find an expert required to have a case.

It is important to correct doctors, as the treatment they provide may harm other people for life or kill them. Since it's so difficult to sue, it's hard to prevent further harm by showing how certain treatments make people worse off. That's why we must amend the medical malpractice act in Delaware. We must prevent further patient harm and deaths.

By electing me you will be electing a candidate that will fight for your life and health. You are priceless — more valuable than all the money in the world. By electing me, you will be electing someone who serves people, not greed.

BEEBE MEDICAL CENTER  
424 SAVANNAH ROAD  
LEWES, DELAWARE 19958  
(302) 645-3300

DATE OF ADMISSION: 11-1-95  
DATE OF DISCHARGE: 11-4-95

DISCHARGE SUMMARY

**FINAL DIAGNOSIS:** Serous cyst of the left ovary with torsion.

**HISTORY:** She is a 41 year old white female, Gravida 0, Para 0-0-0-0, whose last menstrual period was early October 1995. She was admitted for an exploratory laparotomy because of a large cyst in her left pelvic adnexa. She had abrupt onset of left lower quadrant abdominal pain on the morning of admission. She also had some nausea and vomiting.

**PHYSICAL EXAM:** She is a healthy white female in some distress. Blood pressure was 110/64. On the abdominal exam, the abdomen was flat, soft with hypoactive bowel sounds. Pelvic exam - The vagina showed normal mucosa. Cervix showed no inflammation. The uterus was midline and felt small. Adnexa on the right side was negative. The left side showed a large, irregular cyst. Rectal exam was confirmatory.

**LAB DATA:** Admitting CBC shows a hemoglobin of 15.2 gm/dl, hematocrit 43.3%. Serum pregnancy test was negative.

**HOSPITAL COURSE:** The patient had an exploratory laparotomy on 11-1-95 with excision of a large cystic left ovary plus the fallopian tube, both of which had torsion at their base. Postoperatively, the patient's hemoglobin was 12.9 gm/dl, hematocrit 35.5%. She had a normal postop course and was discharged on 11-4-95 to return to the office in two weeks.

*Newell Washburn*  
Newell Washburn, M.D.

NW/nas  
dictated: 11-14-95  
transcribed: 11-15-95  
cc: Dr. Washburn

DISCHARGE SUMMARY

# Exhibit F

(3DI-38 22-3372, Corrected Motion to vacate order)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER:22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Petitioner Meghan M Kelly's Corrected Motion to vacate the Order, dated May 19, 2023

I Appellee, Respondent Meghan M. Kelly pursuant to Fed Rules App Proc R 27(b) and Rule 40 move this Court to vacate the Order at Third Circuit Docket Item ("3DI") 35 attached as Exhibit A, written in bad faith as an abuse of discretion with improper motive to vitiate my First Amendment right to petition, my 5<sup>th</sup> Amendment procedural due process right to meaningful opportunity to be heard before this court to prevent the loss of fundamental rights, harm to health, loss of time with loved ones, loss of access to other courts and other injuries by the Clerk's threat of sanctions.

1. The Clerk errs as a matter of fact, and as a matter of law creating manifest injustice against me. My intent in drafting letters was to include exhibits to refer to and incorporate into pleadings by reference to make the appendices or exhibits with fewer addenda to accommodate my case manager. I understand the Court will not consider them unless I refer to them and incorporate the exhibits contained therein by reference. It is possible my case manager and I misunderstand each other.

2. I have not yet made a motion for an extension of time. The Order is not ripe for adjudication. The Clerk's Order denies me of a fair and meaningful opportunity to be heard on a motion for an extension of time that requires more than three pages of information to persuade this Court to grant relief in violation of the Fifth Amendment.

3. I respectfully move this Court to vacate the page limit. I need more pages to plead for time on this appeal to prevent 6 more law suits. In addition, if the civil rights case is maintained, I would likely be fighting multiple judges and multiple attorneys to defend my private Constitutional rights including but not limited to my right to petition without blatant state attacks, obstruction of service, and State pressured intimidation against me with the intent to cause me to forgo my Religious Freedom Restoration Act lawsuit, *Kelly v Trump*. 3DI-3, 3DI21-3 through 3DI-7, DI10, 12, 3DI29-34. I am fighting not merely for my mere license. I am also fighting for my private First Amendment rights to religious belief, religious exercise of belief, exercise of the right to petition the Court about its own procedural due process violations based on disagreement with my religious political beliefs or poverty with regards to the Delaware Courts, and other claims. I've much to lose should a motion for time be denied.

4. I am not filing as a professional. I am filing to protect my private beliefs, and to prevent punishment against me but for my private speech outlining my religious beliefs contained in my petitions where I invoke or seek to protect my exercise of religious belief from a government compelled substantial burden. I understand other people may not like my assertions contained in the petitions, including my desire for others not to be misled to hell. Yet my religious beliefs are genuine.

5. Third Circuit Docket entries 21, 22, 23, 24 contain pleadings in other cases and personal reasons I placed on the record to cite to in a Motion to stay the proceeding as evidence of my dire need for a stay not merely for additional time to prevent irreparable injury. The Courts in other cases, including this Third Circuit Court have denied me a stay despite the fact I pled denial would obstruct my right to petition with and access to other courts. The denials

resulted in denying me the First Amendment right to petition. The denials have also resulted in other harm.

6. In 3DI 21-24, I attach pleadings that show material harm from the Appellee's denial of a stay, and to refer to in my pleadings. My intent was to make the appendix smaller to accommodate not to displease the clerk.

7. In 3DI 21-36, I alluded to the fact I require time and other courts denied my request for additional time. This is evidence I may cite to concerning the increased the need for time in a motion for a stay. I was not moving or asking the Court for time.

8. For instance in 3DI-21, I indicate in a letter for informational purposes I could cite back to:

In 3DI-21, I informed the Clerk:

“Attached please find my application for an extension of time Justice Alito unreasonably denied. I must draft an appeal for PA Case[by May 29, 2023]. I must file a motion for a rehearing in a civil rights case Kelly v Swartz, et al 21-3198.

In addition I have a family reunion in June. I have not seen my father the legendary Pat Kelly married to my beautiful mom for years. He is a hardworking teacher and a basketball coach...also have a funeral to attend in June, and other issues. My printer died and is out for repairs. I have a back-up, but it hard to print out documents in a timely fashion My printer, actually both printers are very slow. I learned that opposing counsel and courts, the judges and their staff, do not care about my health or life and liberty despite my requests for stays. I look at horror and it appears every court has denied my stay despite harm to my health.”

9. I indicated I need time. I did not ask for time by this Court yet. I provided information, not argument. The Order was not in response to a motion, and the page limit prejudices me due to the voluminous amount of information supporting my need for additional time as to deny me a fair opportunity to be heard.

10. My intent in drafting letters was to include exhibits to refer to and incorporate into pleadings by reference to make the appendices smaller. My intent was not to burden or confuse the Court based on my confusion on how to please the Court without waiving my rights.

11. My case manager previously appeared to indicate it was okay to place exhibits on the record I would later refer to in pleadings by filing addendums not ripe for consideration using the informational letter instead of the appendix key when we talked about it before. She did not indicate her displeasure and said okay. However, I became confused because she asked about why I filed letters more recently. I responded by a letter. 3DI-26. A prior order led me to believe, she was not happy using the appendices key. Yet, I must place the records on the docket that are material to my pleadings in a different way to reserve my rights. I thought using the letter key was a way to appease her.

12. I tried to call Pam before filing the voluminous corrected Rule 12 I intend to cite in a motion to correct the record. 3DI-30-3DI- 34. It is a continuous pleading. I thought it would be easier for the judges to review if I used the word appendix, which is different from her seemingly approved letter key. I am sorry if I made it more difficult instead. Was the use of the word appendix the problem?

13. I placed documents on the record to correct the docket below too. While Appellee's staff Gail Olson was out, Appellee misfiled documents below, and made attempts to correct them. 3DI-29. DI-13.

14. There are over 3,000 pages in the documents that were misfiled in DI 10, 11 and 12. See 3DI 30-1. 3DI30-7. The Record contained other people's pleadings, including a medical



record, are out of order, missing documents and prejudicial. 30-8, and 30-9 have another pro se filings on my case, DI 12-45 through 12-7.

15. So, I placed the corrected docket items on 3DI 29 through 3DI 34 to refer to in a motion to correct as an appendix to distinguish it as one solid corrected pleading, instead of as a letter. Albeit, there may be material information which requires letters not on the docket.

16. 3DI-29 shows the Appellee and I worked at correcting DI 10, 11 and 12. See DI-13 and 3DI-29 through 3DI-31. The Court made some corrections. Then it gave up and filed a notice of a hearing. DI-14 I filed a letter asking what the hearing was on since I had outstanding motions. DI-15, DI-16. I filed motions for orders on the outstanding motions. DI-18, DI-19. Then, the Court booby trapped me by requiring I file a motion concerning why my 2018 retirement in PA would not affect my license with Appellee. Throughout the proceeding I thought I was automatically retired before Appellee. I placed this on the bottom of emails, and motions. 3DI-27, 3DI-29. I averred this in the Motion for a stay and corrected motion to a stay. Exhibit C . The Court knew I was not automatically retired by PA retirement in its court, since even disbarment in state court does not automatically disbar attorneys in federal court under case law or its rules. Its rules do not require automatic retirement under my case where I have been retired since 2018. So, the Court appeared to set me up to fall unjustly to get out work to help me. *In re Ruffalo*, 390 U.S. 544, 551 (1968); *Theard v. United States*, 354 U.S. 278 (1957); *Selling v. Radford*, 243 U.S. 46, 50 (1917). 3DI-27-14. 3DI-3. Exhibit B. My belief I was retired in Appellee was mistaken. I was confused.

17. I need to file a separate motion to correct Respondent Meghan Kelly's Motion pursuant to Local Rule 7.1 (g), FRCP 52, and in addition to or in the alternative of FRCP 59(e), for a rehearing on the Court Order Denying Request for ECF access , and my corrected Motion

to Stay the Proceeding. DI 12 Since, I intended to file a motion for a stay in this proceeding. I also need to place the lower Appellee's material record on this Court's record to prepare for a potential appeal to the United States Supreme Court by reducing costs that create an obstacle so great as to deny me of the First Amendment right to Petition on appeal. It is not for this Court or the Appellee Court's convenience or need that I place material docket items below on this Court's record. I place material parts of the record on the docket as necessary to protect and preserve my First Amendment right to move to petition on the electronic record before the US Supreme Court without incurring costs so great as to deny me of the First Amendment right to appeal to the US Supreme Court should this court rule against me. It is not the guarantee that the US Supreme Court would grant a motion to plead on the record. It is the right to petition.

18. Filing on the record, an inaccurate trial court record in this Court, does not relieve me of the dire need to place the corrected docket items and the docket items I cite below on this Court's record to avoid the great expense of paying for and the time required to file paper copies to further prevent Constitutional compelled violations of my asserted rights in exchange for the exercise of the right to petition in this court, without costs so great as to deny me of the First Amendment right to Petition the this court in the related civil rights case, US Supreme Court. I am scared. I believe I must file the docket items on the record. The US Supreme Court's rules only appears to permit the appendix in this Court or the record in this Court under Supreme Court Rule 26(8), without the threat of additional costs and inconvenience to me and the court as to encourage them to deny my petition. This Court cannot rule for the US Supreme Court and it creates additional loops the United States Supreme Court may not care to go through for the mere opportunity to be heard by not permitting me to place material necessary for a meaningful opportunity to be heard by the US Supreme Court on appeal.

19. I asserted my right before this court to exempt costs, fees including any court sanction in two motions I incorporate herein by reference to prevent compelled violations of my religious belief, my asserted right against involuntary servitude, and the creation of obstacles so great as to deprive me of access to other courts, creating additional the irreparable loss of fundamental rights I seek to defend and preserve along with other rights and interests. I repeat all arguments to be incorporated herein in toto. Exhibits D and E

20. This Court did not grant my motions, nor may this Court rule for the US Supreme Court. Exhibits F and G.

21. I believe I can only file based on the record of this lower court. This Court cannot exempt costs of the US Supreme Court should it claim costs for seeking additional records from additional courts.

22. On May 22, 2023, I reconfirmed I must place the documents on the Third Circuit's record in order for the US Supreme Court to see them electronically so I may move to dispense of the need for a joint appendix or to plead on the record, or to file a motion to plead on the electronic record.

23. It is too expensive and time consuming for the Eastern District Court to print them out and mail them to the United States Supreme Court should this case go to appeal. In addition, the cost to print them out an original with ten copies to supply to the US Supreme Court on appeal is so great for me to pay as to deny my access to that courts due to poverty, religious objections against debt and my invoked right against involuntary servitude. US Amend I, V, XIII. Thus, placing the Appellee's material record on this Court's record is necessary for me to preserve and to exercise my First Amendment right to petition the US Supreme Court by appeal

should this Court deny me relief. I can seek to do that in motions or briefs instead of letters. My intent to file letters was to please my case manager by making addenda smaller.

24. I preserve my right to ask the court to plead on the electronic record before the US Supreme Court by placing the material record below on this Court's docket. A number of court staff have told me I must place their trial court's docket items on the appellate Court's record and docket for the US Supreme Court to see them electronically.

25. The Delaware District Court indicates I must place the docket items on this Court's docket in order for the US Supreme Court to see it. I intend to file pleadings to prevent additional costs I cannot pay as to deprive me of the right to petition before the US Supreme Court due to poverty, asserted religious objections to poverty and my invocation of the right against compelled servitude in exchange for the exercise of my First and 5th Amendment rights including procedural due process. The US Supreme Court's Rules to dispense of the need for a joint appendix applies to the appellate record. I do not believe the US Supreme Court can see the District Court's records electronically. Thus they would likely reject any of motions to file on the electronic record if they cannot see the electronic docket below. I do not believe the Appellee can grant the US Supreme Court electronic access to its docket, and while the Appellee below verbally indicated there was no cost to transfer the record, the Court may change its mind or the US Supreme Court may require costs. It against my religious belief to have costs or debts I cannot pay. I believe the Eastern District Court cannot electronically transfer its records to the US Supreme Court.

26. Ordering I am not allowed to place material parts of the record necessary to my appeal arguably also violates my 6th Amendment right to a public proceeding before the Third

Circuit, as an accused by excluding records below the public and I may not see when looking on the docket. I do not have access to the docket on ECF.

27. I must in the interest of justice alert the court to additional information not contained on the record below material in my pleadings in a Rule 10(e)(2)(c) motion, by citing to by reference or docket to the corrected items in pleadings to prevent manifest injustice. The corrected DI-12 is located at 3DI-32-34. DI 3DI-29 contains some of the efforts I made with the court's staff to correct the docket. DI 13. 3DI-30 shows some corrections by the staff with errors, for DI 10 and 11. Correcting DI 12 is probably the only one I will focus on since it is prejudicial and denies me a meaningful opportunity to be heard, and relates to my expected motion for a stay in this court. 3DI 31-34. (Exhibit K)

28. My case manager seemed okay with my filing of letters with exhibits to refer to, in order to reduce appendixes when I electronically filing them as letters. However, I was worried because after I talked with her about it previously she asked about it again. I am confused. I am not understanding the court. I will not add the docket items below by letter as I was considering before I received the order. I may add material items on exhibits to pleadings instead, to preserve my right to be heard before the US Supreme Court on electronic record. DI 10 is about 1068 pages. I included parts of the documents at DI 32 under the Trump documents. The materials relate to 20 years of disparate treatment or ignored requests for religious accommodations and 6 related law suits. So, there is a lot of necessary material to my appeal, showing irreparable harm and other material support for my appeal and motion for a stay or additional time to prevent irreparable injury.

29. The Order dispensing of an appendix by this Court by referring to the Docket items below while generous, denies me of the right to petition on the electronic record should

this case go before the US Supreme Court. Filing on the record, an inaccurate record in this Court, does not relieve me of the dire need to place the docket items I cite on the record below on this Court's record to dispense of the great expense of paying for and the time required to file a motion to plead on the records to prevent Constitutional compelled violations in exchange for exercise of the right to petition or to dispense of the joint appendix before the United States Supreme Court, without costs so great as to deny me of the First Amendment right to Petition the US Supreme Court. I am scared. I believe I must file the docket items on the record. The US Supreme Court's rules only appears to permit the appendix below or the record below it. This Court cannot rule for the US Supreme Court and it creates additional loops the court may not care to go through for the mere opportunity to be heard. Thus, I seek the right to place docket items on the record, even if it is on an appendix that requires additional addendum.

29. I asserted my right before this court to exempt costs, fees including any court sanction in two motions I incorporate herein by reference to prevent compelled violations of my religious belief, my asserted right against involuntary servitude, and the creation of obstacles so great as to deprive me of access to other courts, creating additional the irreparable loss of fundamental rights I seek to defend and preserve along with other rights and interests. I repeat all arguments to be incorporated herein in toto.

30. I am pretty shaken up. I am having a hard time writing this. I thought it was possible my case manager and I are not understanding each other. However, I recall in another case my case manager lied, the civil rights case. I called the court and emailed them, copying my case manager providing notice I was mailing documents to be used for the reciprocal discipline. The documents were prejudicially placed on the civil rights case. I filed motions to remove them.

31. The Court rendered an order scolding me for using emergency email filing for this pleading. The misfiled document contained proof of postage on the bottom. I was so upset, given I gave the Court a head's up and there was proof I mailed the documents I talked with my case manager Pam. Pam said she believed they were electronically filed despite my email to her, and the postage on the bottom and my communications to her and the court. I incorporate the pleadings herein as Exhibits through H, I, J.

32. On May 22, 2023 I called my case manager because I am not understanding the order at 3DI-35. After talking with her, it appeared she did not understand the need of placing the material items on the docket below on this court's docket.

33. Prior to the Third Circuit Disciplinary case I spoke with Desiree about getting a different case manager, before this case or the Third Circuit Disciplinary matter started. I was uncomfortable working with Pam after the court threatened sanctions based in part on her knowingly misinforming the court regarding how the Court received the Disciplinary documents. Exhibits H, I, J. When I indicate I do not understand the order she says read it. When I talk to her she seems on the attack mode. "Who told you the US Supreme Court cannot see the trial electronic files." The Delaware District Court told me. If I remember correctly when I had the case in Delaware, I called the US Supreme Court case manager and asked her if she could see the trial forum's documents. She said no, too.

34. I was so upset Friday, May 19, 2023 I asked another court staff if I could change case managers. **I do not want her to get into trouble, but I do not want to get into trouble either based on misunderstandings.** When I do not understand the order and tell her. She said read it in the past. I am not sure if I understand the court's recent order.

35. On May 19, 2023, I indicated my intent to file a Rule 10(e)(c) Motion to correct the docket by talking with my case manager, Pam Batts (“Pam”), on the phone.

36. In response to the head’s up, the Court filed an Order I seek to vacate in whole, threatening me with sanctions for my good faith attempts to reduce the size of appendices by placing items on the docket I may refer to in pleadings. 3DI-35 (I incorporate all DI and 3DI’s cited herein to be incorporated herein in their entirety by reference.

37. Prior to knowledge of receipt of the Order at 3DI-35, I filed a letter at 3DI-36 indicating my intent to file 3 motions. In the first sentence I stated, “I am filing documents to cite to for a motion I must draft for a stay, and a motion to correct the Record.” I seek to place 3D I21-34 on the record to cite to for my motions and potentially the Brief. The information contained therein is material to my motions to prevent irreparable injury.” 3DI-36. The Court indicated it hates appendices. So, I sought to make the voluminous appendices smaller by placing them on the record.

38. I am so shaken up. The order appeared to be made to discourage me from filing a motion to correct the flawed docket below.

39. The threat of sanctions requires I relinquish my First Amendment right to petition and meaningful access to the United States Supreme Court on appeal in exchange for exercising the right to petition before this Court, as applied. US Amend I, XIII.

40. The threat of sanctions was ordered in bad faith since I filed a motion to exempt taxes and costs to prevent the compelled loss of the right to petition in this and other courts due to inability to pay, my invoked right against involuntary servitude US Amend XIII, and my genuinely held religious belief against debt I incorporate herein by reference, and attached hereto



as Exhibits B, D, E. US Amend I. 3DI-4. I believe debt is sin leading to hell by making money savior in place of God. Jesus teaches you cannot serve money and God. *Matthew 6:24*. I also incorporate herein by reference in its entirety and attached hereto My motion for permission to use electronic filing and waiver of paper copies before this Honorable Court, to prevent unaffordable costs from being a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in defense of the exercise of fundamental rights, 3-DI 3. Exhibit B.

41. The Court denied my motion to exempt costs in an Order dated January 17, 2023.

The Court held:

“The motion to be exempt from costs is denied without prejudice to renewal once the Court has entered a decision on the appeal, which would include a ruling on whether costs would be taxed against a party. It is noted that no hearings were conducted in the underlying District Court proceedings and, therefore, no transcripts will need to be ordered.” Exhibit F

42. On January 17, 2023, that same day I filed Appellant Meghan Kelly’s Motion for reconsideration of Order dated January 17, 2023, with regards to the denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, incorporate herein as an Exhibit E. 3DI 17.

43. The Court rendered an Order at 3DI-18:

“To the extent Appellant is requesting to be exempt from costs taxed by this Court, the motion is referred to the merits panel that will be assigned to the case once briefing is complete, as that is the panel of the Court that will make the decision on the taxation of costs. It is noted that Appellant has been granted leave to proceed in forma pauperis on appeal, an exemption from PACER fees to access electronic files maintained in this Court for this case, and a wavier from filing paper copies of documents. It is also noted that the District Court record is available electronically and that Appellant is the

only party in the appeal. Given this, the District Court will not be preparing or transmitting a paper copy of the record to this Court” Exhibit G

44. I intended to draft a petition to be heard before judgment before the US Supreme Court on the exemption of costs issue in this case. However, I was deprived of that meaningful opportunity to petition the US Supreme Court by this Court’s denial of my request for a stay in the civil rights case needed in order not to deprive me of the First Amendment right to petition and the opportunity to be heard in other courts. I was also deprived of the opportunity to appeal the Delaware original disciplinary proceeding. The pleadings contained in 3DI 21-25, and 27 show harm or threats of loss of fundamental rights by denial of time, stays and other harm.

45. I was going to refer to the pleadings contained therein in a motion for a stay, and possibly on a brief, which include my petition for additional time to appeal the PA order due May 29, 2023. The denial of the time and my attempts to file for an interim stay with the US Supreme Court which was not docketed soon enough as to deny me relief as rendering it too late are also contained therein. I also included the US Supreme Court’s rejection of my timely filed appeal of the DE Disciplinary order that was denied because I filed the motion for additional pages prior to not simultaneously with the petition.

46. The courts create and continue to create obstacles to my access to other courts by lack of accommodations under my situation in the form of a stay or for additional time, and by the threat of sanctions for asserting my rights. I have lost my fundamental rights, but for denials of stay. I have not showered or changed my clothes in days. I have not had free time or necessary time to spend with loved ones or to care for my basic needs. I am dehydrated. My health has worsened. This information is material to show actual harm has resulted by past denials, and I desire to prevent additional harm by citing to it.

47. I gave notice to this Court of my health requirements. I assert my right to life and health without government compelled sacrifice for convenience. I am fighting multiple law suits and may 6 new law suits if I do not win on this appeal. I ask this Court to please vacate the threat of sanctions and elimination of page requirements because I do not a fair opportunity to draft a motion for time without threats or punishments for asserting my rights. The additional deprivations are material to my pleadings.

48. In DI-9, please refer to exhibit 43 which I have presented to every Court I note,

“Evidence of the surgery that inspired me to study healthcare issues. Due to the surgery referred to therein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die to dehydration when I have my period. I lose five pounds of water weight every month. This is still a challenge. I must assert my right to live because many people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too.”

49. Note, I discussed the fact I collapsed due to severe dehydration just last year, as I discussed in the letter. The Courts do not care. In the PA case I was denied stays too. The Delaware Proceeding afforded me no time to call witnesses, prepare or perform discovery. The Court rendered an order to permit me to self-represent with less than 2 weeks before the hearing, ignored my requests for discovery, to call witnesses or prepare. They compelled me to attend while I was ill recovering from the shingles with additional allergies. If I die, it is not by free but government compelled choice.

50. Wherefore, I respectfully request the Court vacates the Order in whole including the threat of sanctions.

May 25, 2023

Respectfully submitted,  
/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968

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# Exhibit G

(3DI-38 Motion to correct Motion to vacate the order)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER:22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Petitioner Meghan M Kelly’s Motion to Correct her Motion vacate the Order, dated May 19, 2023, submitted May 25, 2023

I Appellee, Respondent Meghan M. Kelly pursuant to Fed Rules App Proc R 27(b) and Rule 40 move this Court to amend my motion submitted May 23, 2023, at Third Circuit Docket Item 37, to correct an inadvertent error and aver:

1. I could not understand why my case manager had not referred my Motion to vacate the Order dated May 19, 2023, until I realized I inadvertently did include the rules, the legal authority to make a request.

2. I had a difficult time drafting this, and had multiple first drafts. 3. 3.

I include “pursuant to Fed Rules App Proc R 27(b) and Rule 40,” Petitioner Meghan M Kelly’s Corrected Motion to vacate the Order, dated May 19, 2023, presented herewith.

4. Please accept the attached Petitioner Meghan M Kelly’s Corrected Motion to vacate the Order, dated May 19, 2023.

5. The only corrections are I added “pursuant to Fed Rules App Proc R 27(b) and Rule 40” in the first paragraph, and changed the word count to 5, 200, without captions or signature or date. It appears I made the word limit by the grace of God.

6. I am acting under great duress. I am fighting multiple cases simultaneously relating to the original Delaware Disciplinary Order. My inadvertent mistake was done unintentionally.

7. In Third Circuit Docket Item (“3DI”) docket items 3DI 21 through 3DI 24 I attached the exhibits for a petition to Justice Alito for more time to appeal PA reciprocal discipline order placing my license to practice law from retired/inactive to retired/inactive disabled, and related petition to Justice Alito.

8. It appears I may have inadvertently failed to attach the petition by attaching the exhibits thereto, without it. DI 21-3 is the first exhibit thereto. My apologies for the error and confusing the Clerk and the court. Attached, please find the petition for more time.

9. My intent was to reduce the size of the appendix to allow me to refer to docket items by reference to appease not confuse the Court. I am sorry for not succeeding based on misunderstanding. I am quite scared in writing this amendment. I am in tears now.

10. At Third Circuit docket item Number (“3DI”) 21-8 and 3DI 21-9, titled Plaintiff Meghan Kelly’s twenty-sixth affidavit update, I incorporate herein by reference as an exhibit hereto, I note the trap the appellee duped me into falling into, and the threat of 6 additional law suits. This increases my duress.

11. At 21-8 I averred:

“11. I realize I must appeal the Eastern District of PA Order or **potentially face 6 new law suits**. That is important to prevent. I am in tears because it is not fair that I must pick and choose which cases to defend since poverty creates a substantial burden upon my access to other courts. My religious beliefs against debt also creates an obstacle the Third Circuit did not alleviate by granting additional time. I believe debt damns people to hell by tempting them to make the pursuit of money instead of pursuit of God and God’s will savior. I also invoked and continue to invoke the 13<sup>th</sup> Amendment against

involuntary servitude to work for money to pay off government compelled debt to defend Constitutional liberties.

12. I have a good argument to overturn the Eastern District of PA's District Court's Order since I was retired from PA since 2018, and thought I was retired from that District Court. (Exhibit E, the retirement application).

13. There are smaller arguments to appeal which I do not discuss herein, but the most important matter is to prevent 6 additional law suits by appealing the Eastern District Court's Order disbaring me as retired.

14. The Court knew I thought I was retired. I stated the same in pleadings. (Exhibit F).

15. The Court knew I have been retired from PA since 2018. That is public knowledge and the Court cited the public state web site. The Court also knew due to lack of time, poverty and limited means of transportation I could not easily research.

16. Despite that the Court ordered me to draft a memorandum of law as to why my retirement in PA would not retire my license in its Court. (Exhibit G)

17. The Court booby trapped me based on an error of fact, an error of law creating manifest injustice against me by using retirement as a reason to disbar me.

18. I filed a letter asking to be placed on retirement, as not admitted in the Eastern District Court of PA District Court to practice because I was confused as to whether I was retired or not. I thought my assumption of retirement might be wrong, but then the Court asked why I should not be retired.

19. The Court disbarred me instead of placing me on retirement. I was surprised because I thought I would be retired. Gail Olsen said the Court was not disciplining me, per the attached letter confirming our conversation, incorporated herein as Exhibit H.

20. After researching I discovered I was not automatically retired since disbarred PA attorneys are not automatically disbarred and may have an office to practice before the Federal courts. See, *Theard v. United States*, 354 U.S. 278, 282 (1957); *Selling v. Radford*, 243 U.S. 46, 49 (1917), *Frazier v. Heebe*, 482 U.S. 641, 648 n.7 (1987); also see, *In re Surrick*, 338 F.3d 224, 231 (3d Cir. 2003), (disbarment by the [s]tate does not result in automatic disbarment by the federal court." *In re Ruffalo*, [390 U.S. 544, 547, 88 S.Ct. 1222, 20 L.Ed.2d 117](#) (1968)). *Surrick v. Killion*, 449 F.3d 520, 530 (3d Cir. 2006), ("The question in this case is whether a state may prohibit an attorney admitted to the bar of a federal district court, but suspended from the state bar, from maintaining a legal office for the sole purpose of supporting a practice before the federal court.")

21. *In Re Surrick*, 2006 case, the Third Circuit proffered a well-reasoned opinion citing a couple of notable cases affirming its agreement with the lower Court, the Eastern District of PA, District Court's determination that the states may not regulate federal licenses and its allowance of a law office to practice federal law, including but not limited to *Sperry* and *In re Desilets*.

22. *In re Desilets*. 291 F.3d 925, 928-29 (6th Cir. 2002), the Court noted.

“*Sperry* provides strong guidance for the current case. The *Sperry* Court noted: In 291 F.3d 925, 928-29 (6th Cir. 2002). *Sperry* provides strong guidance for the current case. The *Sperry* Court noted:

A State may not enforce licensing requirements which, though valid in the absence of federal regulation, give the State's licensing board [in *Sperry*, the Florida Bar Association] a virtual power of review over the federal determination that a person or agency is qualified and entitled to perform certain functions, or which impose upon the performance of activity sanctioned by federal license additional conditions not contemplated by Congress.”

23. The Court booby trapped me by creating the assumption I was retired by asking me to draft a memorandum on why I should not be retired in its court too. I have limited time, resources and ability to research. The Court should not have placed me as disbarred instead of as retired. Moreover it is clear error of law, of fact creating manifest injustice against me to place me on retirement too, even if the order should be changed. I did not have notice of disbarment

24. The US Supreme Court held in, *In re Ruffalo*, 390 U.S. 544, 551 (1968), “The charge must be known before the proceedings commence. They become a trap when, after they are underway, the charges are amended on the basis of testimony of the accused. He can then be given no opportunity to expunge the earlier statements and start afresh.”

25. I did not know the Eastern District Court would disbar me when I did not draft a memorandum as to why retirement in PA would not retire my license in its Court. I asked the Court be placed on retirement so as not to be barred as active, but I thought I might have been wrong on my assumption of retirement. I was confused without ability to research the issue due to lack of time and resources. It was a booby trap based on a misunderstanding similar to the entrapped lawyer relating to the disciplinary proceeding in *In re Ruffalo*, where I was denied fair notice and a fair and fair opportunity to be heard given my unique situation of facing 6 law suits, limited access to the courts given lack of time, health limitations and poverty creating a substantial burden to my access to the courts and religious belief against debt. Maybe the Court misunderstood my letter which created manifest injustice. Reviewing the letter with fresh eyes I can understand why the Court may be confused too. Either way the Order should be overturned. 26. While, I do not have easy access to resources, the Court should have known retirement in state does not automatically retire my federal license unless specifically drafted in its rules. So, the Court appears to have set me up to fall which is not fair or just. I filed the attached pleading I incorporate herein as Exhibit I. I gave the court notice I lacked time and resources to investigate. I was under duress having noticed the court of collapsing on the floor of the post office due to lack of time to care for my health to sustain it. I noticed the Court of my lack of resources to pay for car insurance, and my limited resources too.”

12. In 3DI21-8 and 3DI21-9, I also note the irreparable loss of the First Amendment right to petition in other cases in three matters. 3DI 21-8, 3DI 21-9 are exhibits to my application for more time to the Honorable Justice Alito.



13. In 3DI-8, I discuss this Third Circuit's denial of a stay in a civil rights case and the contributing delay in docketing by the United States Supreme Court that created an obstacle to my access to other courts as to deny me the asserted First Amendment right to petition in other cases by stating:

“On April 1, 2023, I realized the US Supreme Court would not grant relief until it was too late. I filed a Motion to withdraw my petition and application for an interim stay with the Honorable Justice Jackson. I required a stay from the proceeding below to afford me time and resources to fight, not merely file the Delaware Disciplinary appeal. The Delaware Disciplinary appeal was due by or before April 8, 2023 with this Honorable Court. The US Supreme Court was not even scheduled to convene until April 13, 2023 to review the petition before judgment. April 13, 2023 is after the Delaware Disciplinary due date, and is after the Third Circuit's conference dated April 11, 2023. April 13, 2023 was too late for this Court to grant me relief.

3. I was denied access to petition this Court in another case, the Delaware Disciplinary law suit, due to the delays in the United States Supreme Court's docketing or the grant or denial of my appeal and the application for an interim stay pending this United States Supreme Court's final determination. US Amend I, V ...10. I not only was denied the time and apportionment of my meager resources required to file the Delaware Disciplinary Delaware Supreme Court Order, but I was denied time to appeal the Third Circuit's Order in 22-3372 delaying a determination regarding an exemption of fees so as to compel me with the potential threat of violating my religious beliefs in exchange to access to the courts to exercise my First Amendment right to petition.”

14. Justice Alito denied my petition for more time to appeal a reciprocal order of discipline in PA Case Number 2913 DD3 due May 30, 2023, possibly due to the fact within the exhibits attached to my petition I note my disagreement with the Court, and the Courts contributing denial of my First Amendment right to petition by delays in docketing rendering relief in defense of my fundamental rights moot. Id.

15. The graph in 3DI21-5 shows two material motions in my case were sealed in Kelly v Trump during the case, without affording me, a party, notice or an opportunity to be heard. They were also sealed as attachments to my motion for a rehearing in Kelly v Trump.

16. One of the documents the Delaware Supreme sealed labeled under A-4 is Appellant's Motion for the Delaware Supreme Court to reign in its arms through its agents from unlawfully pressuring her to forgo or impede her case to protect her free exercise of religious belief, dated May 25, 2021. I incorporate herein by reference at 3DI-21-4 page 50 to page 90. DI 10, DI 12.

17. The second document the Delaware Supreme Court wrongly sealed is labeled Appellant's Motion for the Delaware Supreme Court to Require the recusal of the Honorable Justice Collins, J. Seitz. 3DI 21-4 page 91 to page 124.

18. I filed a Religious Freedom Restoration Act law suit against former President Donald J. Trump to dissolve the establishment of government religion that caused a government incited substantial burden upon my religious exercise.

19. In the Complaint Kelly v Trump and pleadings I drafted I incorporate hereto by reference in their entirety at Third Circuit Docket Item 21-4 and 3DI21-5, I explain one reason why the establishment of government reasonable foreseeably religion upsets me manifesting in emotional distress.

20. I believe some conduct government agents perform, support, or speak misleads people to exploit others for material gain as God, misleading people to harm, and I believe damnation in hell.

21. I am a Christian. I do not want people to die and go to hell. I do not want misguided judges like I believe Justice Alito and Justice Thomas are to mislead people to lose eternal life.

22. In the second sealed document, I attached my denied petition to the Delaware Supreme Court to exempt attorneys who faced economic hardship from dues during the pandemic dated February 5, 2021 where I stated on page 5.

“With the acceptance of the cloak of government authority, government servants have fewer freedoms to share their belief and may not condemn not support a religious belief under the inherent threat of persecution against people for believing differently than the government authority.

This Court does not have to believe as I do to safeguard everyone’s freedom [including mine] to worship or not according to the dictates of their own conscience without government sponsored persecution.

The Supreme Court misbehaves too. Please see the attached. I fear Justice Alito, Justice Kavanaugh and Justice Thomas are confused into believing in sacrificing human life to keep the so-called Sabbath and to serve business greed is keeping the law. They are wrong. They love money not humanity, and will sacrifice those the Constitution protects to serve the almighty dollar under the guise of an almighty God or good. See, Matthew 6:24. I think those justices will go to hell if they are not corrected by our courts [case law] or otherwise. Confusion kills. See 2 Corinthians 4:4

This Court has the power to save lives and eternal lives, even of US Supreme Court justices, via correction with mercy, to prevent condemnation by transforming wrong doers into right doers, by love for one another, not exploitation of one another to serve the love of money.”

23. I think Justice Alito was offended I was worried that he may go to hell based on his confusion. I really do believe this. One reason why I filed Kelly v Trump is to prevent the government from misleading people to hell by serving sin which serves death by claiming their government agendas which conflict with God’s are backed by God. I think that is why he unreasonably denied my petition for more time in the PA case.

24. I also believe the US Supreme Court is wrong on other opinions and attached this to my petitions for more time, and included these attachments on your docket to refer to herein by reference. 3DI 21-24.

25. In Exhibit 7 attached to the petition, I discuss how Roman law and Plato are wrong, knowing Justice Alito has pridefully praised Roman law outside of the court.

26. I indicate the Supreme Court is wrong in *In Jacobson v. Massachusetts*, 197 U.S. 11, 35 (1905). was wrong about vaccines. I allege the Court in Jacobson also erred in its illogical analysis that the United States is republic. The Court seemed to limit the only freedom the American people have is in a represent government. The Court sacrifices individual liberties by the vote to get out of upholding individual people's freedom in court cases by essentially violating the First Amendment for convenience and productivity. This makes mere statutes and policies weightier than the preempting Constitutional provisions that limit government. I believe this is also the mark of lawless lusts misleading people to hell should they not repent by turning away from inequity. I believe people sin when their desire for convenience, avoidance of costs, productivity, material gain, power, position, praise blinds their eyes from loving others as self.

27. In another exhibit to the petition I disagree with a bunch of US Supreme Court cases where I believe the Court serves the mark of lawless lusts misleading people to hell, the mark of the beast by sacrificing individuals and individual liberty under the guise of material gain.

28. I averred:

“11. I disagree with the Supreme Court's decisions in *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719, 1721 (2018); which is distinguished from my case in that I am punished for exercising my private individual religious belief, private religious-speech, in my private-personal religious petitions. Whereas a business receiving a government license to buy and sell in *Masterpiece Cakeshop* was permitted to choose who is worthy of buying and selling, based on relationship on religious grounds.

12. I understand there may be 13th Amendment arguments against compelled servitude. And yet, business is not freedom. A license is freely accepted and the private holder must not disparately treat customers based on the exercise of the customer's free will to believe and live differently than the merchant. Again my case, is different in that I am persecuted by the state based on my exercise of fundamental rights, my private First Amendment right to petition, my private First Amendment right to religious belief, exercise of belief, My First Amendment right to be free from the government established forced religion, my private-First Amendment right to association, even as a Jesus-lawyer, my First Amendment right to speech and other rights, Equal protection, procedural due process, right to self-represent, call witnesses and so on. I am not seeking government

authority to disparately treat consumers as unworthy to serve based on my disagreement of their religious or secular belief....

13. Some religions include involuntary servitude, forced caste systems and human sacrifice. If the government grants a license to private professionals to use religion to oppress, and blackball others through licensed or government backed businesses or not for profits, we are not free people, but are bartered for under a fixed government backed economy which protects discrimination not based on quality of goods and services but partiality.

14. Similarly, I believe the Supreme Court is misguided by money saved or gained by entities who under the guise of freedom of religion, control people, forcing their religious views, by business greed again in *Little Sisters of the Poor Saints Peter & Paul Home v. Pennsylvania*, 140 S. Ct. 2367, 207 L. Ed. 2d 819 (2020). Here, "The Supreme Court... held that ACA authorized Health Resources and Services Administration (HRSA) to exempt or accommodate employers' religious or moral objections to providing no-cost contraceptive coverage." This arguably saves the employer more money in insurance costs, at the exchange of losing coverage for their employees, bartering away, selling other people's free choice, their souls, or freedoms, for the bottom line by forced choice. It is my religious belief this is based on the mark of the beast, business greed, under the guise of good. I see it as enslaving others to bend to the employer's religious will, diminishing their free will, by economic force, potentially losing a job. The Supreme Court is bartering away people's freedoms to artificial entities without hearts, businesses, not for profits and charities, without the ability to reflect the image of God, by unconditional love. Entities run on cash or conditional labor with no ability to unconditional love by their nature which is collective, contingent conformity. Jesus teaches you cannot serve God and Money. I choose God.

15. Money is not speech either. It is bought not free, not freedom of speech. If buying and bartering for a voice is free speech, only those with money power and connections, have the freedom to purchase a louder voice to be heard, in violation of the Equal protections clause component of the 5<sup>th</sup> Amendment applicable to the federal government by disparate treatment based on poverty and wealth. Wealth does not make one more important or more worthy of being heard. Looking at the bottom line creates unequal treatment and mistreatment of the poor. Do you serve people or greed, which I believe is lawlessness.

16. The US Supreme Court erred in *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 130 S. Ct. 876, 175 L. Ed. 2d 753 (2010). This Court erred in the finding "Use of funds to support a political candidate is speech." *Austin v. Michigan Chamber of Com.*, 494 U.S. 652, 110 S. Ct. 1391, 108 L. Ed. 2d 652 (1990), overruled by *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 130 S. Ct. 876, 175 L. Ed. 2d 753 (2010)

17. The United States Supreme Court also erred in *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 140 S. Ct. 2049, 207 L. Ed. 2d 870 (2020), rendering religious organizations to lawlessly do as they please, fire employees unjustly without remedy. It appears that if a religion allows an entity to discriminate, to do what is most advantageous for the bottom line regardless of the harm, so long as they use the name of God or religion, including non-religion, artificial entities without hearts will chose their own religion, including non-religion forcing people no longer free to bend their will to serve business greed, the mark of the beast, without discipline to sacrifice material gain to

love humanity, in the form of the rule of law, or love written on humanity's hearts per *Jeremiah 31*.

18. I believe lawyers, even lawyers labeled disabled inactive lawyers like me have a duty to uphold the Constitution by telling judges their rulings violate the Constitution, even if the rulings are based on misguided holdings 100 plus years old.

19. With that said, I believe the Courts have been wrong for about 100 years with regards to holding government pay, pensions and social security are not protected under the contract clause.

20. I also believe the courts are wrong by protecting colluding private partners in a fixed not fair unequal economic system. Government contractors should be deemed government agents unprotected by the contracts clause.

21. The money the government uses to pay entities is made by enslaving not serving the people by requiring they work to pay back the federal reserve with interest with money that does not exist. It is a Ponzi scheme requiring the citizens become slaves in a fixed not free economy. The proclamation that all men are created free and the free exercise of liberties is violated by the manner money is coined electronically or otherwise by the private entity the Federal reserve and the banks.

22. In June 2023 a debt default may occur.

23. I desire to persuade our US Attorney General to sue President Biden to change case law and to protect the rule of law, by protecting the people who govern as government employees by protecting their pay, pensions and social security. Case law shows social security, pensions and government pay are not protected and may be wiped out.

24. Should government pay, social security and pensions stop payment this June, I want US Attorney General David Weiss or US Attorney General to sue the government under a contract clause theory to change 100s of years of bad law to prevent the schemed overthrow of our government by eliminating people judges and others. The schemed overthrow is designed by temptations. They entice the government employees to wrongly enslave the people by increasing taxes the people cannot pay. The taxes will cause foreclosures and bankruptcies decreasing tax revenue in bulk despite o and because of the tax increases. Our leaders refuse to think things out by giving into temptations to serve their immediate gratification at the cost of harming the people down the line.

25. I do not want old people to go to hell. I believe the most important time of your life that determines eternity is the day of your death. In Ecclesiastes the Bible teaches the day of your death is more important than the day of your birth.

26. I believe people go to hell for trusting in money as God and savior. If old people become bitter at losing retirement and pensions or I the blame others increasing oppression by requiring others to work to care for them by force, they will go to hell, which is sad. Those who trust in money as savior get thrown into the fire as unworthy of eternal life at the last day, regardless of whether it is through charities or work. I do not want old people to be harmed, die or be doomed to hell because they are in despair and left to die in want because the case law does not protect government pay, pensions or social security under the contracts clause.

27. The case law serves lawless lusts, making the mark o the damned the law productivity, material gain, avoidance of costs and material gain at the exchange of sacrificing souls like Satan.

28. I pray US Attorney General David Weiss or Merrick Garland bravely confronts the courts to say they were wrong to correct them to save government pat, pensions and social security of even federal judges to care for the people.

29. I sent opposing counsel and US Attorney General David Weiss an email with research on this topic the law librarian kindly sent me. (Email attached hereto without the research attached). I hope David Weiss would be the hero we need to be a life saver and eternal life saver, not with money or might, but with his mind to persuade the courts to do justice, not injustice guaranteed if no one asks.

30. I am so concerned. Congress may be crying wolf to feign the hero or to get their will done by eliminating freedom by government control through barter or exchange. One day the wolves will come. I pray the Courts act as god shepherds caring for their flock, not sacrificing them to serve a pack who is schemed to turn on itself at some unknown time.

31. Now may be an opportunity or the US Attorney General to change case law to prevent harm to the people and the dismantling of the government by elimination of control to be controlled by those who control the money which is the global money changer and the central banks. There are plans to eliminate the government to be bank owned not free people.

Thank you for your time.”

29. I believe there is a schemed elimination of not only our economic model, that will be transitioned into a far worse economic model, I believe there is a plan to eliminate the rule of law by eliminating our government.

30. The Court attacks based on inciting the fickle fads of the public, while not adhering to the only two limits checks the Constitution allows is to cause the United States Supreme Court to give into temptation of regulations that will be used to eliminate the courts down the line.

31. IN 3DI-25 I included my petition to appeal this Third Circuits reciprocal discipline of me, and apprised the US Supreme Court of my genuine belief there is an attack to eliminate the courts to slowly overthrow our Country. 3DI-25-4 through 3DI 25-15.

32. The new economic model started July 1, 2023 under Fed Now will charge every person with a bank account 25 dollars a month, and pennies for each transaction. I incorporate

herein by reference 3DI24- 4through 3DI24-8, which discuss this, and include Justice Alito's denial.

33. This artificial debt creates slavery differently. The 25 fee is discounted in 2023, but is scheduled to be convened 2024. I understand the fees for each transaction are pennies now, but will be increased to indebt the government and the people to be enslaved to the central banks.

34. There are other schemes written about, including eliminating physical schools by automation, and by threatening reduction of funds to increase taxes to an amount the people cannot afford. So, they are pushed out of their leased cars and homes to be recouped by the banks. There is reward for the banks to make us worse off. The plan is for the banks to gain property and resources to control the government and the people, to eliminate the government to eliminate the rule of law that restrains entities from oppressing, enslaving, killing, stealing and destroying people for material gain.

35. The crash is by intentional design and may be unschemed by the courts. There are other parts of the schemes which I do not have time to get into.

36. Since the courts are the only thing that stands in the way of an economic overthrow and the schemed elimination of the rule of law by eliminating the government, I seek to safeguard the courts by requiring they limit the check upon its own branch by correction in 1. Cases and controversies like my case, and 2. Impeachment, without regulations that will be used to destroy it. 3DI24. I tried to warn the courts.

37. I write in haste, and in tears. I apologies for errors or typos. I believe federal judges are in trouble. The courts are the only branch that grant us freedom and democracy. The other two branches give us a republic. Without you, we are not free, but for sale products to the governments foreign and private partners.



Wherefore, I pray this court grants my motion.

May 25, 2023

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire

DE Bar Number 4968

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(302) 493-6693(5,133 Words) pro se

# Exhibit H

(3DI-40 Motion for more pages)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent, Appellee	§	CASE NUMBER: _____
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Appellant Respondent Meghan Kelly’s Motion for leave to exceed the word limit in her Corrected Motion to vacate the Order, dated May 19, 2023

I Plaintiff Appellant Meghan Kelly, pursuant to the Court’s equitable powers and Federal Rules Appellate Procedure Rule 2, and any other applicable rule this Court deems just move this Court to permit me to exceed the word limit in my Corrected Motion to vacate the Order, dated May 19, 2023 (hereinafter “motions”).

1. I Meghan Kelly, for good cause, respectfully request, the Word limit be excused in the above captioned Motions.
2. I filed the motions under great duress, and have limited means and time to research. I believed the word limit was 5,200 words. I was wrong. It is 3,900. I am sorry.
3. I have another pleading due May 30, 2023. I do not know how I will get my petition for the US Supreme Court done by or before the next three or four days. I am trying to do so while not waiving my rights before your Honorable Court.
4. The amount of words I request I exceed the 3,900 limitation in my Corrected Motion to vacate the Order, dated May 19, 2023 is 1,300.
5. This case arising from reciprocal discipline of a Delaware Order placing my license on inactive/disability relates to a petition I brought against former-President Donald J. Trump under the Religious Freedom Restoration Act to protect my exercise of belief in Jesus Christ without government sponsored persecution in the state of Delaware.

6. The Delaware original disciplinary case and this reciprocating case represents examples of government persecution based on my exercise of religious beliefs, contained in my speech in my petitions to the Delaware Courts.

7. In the August 23, 2021 letter DE Disciplinary Counsel indicated my religious beliefs contained in my speech contained in my private-religious petitions is the source of their concern of my mental fitness to practice law. In the DE ODC's petition at 7, the Disciplinary Counsel points to my references to the bible e, as evidence of a disability. Third Circuit Docket Items ("3DI") 3DI-3, page 34, and 3DI21-4.

8. This Reciprocal Order by Appellee is based on the Delaware Order I seek to overturn based on lack of subject matter jurisdiction since the DE Supreme Court acted as witness, judge and prosecutor's assistant.

9. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888). This Court must grant my request to prevent injustice by denial of words which essentially denies me the opportunity to be heard in defense of my religious speech reflecting my religious beliefs in my Freedom of Religion Restoration Act Complaint against former President Donald J. Trump. US Amend I, V. 3DI 21-4 pages 126 through 248.

10. This Court must grant my request for additional words to prevent government abuse against my person, oppression, and injustice. It is difficult for me to ask the Court persecuting me for my belief in Jesus, for help.

11. Nevertheless, the Constitutional issues must be addressed to protect not only me, but others beyond me from professional government backed persecution based on exercise of fundamental rights.

12. A professional's private exercise of First Amendment exercise of speech, association, religious belief, religious exercise, and the right to petition to defend the exercise of Constitutional freedom in their private capacity must not be eliminated in exchange for a mere license.

13. I must not be compelled to violate my religious belief by compelled religious violations of my belief in order to regain my license.

14. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. See, *Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced, et. al, No.15-105, 2015 WL 5013734 (US).*(The Court allowed references to the bible in other RFRA petitions); See, *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") *Also see, Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.), cert. denied, 456 U.S. 908 (1982); ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct.

900, 84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa 1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934; See, *Holt v. Hobbs*, 574

U.S. 352; *In re Eternal Word Television Network, Inc.*, 818 F.3d 1122, 1140 (11th Cir. 2016) ("The Supreme Court cautioned that "federal courts have no business addressing" such questions of religion and moral philosophy."

(Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

15. "To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." *Minn. Ass'n, Health Care v. Minn. Dept., P.W.*, 742 F.2d 442, 446 (8th Cir. 1984); Citing, *Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963).

16. "The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established." Citing, *Jones v. Board of Education*, 397 U.S. 31, 34 (1970); E.g., *Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v. Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai*

*Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Trucking Co. v. Railroad Comm'n*, 271 U.S. 583, 593-594; see *Van Alstyne, The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); Comment, *Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: ("One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.")

17. "Neither the state in general, nor the state university in particular, is free to prohibit any kind of expression because it does not like what is being said." *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970)

18. The United States Supreme Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at \*15 (June 27, 2022) held, "Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities."

19. In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state's punishment violated the Coach's first Amendment right applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

20. I must argue this case must be extended to me to prevent the state, federal government and additional governments' including Appellee's punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my petitions, no matter how repugnant or illogical my religious beliefs appear to the state and Federal government.

21. Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law, by making professionals the law, by self-regulating, money, not freedom, or the people, is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined.

22. I require more words to ask the Courts to exercise more of their power to prevent professionals from governing the nation as opposed to government elected or appointed impartial servants without a stake in the outcome against the accused, in terms of position or sustaining profit.

23. Additional words are needed not only to protect the Constitutional rights of the accused, but to improve the world, by allowed criticism, free speech, free enterprise, which helps professionals learn, and improve, not forced conformity under the threat of secret proceedings against professionals who think or believe differently.

24. The Courts guarantee injustice by making business the law. Making professionals who exercise private rights, including their religious beliefs in jeopardy of losing their ability to buy and sell merely for not adopting the government's or government backed religious or secular belief in money and professional material gain and convenience as God and guide.

25. The Words are needed to argue, under the unique facts of this case in defense of my ability to buy and sell as a professional lawyer but for my exercise of my fundamental rights.

Wherefore, I pray this Court grants my motion.

May 25, 2023

Respectfully submitted,  
/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693(1, 645Words) pro se



# Exhibit I

(3DI-40 Motion FRAP R 2 for more pages, confused motion 5200 for 3900 requirement)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent, Appellee	§	CASE NUMBER:22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

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1. I Meghan Kelly, for good cause, respectfully request, the Word limit be excused in the above captioned Motions.
2. I filed the motions under great duress, and have limited means and time to research. I believed the word limit was 5,200 words. I was wrong. It is 3,900. I am sorry.
3. I have another pleading due May 30, 2023. I do not know how I will get my petition for the US Supreme Court done by or before the next three or four days. I am trying to do so while not waiving my rights before your Honorable Court.
4. The amount of words I request I exceed the 3,900 limitation in my Corrected Motion to vacate the Order, dated May 19, 2023 is 1,300.
5. This case arising from reciprocal discipline of a Delaware Order placing my license on inactive/disability relates to a petition I brought against former-President Donald J. Trump under the Religious Freedom Restoration Act to protect my exercise of belief in Jesus Christ without government sponsored persecution in the state of Delaware.

6. The Delaware original disciplinary case and this reciprocating case represents examples of government persecution based on my exercise of religious beliefs, contained in my speech in my petitions to the Delaware Courts.

7. In the August 23, 2021 letter DE Disciplinary Counsel indicated my religious beliefs contained in my speech contained in my private-religious petitions is the source of their concern of my mental fitness to practice law. In the DE ODC's petition at 7, the Disciplinary Counsel points to my references to the bible e, as evidence of a disability. Third Circuit Docket Items ("3DI") 3DI-3, page 34, and 3DI21-4.

8. This Reciprocal Order by Appellee is based on the Delaware Order I seek to overturn based on lack of subject matter jurisdiction since the DE Supreme Court acted as witness, judge and prosecutor's assistant.

9. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888). This Court must grant my request to prevent injustice by denial of words which essentially denies me the opportunity to be heard in defense of my religious speech reflecting my religious beliefs in my Freedom of Religion Restoration Act Complaint against former President Donald J. Trump. US Amend I, V. 3DI 21-4 pages 126 through 248.

10. This Court must grant my request for additional words to prevent government abuse against my person, oppression, and injustice. It is difficult for me to ask the Court persecuting me for my belief in Jesus, for help.

11. Nevertheless, the Constitutional issues must be addressed to protect not only me, but others beyond me from professional government backed persecution based on exercise of fundamental rights.

12. A professional's private exercise of First Amendment exercise of speech, association, religious belief, religious exercise, and the right to petition to defend the exercise of Constitutional freedom in their private capacity must not be eliminated in exchange for a mere license.

13. I must not be compelled to violate my religious belief by compelled religious violations of my belief in order to regain my license.

14. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. See, *Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced*, et. al, No.15-105, 2015 WL 5013734 (US).(The Court allowed references to the bible in other RFRA petitions); See, *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") *Also see, Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.), cert. denied, 456 U.S. 908 (1982); ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct.

900, 84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa 1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934; See, *Holt v. Hobbs*, 574

U.S. 352; *In re Eternal Word Television Network, Inc.*, 818 F.3d 1122, 1140 (11th Cir. 2016) ("The Supreme Court cautioned that "federal courts have no business addressing" such questions of religion and moral philosophy."

(Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

15. "To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." *Minn. Ass'n, Health Care v. Minn. Dept., P.W.*, 742 F.2d 442, 446 (8th Cir. 1984); Citing, *Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963).

16. "The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established." Citing, *Jones v. Board of Education*, 397 U.S. 31, 34 (1970); E.g., *Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v. Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai*

*Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Trucking Co. v. Railroad Comm'n*, 271 U.S. 583, 593-594; see *Van Alstyne, The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); Comment, *Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: ("One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.")

17. "Neither the state in general, nor the state university in particular, is free to prohibit any kind of expression because it does not like what is being said." *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970)

18. The United States Supreme Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at \*15 (June 27, 2022) held, "Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities."

19. In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state's punishment violated the Coach's first Amendment right applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

20. I must argue this case must be extended to me to prevent the state, federal government and additional governments' including Appellee's punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my petitions, no matter how repugnant or illogical my religious beliefs appear to the state and Federal government.

21. Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law, by making professionals the law, by self-regulating, money, not freedom, or the people, is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined.

22. I require more words to ask the Courts to exercise more of their power to prevent professionals from governing the nation as opposed to government elected or appointed impartial servants without a stake in the outcome against the accused, in terms of position or sustaining profit.

23. Additional words are needed not only to protect the Constitutional rights of the accused, but to improve the world, by allowed criticism, free speech, free enterprise, which helps professionals learn, and improve, not forced conformity under the threat of secret proceedings against professionals who think or believe differently.

24. The Courts guarantee injustice by making business the law. Making professionals who exercise private rights, including their religious beliefs in jeopardy of losing their ability to buy and sell merely for not adopting the government's or government backed religious or secular belief in money and professional material gain and convenience as God and guide.

25. The Words are needed to argue, under the unique facts of this case in defense of my ability to buy and sell as a professional lawyer but for my exercise of my fundamental rights.

Wherefore, I pray this Court grants my motion.

May 25, 2023

Respectfully submitted,  
/s/Meghan Kelly  
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# Exhibit J

(3DI 106 filed in 21-3198 June 30, 2023)



THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY, )  
 ) Case No 21-3198  
 ) Case No. 22-2079  
 v. )  
PATRICIA B. SWARTZ, et. al. )

**Appellant Meghan Kelly’s Motion for Reconsideration of Order dated June 20, 2023 and Pursuant to FRAP Rule 2 for a new panel to consider my Motion for a Rehearing on Denial of her Appellate Brief**

Appellant Meghan Kelly’s Motion pursuant to 1<sup>st</sup> Amendment right to petition against government grievances, 5<sup>th</sup> Amendment procedural Due Process requirement of a fair proceeding, Federal Rule of Appellate Procedure Rules 2, 27, 35 and Rule 40 for an en banc reconsideration of this Court’s Order dated June 20, 2023 at Third Circuit Docket Item (“3DI”) 3DI-203, attached hereto as Exhibit A, denying 1) *Motion to recuse the Honorable Judge Anthony J. Scirica to preserve my Due process Rights under the 5<sup>th</sup>*, 2) *Motion for a caveat to her Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority*, and 3. *Motion for a Second caveat to her Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society*. I further move this Court pursuant to US Amendments I, V, and Federal Appellate Rule 2, and its equitable powers for good cause for a new panel to consider my Motion for a Rehearing on Denial of the original Appellate Brief, since a grant of a recusal is an admission the proceeding was biased in violation of my 5<sup>th</sup> Amendment right to a fair impartial proceeding. I incorporate herein by reference in its entirety 3DI-199, 3DI-200, 3DI-201, 3DI-202, and my appellate Brief at 3DI-98 and all documents referred therein as if incorporated herein in full, and aver as follows.

1. The proceeding involves questions of exceptional importance which to my knowledge have not previously been addressed by any Court. The answers the Court provides may promote the impartiality of the federal courts and preserve the United States from an unnaturally schemed overthrow. The answers may also preserve not only my Constitutional liberties but the Constitutional liberties of the people from the government backed foreign and private partners elimination of all Constitutional protections under the threat of removing the ability of people to buy and sell but for their exercise of religious belief in Jesus's teachings which do not conform to the secular or religious belief of the government, or the government backed foreign of private partners.

2. The proceeding also involves the important question as to whether anyone with a license to practice law has any First Amendment private freedoms to 1) petition, 2) religious belief, 3) association as a Christian, Catholic, Democrat without removal of the association as a lawyer but for the exercise of the right to petition to safeguard religious beliefs contained in private speech the government finds repugnant, or speech to petition to correct government misconduct or mistakes without retaliation but for the exercise of the 1<sup>st</sup> Amendment right to petition or 1<sup>st</sup> Amendment right of speech petitioning the courts for grievances of caused by government misconduct and mistakes based on subject matter making the government above the law and lawyers below the law 4) Private speech outlining my religious beliefs in Jesus as God not money or mammon or professional collective gain as God which is the mark of lawlessness leading to damnation in hell, 5) and other private claims and rights from government infringements and violations of including, but not limited to, Equal Protections under the 5<sup>th</sup> and 14<sup>th</sup>, 6<sup>th</sup> Amendment right to self-represent, claims for a fair trial, claims for a right to pleadings in a case against me Case Number 541, claims relating to a conspiracy under 1985 to cause me to

forgo Kelly v Trump by Delaware supreme Court incited witnesses intimidation, threats, concealing evidence by sealing evidence in my favor to cover up procedural due process and misconduct by the state court, preventing my ability to call witnesses by ignoring my motions where I assert the right to self-represent, to perform discovery, scheduling the hearing within fewer days required to subpoena witnesses 8 days as opposed to 10 required by the state disciplinary rules and other harm such as firing two court staff to conceal evidence necessary to my defense, the reciprocal proceedings and this case, and other claims. DI 98.

3. Exhibit B attached hereto and incorporated herein shows my petitions in *Kelly v Trump* were sealed by the Court to prejudice my appeal to the USSC, and to conceal evidence in my favor in the disciplinary proceedings and this civil rights case in violation of my right to a fair trial, notice and an opportunity to be heard and my First Amendment right to petition against the Delaware Courts' conspiracy to threaten me by inciting attacks against me to cause me to forgo my case against Former President Trump and current President Biden to alleviate a substantial burden upon my religious exercise caused by their establishment of government religion based on barter or exchange not freedom, making our rights for sale to be exercised by only those who may legally barter the government through its private or foreign partners to exercise. US Amend I, XIV.

4. My Reply to the ODC's response to my objections to the Board's determination incorporated herein as Exhibit C, my appellate brief, incorporated herein as Exhibit D, Objections, attached as Exhibit E, and Answers incorporated herein without signature page as Exhibit F, my apologies the format including but not limited to indention of paragraphs were removed in the answers and I incorporate all the items referred therein and all exhibits. These exhibits show Constitutional violations and aver facts if taken in the light most favorable to me

show evidence the DE Supreme Court incited the violations of my first Amendment right to petition, violations against witness tampering, reckless or intentional infliction of emotional distress and bodily harm, procedural due process violations in Kelly v Trump and procedural due process violations in the Disciplinary proceeding making the DE Supreme Court the judge and jury, and other claims.

5. At DI 58 I incorporate herein by reference, along with two DE Disciplinary Motions where I aver Constitutional violations of the rules as Exhibit G, the Supreme Court showed it colluded in bringing the disciplinary petition by copying the Disciplinary Board on a letter providing me with the waiver of notary requirements in the pandemic. The Delaware Supreme Court incited the collusion to violate my right to petition in Kelly v Trump and to punish me for my belief in Jesus by sending its arms to attack me. The information the arms used in their attacks were only in the possession of the DE Supreme Court, including but not limited to my private petition for an exemption of bar fees I ended up paying. The Delaware Supreme Court referred to a case in its disciplinary opinion of the requirement of bar fees in its order unnecessarily showing its disdain for my petition. The State Court cared more serving partial business and money not individuals and individual Constitutional liberties in violation of US Amend I, XIV, XIII. As a Christian I believe this is the type of lawless lusts serving material gain at the cost of human sacrifice of life or liberty will damn each justice to hell under the color of law should they not repent with the help of court correction. The lawless partiality to cover up its own misconduct to serve the mere appearance of justice while committing lawlessness will fester and spread should judges remain above the law within the purview of the constitutional limits of 1. Cases and controversies such as mine and 2. Impeachment.

6. I have religious beliefs against partiality by the government. (Exhibits H-J)

7. The Board's function as a group of professionals serving the professionals' interests by making justice a business as opposed to a matter of truth as a matter of law regardless as to whether citizens are poor and have nothing to barter with violates my religious belief, as applied, Equal protections and Due process, as applied and per se.

8. I believe government partiality towards business and interest groups is sin. (See *Isaiah* 10:1-3) That is why I sued the democrats and asked for a waiver from filing requirements.

9. Just like I do not want to go to hell for favoritism, I do not want judges to go to hell based on partiality to those who serve their seats, or who may take them away by judicial discipline, nor do I desire the courts to be placed in a position of temptation to violate the rights of those they serve.

10. Judge Scirica has a conflict of interest with my case I was not aware of until after I filed my motion for a rehearing on June 3, 2023. 3DI-199

11. I moved to recuse him pursuant to my 5th Amendment right to a fair trial to defend the exercise of my private 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68. 3DI-200.

12. Judge Scirica chairs the Committee on Judicial Conduct and Disability. (DI 149).

13. I contest the federal judicial disciplinary rules Judge Scirica drafts on Constitutional grounds. I oppose the elimination of life time limits and believe district court and Circuit Court judges should have life time appointments to prevent them from the temptation to normalize injustice by partiality to the Disciplinary rules as opposed to the preempting Constitutional application of the law. I declared my belief regulating the Court violates the constitutional rights of citizens the court serves and allows for the schemed overthrow to occur in

the District Court prior to discovering the conflict. (See, some examples Docket Item (DI) 23, concerning my belief only the courts may prevent an economic crash and an overthrow of our government, DI-53, DI-55, DI-56, DI-78, DI-95, DI-102, DI-104, DI-114, DI-127, DI-129, DI-131). Favoritism towards those who serve the alleged professions' collective convenience, productivity or the individual judge's future or current seat or highly esteemed position creates unfair proceedings when conflicts arise. I seek to declare the disciplinary rules Judge Scirica Drafts are unlawful.

14. The fact I argued on the record below, my desire to eliminate or prevent disciplinary rules of federal judges and the United States Supreme Court creates a conflict of interest. The appearance of a conflict requires a recusal and a new panel who is not swayed by Judge Brilliant mind and perceived expertise in a subject I disagree

15. I sought to amend my complaint below to include Constitutional arguments against the disciplinary rules and proceedings against attorneys. I incorporate some not all of my proposed arguments against rules I proposed to the Delaware District Court at DI 58, and two state motions. Exhibit G.

16. I oppose attorney self-regulation and third party professional regulation through professional boards on Constitutional grounds, on religious grounds and on grounds the rules violate the Constitution. Standardized compelled practice eliminates free will needed to protect Constitutional freedoms of clients and professionals who do not conform to the standards. Standards makes professional practices above the law by deference of the courts to the standards even when such standards harm, oppress, kill, steal and destroy human life and health for the bottom line. The standards create partiality to profit, productivity not justice.

17 The state proceeding and state disciplinary rules reflect the rules Judge Scirica works on in his capacity as Chair of the federal disciplinary rules. I should be afforded the right to assert my right to amend my complaint to include reasons why the rules violate the Constitution before an impartial forum, as opposed to a Judge who supports disciplinary rules by actively drafting rules for disciplinary proceedings.

18. Judge Scirica privately opposes my view due to his stakeholder interest he has in upholding rules that mirror his work. This conflict of interest violates my procedural due process rights and Equal Protections rights as applied, as a party of one with unique religious-political beliefs in unbiased justice as a religious command by God.

19. I believe there is an attack on judges to eliminate the judiciary to eliminate the rule of law, as I mentioned previously.

20. I believe the courts must limit the purview of correcting federal judges to the purview of the Constitutional limits without waiver, 1. Cases and controversies such as mine, 2. or impeachment, to preserve these United States from schemed overthrow. Allow attorneys to fulfill their duty by requiring in cases that judges do not vitiate Constitutional rights for business. Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution," not *Salazar v. Buono*, 559 U.S. 700, 717 (2010).

21. Judges' loyalty to Boards and regulators must not supersede the Constitution to create actual not mere apparent injustice.

22. I believe regulations will be used to assist the other two branches to exceed the Constitutional limits to impeach and control a no longer free, independent and impartial judiciary. I believe this will be used to eliminate the courts down the line if left unstopped.

23. Upon information and belief there is not only a schemed overthrow of our economic system but there is also an unnatural, man-made designed overthrow and elimination of governments to allow entities who control the resources through technology to enslave the population to live based on their whim with no restraint in the form of law to prevent their oppressing, killing, sealing and destroying liberty and human life.

24. I informed the District Court of lobbyists who scheme to eliminate people judges and people lawyers to eliminate the rule of law at both the World Government Summit (“WGS”) and the World Economic Forum (“WEF”). Speaker Sebastian Thrun at the WGS mentioned lawyers and judges would be replaced by automation at Day 2 of WGS in 2018 you may see on youtube by clicking:

<https://www.youtube.com/watch?v=NsdmPiBc9TI>

25. Also see the attached exhibits where it appears villains who receive unjust gains through banking, grants, charities and government contracts seek to cover up the fact there is no money to pay out for the boomers for their eared retirement, healthcare and social security. The manner money is coined enslaves the people to debt in violation of my religious belief against debt which I believe damns people to hell. DI 2. I proposed a way to coin correctly without violating my religious belief as applied or the 13<sup>th</sup> Amendment as applied to all by enslaving the masses to pay the Central and other banks back for the money the government grants and contracts money with interest.

26. In DI 123,I provided an article where a lobbyists boldly stated

“How can the use of Laws be eliminated? Today we try to control human behavior by enacting laws or signing treaties without changing the physical conditions responsible for aberrant behavior. When Earth’s resources are seen as the common heritage of all people, irrelevant laws and social contracts will vanish. In a resource-based economy, social responsibility would not be a function of artificial laws or force.”



27. I understand the plan is to control the resources people require to live to control a no longer free people's behavior to bend to the dictates of those who control the technology and resources required for life. The scheme is to control the government by controlling the resources for it to function before eliminating the need of government to govern and guide.

28. Professional control through standardized discipline of professionals allows for the schemed government overthrow to take place by allowing professional practices and business to supersede Constitutional laws, making business above the law, unchecked by the courts or government via the governments backing of it.

29. I believe the courts are in trouble. Allowing cases like mine to show judges are not above the law but may be corrected within the purview of the Constitutional limits will prevent the overthrow should I persuade the courts regulating the judiciary creates injustice and should be deemed unconstitutional.

30. Judges must not waive the 5<sup>th</sup> Amendment against self-incrimination by allowing self-regulation or Board regulations because they eliminate the 5<sup>th</sup> Amendment right to Equal protections of claimants they serve by the temptation of judges to be partial towards disciplinary rules which may conflict with the Constitutional application of the rule of law

31. Judicial disciplinary rules also will likely allow ex post facto activity to create cases against Judges to allow congress to more easily impeach judges or create a horse and pony show and mockery of justice by hanging judges they disagree with based on fickle fads. My God teaches impartiality is a command. I must protect the court, even when I disagree with them.

32. June 30, 2023, I received 2 orders dismissing my 2 cases by this court as I write this in haste. I apologize for typos. I write with tears in my eyes and provide you evidence of harm. Please see the attached article showing there are automated peopleless courts in China.

Please see some excerpts from the WEF books, including the note of eliminating the job of attorneys by 2027 or so. This is real life. I read information by those I disagree with to understand their plans.

33. The issue of whether the practice of law should be regulated within the purview of the Constitution so as not to prejudice the public by creating injustice by partiality to serve ourselves may very well save the courts from a very real planned overthrow. The attacks against the US Supreme Court are not normal. They are hypocritical since the Congress and the President commit the same acts unashamed. I have religious beliefs against partiality. Regulating professionals and the courts through disciplinary proceedings guarantees injustice by chilling attorneys' duty to require judges adhere to the rule of law without vindictive retaliation based on court correction needed to preserve the judiciary and the government.

34. Under objective standards in my case, "the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." (*Rippo v. Baker*, 137 S. Ct. 905, 907 (2017), Citing *Withrow v. Larkin*, 421 U.S. 35, 47, 95 S.Ct. 1456, 43 L.Ed.2d 712 (1975); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 872 (2009)). "The Tumey Court concluded that the Due Process Clause incorporated the common-law rule that a judge must recuse himself when he has "a direct, personal, substantial, pecuniary interest" in a case. Ibi" *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). In this matter, Judge Scirica's personal interest in opposition to my claims is too prejudicial to my case to afford me a fair proceeding. US Amend I, V.

35. "A fair trial in a fair tribunal is a basic requirement of due process." *Murchison, supra*, at 136, 75 S.Ct. 623" *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). The Court cannot grant a fair proceeding with Judge Scirica's participation.

36. “The Court asks not whether a judge harbors an actual, subjective bias, but instead whether, as an objective matter, the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias" *Williams v. Pennsylvania*, 579 U.S. —, —, —, 136 S.Ct. 1899, 1905, 195 L.Ed.2d 132 (2016) (" (internal quotation marks omitted))."); See, *Rippo v. Baker*, 137 S. Ct. 905, 907 (2017) (“we did not hold that a litigant must show as a matter of course that a judge was "actually biased in [the litigant's] case”)

37. Should this Court find Justice Scirica’s participation violated due process. I seek relief from this court to prevent needless waste of judicial resources.

38. The “Federal Rules of Civil Procedure treat orders that are entered without due process as void, permitting reopening of the case. U.S.C.A. Const.Amend. 5; *Fed.Rules Civ.Proc.Rule* 60(b)(4). The panel’s inclusion of Judge Scarica violates Due process. US Amend I, V.

39. Reopening the case would be needless should this court grant this motion on recusal.

40. To prevent the need to reopen the case, I move this Honorable Court pursuant to US Amendments I, V, and Federal Appellate Rule 2, for good cause for a new panel to consider my Motion for a Rehearing on Denial of the original Appellate Brief find out Third Circuit Docket Item (“3DI” 3DI-199).

41. Federal Rules of Appellate Procedure Rule 2 provides, “On... a party's motion, a court of appeals may for good cause-suspend any provision of these rules in a particular case and order proceedings as it directs.” Fed. R. App. P. 2

42. Since granting my motion for a rehearing on the denial of the recusal of Judge Sirica would show a procedural Due Process violation of my right to a fair trial occurred by

requiring a recusal, I would be left without a remedy before this Court unless the Court suspends the rules of Rules “for good cause” to uphold my right to a fair and impartial forum to safeguard my exercise of fundamental rights without punishment and elimination of my liberties and property interests in my licenses to buy and sell as an attorney but for my religious belief in Jesus Christ as God, not mammon, money and material gain as God. Citing Bible, Matthew 6:24.

Appealing the Matter before the US Supreme Court would be a waste of resources for all should this Honorable Court require the recusal of Judge Scirica. Thus, this Court must suspend the rules to prevent waste of resources and likely elimination of my Constitutional rights

43. I have shown good cause to suspend the Rules to allow a different panel to consider my Motion for reargument on the denial, should this Court grant my motion for reargument of Judge Scirica. Id. Safeguarding my Constitutional rights also shows good cause.

44. I move for a panel on the papers only since poverty creates a substantial burden upon my access to the courts, and the cost for a transcript and to travel are so great under my circumstances as to deny me the First Amendment right to petition to defend my exercise of my Constitutional rights.

45. I also do not feel well. I had surgery as a teenager I apprised this Court and every court of and assert my religious exercise of belief to the right to live.

46. I move this panel for reconsideration on the papers only in order to sustain my health. I am required to take time to drink inordinate amounts of water and rest that the average person does not require to stay alive. I require time to sustain my health. A hearing would take away time.

Wherefore I pray the Court grants my motion.

Respectfully submitted,

Dated June 30, 2022

/s/Meghan Kelly

---

Meghan Kelly, Esquire  
DE Bar Number 4968 INACTIVE,  
not acting as an attorney on behalf of  
another

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( 3,877 words)



# Exhibit K

(3DI-208 record stricken by Motion 3 DI 209)

“ECF FILER: Motion filed by Appellant Meghan M. Kelly to strike Please Strike Docket Item No 208, The motion was meant for another case. This Court rendered Orders denying 7 different requests for relief on Friday before the 4th of July Holiday weekend. I write in haste to assert and not waive my rights. Thank you. Certificate of Service dated 07/04/2023. Service made by ECF. [21-3198, 22-2079]--[Edited 07/05/2023 by PDB] (MMK) [Entered: 07/04/2023 05:19 PM]”

This was correctly filed in 22-3372 DI 49

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
v.	§	DISTRICT COURT
United States District Court,	§	Misc. No. 22-45
Eastern District of Pennsylvania	§	Judge, Paul S. Diamond,

**Appellant Meghan Kelly’s motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023**

I Meghan Kelly, Esq., pursuant to Fed. R. App. P. R. 2, 35, 40, my 5th Amendment right to a fair trial to defend the exercise of my 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law move for a different impartial panel or an en banc panel re-hearing on the papers of the Order dated June 20, 2023 on the Court’s denial of my motion to recuse Judges Phipps and Scirica and to prevent the participation of these two judges on the Third Circuit in this matter and related matters. (Exhibit A, Third Circuit Docket Item (“3DI”) 3DI-47).

I further move this Court pursuant to US Amendments I, V, and Federal Appellate Rule 2, and its equitable powers for good cause for a new panel to consider my Motion to vacate order at 3DI-37, Motion to correct motion to vacate at 3DI-38, Motion by Appellant to for Leave to Exceed Word Limit, 3DI-40, Motion by Appellant to Correct the Record, at 3DI-41, Motion for time, at 3DI-42, and Motion to stay at 3DI-45, since a grant of a recusal is an admission the proceeding was biased in violation of my 5th Amendment procedural due process right to be heard by a fair impartial proceeding, making the Order attached hereto as Exhibit A-1 void or voidable, as well as the Order at 3DI-48. (3DI-47).



I incorporate herein and reargue by reference the Motion to file unconfirming documents at 3DI 17, Motion for reconsideration of Order dated January 17, 2023, with regards denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights at 3DI-19, Motion to vacate an Order at 3D-37, Motion to correct the Motion to Vacate the Order at 3DI-38, Leave for More pages, 3DI-40, Motion to Correct the Record at 3DI-41, Motion for more time at 3DI-42, Motion to recuse 4 judges, 3DI-43, Caveat to Motion for this Court to recuse Judge Scirica wherein I moved him for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority, 3DI-44, Motion for a stay at 3DI-45, and this Court's orders at 3DI 46, 3DI-47, and 3DI-48. I simultaneously file herewith a Motion for leave to exceed the word and page limit, and an affidavit to be incorporated herein in its entirety with exhibits thereto. I also incorporate the entire record below in the District Court, and aver.

1. The proceeding involves questions of exceptional importance which to my knowledge have not previously been addressed by any Court. The answers the Court provides may promote the impartiality of the federal courts and preserve the United States from an unnaturally schemed overthrow. The answers may also preserve not only my Constitutional liberties but the Constitutional liberties of the people from the government backed foreign and private partners elimination of all Constitutional protections under the threat of removing the ability of people to buy and sell but for their exercise of religious belief in Jesus's teachings which do not conform to the secular or religious belief of the government, or the government backed foreign or private partners.

2. The proceeding also involves the important question as to whether anyone with a license to practice law has any First Amendment private freedoms to 1) petition, 2) religious belief, 3) association as a Christian, Catholic, Democrat without removal of the association as a lawyer but for the exercise of the right to petition to safeguard religious beliefs contained in private speech the government finds repugnant, or speech to petition to correct government misconduct or mistakes without retaliation but for the exercise of the 1<sup>st</sup> Amendment right to petition or 1<sup>st</sup> Amendment right of private speech contained in petitions relating to grievances caused by government misconduct and mistakes based on subject matter, making the government above the law and lawyers below the law 4) Private speech outlining my religious beliefs in Jesus as God not money or mammon or professional collective gain as God which is the mark of lawlessness leading to damnation in hell, 5) and other private claims and rights from government infringements and violations, including, but not limited to, Equal Protections under the 5<sup>th</sup> and 14<sup>th</sup>, 6<sup>th</sup> Amendment right to self-represent, claims for a fair trial, claims for a right to pleadings in a case against me in Delaware Case Number 541, claims relating to a conspiracy under 1985 to cause me to forgo Kelly v Trump by Delaware supreme Court incited witnesses intimidation and threats, concealing evidence by sealing evidence in my favor to cover up procedural due process and misconduct by the state court, preventing my ability to call witnesses by ignoring my motions where I asserted the right to self-represent, to perform discovery, by scheduling the hearing within fewer days required to subpoena witnesses 8 days as opposed to 10, required by the state disciplinary rules and other harm such as firing two court staff to conceal evidence necessary to my defense, the reciprocal proceedings and this case, and other claims.

3. This case relates to the important question as to whether judges are above the Constitutional application of the rule of law and whether a lawyers in exchange for their license

to buy and sell as an attorneys are fictitiously deemed, despite no meeting of the minds, below the Constitutional application of the rule of law in exercising their private fundamental rights to petition, speak, believe, self-represent, associate, exercise of religious belief.

4. This case relates to the important question as to whether lawyers are below the Constitutional protections, and are in fact punished for upholding the Constitution by seeking to correct judicial misconduct and judicial mistakes to protect private rights, the public and the actual impartial rule of law.

5. This case relates to the important question as to whether federal judges should be corrected within the purview of the Constitutional limits without government compelled waiver of their 5<sup>th</sup> Amendment right in 1. Cases and controversies and 2. By impeachment, so as not to vitiate the 5<sup>th</sup> Amendment Equal Protections and right to a fair and impartial forum disciplinary proceedings or regulations of claimants would cause some claimants before the partial forums to suffer. This requires the court entertain and encourage and not chill attorney complaints to correct mistakes and misconduct by the judiciary.

6. Federal Judges affirmed they would “administer justice without respect to persons, and do equal right to the poor and to the rich,” even people whose religious-political beliefs judges disagree with, find repugnant or illogical, including me in my private capacity, regardless of my license to practice law. 28 U.S.C.A. § 453

7. This conflict of interest between Judge Scirica and I relates to whether attorney disciplinary proceedings and certain rules and judicial discipline violate the Constitution by requiring officers of the court to defer towards business interests of the courts, attorneys or the professional’s who are charged with discipline, even peers, at the threat of personal punishment instead of the Constitutional application to the rule of law in violation of the supremacy clause.

Lawyers and judges are tempted to adhere to the lesser regulatory laws to protect themselves instead of the Constitutional application of the rule of law to uphold the rights of those they serve, the parties, their clients, the public and their private exercise of fundamental right to religious belief in violation of the Equal Protections Clause of the 5<sup>th</sup> applicable to the Federal government and the 14<sup>th</sup> to States by disparately treating claimants whose beliefs conflict with the Disciplinary regulations' purpose.

8. The US Supreme Court appears to enslave the courts to the fickle fads of the public in *Williams-Yulee v. Fla. Bar*, 575 U.S. 433, (2015) decision instead of the impartial Constitutional application to the rule of law by holding, "States have a vital interest in safeguarding public confidence in the fairness and integrity of elected judges; the judiciary's authority depends in large measure on the public's willingness to respect and follow its decisions." This finding creates injustice by legitimizing an illegitimate purpose by finding courts must appease dictates of the mob or the majority at the sacrifice of every individual liberty upon approval of the collective authority of public perceived opinions. Justice is not a matter of popularity. Justice is a matter of truth, leaving leeway for appeal should judges get it wrong. The USSC errs in *Williams v. Pennsylvania*, 579 U.S. 1, (2016) by thinking, "Both the appearance and reality of impartial justice are necessary to the public legitimacy of judicial pronouncements and thus to the rule of law itself." As citizens we are required to uphold the Constitutional positions of congress, the courts and Congress, even if the public disagrees. It is not for the public to decide based on mere appearance. As a Christian I believe Jesus Christ's command not to judge based on appearance but rightly based on truth in *John 7:24*. I believe Jesus is God and Jesus is correct. The Courts err. The potential for actual injustice and the appearance of injustice must be to protect actual parties, not the fancies of the public or the alleged legitimacy of the

courts, and certainly not the rule of law as this promotes sin, aka lawless lusts, to serve partial favor of the courts at the cost of sacrificing the people and their liberty they are charged to protect. 28 U.S.C.A. § 453 There is no social contract by citizens with the government. There is no meeting of the minds. There is a contract with every government employee to accept reduced Constitutional rights in order to uphold the liberties of those they serve, even those the government disagrees with. *Id.* Justice is never a matter of popular opinion. Injustice occurred when Jesus Christ an innocent man, God himself died on the cross because Pilate allowed the mob to reign instead of the impartial rule of law. (*John 19:4-6*) Not all laws nor all sins lead to eternal death. Jesus indicated those who handed him over committed a greater sin. (*John 19:11*) I commit a sin if I do not correct the court to prevent the believed overthrow of the judiciary. I believe the US Supreme Court gives Congress case law to be used to impeach judges to actually cause public disrepute of judges. I have a duty to protect judges from harmful choices that may remove them from their seats based on fancies not truth but partiality towards fickle public opinion based on mere appearance. I was really upset after I read the judicial nominee questions Judge Phipps responded to because he alleged a duty to mere men's precedent as if they were mini-gods not the Constitutional rule of law. I read a recent decision where USSC told lower courts it must obey it. So, I am realizing judges are stuck. Only lawyers have the power to tell judges they are wrong or upper Courts are wrong as advocates. Lawyers must be permitted to do so, even if the lawyer errs, to prevent actual injustices the courts may not consider without the aid of an attorney advocate. With that said, I am concerned about judges lobbying while acting as attorney advocates on behalf of case law they favor by teaching in schools and speaking at special interest groups where not all of the population agrees with judicial partial views by a judge or special interest groups. Ultimately, I think it is up to lawyers to advocate for justice,

even if the courts disagree with them. Allowing regulation or discipline of federal judges creates injustice and should be stopped, while disagreement by attorney advocates should be permitted. Judges must not act as attorneys to grant themselves favor at the cost of prejudicing the public and lawyers in their public and professional capacity.

9. Judge Scirica has a conflict of interest with my case I was not aware of until recently. Judge Scirica chairs the Committee on Judicial Conduct and Disability. (*Kelly v Trump*, 21-1490, *Kelly v Swartz*, Civil Rights Docket Item (“CRDI”) CVDI 149.)

10. I contest the federal judicial disciplinary rules Judge Scirica drafts on Constitutional grounds. I oppose the elimination of life time limits on US Supreme Court justices and believe district court and Circuit Court judges should have life time appointments to prevent them from the temptation to normalize injustice by partiality to the Disciplinary rules as opposed to the preempting Constitutional application of the law, on religious grounds as a party of one with religious beliefs in God’s command against favoritism and for justice in the courts.

11. I declared my belief regulating the Court violates the constitutional rights of citizens the court serves, including me as a party of one, and allows for the schemed overthrow to occur in the DE District Court prior to discovering the conflict between Judge Scirica and I. Regulating the Court through disciplinary rules guarantees the partiality of the Court to the interests of those who discipline them instead of the impartial application of the rule of law. (Examples, (CRDI) 23, concerning my belief only the courts may prevent an economic crash and an overthrow of our government, CRDI-53,-55,56, 78, 95, 102, 104, 114, 127, 129, 131, CRDI 149-162). Favoritism towards those who serve the alleged professions’ collective convenience, productivity or the individual judge’s future or current seat or highly esteemed position creates unfair proceedings when conflicts arise. I seek to declare the disciplinary rules Judge Scirica

drafts are unlawful by amending my complaint in the civil rights proceeding to make that argument . I included certain arguments against certain DE Attorney Disciplinary rules and the Attorney Disciplinary proceedings I incorporate herein by reference but intent to reserve my right to include more arguments in the Civil rights proceeding, even if on appeal to the US Supreme Court in Kelly v Swartz at 3DI-43-8, 3DI-43-9, 3DI 43-10. Judge Scircia denied me the opportunity to be heard on my arguments, by denying my right to amend to contest certain state rules. Attached hereto please find my Motion for ECF rights in the District Court below, which I incorporate herein b reference in its entirety, wherein I contested an additional, different Delaware Disciplinary rule I wish to include in a complaint Del. Law. R. of Disciplinary Proc. Rule 7(d). DI 31.

12. The fact I argued on the record in the civil rights case, my desire to eliminate or prevent disciplinary rules of federal judges and the United States Supreme Court creates a conflict of interest. The appearance of a conflict requires a recusal and a new panel who is not swayed by Judge Brilliant mind and perceived expertise in a subject I disagree

13. I seek to amend my complaint in the civil rights case to include Constitutional arguments against the state disciplinary rules and proceedings against attorneys. I incorporate some not all of my proposed arguments against rules I proposed to the Delaware District Court at DI 58, and two state motions, incorporated herein at 3DI-43-8, 3DI-43-9, 3DI 43-10.

14. I oppose attorney self-regulation and third party professional regulation through professional boards on Constitutional grounds, on 1<sup>st</sup> Amendment religious grounds, on grounds the rules violate the Constitutions' 5<sup>th</sup> and 14<sup>th</sup> Amendment right of Equal Protections and procedural due process.

15. Standardized compelled practice eliminates free will needed to protect Constitutional freedoms of clients and professionals who do not conform to the standards. Standards makes professional practices above the law by deference of the courts to the standards even when such standards harm, oppress, kill, steal and destroy human life and health for the bottom line. The standards create partiality to profit, productivity not justice.

16. The conflict of interest between Judge Scirica's interest in carefully drafting federal disciplinary laws that mimic the disciplinary laws and disciplinary proceedings I seek to declare unconstitutional in the civil rights case, and in this case is prejudicial as a matter of fact, a matter of law as to create manifest injustice against me should the Order not be overturned.

18. "The Fourteenth Amendment's due process clause may sometimes demand recusal even when a judge has no actual bias." *Citing, Rippo v. Baker*, 580 U.S. 285, 137 S. Ct. 905, 197 L. Ed. 2d 167 (2017).

19. Recusal is required under the Fourteenth Amendment's due process clause because "objectively speaking, the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." *Id.* In my case the probability that Judge Scirica would deny me the mere opportunity to be heard to contest the disciplinary rules he works on, or mirror the rules he works on, is too great as to cause actual in addition to apparent partiality to my claims and future claims, and past claims in other cases.

20. It is especially notable as two forums, the USSC and the DC ODC appeared to accept my argument the reporting requirements violate the 5<sup>th</sup> Amendment right against self-incrimination.

21. It was clear error of law for Judge Scirica and Judge Phipps to fail to disqualify themselves in this proceeding. A reasonable person would question the partiality of both Judge



Scirica and Judge Phipps under the facts of this case. “[A} reasonable person, knowing the relevant facts, would expect that the [Judge Scirica and Judge Phipps knew of circumstances creating an appearance of partiality, notwithstanding finding that the judge was not actually conscious of those circumstances. 28 U.S.C.A. § 455(a). *Liljeberg v. Health Servs. Acquisition Corp.*, 486 U.S. 847, 108 S. Ct. 2194, 100 L. Ed. 2d 855 (1988)

21. “The operative inquiry is objective: whether, ‘Considering all the circumstances alleged,’ *Rippo*, at 907, ‘the average judge in [the same] position is likely to be neutral, or whether there is an unconstitutional potential for bias,’” *Citing, Isom v. Arkansas*, 205 L. Ed. 2d 373, 140 S. Ct. 342, 343–44 (2019) *Citing, Williams v. Pennsylvania*, 579 U.S. 1 (2016).

22. Considering all of the circumstances a reasonable person would find no judge in the position of Judge Scirica could ignore the potential unconstitutional bias based on the fact I am attacking his personal, hard work regardless of the fact he may not have a pecuniary stake other than the esteemed position of drafting the rules that regulate his peers which I seek to argue are unconstitutional in another case and potentially this case to prevent standardization of the court to an extent to allow the automation of the Court like certain courts in China have become peopleless, per the attached article without an exhibit page. <sup>1</sup> Those whose exercise of individual

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<sup>1</sup> *Isom v. Arkansas*, 205 L. Ed. 2d 373, 140 S. Ct. 342, 344 (2019) (At the same time, the Court has acknowledged that “[a]llowing a decisionmaker to review and evaluate his own prior decisions raises problems,” *Withrow*, 421 U.S. at 58, n. 25, 95 S.Ct. 1456, perhaps because of the risk that a judge might “‘be so psychologically wedded to his or her previous position’” that he or she will “‘consciously or unconsciously avoid the appearance of having erred or changed position.’” *Williams*, 579 U. S., at —, 136 S.Ct., at 1906 (*quoting Withrow*, 421 U.S. at 57, 95 S.Ct. 1456). And it has warned that a judge’s “personal knowledge and impression” of a case may sometimes outweigh the parties’ arguments. *In re Murchison*, 349 U.S. 133, 138, 75 S.Ct. 623, 99 L.Ed. 942 (1955).)

*Liteky v. United States*, 510 U.S. 540, 114 S. Ct. 1147, 127 L. Ed. 2d 474 (1994)(“Extrajudicial source is not the only basis for establishing disqualifying bias or prejudice;

not collective liberties which do not fall within the purview of the standards through automation in the peopless courts in China are not free, but compelled to mob rule for the convenience of court business.

23. In *Laird v. Tatum*, 409 U.S. 824, 93 S. Ct. 7, 34 L. Ed. 2d 50 (1972), Justice Rehnquist held that “Supreme Court justice has a duty to sit where not disqualified which is equally as strong as the duty to not sit where disqualified. (Per Mr. Justice Rehnquist, on motion to recuse.) 28 U.S.C.A. §§ 453, 455.

24. Thus, I requested an e banc hearing on the paper so as to remove any misplaced belief Judge Scirica would violate some dual duty. Merely because I seek to litigate against the rules he works on as Chair should not be taken as an attack upon him.

25. I seek an en banc hearing, **on the paper**, in order not to vitiate my access to the courts by causing a substantial burden upon my access to the courts due to costs, religious beliefs against debt for transcripts, health, and compelled violations of involuntary servitude to pay off debt I incorporate herein by reference in 3DI-19, and in the attach pleading filed in another court to be heard on the papers. I also made this request for an en banc hearing in the Civil case, where unfortunately Judge Scirica presided on all unconstitutional rulings.

26. The US Supreme Court held in *Williams v. Pennsylvania*, 579 U.S. 1, 14, 136 S. Ct. 1899, 1909, 195 L. Ed. 2d 132 (2016):

“Having determined that Chief Justice Castille's participation violated due process, the Court must resolve whether Williams is entitled to relief. In past cases, the Court has not had to decide the question whether a due process violation arising from a jurist's failure to recuse amounts to harmless error if the jurist is on a multimember court and the jurist's vote was not decisive. See Lavoie, supra, at 827–828, 106 S.Ct. 1580 (addressing “the question whether a decision of a multimember tribunal must be vacated because of the participation of one member who had an interest in the outcome of the

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it is the only common basis, but it is not the exclusive one, since it is not the exclusive reason a predisposition can be wrongful or inappropriate. 28 U.S.C.A. §§ 144, 455”)

case,” where that member's vote was outcome determinative). For the reasons discussed below, the Court holds that an unconstitutional failure to recuse constitutes structural error even if the judge in question did not cast a deciding vote.”

27. Accordingly participation and recusal of Judge Scirica in the civil rights case and in this case, even if he was not the deciding vote required is required as a matter of law, as a matter of fact creating manifest injustice against me by vitiating my fundamental rights including the First Amendment right to petition the courts to demand the courts uphold my fundamental rights instead of exhibiting unlawful partiality and deference to sister courts in violation of the 5<sup>th</sup> Amendment Equal Protections components by courts protecting their own interest and not the Constitutional preempting liberties of the people they swore an oath to serve. I argue the courts must not punish lawyers for petitioning to safeguard Constitutional laws that protect claimants and their own private acts, but must allow it to protect the impartial rule of law, prevent regulation and preserve these United States from schemed overthrow.

28. Judge Scirica and Judge Phipps abused their discretion by not recusing themselves committing clear error of law, error of fact, creating manifest injustice against me by the Order, dated June 20, 2023 attached hereto as Exhibit A. It is especially damaging since Judge Phipps signed the Orders on June 30, 2023. Thus, I require a new panel or an en banc panel to please review this motion to eliminate the appearance of a conflict of interest, and an actual conflict of interest, so as not to deny me procedural Due process and vitiating of my fundamental rights. US Amend I, V, VI, XIII, XIV.

29. This law suit arises based on my private exercise of the 1<sup>st</sup> Amendment right to petition in a law suit against former President Donald J. Trump (“Trump”) to dissolve the establishment of government religion that created and continues to create a substantial burden upon my religious exercise. I incorporate herein by reference the pleadings I filed in *Kelly v.*

*Trump* at Third Circuit Docket Item (“3DI”) 3DI21-4. I am a Christian, who associates as a Catholic who places her faith in God, not the church or priest as God. See, 1 *Corinthians* 2:5, *Matthew* 23:8, *John* 14:1.

30. The State of Delaware admitted it placed my license to practice law on inactive disabled but for my private-exercise of the First Amendment rights to petition in *Kelly v Trump*, exercise religious belief, exercise of belief, association, my private First Amendment right of protected speech to outline my genuinely held religious beliefs in *Kelly v Trump*. See, DE Disciplinary petition at 7 at 3DI21-6, August 23, 2021 letter 3DI21-7. Though evidence shows they also colluded based on my private exercise of the right to petition concerning bar dues, and private right to petition both the Chancery Court and Delaware Supreme Court concerning procedural due process defects caused by its own members and agents. *Id.* See, A-4, *Appellant’s Motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, and exhibits thereto, Exhibit 55 of the brief below, the December 1, 2020 letter regarding due process concerns to the Master, and the October 19, 2020 letter to the Master regarding the fact I am pro se, not represented by counsel, and, A-5. Appellant’s Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation, Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, Feb. 5, 2021 request for relief from bar dues, my concerns relating to recent US Supreme Court cases. Citing, (3DI-21-4.)*

31. I discovered the Delaware Supreme Court incited its arms to attack me during *Kelly v Trump* in an attempt to cause me to forgo my First Amendment right to petition since the

Delaware arms, Judge Kenneth Clark of the CCP, and DE-Lapp communicated information only the Delaware Supreme Court had as reasons for the attacks, namely my bar due petitions.

32. Per the attached email I sent to Judge Diamond the e-filing service showed the DE Court also sought to fix the decision on appeal in *Kelly v Trump* to prevent the USSC from seeing the alleged procedural due process violations by DE Supreme Court members and staff. (Exhibit B) Then the State-Court fired staff to cover up its own misconduct while preventing me from subpoenaing the witnesses to conceal the cover up by affording me 8 days when the rules require 10 to subpoena witnesses for hearings. The state court denied me the right to self-represent, notice, a fair opportunity to be heard and other denials too numerous to include herein. I attach my appellate brief in the civil rights case, Exhibit C, the motion for reargument of denial of my appeal, Exhibit D, and my Reply in the original disciplinary proceeding as Exhibit E and incorporate herein in its entirety for more detail.

33. The attached letter, labeled Exhibit F shows the Delaware Supreme Court participated in witness tampering, vitiating my First Amendment right to petition, First Amendment right to speech, religious belief, association, procedural due process and other violations which occurred during *Kelly v Trump* by copying the Disciplinary Board Administrator Karlis Johnson on my request to excuse notary requirements during the global pandemic, especially since President Trump had covid at the time of my request, dated October 20, 2020.

34. The DE Disciplinary proceeding was also brought to conceal the DE Supreme Court's misconduct in sealing petitions where I allege the DE Court committed violations of my right to petition in violation of procedural due process without providing me, a party in *Kelly v*

*Trump* notice or an opportunity to be heard to prejudice my case, and schemed state disciplinary case. (3DI 21-5)

35. This reciprocal case was brought based on Delaware adjudicating me disabled, but for religious speech outlined in my Religious freedom restoration Act petitions in Kelly v trump.

36. It is my private religious belief President Trump reflects the image of the devil by business greed at the cost of human life and liberty unrestrained by love written on his heart or the just rule of law to prevent him from oppressing, enslaving, controlling, killing, stealing and destroying human life or liberty to get as much as he can for as little as he can.

37. It is my private genuine religious belief Trump teaches people to reflect the image of the devil to give into temptations to do what they want, chase happiness, serve lawless lusts, their own desires or the desires of their own family or people, to the extent they oppress and harm others to serve their own, causing harm here and loss of eternal life unrestrained by love written on the hearts of the saved or the just rule of law.

38. I believe judges may choose to save not only the victims of other people's sins, but the eternal lives of wrongdoers by transforming them into right doers, by no longer sacrificing human life and liberty to serve business greed. *Amos 5:15, Matthew 23:23.*

39. Former President Trump nominated Judge as nominees to become US Supreme Court justices. President Trump is running for President in 2024. I believe Trump will likely be reelected.. Trump will likely nominate Judge Phipps again should President Trump be elected and another justice retires.

40. My religious belief President Trump served lawlessness, also known as sin, under the color of religious and secular law presents a conflict of interest with Judge Phipps' personal stake in supporting Trump to gain a seat at the highest Court. Trump may grant him a life-long appointment as US Supreme Court justice. This creates at least the appearance of a conflict so great a reasonable person would question the prejudice and notice the bias to violate my right to a fair proceeding and due process. US Amend V.

41. Merely because I note this inherent temptation to rule against me to serve his own political position should not be taken as a negative reflection upon Judge Phipps. The conflict of interest in this case would tempt the common man to corrupt justice unconsciously.

42. Judge Phipps conflict is exacerbated by the fact I seek to void Kelly v Trump due to procedural due process violations that shock the conscience to allow for another law suit against Trump.

43. Judge Phipps may be offended by my religious beliefs contained in my petitions, or at least create the appearance of bias by the temptation to be partial towards the one who may and will likely benefit him. This creates the appearance of impropriety and possible actual impropriety I seek to prevent.

44. I respect Judge Phipps, but this case requires his recusal. My complaints about President Trump's misconduct in profaning my God's Word for his own vanity should not be attributed to this well respected judges. Nevertheless, the appearance of conflict is too great to allow Judge Phipps to judge me in this case. Judge Phipps violated due process and my right to an impartial proceeding by participating in the Orders, dated June 30, 2023.

45. “[Judge Phipps and Judge Scirica’s] unconstitutional failure to recuse, in violation of due process, constitutes structural error not subject to harmless-error review, even if the judge in question did not cast a deciding vote on a multimember court.” *Williams v. Pennsylvania*, 579 U.S. 1, 136 S. Ct. 1899, 195 L. Ed. 2d 132 (2016). However Judge Phipps appeared to so participate making the violation even more grave.

46. “A multimember court must not have its guarantee of neutrality undermined, for the appearance of bias demeans the reputation and integrity not just of one jurist, but of the larger institution of which he or she is a part.” *Id.*

47. This I require both judges be recused.

34. Under objective standards in my case, “ the probability of actual bias on the part of the [Judge Phipps and Judge Scirica] is too high to be constitutionally tolerable.” (*Rippo v. Baker*, 137 S. Ct. 905, 907 (2017), Citing *Withrow v. Larkin*, [421 U.S. 35, 47](#), [95 S.Ct. 1456, 43 L.Ed.2d 712](#) (1975); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 872 (2009)). “The *Tumey* Court concluded that the Due Process Clause incorporated the common-law rule that a judge must recuse himself when he has “a direct, personal, substantial, pecuniary interest” in a case. *Ibi*” *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). In this matter, Judge Scirica;s personal interest in opposition to my claims is too prejudicial to my case to afford me a fair proceeding. US Amend I, V.

35. ““A fair trial in a fair tribunal is a basic requirement of due process.” *Murchison, supra*, at 136, [75 S.Ct. 623](#)” *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). The Court cannot grant a fair proceeding with Judge Scirica’s participation, and this Court violated due process by allowing Judge Phipps participation in the June 30, 2023 Orders.



36. “The Court asks not whether a judge harbors an actual, subjective bias, but instead whether, as an objective matter, the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias” *Williams v. Pennsylvania*, 579 U.S. —, —, —, 136 S.Ct. 1899, 1905, 195 L.Ed.2d 132 (2016) (“ (internal quotation marks omitted).”); See, *Rippo v. Baker*, 137 S. Ct. 905, 907 (2017) (“we did not hold that a litigant must show as a matter of course that a judge was “actually biased in [the litigant's] case”)

37. Should this Court find Justice Phipp’s actual participation and Judge Scircica’s potential involvement violated due process, I seek relief from this court to prevent needless waste of judicial resources.

38. The “Federal Rules of Civil Procedure treat orders that are entered without due process as void, permitting reopening of the case. U.S.C.A. Const.Amend. 5; *Fed.Rules Civ.Proc.Rule* 60(b)(4). The panel’s inclusion of Judge Phipps violates Due process. US Amend I, V.

39. Reopening the case would be needless should this court grant this motion on recusal.

40. To prevent the need to reopen the case, I move this Honorable Court pursuant to US Amendments I, V, and Federal Appellate Rule 2, for good cause for a new panel to consider my Motion for a Rehearing on Denial of the original Appellate Brief find out Third Circuit Docket Item (“3DI” 3DI-199).

41. Federal Rules of Appellate Procedure Rule 2 provides, “On... a party's motion, a court of appeals may for good cause-suspend any provision of these rules in a particular case and order proceedings as it directs.” Fed. R. App. P. 2

42. Since granting my motion for a rehearing on the denial of the recusal of Judge Phipps and Scirica would show a procedural Due Process violation of my right to a fair trial occurred by requiring a recusal, I would be left without a remedy before this Court unless the Court suspends the rules of Rules “for good cause” to uphold my right to a fair and impartial forum to safeguard my exercise of fundamental rights without punishment and elimination of my liberties and property interests in my licenses to buy and sell as an attorney but for my religious belief in Jesus Christ as God, not mammon, money and material gain as God. Citing Bible, *Matthew 6:24*. Appealing the Matter before the US Supreme Court would be a waste of resources for all should this Honorable Court require the recusal of Judge Phipps and Scirica. Thus, this Court must suspend the rules to prevent waste of resources and likely elimination of my Constitutional rights

43. I have shown good cause to suspend the Rules to allow a different panel to consider my Motion to vacate order at 3DI-37, Motion to correct motion to vacate at 3DI-38, 3DI-40, Motion by Appellant to Correct the Record, at 3DI-41, Motion for time, at 3DI-42, and Motion to stay at 3DI-45, should this Court grant my motion for reargument to recuse Judge Phipps and Judge Scirica. Id. Safeguarding my Constitutional rights also shows good cause.

44. I move for a panel on the papers only since poverty creates a substantial burden upon my access to the courts, and the cost for a transcript and to travel are so great under my circumstances as to deny me the First Amendment right to petition to defend my exercise of my Constitutional rights.

45. I also do not feel well. I had surgery as a teenager I apprised this Court and every court of and assert my religious exercise of belief to the right to live.

46. I move this panel for reconsideration on the papers only in order to sustain my health. I am required to take time to drink inordinate amounts of water and rest that the average person does not require to stay alive. I require time to sustain my health. A hearing would take away time.

Wherefore, I pray this Court grants this Motion.

Dated July 3, 2023

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
Inactive license  
34012 Shawnee Drive  
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[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(6272 words) PRO SE



# Exhibit L

(accidentally filed in Both cases 3DI 208-  
21-3198)

(correctly filed in 22-3372, 3DI-49)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT No. 22-3372
Respondent, Appellee	§	
v.	§	DISTRICT COURT No. 22-45
United States District Court,	§	District Court Judge
Eastern District of Pennsylvania	§	Judge Paul S. Diamond

Appellant Respondent Meghan Kelly’s Motion for leave to exceed the word and page limit in her motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023

I Appellant Meghan Kelly, pursuant to the Court’s equitable powers and Federal Rules Appellate Procedure Rule 2, right to Equal Protections, a fair proceeding and access to the courts, given physical limitations I noticed this court on, poverty and religious beliefs against debt, and assertion of my right against involuntary servitude under the 13th Amend, and time constraints, and any other applicable rule this Court deems just move this Court to permit me to exceed the word limit in my Motion for leave to exceed the word and page limit in her motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023 (hereinafter “motions”).

1. I Meghan Kelly, for good cause, respectfully request, the Word limit be excused in the above captioned Motions.
2. I filed the motions under great duress, and have limited means and time to research, due to health and poverty conditions creating a substantial Burden.
3. This Court rendered 6 Judgments against me on June 30, 2023, I have until July 14, 2023 to file Motions for reconsiderations on the 6 Orders. I do not have access to lexis or Westlaw research at home. In order to gain access I must go to the law library. The law library is closed and I have limited means to pay for gas in order to travel the round trip which is about 40

miles. I do not know how I will have time to research and draft motions in light of the heavy 4<sup>th</sup> of July traffic, costs and my limited means. I am trying to do so while not waiving my rights before your Honorable Court, and other forums.

4. I also must appeal a June 30, 2023 decision in Kelly Swartz, DE District Court Number 21-1490, Third Circuit Number 21-3198, the Civil rights case relating to similar subject matter and additional facts and issues or otherwise seek to sustain my case against the Delaware Supreme Court, Delaware Disciplinary Counsel and Board for equitable relief, damages and nominal damages.

5. The amount of words I request I exceed the 3,900 limitation in my is 2,378, in the amount of 6,272 words.

6. I thought about bifurcating the motions into two motions, but I do not feel well at all, and do not have time in light of the fact I must file a Motion for reargument on the unexpected order or orders by this Court, dated Friday June 30, 2023 by Friday July 14, 2023, pending this court's determination on the papers filed herewith. Obviously, if this Court grants a new panel to review all of the Motions contained in 3DI-47 I may not be required to file motions for reargument on the same by July 14, 2023. 3DI 47-48.

7. Receiving the three Orders from the Third Circuit during a holiday weekend when loved ones were visiting nearby was tough. I am not allowed to upset my family and get into trouble when I talk about thins. Then, I get into trouble for not talking about things. I told my parents and they threatened to cut off my phone again and to kick me out. I love them, but they are freaked out by all of this.

8. I am reasonably emotionally distraught too.

9. I thought about drafting a motion indicating I might just take a disability inactive order as I require time and a stay in order not to be compelled to violate my right to private religious belief to sustain and restore my health and religious exercise of life, and to safeguard my right to petition in fairly in this case and other cases, so as not to be compelled to draft subpar pleadings to prejudice me by government force, not free choice.

10. I do not have time to draft a brief, and to fight this case while I will overturn the civil rights case and fight multiple Defendants in the civil case which will require all my resources. I do not know what I will do. It appears I have limited time until July 14, 2023 to figure it out. I am not acting in bad faith. I am asserting my rights imperfectly under government compelled conditions in order not to waive my rights.

11. If I do not overturn the Order in this case, I will likely have 6 new law suits against me based on a new order, or at least the USSC, since their Rule 8 does not include disability only a lawsuit for discipline.

12. I am prejudiced at the threat of 6 new law suits if I do nothing. I need time to research and think instead of being compelled to act against my will to harm myself for the pleasure of the court who is charged to uphold asserted, not waived Constitutional rights for all, even those they disagree with, even me.

13. Even appealing this law suit to the USSC places me in danger. I think that is why the USSC denied my request to link Appeal 22-7695 with application 22A981 in order not to waste judicial resources to begin needless additional law suits by the USSC and other courts.

14. This case arising from reciprocal discipline of a Delaware Order placing my license on inactive/disability relates to a petition I brought against former-President Donald J.



Trump under the Religious Freedom Restoration Act to protect my exercise of belief in Jesus Christ without government sponsored persecution in the state of Delaware.

15. I had to assert my right to live and not die for the sinful vanity of others when I had the means to go to the gym to care for my health and life by drinking gallons of waters. Now I am without means and time required. I am suffering. I provided doctors' notes and pictures previously. My vision is becoming blurry again. I do not want to lose my eye sight because of denied requests for time required I to sustain my life. The severe dehydration I have due to a surgery and due to the exacerbation the pressures of the government has placed upon me endangers my health and life.

16. The Court has 6 different cases worth of information in the voluminous pleadings in both Third Circuit matters. I am overwhelmed. I imagine the court the Court is overwhelmed of the 20 years of DE Court religious discrimination and place of origin discrimination against me and the voluminous amount of information relating to this case. Yet, the Court must fulfill its duty by granting me an actual opportunity to be heard in accordance with the 5<sup>th</sup> Amendment procedural due process requirement by reviewing the voluminous pleadings, without violating the Equal protections component of the 5<sup>th</sup>, based on bulk of asserted rights and evidence.

17. I think I must request a stay to grant this court time it requires and time I require. I am still not sure what I will do. I have until July 14, 2023. I do not feel no well at all. I do not want to die. When I affirmed in a letter to the Eastern District Court I collapsed due to dehydration at the post office, the Court cared not if I died.

18. I actually got the shingles in the DE disciplinary proceeding and was forced to attend sick while being denied my asserted right to subpoena witnesses while the Court lied before God and men saying I had time to call them when the rule says you must call witnesses

within 10 days. There was only 8 days before the hearing, which made it an impossibility to adhere to the time constraints.

19. I have not waived my right to a fair proceeding in any case given my limitations, poverty, religious belief, and stated right to religious belief to care for my health and not die. I provided this court with my health records unashamed relating to the bad health care I received which has weakened me for life requiring I take time to alleviate the harm in order not to die for the sinful vanity of men, for wicked lawless lusts the desire for convenience, productivity, profit and avoidance of costs. I believe those lusts reflect the mark of the beast in the Bible. Human sacrifice for material gain is always naughty. It serves greed not humanity. If business, even the courts own business, is left unrestrained from killing, oppressing, harming and stealing life and health to sustain problems, position and profit than businesses are above the law, and there is no free man or women. We are just slaves to serve the way to hell unrestrained by love written on the hearts of men or just decrees by the courts to save lives and eternal lives.

20. I am a child of God, a believer in the Word which is not the Bible but in the holy spirit leading certain people in the bible and people today. I believe in God the father son and holy spirit. My God will exist even if all bibles are eliminated or changed. The elimination or the desecration of the Bible appears to be part of a global agenda in decades to come. My God is, even if no Bibles exist. With the death and resurrection of Jesus Christ, God's law guiding us not to be tempted by lusts to love God and one another is written on the hearts of men to accept or reject according to the inspired prophesies of Jeremiah in Chapter 31. These are my religious beliefs. I do not force the force the court to adopt my religious beliefs. Yet I do recognize this court may save lives and eternal lives and is our hope of a hero by "justice in the courts." Justice is never vengeance, even if it disagrees with my private beliefs. Citing *Amos*

5:15. Vengeance is God's not ours, and those who take vengeance on others or use people as an example by punishing them disparately in violation of the Equal Protections Clause to compel the populace to conform to the will of the state or government backed partners violate my God's law on impartiality and against favoritism. Favoritism is not excused by favoring people in associations and disfavoring those who disagree with associations we are members in. See, *Exodus* 23:6 ("You shall not deny justice to the poor in their lawsuits."); *Deuteronomy* 1:17 ("Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God."); *Deuteronomy* 16:19 ("Do not deny justice or show partiality. Do not accept a bribe, for a bribe blinds the eyes of the wise and twists the words of the righteous."); *Isaiah* 10:1 ("Woe to those [meaning damned to hell are those should they not repent] who enact unjust statutes and issue oppressive decrees, 2to deprive the poor of fair treatment and withhold justice from the oppressed of My people, to make widows their prey and orphans their plunder.").

21. The Fifth Amendment to the United States Constitution provides: "No person shall be . . . deprived of life, liberty, or property, without due process of law . . ." U.S. Const. amend. V.

22. Due Process relates to the administration of justice, and thus the due process clause acts as a safeguard from arbitrary denial of life, liberty, or property by the Government outside the sanction of law. I

23. I assert my right to due process for the exercise of my private First Amendment right to religious belief, exercise of belief, property interests in my license, association, petition, speech and Equal protections in the form of an accommodation by allowing additional words and pages for good cause due to substantial hardship and lack of time to exercise the 1<sup>st</sup> Amendment

Right to petition fairly in this case, as I also seek to safeguard my rights in other cases without government compelled but forced waiver.

24. The Delaware original disciplinary case and this reciprocating case represents examples of government persecution based on my exercise of religious beliefs, contained in my speech in my petitions to the Delaware Courts.

25. In the August 23, 2021 letter DE Disciplinary Counsel indicated my religious beliefs contained in my speech contained in my private-religious petitions is the source of their concern of my mental fitness to practice law. In the DE ODC's petition at 7, the Disciplinary Counsel points to my references to the bible e, as evidence of a disability. Third Circuit Docket Items ("3DI") 3DI-3, page 34, and 3DI21-4.

26. This Reciprocal Order by Appellee is based on the Delaware Order I seek to overturn based on lack of subject matter jurisdiction since the DE Supreme Court acted as witness, judge and prosecutor's assistant.

27. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888). This Court must grant my request to prevent injustice by denial of words which essentially denies me the opportunity to be heard in defense of my religious speech reflecting my religious beliefs in my Freedom of Religion Restoration Act Complaint against former President Donald J. Trump. US Amend I, V. 3DI 21-4 pages 126 through 248.

28. This Court must grant my request for additional words to prevent government abuse against my person, oppression, and injustice. It is difficult for me to ask the Court persecuting me for my belief in Jesus, for help.

29. Nevertheless, the Constitutional issues must be addressed in this case as well as the civil rights case to protect not only me, but others beyond me from professional government backed persecution based on exercise of fundamental rights.

30. A professional's private exercise of First Amendment exercise of speech, association, religious belief, religious exercise, and the right to petition to defend the exercise of Constitutional freedom in their private capacity must not be eliminated in exchange for a mere license.

31. I must not be compelled to violate my religious belief by compelled religious violations of my belief in order to regain my license.

32. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. See, *Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced*, et. al, No.15-105, 2015 WL 5013734 (US).(The Court allowed references to the bible in other RFRA petitions); See, *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") *Also see, Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.), cert. denied, 456 U.S. 908 (1982); ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly

and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim.”); *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa 1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, (1969) (holding that “the First Amendment forbids civil courts from” interpreting “particular church doctrines” and determining “the importance of those doctrines to the religion.”); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934; See, *Holt v. Hobbs*, 574 U.S. 352; *In re Eternal Word Television Network, Inc.*, 818 F.3d 1122, 1140 (11th Cir. 2016)(“The Supreme Court cautioned that "federal courts have no business addressing" such questions of religion and moral philosophy.” (Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

33. “To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right.” *Minn. Ass'n, Health Care v. Minn. Dept., P.W.*, 742 F.2d 442, 446 (8th Cir. 1984); *Citing, Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963).

34. “The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established.” *Citing, Jones v. Board of Education*, 397 U.S. 31, 34 (1970); *E.g., Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v.*

*Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Trucking Co. v. Railroad Comm'n*, 271 U.S. 583, 593-594; see *Van Alstyne, The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); Comment, *Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: ("One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.")

35. "Neither the state in general, nor the state university in particular, is free to prohibit any kind of expression because it does not like what is being said." *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970)

36. The United States Supreme Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at \*15 (June 27, 2022) held, "Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities."

37. In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state's punishment violated the Coach's first Amendment right applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

38. I must argue this case must be extended to me to prevent the state, federal government and additional governments' including Appellee's punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my petitions, no matter how repugnant or illogical my religious beliefs appear to the state and Federal government.

39. Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law, by making professionals the law, by self-regulating, money, not freedom, or the people, is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined.

40. I require more words to ask the Courts to exercise more of their power to prevent professionals from governing the nation as opposed to government elected or appointed impartial servants without a stake in the outcome against the accused, in terms of position or sustaining profit.

41. Additional words are needed not only to protect the Constitutional rights of the accused, but to improve the world, by allowed criticism, free speech, free enterprise, which helps professionals learn, and improve, not forced conformity under the threat of secret proceedings against professionals who think or believe differently.

42. The Courts guarantee injustice by making business the law. Making professionals who exercise private rights, including their religious beliefs in jeopardy of losing their ability to buy and sell merely for not adopting the governments' or government backed religious or secular belief in money and professional material gain and convenience as God and guide.

43. The Words are needed to argue, under the unique facts of this case in defense of my ability to buy and sell as a professional lawyer but for my exercise of my fundamental rights.

Wherefore, I pray this Court grants my motion.

July 4, 2023

Respectfully submitted,  
/s/Meghan Kelly  
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# Exhibit M

(DI 50 in 22-3372, Required Affidavit)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	Judge Paul S. Diamond
Eastern District of Pennsylvania	§	

Petitioner Meghan Kelly Affidavit in Support of Recusal of Judge Phipps, and Judge Scirica

Comes now Plaintiff Meghan Kelly, I declare and affirm that the foregoing statement is true and correct.

1. I certify this affidavit is made in good faith to prevent manifest injustice against me by vitiating my Constitutional rights by bias and prejudice so great by Judge Scirica and Judge Phipps in favor of an adverse party or adverse ruling that I respectfully request their recusal in this matter pursuant to 28 U.S.C. § 144

2. 28 U.S.C. § 144 provides, “ The affidavit shall state the facts and the reasons for the belief that bias or prejudice exists, and shall be filed not less than ten days before the beginning of the term at which the proceeding is to be heard, or good cause shall be shown for failure to file it within such time.”

3. Good cause is shown by excusable neglect in that I did not know I was required to file an affidavit. Due to poverty, and health issues I have limited ability to research.

4. Moreover, I was taken aback that Judge Phipps had the boldness to serve as a member of the panel adjudicating my matter in this case given the grave prejudice I alerted the Court to in the Civil Rights case and this case prior to the June 30, 2023 Order wherein I learned he is the member of the panel who ruled against me.

5. I was taken by surprise, given the notice of my legitimate concern that Judge Phipps’ acting as a member of the panel actually granting an adverse decision based on actual

prejudice relating to a conflict of interest so great as to tempt the common person to rule against me as he did.

5. I move for good cause for this court to accept this affidavit.

6. I unfortunately did not realize the requirement when I filed a similar motion in this Court in the Civil rights case, given the voluminous pressures I apprised this court that I faced.

7. I dare not file an addendum in the Civil Rights case now. This court has chilled my First Amendment right to petition by substantial burdens in the form of government threats of compelled religious violations against my religious belief against debt, given poverty and my assertion of the 13<sup>th</sup> Amendment, and my assertion of obstacles to my access to resources including research which causes a substantial burden to my access to this Court and the exercise of my 1<sup>st</sup> Amendment right to petition, to bend my will to the States by force of the fires oh hell, not freely. US Amend I, V.

8. I truly believe those who create debt slavery by compelled force, not a meeting of minds, or any debt sins. Those who are enslaved to debt are tempted to go to hell by making money savior and God. Jesus teaches you cannot serve God and money. *Matthew* 6:24. It is my religious exercise of belief to serve God, not money. I believe churches teach people to go to hell when they collect money as savior for others, which is the mark of the beast. In *Matthew* 6:1-54, Jesus teaches us to give alms in secret or not all. Jesus teaches, do not give to get. Giving out of one hand to get out of the other teaches people business is love or charity. This lie damns people to hell by teaching them to love money to extract money from one another, driving out love for one another replaced with the love of material gain under the false belief business is contributing good, charity or love. I believe Jesus teaches people go to hell for organized

charity, fundraising, exploiting child labor by selling girl scout cookies and volunteering because in *Matthew* 6:1-4, Jesus teaches “You will have no reward from your father.” I believe the only reward we have from God is eternal life and the riches of saving other people’s souls from hell to share a fuller type of love with God the last day for an eternity in heaven. God is awesome. In his parable where laborers worked for different amounts of time but gained the same pay, God shows us the glorious wisdom that we may all receive the same salvation, a fuller type of love with God, not more or less than those who became saved from their sin at the end with little time doing what was right in the eyes of God. This humility helps us to love others without resentment, to look at people as the wonderful treasure they are, not moth and rust, or our own works. God is smart. He drives out the sin of Satan pride with eternal life saving humility and mercy that saves us from the default the second death to be no more.

9. If Judge Phipps is removed and any ruling is granted in my favor, Judge Phipps is clean of that and should not be punished by Trump. Judge Phipps appeared to expressed his immediate indication that he does not necessarily agree with me in response to my initial brief in the other matter. Yet, it appears Judge Phipps desires the Court to be clear and to be made clean of law suits whose rulings in my favor harm his prospects at nomination to the USSC.

10. I only discovered Judge Phipps became a member of the panel on my case on June 30, 2023

11. I was taken aback in light of the conflict of interest I noticed the Courts about contained in the Civil rights case, *Kelly v Swartz*, 22-3198 and in this case on June 30, 2023 when I filed a motion to recuse 4 judges. Judge Phipps rendered adverse orders against me in the civil rights case. It is prejudicial to have the same judge, Judge Phipps, to determine different issues on related matters where the advocate in the other case speaks in his mind if not on the

papers, prejudicing me with the false allegations by the State of Delaware's counsel and the false allegations of the Delaware Supreme Court asserted to claim the real issues of discrimination against me based on my genuine not fake belief in Jesus and to cover up years of State Court misconduct. Jesus teaches people commit lawlessness when they judge based on mere appearance or marketing instead of rightly. See, *John 7:24*.

12. Actual prejudices occurred in that Judge Phipps ruled against me unexpectedly by unreasonably denying a stay or additional time on June 30, 2023 in this case. My case manager told me the Court would grant me time. I relied on her comfort that I was okay to my detriment.

13. In bad faith this Court appeared to ruin a weekend where loved ones came for the 4<sup>th</sup> of July in the area by increasing pressure given the substantial burden of poverty, health, religious objection to debt, lack of time, no access to Westlaw or Lexis at home and other burdens by rendering orders in two cases against me prior to a holiday weekend, where the law library would be closed.

14. I cannot tell my parents bad news without rebuke. I called them, told them and they threatened to cut off my phone and kick me out. My parents get upset easily. They have already indicated they intend to cut off my inheritance because of these law suits. Whether the threats are real or just parents indicating I cannot turn to them when problems arise I do not know. I know that I was scolded for calling them in college if I ever needed things like proof reading. I am sorry I am a poor typist. I seek to practice real estate not litigation with my former firm by overturning the DE Order.

15. Over the weekend, my mom indicated she intended to cut off my phone since I alerted her there were orders against me. She did it before. I noticed this Court of that in affidavits in the DE District Court, she may do it again.

16. I love my parents very much. I am grateful to them, but I love God even more, and will stand up for my faith in Jesus Christ even though the courts appear to threaten me with death and bodily harm by not accommodating me based on my asserted religious right to live and not die for the lawless lusts and vanity of men cloaked in the color of law or otherwise.

17. In my affidavits I told this Court I assert my right to live and not die for the sinful convenience or other vanity of the court and government based on exercise of my religious belief to live for God, and not die for mere men which is damnation in hell by making men God.

18. I required time and asserted and required accommodation when I did not face all of the substantial burdens I face now. My health has diminished, and I assert my religious belief and religious exercise of required to retore my health and sustain what cannot be restored. My condition and health show good cause, especially given this Court knows I suffered an eye injury and has should have reviewed the papers on that.

19. I have gained weight too. After my mom's best friend said I looked anorexic I felt so ugly and ate more hoping to become womanlier since my surgery seemed to stilt my growth, only to gain fat in ugly places. This has never happened before. I have maintained the same weight for more than 25 years before this 2023.

20. In high school, I had surgery where the doctor removed my ovary. The doctor said I would only have my period every other month. He was wrong. I had it every month, and every month I became dangerously dehydrated requiring gallons not cups of water, rest and exercise in order not to collapse, faint or die.

21. I still require this. It has never gotten better. It seemed to be the same for the past 20 years. But it got worse and is worse during this litigation. My health has worsened due to the fact none of the courts accommodate me to prevent irreparable injury in terms of loss of my fundamental rights and my property interests, even harm to body, life and potential loss of eternal life.

22. I know that I must assert my right to time, rest and exercise. After the surgery in my youth I fainted. I learned to prevent fainting due to severe dehydration I had to drink gallons of water, rest and exercise. Drinking unusual amounts of water is the most important accommodation.

23. One time I blacked out and peed my pants in a class in college. Everyone left me, I awoke on the floor of a UD classroom all alone after the class in Western medicine.

24. In undergrad and law school I took classes and healthcare and learned how wicked and evil most care was in that it harmed people, and I believe damned people to hell. I have religious objections against healthcare, mental healthcare, carelessly referring people to professionals or to purchase products because I believe it teaches people man, man's work, including technology, science or money to pay for a product or service is savior instead of God's Word, misleading most of humanity on the path to hell. I also believe people to go to hell for blindly doing what they are trained to do, paid to do, or told to do when they harden their heads and hearts from caring to know how their products or practices oppress or harm others. Not knowing, believing a lie, confusion, misunderstanding is guilt to God. See *Math 13*. *2 Cor 4:4*, *Hosea 4:6*. I believe Courts can help the blind see, and the dumb hear to help people know in order to turn away from sin to be saved from certain destruction in the fires of hell as being too disgusting to live for valuing moth and rust at the cost of sacrificing the life or liberty of another

person God loves. I oppose human sacrifice for material gain, even knowledge by science. I have religious objections on anyone collecting data on me or statistics. I also believe people sin for cremation, using others peoples' organs or blood samples for testing or otherwise. See *Amos* 2:1. Jesus teaches us through the holy spirit to judge correctly to discern children of the devil from children of God. *Matthew* 12:34-38. God teaches most people are children of the desolate one, the evil one, sadly without eternal life. (Isaiah 54, more are the children of the desolate woman than of her who has a husband") Jesus teaches the way to gain eternal life is hard, and few people escape hell. See *Matthew* 7:13-15, *Luke* 13:23-28. God commands us not to obey the traditions of men to violate God's law. *Mark* 7:8. The Bible teaches me keep myself separate by not sinning merely for the convenience or pleasure of the world. *Romans* 12:2.

25. I proposed ways to improve healthcare when I ran for office in 2018, which I incorporate herein by reference.

26. I believe people go to hell for their careless words, should they not repent. *Matthew* 12:35-37. I believe people sin for telling other people to pay for a product or pay for a professional to eliminate problems by those who sustain positions and profit so long as the problem is managed and not eliminated. *Romans* 1:25 This makes money to pay a professional, man or man's science or work God in place of God. *Matthew* 6:24.

27. I have religious objections to healthcare and I believe people go to hell for believing all mental health theories which are based on scientific conditions also known as temptations which teach people's will to be bent not free in Christ, reflecting the image of the devil and his children.

28. I am licensed to teach 6 subjects. I studied courses on psychology and behavioral and mental health theories. I believe so many mental theories I had to learn to gain my license



teach children to go to hell, to be the evil, by chasing happiness, their hearts, to be enslaved not free but controlled and managed by those who entice their desires by reward or threat of harm to bend their substantially burdened will to the dictates of mere men in place of God. Kids learn not to think things out, not give into to temptation of immediate gratification and happiness. They do not learn to lay down their desires to love God and love others as themselves. God teaches our body is not our own. Our bodies are temples, and are Gods. It is a sin to destroy our bodies for mere man or money by what others sell or give us. God teaches those who destroy his temple, people's bodies will be destroyed in hell for loving mammon more than God by respecting his desire that we love one another without human sacrifice for material gain even the lie of sustaining the world. Business is not the sin. Human oppression, sacrifice of life or liberty for convenience and material gain is sin because people love what they can get, moth and rust more than one another untampered by love written in the hearts of the born again or the just rule of law. I especially oppose BF Skinner which taught the mark of the beast. He taught the lie there was no unconditional love, and that people lived solely based on conditions of reward and avoidance of harm to be controlled without free will by those who enticed their desires by conditions, also known as temptations.

29. During the lawsuits the dehydration has increased resulting to my inability to restore my health.

30. On the record, I noticed this court, PA and the district courts as well as the USSC that I collapsed on the floor of the post office due to severe dehydration. I requested a stay based on need, physical need. None of the courts cared about upholding my fundamental right to live, my religious belief to live and not die by human sacrifice for mammon of the courts and government.

31. I asserted and did not waive my rights at any time. Despite that the courts create substantial burdens and harm to my health.

32. During the original disciplinary proceeding, I asserted my rights, and was compelled to attend a hearing as I recovered from the shingles and allergies without time to prepare, my asserted right to perform discovery, subpoena witnesses and other violation of my asserted and not waived fundamental rights.

33. I told the DE Court in Kelly v Democrats, Kelly v Trump and the Disciplinary matter that I faint and may die if I am not afforded accommodations by attaching the same Exhibit 43 I provided this Court. They knew or should know that I assert a right to fair proceeding giving my personal abilities to sustain life and health and not die by human sacrifice for the vanity of the state who doesn't care about life or health unless we attorneys or parties demand it.

34. This Court is aware that I injured my eye and lost vision, and my eye is blurry by severe dryness.

35. The Courts have disregarded my asserted rights, including my right to live, the superseding Constitutional laws and statutes in my cases. The Delaware Supreme Court members have behaved above the law in the disciplinary case by firing witnesses, concealing evidence in my favor to fix the sham proceedings against me.

36. In my cases I see how lawless lusts not the impartial rule of law reign.

37. I do not think disciplining judges is the answer. I think attorney advocates have a duty to uphold the rule of law when judges violate it in cases and controversies including my Civil Rights case, and this case where the lower Court booby trapped me. I think the courts must

encourage attorneys to fulfill their duty of upholding the Constitutional rights of the public, the people and the attorney's own rights without fear of vindictive retaliation by the courts.

38. Business, professional licensure should not supersede the Constitutional rights of private citizens, even me as a private party with a professional license to practice law.

39. I write under duress. My health has diminished.

40. On Monday, July 3, 2023 I called my case manager in this case. She indicated her surprise. She did not expect the court not to deny time. She said Courts usually grant time even less time. We were both taken aghast.

41. My case manager indicated she was not going to be in July 4, or July 5<sup>th</sup> but I could email her or call the Court since this is due by or before July 5, 2023.

42. I have limited time, and require a stay in order to defend my faith in Jesus, not money or material gain as God to be controlled by those who control resources instead of to freely lay down my desires and needs to do what is right, the will of God love to overcome lusts.

43. This Court denied me time, and I have to file a motion for reconsideration by July 14<sup>th</sup> should this court not grant consideration of the motions by a new panel pursuant to my requests in the motion accompanying this affidavit.

44. The substantial burdens due to other law suits, health, debt, familial situation, time, unexpected surprise are good cause under the circumstances to consider this affidavit.

48. Judge Phipps' conflict is so great a reasonable person would conclude bias or prejudice in my case under the facts.

49. Judge Phipps was placed on a list of potential nominees to the US Supreme Court by President Trump.

50. Donald J. Trump (“Trump”) is running to become President of the United States in 2024.

51. I believe Trump will likely be reelected.

52. Trump will likely nominate Judge Phipps again should a Supreme Court Justice retire

53. The Delaware Office of Disciplinary Counsel state they brought the Disciplinary proceeding against me for suing President Trump. The Delaware Supreme Court cite my religious beliefs contained in my Religious Freedom Restoration Act petition against President Trump for the reason for the discipline.

54. I seek to overturn Kelly v Trump in the civil rights case. In addition, this case is based on my lawsuit against the one who may benefit Judge Phipps should he rule against me and essentially for Trump, by demeaning my law suit against Trump.

55. Phipps has a personal stake in my law suit. He has an interest in safeguarding Trump in order to gain a potential seat at the US Supreme Court.

56. This temptation to gain the most powerful seat on the planet, a position at the US Supreme Court is so great as to create a reasonable person to include there is an appearance of bias or there is actual bias against me in this case and in favor of the Government.

57. Judge Phipps also has other conflicts of interest I incorporate herein by reference in my June 20, 2023 Motion to recuse, and attachments thereto showing conflicts of interests.

58. Judge Phipps may also be offended by my religious belief that Trump misleads people to hell. Judge Phipps may also be offended I drafted 5 proposals to impeach President Trump 1. Based on his violations of criminal law 18 USC 227 for encouraging the firing of NFL players for peacefully exercising their First Amendment right to petition against alleged disparate

treatment against blacks within the criminal judicial system, 2. Violations of 18 USC 227 for encouraging economic harm to members of the press exercising their First Amendment Freedom, 3. An impeachment regarding the porn star activity by the President, 4 relating to kidnapping babies at the border, and profiting private partners by overcharging payments to their commitment facilities, 5. A proposal relating to the war powers act, I incorporate herein.

59. No one is above the law, nor is anyone below the law's correction with mercy, not even the President.

60. With regards to Judge Scirica, I was absolutely horrified terribly mortified to discover the conflict of interest rather recently. I outlined my concerns in the Delaware District Court case I incorporate herein by reference by referral to Kelly v Swartz, 21-1490.

61. I seek to destroy what Judge Scirica works on the disciplinary rules as chains that eliminate freedom under the illusion of upholding it by beholding judges to serve what I believe is the mark of lawlessness that misleads humanity to hell, business greed at the cost of human sacrifice of life or liberty.

62. I strongly oppose regulating the courts to partiality to business by barter or exchange. This urges the courts to serve greed not humanity or the liberty that allows beautiful disorder and criticism which helps us improve and gain humility needed to escape the certain default for most of humanity loss of eternal life due to pride.

63. I noted on the Delaware record my desire to prevent regulation of the USSC and my hope I could eliminate judicial discipline of federal judges.

64. Judge Scirica is the Chair on the rules of federal judicial discipline I seek to eliminate. He has a personal interest in ruling against me as I seek to overturn his hard work.

65. I also seek to amend my complaint to include Constitutional arguments against the DE disciplinary proceedings and certain Delaware Disciplinary Rules rules I argued on the record in the civil rights case.

66. These rules mirror the rules Judge Scirica works on, and attacks his work.

67. I sought to destroy the work of Jude Scirica first in the Civil rights case and now may seek to attack the rules he works on in this case.

68. In the Civil rights case, at Delaware District Court, Number 21-1490 Kelly v Trump, I alerted the Court of my concerns against Judicial discipline and the elimination of people judges or other hardship and concerns in the attached documents I incorporate herein by reference, and in additional Docket items 23, 53, 55, and 56 which I may not be able to upload in the DE District Court case.

69. I truly believe preventing the regulation of the US Supreme Court and eliminating the corrupt disciplinary rules against federal judges and requiring life term appointments for all federal judges, with the ability to choose different appointments would aid in preventing the schemed overthrow of the rule of law to eliminate it by automation by those who reign over people by the mark of the beast, business greed, with no unconditional love.

Thank you for your time and consideration.

Respectfully submitted,

Dated 7/4/23

Meghan M. Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

(302) 493-6693, Not acting as a lawyer

Defending my First Amendment private right to

believe in Jesus Christ as God, not money or

mammon as God

# Exhibit N

(Motion to strike DI 208 meant for 22-3372 at DI 209, DI 210 granted this and struck DI 208)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
v.	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	

Petitioner Plaintiff Meghan Kelly’s Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike the Motion inadvertently filed in this matter meant for another matter Third Circuit Appeal 22-3372 at 3DI-208

I, Respondent Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), respectfully request this Court strike Third Circuit Docket Item 208, containing a motion meant for another matter.

1. On June 30, 2023, I received two orders dismissing my cases by this Court, the Third Circuit Court including another matter.

2. I inadvertently filed a motion meant for another case on July 4, 2023.

3. Please strike it from consideration.

4. I am sorry. I am rushing to imperfectly assert my rights in order not to be compelled to waive them in any Court.

5. I had 7 orders by this Court denying relief by this Court on Friday. I write in haste in order to prevent 6 new law suits or at least one based on this Court’s new order.

6. Thank you for your time and help.

Wherefore I pray this Court grants my motion.



July 4, 2023

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 4968 DEACTIVE (152)

# Exhibit O

3DI-51 22-3372,

Motion to expedite filed July 5, 2023

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
v.	§	DISTRICT COURT
United States District Court,	§	Misc. No. 22-45
Eastern District of Pennsylvania	§	Judge, Paul S. Diamond,

**Motion to Expedite Consideration of  
Appellant Meghan Kelly’s motion for reconsideration of Order Dated June 20, 2023  
denying the recusal of Judge Phipps and Judge Scirica  
and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court  
on June 30, 2023**

I Meghan Kelly, Esq., pursuant to Fed. R. App. P. R. 2, 27, my 5th Amendment right to a fair trial to defend the exercise of the private exercise of 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, or other applicable law move good cause to expedite consideration of the above referenced Motion filed July 4, 2023.

1. On June 30, 2023 this Court entered 7 judgments against me near closing time on the 4<sup>th</sup> of July holiday weekend in this matter and in the Civil rights case 21-3198.

2. To my horror, on June 3, 2023 Judge Phipps participated in 5 judgments against me at Third Docket Item Number (“3DI”) 3DI-47, which provided:

“Present: SHWARTZ, MATEY and PHIPPS, Circuit Judges

1. Unopposed Motion by Appellant Meghan M. Kelly to Vacate order dated 05/19/2023;
2. Unopposed Motion by Appellant to Amend Correct Motion to Vacate to Include Pursuant to Fed. R. App. Proc R 27(b) and Rule 40;
3. Motion by Appellant to for Leave to Exceed Word Limit for Corrected Motion to Vacate Order dated May 19, 2023;
4. Motion by Appellant to Correct the Record, Specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27;
5. Motion by Appellant for Extension of Time to File Brief and Appendix for 120 Days to appeal the lower court's order placing license on disbarred as retired but for religious beliefs, religious political beliefs, and religious political speech contained in petitions;
6. Motion by Appellant Meghan M. Kelly to stay of this proceeding including briefing, with the allowance of 30 additional days, when the stay is lifted at the

conclusion of case 21-3198.

The motion to exceed word limit is GRANTED. The motion to correct the record is DISMISSED. All other foregoing motions are DENIED.”

3. On June 8, 2023 I filed a Motion to recuse Four Judges, Judge Hardiman, Judge Phipps, Judge Honorable Montgomery-Reeves, and Judge Scirica. (3DI-43) I incorporate herein by reference.

4. On June 9, 2023 I filed motion for a caveat to her Motion for this Court to recuse Judge Scirica, wherein I moved Judge Scirica for “for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority.” Wherein I averred:

“1. I ran for State local office in 2018 because no one would do anything about the rampant problem we have here in Delaware. Non-attorneys-out of state title companies are practicing real estate law without a license to practice law.

2. I lost, but I care because this is bigger than Delaware. I have uncovered a plan that intends to allow those who control entities through technology to practice law, judge and govern without authority by the people or the law.

3. DE Office of Disciplinary Counsel did not help lawyers, or help me when I complained about the problem of non-lawyers practicing law without a license back in 2016. I did not know why until they sued me. I was compelled to read their rules of limited jurisdiction before the Board, which does not allow my federal claims, nor does it give office of disciplinary counsel in Delaware or Pennsylvania subject matter jurisdiction to discipline, correct or protect nonlawyers and nonjudges from acting as judges and attorneys without a license.

4. The plan in the schemed overthrow is to allow entities to behave above the law, above correction from the government, to take over government to eliminate it down the line.

5. Per the attached two email I sent opposing counsel, Walmart and businesses are already governing without election or government authority restricting my right to buy and sell.

6. Since the overthrow and unnatural fall of the US is based on nonlawyers and nonjudges lawyering and judging without government authority I thought it imperative to seek Judge Scirica’s consideration of drafting laws to prevent nonjudges from taking the place of judges, even by controlling automation. Non-people courts already exist in China.

7. I attach an affidavit I filed in Delaware District court for this Court’s consideration.

8. I was alarmed lobbyists wrote Judge Scirica to lobby control over the rules controlling the Judiciary, the only impartial branch. (Exhibit E to the Affidavit.)

9. In Exhibit E to the attached affidavit, you will find their letter. What makes this even more alarming is they lobbied to allow non-attorneys to practice law without a license.

10. Should this not be stopped, the rule of law will be eliminated, our government may fall as schemed.

11. I should like the Honorable Judge Scirica's consideration of this narrow issue. I respectfully request he consider whether he may draft laws to prevent non attorneys from practicing law or judging in the place of people judges without government authority.

12. I pray Judge Scirica considers drafting federal rules granting state Office of disciplinary counsel through federal law authority to discipline and correct non-lawyers from acting as lawyers on behalf of another, as opposed to pro se.

13. I pray Judge Scirica drafts federal disciplinary rules to prevent nonjudges from taking the place of judges by giving the U Attorney General or/and state Office of Disciplinary Counsel authority to prevent the schemed elimination of people judges by automation.”

5. I believe there is a schemed agenda to eliminatethe rule of law by standardizing justice to automate it which makes no one free to exercise individual liberty unless such exercise fit in the conformed, compelled standards automated.

6. Judge Phipps presided in the Civil rights case, where the state alleged false allegations and attempted to demean my legitimate claims of violations against my Private fundamental rights to association, religious belief, exercise of belief, speech, petition, Due Process, Equal Protections, 6<sup>th</sup> Amendment right to self-represent and other claims to cover up State misconduct and scandalous outrageous behavior that shocks the conscience, including but not limited to compelling my to violate my religious belief by swearing in at the inception of my DE bar admission, misspelling my name at the court's record on the wall of the Dover office, judges telling me to go back to Pennsylvania, or calling me a Philadelphia lawyer when place of origin does not signify good or bad, firing witnesses to prevent their testimony, ignoring my motions, not providing time the rules require when rescheduling the hearing 8 days as opposed to 10 after I discovered my motion to call a fired witness was denied. The rules require ten days. I violate no rule. I was prevented the time to make a request under the rule in the rushed sham

proceeding against m where I was compelled to attend sick with the shingles where the reporter made up things and said she could not hear me.

7. Judge Phipps was the authoring Judge in accepting my appellate Brief for the Civil rights case, 22-3198 (hereinafter referred to as “2-3198”), at Order dated October 24, 2022 at Civil rights Docket Item-100 (hereinafter “CRDI” for Civil rights Docket item).

8. On January 1, 2023, I filed a Motion for additional time to file a brief in reply to Defendant’s Answer in the amount of 45 days in 21-3198, I attached hereto and incorporate herein by reference including exhibits.

9. On January 4, 2023, I filed a motion for a stay in 21-3198, I attach hereto and incorporate herein, and may refer to the items therein and all pleadings on the record by reference without docket number in Motions for reargument due July 14, 2023.

10. On January 5, 2023, I filed a letter, I attach hereto and incorporate herein in its entirety, apologizing for typos and noting my concerns about our monetary system which is Ponzi scheme, noting I pled a way to care for the boomers and reverse an economic crash in my pleadings in 21-3198.

11. On January 6, 2023, Judge Phipps ordered in 21-3198: “The foregoing Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days is granted. Beyond this extension, this order provides no other relief. The motion to stay these appeals is denied.”

12. I filed an interim appeal of Phipps denial of a stay in 21-3198 to the US Supreme Court regarding the denial of a stay as to deny me the First Amendment right to be heard in other cases, which actually did cause me to lose my First Amendment right to appeal in the Delaware Disciplinary matter, which I in good faith filed within the time 90 days, but my initial Petition

was rejected because I filed a Motion to exceed the Page limit first and not simultaneously therewith. Then, the US Supreme Court did not file its distribution until it was too late prejudicing me forcing me against my will to forgo my second attempt to petition the Delaware Order for which this case arises, due to the substantial burden of time, health, religious belief, and means to create an obstacle so great as to actual deprive me access to the courts to defend m licenses, and fundamental rights.

13. Since I appealed a decision in 21-3198 to the United States Supreme Court on February 7, 2023 I filed a motion for a different Stay pending the court's decision on my interim appeal of this Third Circuit, I attach hereto and incorporate with leave to refer to the items included therein by reference without docket item numbers including but not limited to

1. Motion for an interim Stay (All pages, or Page 1-3)
2. **Exhibit A** Phipps order denying First Request for stay (page 7 (Redacted page number with fewer than 771 pages I refer to page numbers out of 771 pages, redacted)
3. **Application to Justice Alito** to receive my petition should it be delayed more than 3 days in the mail (Page 10-13)
4. **Petition for Writ of Certiorari before judgment pursuant to 28 U.S.C. § 2101 (e)** to the United States Court of Appeals for the Third Circuit, Case Number Case Numbers 22-8037 and 22-2079 to vacate a denial of a stay pending this Honorable Court's determination **or** denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case
5. **Appendix 1-a** Constitutional and statutory provisions involved
6. **Appendix A**, Phipps denying Motion to Stay Appeals while Appellant Petitions the Supreme Court on the Civil rights matter appealing the objection of the stay
7. **Appendix C** Plaintiff's Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2) to include additional parties, eliminate a party, include additional facts and include additional requests for relief, dated January 24, 2022.....(Page 97-101)
8. **Appendix D** Appellant Plaintiff Meghan Kelly's Opening Brief moving the Third Circuit Court of Appeals to vacate the Delaware District Orders, filed October 22, 2022. (Page 103-158)
9. **Appendix E** Appellant Plaintiff Meghan Kelly's Motion to recuse the Honorable Thomas Hardiman and the Honorable Tamika Montgomery-Reeves from participating in this case to preserve Due Process rights under the 5<sup>th</sup> Amendment, filed January 3, 2023.

10. **Appendix F** Plaintiff's Motion to amend her motion for re-argument, filed November 9, 2021
11. **Appendix G** Plaintiff's Motion to Amend Exhibit G to Complaint to add missing page, filed November 18, 2021
12. **Appendix H** Plaintiff's Motion to Amend findings of facts and alter the order dated December 22, 2021, based on New findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice, dated January 10, 2022, filed January 11, 2022.
13. **Appendix I** Plaintiff's **Second** Additional Motion pursuant to FRCP R. 52(b), 59 (e) and 60 (b)(1)(2)(6) to amend findings of facts and alter the order, dated December 22, 2021, based on New Findings of Fact, to prevent Clear error of facts, Clear error of Law, and to prevent manifest injustice, dated January 18, 2022, filed January 19, 2022. (DI 39) **(excluding the voluminous exhibits therein of records in the Delaware Disciplinary Proceeding)**
14. **Appendix J** Plaintiff Meghan M. Kell's 3<sup>rd</sup> Emergency Motion pursuant to FRCP R. 52(b), 59 (e) and 60 (b)(1)(2)(6) and 65 (Excluding Exhibits of emails to Defendants and Disciplinary Orders or entrees in the Delaware Disciplinary Matter)
15. **Appendix K** Letter to Chief Judge Connelly attaching documents showing procedural due process violations in Kelly v Trump and in the Delaware Disciplinary matter, requesting to amend the Complaint as a matter of right with additional changes of new information since he did not render an order on my January 24, 2021 Motion to amend the complaint as a matter of right before service to Defendants, The DE Disciplinary Rules 12 and 13 are unconstitutional per se by silencing free speech of the accused at the threat of additional punishment to protect the State not the accused and as applied, doctored praecipe/concealing elimination of key witness by retiring or terminating Chancery Court staff Arline Simmons and Katrina Krugar filed prior to his Order.
16. **Appendix L** Letter to Honorable Chief Justice Colm F. Connelly regarding Office of Disciplinary Counsel Patricia Swarts, with new and additional evidence of Defendants bad faith and harassment, dated December 4, 2021, filed December 6 2022, excluding attachments. Since the Third Circuit allowed me to plead by citing the record, I merely cited it in the appellate court
17. **Appendix M** Appellant Plaintiff Meghan M Kelly's Motion to stay the Proceeding until the conclusion of the originating disciplinary proceeding, until final non-appealable determinations are made or the time of appeal has lapsed. I further move the Court, for good cause for permission to file the "for cause" motion 30 days after the stay is lifted, dated January 4, 2023.
18. **Appendix N** (3DI-126) Appellant Meghan Kelly's Motion for additional time to file a brief in reply to Defendant's Answer in the amount of 45 days, dated, January 1, 2023
19. **Appendix O** Petitioner Meghan Kelly's Motion for permission to exceed the word limit and page limit in her writ of certiorari On Appeal from the Delaware Supreme Court, Case No. 2022, 58, dated January 23, 2023.



20. **Appendix P** Petition of writ of certiorari filed on appeal for the Third Circuit disciplinary matter No. 22-8037, filed but not accepted or rejected yet. No. 22-6584.
21. **Appendix Q** Letter by PA ODC opposing a stay.
22. **Appendix R A-4**, Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, Internal Exhibit thereto, including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court's staff based on religious belief, political association or poverty; emails, Internal Exhibit, Oct 19, 2020 letter to Patricia Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email, Internal Exhibit, letter dated May 21, 2020.
23. **Appendix S A-5**, Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation, Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, dated **February 5, 2021**; attachment relating my concerns relating to recent US Supreme Court cases.
24. **Appendix T** Letter dated January 7, 2021, first letter regarding bar dues, the second letter is attached to App S, dated February 5, 2021.
25. **Appendix U** Letter regarding My second Motion for a stay in the district Court pending a determination on the appeal of the Delaware Disciplinary matter or until the time for appeal had lapsed, and my incorrect assumption that the Third Circuit's case was stayed pending a determination by the Delaware District Court on a Rule 60 motion
26. **Appendix V** (PA Supreme Court refused docketing denying opportunity to be heard on letter and motions) Respondent Meghan M. Kelly's Motion pursuant to Pa. R.A.P. 105 for permission to file unconfirming documents and to compel the acceptance of rejected documents upon the date of their submission, with allowance for opposing counsel to respond, dated December 19, 2022
27. **Appendix W** (PA Supreme Court refused to docket, denying opportunity to be heard) Respondent Meghan M Kelly's Second Motion for a stay due to circumstances increasing prejudice and harm, new facts arising necessary to my defense of reciprocal order, and additional questions that require answers in order to defend myself in response to the reciprocal order in the alternative a continuance of 6 months
28. **Appendix X** First email to the grievance committed asserting right to live under the ADA where I noted "This Court has notice I could not stand at the post office due to severe dehydration related to a surgery. I assert my right to live by seeking an accommodation. It appears I attempted to file it with the court correctly, but it remains undocketed. This Court has notice of my medical records, but it is more concerned with costs and convenience than justice. Justice is not a matter of business and barter or exchange, but a matter of truth under the law. Claimants without means or with limited ability should be afforded access to the courts

without denial of an opportunity to be heard by the court's failure to docket the items. I thank you for your consideration and getting back to me. Have a good day”

29. **Appendix Y** additional emails denied accommodations by the ADA officer
30. **Appendix Z** Docket Kelly v Trump, in the Delaware Supreme Court, where I circled the four docket numbers missing one or more items sealed in secret from the record
31. **Appendix AA** Email to lexis representative regarding 4 items necessary to my defense are not available on Court Link on lexis.
32. **Appendix BB** (3DI 121-8) Lexis docket of Kelly v Trump missing four items, showing the court accesses docket date of preliminary hearing
33. **Appendix CC** (3DI-121-4) Chart of file and serve showing the Court sealed items in Kelly v Trump to prevent material evidence in my favor on due process grounds hiding it from the US Supreme Court too in bad faith collusion with the Office of Disciplinary Counsel
34. **Appendix DD** Letter to the PA Supreme Court regarding time required to sustain health, others issues computer repairs needed, printer repairs needed, and internet outage
35. **Appendix EE** Exhibit 43, noted objection to healthcare, Federal proposal to reduce the costs of healthcare, newspaper article I wrote to improve state healthcare when I ran for office, college and law school transcript, health record showing bad care received, making me weak requiring accommodation to prevent death.
36. **Appendix FF** Facebook posts present sense impression someone talking about shooting me for my religious political beliefs contained on stickers on my car
37. **Appendix GG** *The Fourth Industrial Revolution*, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version published by Portfolio Penguin, which may be found at
38. [https://www.academia.edu/38203483/The\\_Fourth\\_Industrial\\_Revolution\\_pdf?fbclid=IwAR1koMak7N40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl\\_hsN-RnQ](https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ) (3DI 121-15, page 1-2) Discussing eliminating lawyers by automation
39. **Appendix HH** *Covid-19: The Great Reset*, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, which may be found at [https://carterheavyindustries.files.wordpress.com/2020/12/covid-19\\_-the-great-resetklaus-schwab.pdf](https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-resetklaus-schwab.pdf) Discussing the schemed elimination of the fiat currency to scheme to eliminate judges and the rule of law by the rule of automation by the lie technology knows best. (3DI 91-6, pages 3-6, 3DI 91-5, pages with writing, 3DI-105, plain pages the entire book
40. **Appendix II** *Covid-19: The Great Reset*, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, which may be found at [https://carterheavyindustries.files.wordpress.com/2020/12/covid-19\\_-the-great-resetklaus-schwab.pdf](https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-resetklaus-schwab.pdf). (3DI-105-14, filed December 2, 2022) This talks about elimination of politicians. I do not have time to pull all of the references to elimination of government officials in all materials at the WEF

41. **Appendix JJ excerpts from the The Great Narrative (The Great Reset) Paperback** – December 28, 2021, by Klaus Schwab (Author), Thierry Malleret, Forum Publishing regarding \*Central Banks taking over the authority of the Courts\* (emphasis intended because the Court is in trouble) (3DI-95-5, 95-6)
  42. **Appendix KK** (3DI-121-14, pages 1-5) *Robot justice: China's use of Internet courts* By Tara Vasdani This article was originally published by The Lawyer's Daily (<https://www.thelawyersdaily.ca/>), part of LexisNexis Canada Inc., printed December 15, 2022, by save PDF print
  43. **Appendix LL**, Article by Bank of International Settlements (hereinafter "BIS"), the global money changer who makes money out of nothing, and gains more the worse off humanity is in, in terms of debt control and profit on interest who on or about **December 5, 2022**, indicated state, local and federal **pensions will not be paid**. They were written off as tax breaks in debt swaps, and another article indicating the same
  44. **Appendix MM** Excerpts of the book, *Creature of Jekyll Island, a Second look at the Federal Reserve*, by Edward Griffin, 7th printing 1998, 3rd Ed., by American Media, to show the Great Depression was created unnaturally by the Federal Reserve and other banks. This book appears to have the theory wars are instigated to create debt to create banks profit, and the environmental and biological concerns can do the same by unjust decrees that do not protect the environment and lives of humanity. Instead, unjust decrees such as fines and material rewards taken out of others pockets, create debt for profit by increasing desperate conditions. So wrong doers may get as much as they can get for as little as they can get without restraint in the form of just rules of law
  45. **Appendix NN** Letter to Delaware Supreme Court, dated August 29, 2022, with footnotes showing how the private federal Reserve coining federal reserve notes enslaves the government and the governments people in violation of US Amend XIII, with attachments showing the more debt, the worse off the country is in the more profit and power the shareholders of the Federal Reserve, commercial banks get in their business transactions despite not collecting shares at the Federal Reserve as shareholders
14. On February 9, 2023, merely two days later, Phipps denied my request for an interim stay pending the USSC determination of the Judge Phipps' Order denying a stay.
15. I am prejudiced by Phipps participation. State of Delaware's counsel and documents speak in this case in the mind of Phipps where I dispute their false allegations, false conclusions of law and false conclusions of law to cover up the unconstitutional unlawful conduct of Judges in the Delaware Courts where they misuse the cloak of government authority

to protect private interests in abusing their power to eliminate my constitutional rights, chilling them inappropriately.

16. The mere status of judicial position does not make judges above the law at the cost of killing, stealing destroying people's lives and liberty for what I believe is the mark of the twice dead not born again, lawless lusts for convenience, productivity, avoidance of costs, position and profit. It is essentially human sacrifice of life and liberty, all individual liberties under the lie of the common good, the medieval lie that more is better. More injustice is worse. It is my religious belief the practice of law is special. It is not a business, but a matter of truth to guide the misguided from harming others so they will not be damned to hell. I believe judges can save lives and eternal lives. Jesus says it is a more important command than anything dealing with money or goods. Math 23:23. God commands it in Amo 5:15.

17. On July 4, 2023 I filed a Motion for reargument en banc, or by a different panel on the papers on the Order dated June 20, 2023 on the Court's denial of my motion to recuse Judges Phipps and Scirica and to prevent the participation of these two judges on the Third Circuit in this matter and related matters. (Exhibit A, Third Circuit Docket Item ("3DI") 3DI-47). (3DI-49-50, hereafter "**3DI-49-50 Motion**")

18. I further moved this Court pursuant to US Amendments I, V, and Federal Appellate Rule 2, and its equitable powers for good cause for a new panel to consider my Motion to vacate order at 3DI-37, Motion to correct motion to vacate at 3DI-38, Motion by Appellant to for Leave to Exceed Word Limit, 3DI-40, Motion by Appellant to Correct the Record, at 3DI-41, Motion for time, at 3DI-42, and Motion to stay at 3DI-45, since a grant of a recusal is an admission the proceeding was biased in violation of my 5th Amendment procedural due process

right to be heard by a fair impartial proceeding, making the Order attached hereto as Exhibit A-1 void or voidable, as well as the Order at 3DI-48. (3DI-47). (3DI-49-50 Motion).

19. I incorporate herein and reargue by reference the Motion to file unconfirming documents at 3DI 17, Motion for reconsideration of Order dated January 17, 2023, with regards denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights at 3DI-19, and all docket items referred to herein.

20. I requested the following relief in 3DI-49-50 Motion:

“37. Should this Court find Justice Phipp’s actual participation and Judge Scircica’s potential involvement violated due process, I seek relief from this court to prevent needless waste of judicial resources.

38. The “Federal Rules of Civil Procedure treat orders that are entered without due process as void, permitting reopening of the case. U.S.C.A. Const.Amend. 5; Fed.Rules Civ.Proc.Rule 60(b)(4). The panel’s inclusion of Judge Phipps violates Due process. US Amend I, V.

39. Reopening the case would be needless should this court grant this motion on recusal.

40. To prevent the need to reopen the case, I move this Honorable Court pursuant to US Amendments I, V, and Federal Appellate Rule 2, for good cause for a new panel to consider my Motion for a Rehearing on Denial of the original Appellate Brief find out Third Circuit Docket Item (“3DI” 3DI-199).

41. Federal Rules of Appellate Procedure Rule 2 provides, “On... a party's motion, a court of appeals may for good cause-suspend any provision of these rules in a particular case and order proceedings as it directs.” Fed. R. App. P. 2

42. Since granting my motion for a rehearing on the denial of the recusal of Judge Phipps and Scirica would show a procedural Due Process violation of my right to a fair trial occurred by requiring a recusal, I would be left without a remedy before this Court unless the Court suspends the rules of Rules “for good cause” to uphold my right to a fair and impartial forum to safeguard my exercise of fundamental rights without punishment and elimination of my liberties and property interests in my licenses to buy and sell as an attorney but for my religious belief in Jesus Christ as God, not mammon, money and material gain as God. Citing Bible, Matthew 6:24. Appealing the

Matter before the US Supreme Court would be a waste of resources for all should this Honorable Court require the recusal of Judge Phipps and Scirica. Thus, this Court must suspend the rules to prevent waste of resources and likely elimination of my Constitutional rights

43. I have shown good cause to suspend the Rules to allow a different panel to consider my Motion to vacate order at 3DI-37, Motion to correct motion to vacate at 3DI-38, 3DI-40, Motion by Appellant to Correct the Record, at 3DI-41, Motion for time, at 3DI-42, and Motion to stay at 3DI-45, should this Court grant my motion for reargument to recuse Judge Phipps and Judge Scirica. Id. Safeguarding my Constitutional rights also shows good cause.

44. I move for a panel on the papers only since poverty creates a substantial burden upon my access to the courts, and the cost for a transcript and to travel are so great under my circumstances as to deny me the First Amendment right to petition to defend my exercise of my Constitutional rights.

45. I also do not feel well. I had surgery as a teenager I apprised this Court and every court of and assert my religious exercise of belief to the right to live.

46. I move this panel for reconsideration on the papers only in order to sustain my health. I am required to take time to drink inordinate amounts of water and rest that the average person does not require to stay alive. I require time to sustain my health. A hearing would take away time.”

21. Should this Court grant my request to have another panel determine the motions rejected on June 30, 2023, 3DI-47. Further, should that panel grant relief contained in the motions, I would not be required to file 5 or 6 motions for reargument or otherwise by July 14, 2023.

22. While there is a voluminous amount of material. I do not waive my right to be heard on the material, as the pleadings and the harm and injury relate to about 20 years of DE court misconduct and disregard for my asserted religious belief in Jesus or state of origin animus against Pennsylvanians as allegedly less than lawyers in the eyes of DE judges which is naughty.

23. The reciprocal filings in 6 other courts are also relevant to the need for review and time.

24. Should this Court deny my request for a stay, my right to petition may be extinguished by impossibility due to the undue hardship this Court causes on my health, my First Amendment right to petition, access to other courts, religious belief against debt, poverty, and other irreparable injury in terms of the loss of the 6<sup>th</sup> Amendment right to self-represent in DE, private First Amendment right to religious belief in Jesus as God, not money as God to be controlled by children of the devil who create artificial debt or unjustly control the resources, instead of free in Jesus Christ of adultery with God, see *Matthew* 6:24, freedom to exercise my private religious belief, freedom to petition the court to alleviate substantial burdens on religious beliefs like my religious objections to family law, my private right to petition and other hardship.

25. Should this Court deny relief I face a possible 6 new reciprocal law-suits, with a certain law suit by the USSC. The high court's rules do not include disability disbarments or punishment. Rule 8

26. I understand I may use US Supreme Court case *Theard* 354 U.S. 278 (1957) to argue disability to prevent disbarment. Nevertheless, my faith in Jesus Christ as God is not a disability. I cry as I type this and write in haste to assert and not waive my rights.

Wherefore I pray this Court grants this motion.

Dated July 5, 2023

Respectfully submitted,

/s/Meghan Kelly  
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PRO SE (5, 173 words)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	Civil Action No.: 1:21-1490 (CFC)
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B.	)	
Swartz, et.al	)	
Defendants.	)	

PLAINTIFF MEGHAN KELLY’S 55th AFFIDAVIT UPDATE

Comes now Plaintiff Meghan Kelly, I declare and affirm that the foregoing statement is true and correct.

1. In recent news people appear to attack Supreme Court justices for not recusing themselves based on speculative conflicts?
2. The verbal attacks by lobbyists who control the other two branches seek to tempt the Supreme Court justices to allow the mob’s marketed desire to regulate the court. (See the attached article from NPR) This would allow the Supreme Court to be controlled by those charged to discipline and impeach them should they not bend to the dictates of those controlling the regulators instead of impartially respecting parties. There are multiple layers of concern for me. I do not believe the loudest, most advertised mob’s desire is the actual desire of the many. It is just the loudest based on bought speech based on barter or exchange.
3. My case may allow the US Supreme Court to look with fresh eyes at case law to come up with new law to uphold the integrity of the courts in truth, not just merely based on appearance.
4. The right to an impartial judge to discern conflicts should be key. Regardless of past case law the judge parties move to recuse should no longer be soul judge on himself, or at least on reargument.



5. This remedy to prevent injustice or incited unrest by lobbyists allows the Court to correct itself within the purview of the Constitutional limits of 1. cases and controversies and 2. Impeachment, instead of creating partiality towards regulators.

6. Plus, this prevents Supreme Court justices from being disciplined ex post facto, like lawyers and judges are in state court cases, like I tried to prevent Justice Kavanaugh from gaining the bench per the attached ODC letters from two boards declining discipline.

7. I believe in mercy. There is no remedy or issue now just improvement.

8. It was interesting that the ODC recommended I send a petition to the 10<sup>th</sup> Circuit. I declined, but 83 people filed ODC complaints which were all printed on the web site.

9. I do not want to impeach Justice Kavanaugh. Discipline is for correction. Impeachment is for destruction. The 10<sup>th</sup> Circuit court indicated the rules do not apply to Justice Kavanaugh since he is no longer a judge before the Circuit, per the attached Yet, those letters would likely apply should an impartial board control discipline of alleged Supreme Court misconduct outside the purview of impeachment. This is dangerous.

10. I think Justice Kavanaugh is being set up to fall should the Court regulate.

11. The lobbyists are enslaved and controlled by those who entice their unbending unified groups desires to attack the rule of law. They are going after the head ,not the body, the District Court or Appellate judges. If the head is chopped off the body will fall.

12. I need time to consider how this case may be used. Maybe the Third Circuit court may consider the same to prevent the elimination of people judges. I think allowing other non-partial judges would be the answer. That is why I made such a request in the Eastern District Court of PA appeal before the Third Circuit.

13. With regards to other schemes to create the conditions of unrest to eliminate the government down the line, this court may prevent or reverse harm. I have concerns about eliminating natural foods to patent GMOs to control the food source to control the people by artificial scarcity or price changes to change demand.

14. I do not do patent law. My friend Chad Stover in upper Delaware does patent law. We went to college together. He lived on my freshman floor, third floor at Russel A honors Dorm at University of DE. His picture is attached. I see this court appointed him before. I lost touch with him, but remained in touch with other freshmen friends from since we graduated.

15. This Delaware District Court is the preeminent patent law Court in the whole world. I believe the most important patents may be connected to Delaware, even if it is by mere incorporation in this state instead of where the patents were filed. I do not know patent law. So, I could be wrong.

16. Justice BREYER delivered the opinion of the Court in *Mayo Collaborative Servs. v. Prometheus Labs., Inc.*, 566 U.S. 66, 70-71 (2012)

“Section 101 of the Patent Act defines patentable subject matter. It says:

Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefor, subject to the conditions and requirements of this title.” [35 U.S.C. § 101](#).

The Court has long held that this provision contains an important implicit exception. “[L]aws of nature, natural phenomena, and abstract ideas” are not patentable. *Diamond v. Diehr*, [450 U.S. 175, 185, 101 S.Ct. 1048, 67 L.Ed.2d 155](#) (1981) ; see also *Bilski v. Kappos*, [561 U.S. 593](#), —, [130 S.Ct. 3218, 3233–3234, 177 L.Ed.2d 792](#) (2010); *Diamond v. Chakrabarty*, [447 U.S. 303, 309, 100 S.Ct. 2204, 65 L.Ed.2d 144](#) (1980) ; *Le Roy v. Tatham*, 14 How. 156, 175, 14 L.Ed. 367 (1853) ; *O’Reilly v. Morse*, 15 How. 62, 112–120, 14 L.Ed. 601 (1854) ; cf. *Neilson v. Harford*, Webster’s Patent Cases 295, 371 (1841) (English case discussing same). Thus, the Court has written that “a new mineral discovered in the earth or a new plant found in the wild is not patentable subject matter. Likewise, Einstein could not patent his celebrated law that  $E=mc$  ; nor could Newton have patented the law of gravity. Such

discoveries are ‘manifestations of ... nature, free to all men and reserved exclusively to none.’ " *Chakrabarty, supra*, at 309, [100 S.Ct. 2204](#) (quoting *Funk Brothers Seed Co. v. Kalo Inoculant Co.*, [333 U.S. 127, 130, 68 S.Ct. 440, 92 L.Ed. 588](#) (1948) ). [Emphasis intended]"

17. Since the Supreme Court held natural foods cannot be patented there is an incentive for people like William Gates to create genetically modified food into infinity to control the food, an inelastic good, to control the people.

18. It is interesting to note Russian President Putin outlawed genetically modified food. It is also notable he sought the bread basket Ukraine. This may be to set him up as a savior for hungry people who cannot afford GMO, or who observe GMO foods without seeds cannot be grown in private by design and are less nutritious.

19. All of the actors misbehave by giving into temptations by those who entice their desires to a global plan, not free in Jesus Christ or free by court correction with the just rule of law to tame their untamed lusts.

20. I think outside of my case, this court may create case law to prevent schemes to increase in desperate conditions and hunger to prevent the overthrow of the government.

21. We do not have to give into temptation. We are not stuck. There is always a way out of sin. *Citing*, 1 *Corinthians* 10:13 (“No temptation has overtaken you except what is common to mankind. And God is faithful; he will not let you be tempted beyond what you can bear. But when you are tempted, he will also provide a way out so that you can endure it.”)

22. We must think things out. It is okay if you disagree with my on patent issues. You may come up with better ideas. *See, Proverbs* 27:17, (“Iron sharpens iron, and one man sharpens the face his neighbor,” by disagreement which helps us learn from one another to improve.

Thank you for your time and consideration.

Respectfully submitted,

Dated 7/8/23

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(302) 493-6693, Not acting as a lawyer  
Defending my First Amendment private right to  
believe in Jesus Christ as God, not money or  
mammon as God