

# Exhibit I

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

**The Honorable Judge and panel leader**

**Paul S. Diamond**

**Attn: Clerk of Court**

**Via Email**

**601 Market St Ste 16613,**

**Philadelphia, PA 19106**

**RE: In the Matter of Meghan Kelly/ Case 2:22-mc-00045 / Extension of time  
to file a for cause motion**

October 10, 2022

Dear Honorable Judge Paul D. Diamond:

I respectfully request additional time to respond with a for cause motion,  
should this court automatically report to all jurisdictions.

I got a flat on my bicycle tire. I am not sure what I will do about  
transportation. I alerted opposing counsel in my civil rights case and in my  
Delaware Disciplinary case, per the attached Exhibits incorporated herein as  
Exhibits A, and B.

To worsen matters, PA-ODC- rejected my request to stay proceedings.  
Please see Exhibits C and D incorporated herein by reference. I sent out pleadings  
to PA-ODC by riding my bicycle to the Post office on Friday, October 7, 2022. I  
seek to stay that case as well.



Because of surgery I had as a youth, I am in danger of death if I do not drink gallons of water a certain week of each month. I lose five pounds of water weight each month. I have consistently weighed less a week of each month for more than two decades due to dehydration. Please see the attached Exhibit E, incorporated herein by reference, which includes a medical exhibit and my proposals to improve our healthcare that harms. Healthcare is what has harmed me.

Dehydration is serious and may lead to death in my case. It has led to fainting in my life. I also have serious allergies and get anaphylactic shock. I have bad reactions to medicine, and oppose healthcare and mental healthcare on religious grounds.

I do not have good water. Without tags on my vehicle or money for gas, it is a time-consuming task to bike to the grocery store to buy water. In light of the fact I do not have time to fight 8 law suits simultaneously, I have not been able to drink enough clean water. I used to drink a gallon of water at the gym to prevent fainting and death. Now I do not have the means to go to the gym or to pay for a membership. Delaware prevents me from working as an attorney, and has caused me to focus all my time to address reciprocal law suits, appeals and the civil rights case to remedy their illegal proceedings.

On Friday as I was in line at the post office, I could not stand, my forehead had a cold sweat, I became dizzy, and a customer saved my life by getting me

water. As I sat down to collect strength to stand, the post office staff entered in the postage information on the customer's side, and messed up. I correctly, labeled the PA-ODC's information on my mail parcel. To my horror, on Saturday, October 9, 2022, the Post Office delivered me the package instead of PA-ODC. I talked to my post man, and asked him to look at the address which was a Philadelphia address and asked him to please try to fix the postal mistake. He took the package back after seeing my address was not the delivery address on the parcel. I also called the US post office's number. I spoke with a gentleman named Lionel. He put in a claim to correct the delivery.

The box is rather heavy. I am not sure what I will do if the delivery is not successful since the post office is located too far to walk to.

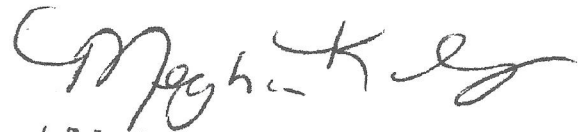
I also am attaching Exhibit F to show you one reason why I filed the law suit against former President Trump to dissolve his establishment of government religion by his attacks against democrats like me as seeking to eliminate the church or the bible, and his use of God, Christianity and the bible for his political vanity. People threatened me with bodily and property harm. A stranger talked about shooting me for my religious-political beliefs. One person shot two bullets in my friend's home based on his perceived religious or political beliefs.

I do not want to be harmed for my religious-political beliefs. I sought safety by the courts, only to be persecuted by the courts based on the members disdain towards my religious-political beliefs or poverty.

Freedoms are not free and are illusion if they require a bartered for exchange, making only those who have something other than their souls to exchange free to exercise First Amendment rights of religious belief, exercise, association, speech and petition.

Thank you for your guidance and consideration.

Respectfully,



/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Retired Bar Number 202268

October 10, 2022

# Exhibit A

Fw: Flat tire/58, 2022/21-1490

From: Meg Kelly (meghankellyesq@yahoo.com)

To: kathleen.vavala@delaware.gov; david.white@delaware.gov; david.weiss@usdoj.gov;  
meghankellyesq@yahoo.com

Date: Monday, October 10, 2022 at 09:44 AM EDT

Good morning,

Per the pictures below. My main source of transportation is not working. I tried to fix the tube yesterday, but it was flat this morning.

This may create an obstacle for me.

Thank you for keeping this in mind as I seek to figure out what I will do.

Have a good day.

Very truly,  
Meg

----- Forwarded Message -----


**From:** Meg Kelly <meghankellyesq@yahoo.com>

**To:** Meg Kelly <meghankellyesq@yahoo.com>


**Sent:** Monday, October 10, 2022 at 08:46:26 AM EDT

**Subject:** Flat tire

Sent from my iPhone

 IMG\_1426.jpg  
882.9kB

 IMG\_1427.jpg  
1.2MB

 IMG\_1428.jpg  
1.3MB











# Exhibit B



Fwd: Flat tire 21-1490

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: meghankellyesq@yahoo.com; zi-xiang.shen@delaware.gov  
Date: Monday, October 10, 2022 at 08:49 AM EDT

Good morning Zi-Xiang Shen, Esq.,  
I am having a problem with my main mode of transportation. I tried to fix the tube yesterday. It may be the tire.  
Thank you for your understanding in light of this. I have to figure this out. :(  
Have a good day,  
Very truly,  
Meg

Sent from my iPhone

Begin forwarded message:

From: Meg Kelly <meghankellyesq@yahoo.com>  
Date: October 10, 2022 at 8:46:26 AM EDT  
To: Meg Kelly <meghankellyesq@yahoo.com>  
Subject: Flat tire



















# Exhibit C

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive  
Dagsboro, DE 19939

Anthony Sodroski  
Office of Disciplinary Counsel  
1601 Market Street 3320  
Philadelphia, PA 19103

**RE: Report Discipline Order PA Bar No 202268 Retired/Supreme Court No 2913 DD3**

September 3, 2022

Dear Anthony Sodroski,<sup>1</sup>

On September 2, 2022, I received a letter from the Pennsylvania Supreme Court in Pittsburgh, PA relating to Meghan Kelly, matter No. 2913 DD3.

I also received a notice on my door that I missed a document. I left a voice message with your office concerning this fact.

I am arguing motions, and intend to draft and file a motion in the original disciplinary Court this Tuesday, September 6, 2022.

---

<sup>1</sup> I have religious opposition to using Mr., Mrs. or Miss, or Ms. I am a Christian, a child of God. I believe Jesus Christ teaches us not to use these titles to categorize people based on marital relationship or sex. See Bible, *Matthew 23:8-11*, also see, *Galatians 3:28* ("There is neither Jew nor Gentile, neither slave nor free, nor is there male and female, for you are all one in Christ Jesus."). I am called to unconditional love and respect others, not based on their relationship status or title as a male or female, as a parent, as married or single. Disparate treatment based on title as opposed to need is unjust.

Additionally, I brought a civil rights case, on or about October 25, 2022, in the Delaware District Court, No 21-1490, appellate Third Circuit Court, No. 21-3198.

In addition, there are a total of 6 other potential disciplinary proceedings against me, simultaneously, including the original Delaware proceeding.

Reargument has not been decided.

The Delaware Disciplinary proceeding was first brought, informally, in interference with my case against former President Donald J. Trump (“Trump”) to impede the outcome of the case, or to cause me to forgo my case, based on the Delaware Supreme Court’s and the arms’ of the Delaware Supreme Court political-religious animus, or poverty animus.

I brought a RFRA petition against Trump to alleviate a substantial burden upon my free exercise of religious belief, caused by Trump’s establishment of government-political-religion, through a series of his identified conduct, and executive orders.

Trump’s establishment of government-political-religion incited others to persecute me, socially, economically and physically, including by threatening harm to my property and life.

Someone allegedly shot into the home of my friend, Gregory Layton, almost hitting him and his wife as they sat at the kitchen table as two bullets entered their



home, based on Greg's perceived political or religious beliefs. I sought to safety from the Delaware Courts, only to be punished for asking for help. The Court punished me based on my religious-political beliefs contained in my religious-political-speech in the religious-political-petitions, and to cover up state misconduct.

The Delaware Disciplinary proceeding both informally and formally have lasted beyond a year.

Should this proceeding begin, it will likely last beyond a year too.

I seek to ask the Pennsylvania Supreme Court for permission to stay the proceeding, to allow me to file a "for cause" motion after the conclusion of **both**, my Civil rights case, regarding the disciplinary proceeding, and the original Delaware Bar proceeding before the Delaware Supreme Court, until the proceedings have been concluded, including the appeal to the US Supreme Court has been complete, or the time of appeal has lapsed.

Staying the proceeding will conserve judicial resources. A determination by the US Supreme Court on my appeal of the original discipling court may otherwise conflict with this Court's decision, or may give precedent, which may foreclose my case.

I am also considering appealing the Third Circuit's Reciprocal Disciplinary matter to the US Supreme Court, matter No. 22-8037. It appears those who have

been suspended or disbarred are afforded more Constitutional protections than those labeled “disabled” under the Third Circuit’s rules. (See *Rules of Attorney Disciplinary Enforcement Rules 6 and 16*) Disabled attorneys, unlike suspended or disbarred attorneys, are not permitted to file a “for cause motion” within 30 days of an Order issued reciprocating discipline to contest the original order on procedural defects and Constitutional concerns.

Essentially, the Third Circuit’s disciplinary rules appear to unconstitutionally disparately treat lawyers labeled “disabled,” by eliminating procedural due process protections, while affording more Constitutional protections to all other disciplined attorneys.

It is more advantageous to be disbarred than to be labeled as disabled under the Third Circuit’s rules.

So, I may ask for additional time, should I appeal the denial of receipt of documents for a “for cause” motion in the Third Circuit too.

Could you please let me know your position on my potential motions.

Instituting a case now will interfere with my appeal and civil rights case.

I am impoverished, unable to work at my former law firm, where I would be performing real estate settlements. I have been compelled to turn in my car tags. Car insurance is unaffordable, and I have religious oppositions to debt.

I also have religious oppositions to healthcare and mental healthcare.

This proceeding would cause a substantial burden on my exercise of access to the courts on appeal for the original disciplinary case, and in my civil rights case, by additional costs I am unable to afford, but for the original proceeding.

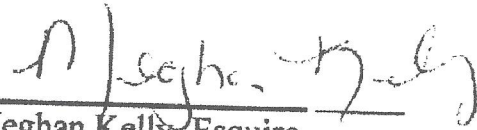
Your case will prejudice the outcome of my other two cases, by preventing me time and resources I require in order to make petitions in those two cases.

Attached, please find orders three jurisdictions who have instituted reciprocal disciplinary proceedings.

Thank you for your time and attention to this important matter.

September 3, 2022

Respectfully Submitted,



Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 202268 **RETIRED Bar**

Under religious objection, I declare, affirm that the foregoing statement is true and correct under the penalty of perjury.

Dated: September 3, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

# Exhibit D



Thomas J. Farrell  
Chief Disciplinary Counsel

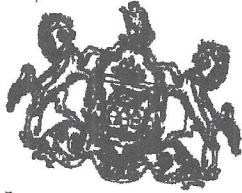
Raymond S. Wierciszewski  
Deputy Chief Disciplinary Counsel

Anthony P. Sodroski  
Disciplinary Counsel-in-Charge,  
Special Projects

Disciplinary Office  
1601 Market Street  
Suite 3320  
Philadelphia, PA 19103-2337

(215) 580-8206  
FAX (215) 580-4520

THE DISCIPLINARY BOARD  
OF THE  
SUPREME COURT OF PENNSYLVANIA



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Jeffrey M. Krulik  
Mark F. Gilson

September 12, 2022

Meghan Marie Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939

Re: In the Matter of Meghan Marie Kelly  
No. 2913 DD3 - Supreme Court

Dear Ms. Kelly:

Your correspondence dated September 3, 2022, has been received and reviewed by Office of Disciplinary Counsel (ODC). ODC will not agree to a stay of the above-captioned proceeding.

If the order of the Supreme Court of Delaware dated August 10, 2022, is vacated or stayed, please notify me and provide a copy of the order vacating or staying the August 10 Order.

Thank you.

Very truly yours,

*Anthony P. Sodroski*

Anthony P. Sodroski  
Disciplinary Counsel-in-Charge,  
Special Projects

APS/rbc

cc: Thomas J. Farrell, Chief Disciplinary Counsel  
Raymond S. Wierciszewski, Deputy Chief Disciplinary Counsel

# Exhibit E

## **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.**

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 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.



**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.

License No. 18929

Official Verification of Licensure Available at <https://deceda.doc.k12.de.us>

# State of Delaware

## Department of Education

### Initial License

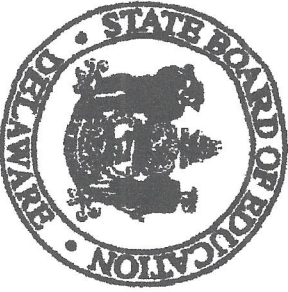
Know all persons by these Present, that

**Meghan Marie Kelly, Esq.**

has fulfilled the Licensure and Certification requirements of the Professional Standards Board and is certified in the following area(s):

- STANDARD: Teacher of Elementary Grades K-6 \*\*
- STANDARD: Teacher of Exceptional Children Grades K-12
- STANDARD: Teacher of Health Education Grades 5-12
- STANDARD: Teacher of Middle Level Mathematics Grades 6-8 \*\*
- STANDARD: Teacher of Physical Education Grades K-12
- STANDARD: Teacher of Social Studies Grades 9-12 (Valid 5-8 in a Middle School)

This is a valid license. This license will be activated upon employment with a Delaware Public School District/Charter School.



\*\* Indicates Highly Qualified in content areas covered by this certificate

Each License Holder is Responsible for Knowing and Satisfying License Renewal Requirements or Any Provisions Required to Retain His or Her License-Certificata

Issue Date: September 25, 2006  
Effective Date:  
Expiration Date:

Secretary of Education



LAW Transcript

# DUQUESNE UNIVERSITY

Record as of: 07/01/05

610 FORBES AVENUE PITTSBURGH, PA 15282-0299

**MS. MEGHAN M. KELLY**

DEGREE: JURIS DOCTOR

MAJOR: Juris Doctor - Day

MINOR:

Student ID:

SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS	SEM	COURSE DESCRIPTION	DEPT	CAT	T	COMPL	G.PTS
02-FAL	LEGAL PROCESS AND PROCEDURE	LAW	C156		1.00	3.00	7.5000		COMMERCIAL TRANSACTIONS I	LAW	C446	00	3.00	8.2500
	SEMESTER GPA = 3.5000				3.00	3.00	7.5000		APPELLATE PRACTICE & PROC	LAW	C414	00	0.00	0.0000
									SEMESTER GPA = 3.1667			00	12.00	20.5000
	CONTRACTS	LAW	C115		4.00	6.00	18.0000		CONFLICTS OF LAW	LAW	C152	00	3.00	10.0000
	PROPERTY	LAW	C112		0.00	4.00	10.5000		BANKRUPTCY	LAW	C405	00	2.00	7.0000
	TORTS	LAW	C109		0.00	0.00	0.0000		FED COURTS & THE FED SYS	LAW	C361	00	3.00	9.7500
	CIVIL PROCEDURE I	LAW	C200		1.00	3.00	9.7500		ROMAN LAW	LAW	C144	00	2.00	7.5000
	CRIMINAL LAW & PROCEDURE	LAW	C207		1.00	3.00	11.2500		COMMERCIAL TRANSACTIONS II	LAW	C448	00	3.00	9.7500
	LEGAL RESEARCH AND WRITING	LAW	C170		1.00	3.00	11.2500		SEMESTER GPA = 3.4231			00	13.00	44.5000
02-SPL	SEMESTER GPA = 3.1250						28.00	27.5000						
	SEM CAL SE WRONGS OF CRIM CONV	LAW	C191		1.00	2.00	7.5000		TOTALS CRED CPT - 16.00					
03-FAL	SEMESTER GPA = 3.7500				2.00	2.00	7.5000							
	LABOR LAB	LAW	C178				5.00	9.0000						
	HEALTH CARE FINANCE	LAW	C204				2.00	7.5000						
	EVIDENCE SECT B	LAW	C202				3.00	10.5000						
03-FAL	SEMESTER GPA = 3.3750						6.00	27.0000						
	LAW AND MEDICINE	LAW	C162				2.00	7.5000						
	CONSTITUTIONAL LAW - SECT B	LAW	C158		2	3.00	15.0000							
	TAXA FIN	LAW	C131		2	4.00	13.0000							
	CORPORATIONS SECT B	LAW	C206		1	4.00	13.0000							
	FAMILY LAW	LAW	C176		0	2.00	7.5000							
03-SPL	SEMESTER GPA = 3.1915						17.00	53.0000						
	TRIAL COURT CLERKSHIP	LAW	C241		10	3.00	0.0000							
04-FAL	SEMESTER GPA = 0.0000				00	3.00	0.0000							
	PROFESSIONAL RESPONSIBLIT	LAW	C208		1.00	3.00	0.0000							
	ESTATES AND TRUSTS	LAW	C429		00	1.00	9.7500							
	ENV ADVOCACY	LAW	C211		00	3.00	10.5000							

JURIS DOCTOR Degree Awarded on 06/05  
 Majors: \_\_\_\_\_ Minors: \_\_\_\_\_ Specializations: \_\_\_\_\_  
 Juris Doctor - Day

RAISED SEAL NOT REQUIRED  
 This official University transcript is printed on Secured paper and does not require a raised seal.  
*Patrick E. Jabala*  
 Patrick E. Jabala  
 University Registrar

MEGHAN M. KELLY

ISSUED TO STUDENT

Name: Meghan Marie Kelly

SEX: FEMALE

DOB: 06/11/02

ACADEMIC YEAR: 2

Current Academic Program:  
 College of Arts and Science  
 Bachelor of Arts  
 Major: History Education

UNIVERSITY OF DELAWARE Degrees Conferred:  
 Bachelor of Arts  
 College of Arts and Science  
 Major: History Education  
 Rank: 1213 of 3174 in class, 18 of 73 in History  
 Graduation GPA: 3.159

Completed NCATE/State Approved Teacher Education Program in Social Studies Education  
 University of Delaware  
 Confirmed May 2002

Admitted Program:  
 College of Education  
 Bachelor of Science in Education  
 Major: Elementary Teacher Education

Term	Course	Grade	Hours	Amount	Financial Aid
EDST-247	PROF ISSUES: HIST PERSPECTIVE'S		3	10,000	
ENGL-110	CRITICAL READING & WRITING		3	4,000	
HPER-120	EXERCISE AND CONDITIONING		1	1,000	
MATH-251	MATH FOR ELEMENTARY SCHOOL I		3	11,000	
POSC-240	INTRO TO INTERNATIONAL RELATIONS		3	6,000	
THEA-104	INTRO TO THEATRE AND DRAMA		3	8,000	
<b>Total</b>			<b>16</b>	<b>13,000</b>	<b>13</b>
<b>Cumulative</b>			<b>16</b>	<b>13,000</b>	<b>13</b>
					<b>39,000</b>
					<b>1164/4709</b>

Term	Course	Grade	Hours	Amount	Financial Aid
BISC-207	INTRODUCTORY BIOLOGY I		4	12,000	
HIST-206	UNITED STATES HISTORY		1	1,000	
HPER-120	BEGINNING BALLROOM DANCE		1	1,000	
<b>Total</b>			<b>8</b>	<b>4,000</b>	<b>3</b>
<b>Cumulative</b>			<b>24</b>	<b>17,000</b>	<b>16</b>
					<b>51,000</b>

Term	Course	Grade	Hours	Amount	Financial Aid
BISC-207	INTRODUCTORY BIOLOGY I		4	12,000	
ENGL-110	CRITICAL READING & WRITING		3	7,000	
GEOG-113	EARTH SCIENCE		4	12,000	
HPER-120	WALK FOR FITNESS		1	4,000	
MATH-252	MATH FOR ELEMENTARY SCHOOL II		3	9,000	
<b>Total</b>			<b>15</b>	<b>15,000</b>	<b>15</b>
<b>Cumulative</b>			<b>39</b>	<b>32,000</b>	<b>31</b>
					<b>95,000</b>
					<b>79/3538</b>

Transferred To:  
 College of Arts and Science  
 Bachelor of Arts  
 Major: History Education

Term	Course	Grade	Hours	Amount	Financial Aid
ENY-210	INTRO TO ITT AND ITT MARKING		3	11,000	
EDST-203	HUMAN DEVELOPMENT THROUGH 5th		3	9,000	
HIST-101	WESTERN CIV TO 1600		3	12,000	
MATH-253	MATH FOR ELEMENTARY SCHOOL III		3	7,000	
SCIN-101	PHYSICAL SCIENCE		4	14,000	
<b>Total</b>			<b>16</b>	<b>16,000</b>	<b>16</b>
<b>Cumulative</b>			<b>55</b>	<b>48,000</b>	<b>47</b>
					<b>149,000</b>
					<b>887/3302</b>

Term	Course	Grade	Hours	Amount	Financial Aid
HIST-102	WESTERN CIV: 1640-PRES		3	4,000	
<b>Total</b>			<b>3</b>	<b>4,000</b>	<b>3</b>
<b>Cumulative</b>			<b>58</b>	<b>52,000</b>	<b>50</b>
					<b>151,000</b>
					<b>900/3655</b>

Term	Course	Grade	Hours	Amount	Financial Aid
GEON-152	INTRO MACROECON: PRICE & MARKET		3	10,000	
GEON-120	WORLD REGIONAL GEOGRAPHY		3	7,000	
HIST-104	WORLD HISTORY TO 1640		3	11,000	
HIST-104	WORLD HISTORY TO 1640		3	11,000	
POSC-105	AMERICAN POLITICAL SYSTEM		3	9,000	
SPAN-106	SPANISH II - ELEM/INT		4	9,133	
<b>Total</b>			<b>16</b>	<b>16,000</b>	<b>16</b>
<b>Cumulative</b>			<b>89</b>	<b>82,000</b>	<b>81</b>
					<b>241,000</b>
					<b>1035/3254</b>

Term	Course	Grade	Hours	Amount	Financial Aid
SPAN-107	SPANISH III - INTERMEDIATE		4	10,667	
SPAN-207	CONTemporary Latin America I		3	11,000	
<b>Total</b>			<b>7</b>	<b>7,000</b>	<b>7</b>
<b>Cumulative</b>			<b>96</b>	<b>89,000</b>	<b>88</b>
					<b>272,667</b>
					<b>311,000</b>

Term	Course	Grade	Hours	Amount	Financial Aid
<b>Total</b>			<b>15</b>	<b>15,000</b>	<b>15</b>
<b>Cumulative</b>			<b>111</b>	<b>103,000</b>	<b>103</b>
					<b>353,000</b>
					<b>1035/3254</b>

Term	Course	Grade	Hours	Amount	Financial Aid
<b>Total</b>			<b>7</b>	<b>7,000</b>	<b>7</b>
<b>Cumulative</b>			<b>118</b>	<b>110,000</b>	<b>110</b>
					<b>360,000</b>
					<b>1035/3254</b>

**UNIVERSITY OF DELAWARE** DEWARE, DELAWARE 19710-8200

**TRANSCRIPT LEGEND**

The University of Delaware confers a plan in addition to the semester, a 5-week vacation semester and summer session during 5 weeks and 7-12 week classes. One year - 180 unit of credit is the standard credit load which is generally based on the credit for instruction of 15 units. Instruction in year, restriction plus work per semester. For students on probation, the length of the period may or number of sessions per week is in accordance to institutional time equivalent to be set in a regular semester.

University of Delaware adopted a grading system effective Fall 1981.

**GRADE STANDS**

A Quality grade  
 B Good  
 C Fair  
 D Poor  
 F Failure - no credit  
 W Withdrawn - no credit  
 I Incomplete - no credit  
 R Repeating - no credit  
 S Satisfactory - no credit  
 U Unsatisfactory - no credit  
 L Lacking - no credit  
 M Mailed - no credit  
 N Not taken - no credit  
 O Official Withdrawal - no credit  
 WF Waiver of instruction

**TEACHING CATEGORIES**

1. Instructional  
 2. Student Services  
 3. Administrative Services  
 4. Other (to be defined by institution)

**EXPLAINER NUMBERS**

121-029 Mean degree course  
 120-101 Instructional level course  
 200-200 Instructional level course  
 300-400 Advanced degree  
 500-200 Graduate level course  
 200-200 Ph.D. level course

Capitalize course number unless otherwise indicated. Only those students who are properly registered and formally admitted students in a Graduate program.

**UNIVERSITY OF DELAWARE AT RELEVANT OF STUDENT**  
 DO NOT RELEASE TO OTHERS WITHOUT  
 CONSENT OF STUDENT

This report copy requires upon development. A blank end will be returned to the student.



Irma Reinhard Marie Kelly

15 FEMALE 1906-01-01

10/11/22

10/11/22

TRANSCRIPT LEGEND

ACADEMIC YEAR

Spring 1999

EDUC-300	INTERMED MICROECONOMIC THEORY	3	9.000
HIST-101	UNIVERSITY IN THE CLASSROOM	3	10.000
HIST-101	PHYSICAL GEOGRAPHY	3	9.000
HIST-203	UNITED STATES HISTORY	3	11.000
Term		12	12.00
Cumulative		108	101.00
		100	311.667

Fall 1999

EDUC-304	ED PSYCHOLOGY: SOCIAL ASPECTS	3	11.000
EDUC-305	ED PSYCHOLOGY: COGNITIVE ASPECTS	3	12.000
GEOG-203	INTRO TO CULTURAL GEOGRAPHY	3	10.000
MATH-114	COLLEGE MATHEMATICS & STATISTICS	3	10.000
Term		12	12.00
Cumulative		120	113.00
		112	354.667

Academic Status: Dean's List.

Winter 2000

HIST-367	REEL HIST: HOLLYWOOD & AMER PAFT	3	10.000
THEA-102	INTRODUCTION TO PERFORMANCE	3	11.000
Term		6	6.00
Cumulative		126	119.00
		218	375.667

Spring 2000

GSCC-382	HISTORY OF WESTERN MEDICINE	3	7.000
HIST-268	SCOTLAND 1916-PRESENT	3	10.000
HIST-343	MEDIEVAL EUROPE 1050-1350	3	8.000
PHIL-302	MEDIEVAL PHILOSOPHY	3	6.000
POSC-387	AMERICAN POST-IMPERIAL THOUGHT	3	10.000
THEA-200	INTRO TO THEATRE PRODUCTION	3	10.000
Term		18	18.00
Cumulative		144	134.00
		133	416.667

Fall 2000

EDUC-420	READING IN THE CONTENT AREAS	1	4.000
HESC-368	COACHING TRACK & FIELD	(1)	
HIST-368	MODERN CHINA: 1600-1920'S	3	11.000
HIST-440	SEN: AFRICA UNDER COLONIAL PLANNING A COURSE OF INSTRUCTION	3	9.000
HIST-491	INTRODUCTION TO LAW	3	11.000
POSC-380		(3)	
Term		14	10.00
Cumulative		158	144.00
		143	451.667

NO ENTRIES BELOW THIS LINE

1449/3931

Spring 2001

Program Changed to:  
Major: History

EDUC-400	STUDENT TEACHING: SOCIAL STUDIES	4	(5)
HIST-493	PROB IN ENGL HIST & SOC SCI	4	(5)
Term		12	0.00
Cumulative		170	144.00
		143	451.667

Requirements completed for Bachelor of Ar. Sc.

Program Changed to:  
Major: History Education

Spring 2002

EDUC-400	STUDENT TEACHING: SOCIAL STUDIES	4	7.000
HIST-493	PROB IN ENGL HIST & SOC SCI	4	10.000
Term		12	12.00
Cumulative		182	156.00
		146	454.667

Academic Status: Honors.

NO ENTRIES BELOW THIS LINE

Spring 2002

EDUC-400	STUDENT TEACHING: SOCIAL STUDIES	4	7.000
HIST-493	PROB IN ENGL HIST & SOC SCI	4	10.000
Term		12	12.00
Cumulative		194	168.00
		158	464.667

Academic Status: Honors.

NO ENTRIES BELOW THIS LINE

The University of Delaware accepted a grading system effective Fall 1991.

EXCELLENCE

A	Excellent	Quality points
A-	Very Good	3.67 per credit
B+	Good	3.33 per credit
B	Satisfactory	3.00 per credit
B-	Below Average	2.67 per credit
C+	Below Average	2.33 per credit
C	Average	2.00 per credit
C-	Below Average	1.67 per credit
D+	Below Average	1.33 per credit
D	Below Average	1.00 per credit
D-	Below Average	0.67 per credit
F	Failure	0.00 per credit
W	Withdrawn	0.00 per credit
NR	Not Reported	0.00 per credit

UNIVERSITY OF DELAWARE

MEGHEAN MARIE KELLY

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

DATE OF ADMISSION: 11-4-95  
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

# Exhibit F



## Troopers Investigating Shots Fired Complaint- Camden

*Camden* – The Delaware State Police are investigating a shots fired complaint that occurred last evening.

The incident occurred on April 22, 2020, at approximately 9:14 p.m., when Troopers were dispatched to the 9000 block of Willow Grove Road, Camden, for reports of shots fired. Upon arrival, contact was made with the two victims who reside at the residence. The investigation revealed the residents were sitting inside when they heard gunshots coming from outside. After hearing the shots, they discovered a projectile hole in the wall above their heads. A search of the area conducted by Troopers located shell casings outside the residence and along the roadway. No one was injured during the incident.

Anyone with information regarding this incident is asked to contact Troop 3, Criminal Investigations Unit, Detective D. Blomquist at (302)697-4454. Information may also be provided by calling Delaware crime stoppers at 1-800-TIP-3333 or via the internet at <http://www.delaware.crimestoppersweb.com>

If you or someone you know is a victim or witness of crime or have lost a loved one to a sudden death and are in need of assistance, the Delaware State Police Victim Services Unit/Delaware Victim Center is available to offer you support and resources 24 hours a day through a toll free hotline 1800 VICTIM-1. (1800 842-8461). You may also email the unit Director at [debra.reed@state.de.us](mailto:debra.reed@state.de.us).

You can follow the Delaware State Police by clicking on:

Delaware State Police Official Web Site

Facebook

Twitter

Nextdoor

Please tell us how we're doing via our Citizen Satisfaction Survey.

Presented by Public Information Officer, Senior Corporal Heather Pepper

Released: 042320 0850







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**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Monday, October 10, 2022 7:51 PM  
**To:** PAED Documents  
**Cc:** Meg Kelly  
**Subject:** Case 2:22-mc-00045-/In the Matter of the Member of the Bar Meghan Kelly/ Letter to the Honorable Judge Paul S. Diamond/transportation issue  
**Attachments:** Letter to Judge Diamond Oct 10.pdf; Exhibit A to DE-ODC and US AG regarding transportation.pdf; Exhibit B email to opposing counsel in Civil rights case.pdf; Exhibit C request PA ODC's position.pdf; Exhibit D PA odc rejects stay.pdf; Exhibit E healthcare docs.pdf; Exhibit F substance on car two bullets shot above head of Greg and his wife.pdf

**CAUTION - EXTERNAL:**

Attached, please find a letter, with exhibits, to the panel, in care of Judge Paul S. Diamond.

Could you please file this.

Thank you for your help.

Have a good day.

Respectfully,  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939

meghankellyesq@yahoo.com  
(302) 493-6693  
Retired Bar No 202268

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.



# Exhibit J

**NOT PRECEDENTIAL**

UNITED STATES COURT OF APPEALS  
FOR THE THIRD CIRCUIT

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Nos. 21-3198 & 22-2079

---

MEGHAN M. KELLY,  
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ; DISCIPLINARY COUNSEL  
KATHLEEN M. VAVALA; DAVID A. WHITE, CHIEF DISCIPLINARY COUNSEL;  
OFFICE DISCIPLINARY COUNSEL; BOARD ON PROFESSIONAL  
RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE;  
PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL  
DELAWARE

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On Appeal from the United States District Court  
for the District of Delaware  
(District Court No. 1-21-cv-01490)  
District Judge: Hon. Colm F. Connolly

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Submitted Pursuant to Third Circuit L.A.R. 34.1(a)  
April 11, 2023

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Before: CHAGARES, Chief Judge, SCIRICA and AMBRO, Circuit Judges

(Filed: April 20, 2023)

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OPINION\*

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CHAGARES, Chief Judge.

Meghan Kelly, a Delaware attorney, filed a complaint for injunctive and related relief to halt a state proceeding to adjust her bar status to “disability inactive” (the “disability proceeding”). The disability proceeding has since concluded. For the reasons that follow, we will dismiss the appeal in part as moot and affirm in part the District Court’s judgment dismissing the complaint. We also will affirm the District Court’s other orders, including its post-judgment orders denying reconsideration.

I.<sup>1</sup>

Delaware’s Office of Disciplinary Counsel (“ODC”)<sup>2</sup> informed Kelly in August 2021 that it had concerns about her fitness to practice law and requested that she voluntarily submit to a mental health examination. Kelly refused an examination. The ODC then informed her that it would petition the Preliminary Review Committee (“PRC”)<sup>3</sup> to place her Delaware bar membership on disability inactive status.

Kelly responded by filing a 103-page pro se complaint in the United States District

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\* This disposition is not an opinion of the full Court and, pursuant to I.O.P. 5.7, does not constitute binding precedent.

<sup>1</sup> Because we write for the parties, we recite only facts pertinent to our decision.

<sup>2</sup> The ODC is an independent arm of the Delaware Supreme Court that has authority to recommend disciplinary action regarding the practice of law in Delaware. See Del. Supreme Ct. Rule 64(e)(3).

<sup>3</sup> The PRC reviews the recommendations of the ODC following its initial investigation. Delaware Lawyers’ Rules of Disciplinary Procedure (“Del. Disc. Rules”) 3(a).



Court for the District of Delaware naming the ODC and several of its officials, the PRC, the Board of Professional Responsibility (“BPR”),<sup>4</sup> and the state Attorney General (collectively referred to as “the defendants”). In it, she claims the defendants are pursuing the disciplinary proceeding to malign and retaliate against her based on her political and religious beliefs. Kelly’s complaint seeks injunctive relief and asserts claims under § 1983, for intentional infliction of emotional distress, obstruction of justice, and for injury to her reputation. She seeks relief in the form of an injunction, attorneys’ fees, and “possibly” damages for emotional distress. Complaint 103.<sup>5</sup>

The District Court dismissed the complaint and denied related relief, including a request for a preliminary injunction, concluding that it should abstain under Younger v. Harris, 401 U.S. 37 (1971). It determined: (1) the disciplinary proceeding falls within an “exceptional category” covered by Younger, see Sprint Commc’ns v. Jacobs, 571 U.S. 69, 78 (2013); and (2), the disciplinary proceeding is: (a) a state judicial proceeding that (b) implicates important state interests and (c) allows an adequate opportunity to raise constitutional challenges, see Middlesex Cty. Ethics Comm. v. Garden State Bar Ass’n, 457 U.S. 423, 432 (1983). Kelly timely appealed.

Kelly then filed in the District Court a “motion for reargument” and other motions, which the court construed as seeking reconsideration under Federal Rule of

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<sup>4</sup> The BPR conducts hearings and makes findings, conclusions, and recommendations in attorney discipline and disability matters. Del. Disc. Rule 2(a). The BPR submits its report and recommendation to the Delaware Supreme Court for review. Del. Disc. Rule 9(e).

<sup>5</sup> Page 103 of the Complaint appears to have been omitted from the Supplemental Appendix.

Civil Procedure 59(e) and denied. Kelly filed an amended notice of appeal to incorporate that order and continued filing motions in that court. She sought, among other things, reconsideration of the reconsideration denial under Rules 52(b) and 59(e). The District Court denied relief, and Kelly filed a second notice of appeal. The appeals have been consolidated for all purposes.

The Delaware Supreme Court issued an order while the appeals were pending, transferring Kelly to disability inactive status.<sup>6</sup> It noted that Kelly's court filings "were confusing and unfocused, irrelevant to the issues at hand, demonstrated a lack of understanding of the role of courts, and were non-compliant with court rules." Supplemental Appendix ("Supp. App.") 149. Due to Kelly's religious objection to a mental health examination, none was conducted. The Delaware Supreme Court instead considered the record, noting that Kelly's "inability to make cogent legal arguments, present relevant evidence, or identify relevant legal authority is painfully clear from the record." Supp. App. 154. It concluded that Kelly's "lack of competence to practice law endangers prospective clients, the public, and the orderly administration of justice." Supp. App. 155. The court also considered and rejected Kelly's constitutional claims.

Kelly's bar status is now disability inactive and she cannot practice law in Delaware. If she wishes to seek reinstatement, she must petition the Delaware Supreme Court for reinstatement to active status. See Del. Disc. Rule 19(e).

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<sup>6</sup> The Delaware Supreme Court appointed counsel for Kelly at no cost to her, but she elected to proceed pro se.



II.<sup>7</sup>

A.

Kelly's complaint primarily seeks to vindicate First and Fourteenth Amendment rights through an injunction to halt the disability proceeding. See Supp. App. 130–35; see also Supp. App. 39 (“I brought this law suit . . . to enjoin proceedings brought by the Defendants to place my attorney license on inactive disabled in violation of the First Amendment . . . [and] Fourteenth Amendment. . .”). Because Delaware since has concluded the disability proceeding, the requested injunctive relief is no longer available. That aspect of the complaint is therefore moot.<sup>8</sup> See Berger v. Cuyahoga County Bar Ass’n, 983 F.2d 718, 724 (6th Cir. 1993) (“[I]ssuance of the [disciplinary] decision by the Ohio Supreme Court moots plaintiffs’ claims for injunctive and declaratory relief against defendants.”); Partington v. Gedan, 961 F.2d 852, 858 (9th Cir. 1992) (concluding that, when the underlying disciplinary matter came to a close, “a request for injunctive relief from those proceedings is now a moot issue”).

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<sup>7</sup> Kelly invoked the District Court’s jurisdiction under 28 U.S.C. § 1331. We have jurisdiction to review the District Court’s judgment and orders under 28 U.S.C. § 1291.

<sup>8</sup> Kelly presents challenges to the Delaware Supreme Court’s order adjusting her status, claiming she was denied notice, discovery, an impartial judge, an ability to present evidence and witnesses, and the like. These issues are beyond the scope of the current appeal. After the District Court dismissed her complaint, Kelly moved to amend the complaint to add claims concerning the Delaware Supreme Court’s decision to adjust her bar status and to add the Delaware Supreme Court as a party. It does not appear that the District Court has ruled upon Kelly’s post-judgment motions, although it appears that these attempts to pursue a federal court challenge to the Delaware Supreme Court’s order would be barred. See, e.g., Partington v. Gedan, 961 F.2d 852, 865 (9th Cir. 1992) (holding that the Rooker-Feldman doctrine barred federal court from reviewing state court imposition of attorney discipline sanction).

B.

To the extent any of Kelly's claims are not moot, we agree that the District Court properly abstained under Younger. We review the District Court's decision to abstain de novo. PDX N., Inc. v. Comm'r N.J. Dep't of Labor, 978 F.3d 871, 881 n.11.

Attorney discipline matters<sup>9</sup> fall within the narrow range of cases in which Younger abstention may be appropriate. See Middlesex County Ethics Comm. v. Garden State Bar Ass'n, 457 U.S. 423, 434 (1982). Younger abstention is therefore appropriate where the disciplinary matter: (1) is a state judicial proceeding that (2) implicates important state interests and (3) provides an adequate opportunity to raise constitutional challenges. Id. at 432. The burden rests on the plaintiff to show that the state procedures do not provide an adequate opportunity to present the federal claims. See Schall v. Joyce, 885 F.2d 101, 107 (3d Cir. 1989).

Kelly argues that the disability proceeding did not permit her to present constitutional claims. She contends, without legal support, that the Delaware Supreme Court is "without subject matter jurisdiction" over her constitutional claims. Kelly Br. 15. Kelly points to no legal bar to bringing her constitutional challenges in the disciplinary proceeding and thus fails to meet her burden.

---

<sup>9</sup> Delaware conducts attorney discipline and attorney disability matters in the same manner. Del. Disc. Rule 19(c) ("The [disability] procedures and hearings shall be conducted in the same manner as disciplinary proceedings."). We therefore treat the disability proceeding as equivalent to a disciplinary proceeding for purposes of our analysis.



Kelly also contends that abstention was inappropriate due to “bad faith, harassment, or extraordinary circumstances.” Kelly Br. 18. She is correct that, if shown, bad faith, harassment, or extraordinary circumstances provide exceptions to Younger abstention. See Middlesex, 457 U.S. at 435. Kelly merely presents conclusory statements in this regard. She has failed to support adequately her claim of bad faith, harassment, or extraordinary circumstances to warrant a Younger exception.

Kelly finally claims that she seeks damages that are not available in the state forum, and so her case should have been stayed under Younger rather than dismissed and now should be permitted to proceed. We disagree because damages are unavailable. Delaware’s Disciplinary Rules provide that the BPR, the PRC, the ODC and its members, and others involved in the disciplinary process are “immune from civil suit for any conduct in the discharge of their official duties.” Del. Disc. Rule 10.

C.

We review the District Court’s denial of reconsideration for abuse of discretion. See Lazaridis v. Wehmer, 591 F.3d 666, 669 (3d Cir. 2010). Kelly did not show an intervening change in controlling law, the availability of new evidence, or the need to correct a clear error of law or fact to prevent manifest injustice, and thus did not meet the standard for reconsideration. See Max’s Seafood Café ex rel. Lou-Ann, Inc. v. Quinteros, 176 F.3d 669, 677 (3d Cir. 1999). The District Court therefore did not abuse its discretion in denying relief.

D.

Kelly seeks review of every interim ruling the District Court made in her proceeding. We have considered her arguments and the record below and conclude that no relief is warranted.

III.

For the foregoing reasons, we will dismiss as moot any claims concerning the aspects of Kelly's complaint that seek injunctive relief. We will affirm the remainder of the District Court's judgment, its post-judgment orders, and all other orders on appeal.<sup>10</sup>

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<sup>10</sup> The defendants' motion for summary affirmance is denied. The defendants' motion to supplement the appendix is granted. Kelly's motion to correct an error of fact is considered but no action will be taken, as it is unclear what relief it seeks. Kelly's motion for reconsideration is denied.



# Exhibit K

KELLY, MEGHAN M [REDACTED] 8 A & P

page 1 of 1

Electronically signed by: Dr. Parker, Aimee 04/21/2023

99202

X Medical

ASSESSMENT:

1 H11.32 Conjunctival hemorrhage, left eye

PLAN:

1 Reassured pt on benign nature of condition

6

6

Bill Code	Procedure Codes	Description
1 99202	99202	Office outpatient visit new

RETURN TO CLINIC:

7

Addendum:



KELLY, MEGHAN M 01/29/2023 ROS

Electronically signed by: Dr. Parker, Aimee 04/21/2023

page 1 of 1

REVIEW OF SYSTEMS:

X Review of systems reviewed and confirmed by providing physician (documentation initiated 01/08/2014).

DO YOU CURRENTLY HAVE ANY OF THESE PROBLEMS?

Ocular Pain Assessment 1-10: 4

WCC-6

GENERAL: (Ex: fever, weight loss, weight gain, fatigue?) None ✓

EAR, NOSE, THROAT: (Ex: allergies, sinus, cough, dry mouth/throat?) None ✓

CARDIOVASCULAR: (Ex: high BP, heart surgery, vascular disease?) None ✓

RESPIRATORY: (Ex: asthma, bronchitis, emphysema, COPD?) None ✓

GENITAL, KIDNEY, BLADDER: (Ex: kidney stones, frequent urination, impotence?) None ✓

MUSCLES, BONES, JOINTS: (Ex: arthritis, joint pains, head or neck injury?) None ✓

SKIN: (Ex: growths, rashes, acne, moles?) None ✓

NEUROLOGICAL: (Ex: headaches, migraines, seizures?) None

PSYCHIATRIC: (Ex: depression, anxiety, insomnia?) None

ENDOCRINE: (Ex: thyroid dysfunction, diabetes?) None

BLOOD/LYMPH: (Ex: anemia, high cholesterol, bleeding disorders?) None

ALLERGIC / IMMUNOLOGIC: (Ex: seasonal allergies, rheumatoid, AIDS, allergy shots, lupus?) None

GASTROINTESTINAL: (Ex: diarrhea, constipation, ulcers, reflux?) None

Allersim

Addendum:

KELLY, MEGHAN M [REDACTED] PR/ER

Electronically signed by: Dr. Parker, Aimee 04/21/2023

page 1 of 1

CHIEF COMPLAINT irritated eye

Location OS

Timing Always

Quality worse

Severity "doesnt do scales", sharp pain

Context rash on face past week, got worse when using cold compress. Daily use

Duration 3 days

Associated red, painful, watery

X Chief complaint and history of present illness obtained by providing physician (documentation initiated 01/08/2014).

VA OD cc 20/20-1

EYE MEDSnone

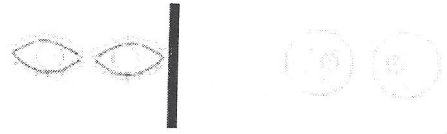
VA OS cc 20/20-2

PUPILS PERRL; neg APD

EOM FROM OU (+)pain in all gazes, (-)diplopia

CF FTFC OD, OS

Blood Pressure 134 / 91



IOP (Ta) OD 18 mmHg

Adnexa clear

OD

ANTERIOR SEGMENT clear

OS

IOP (Ta) OS 17 mmHg

Lids/Lashes clear

clear

Time 02:35 PM

Bulb conj white and quiet

subconj heme interpalpebral temp

Palp conj tr papillae

tr papillae

Dilated? No

Tear meniscus normal

normal

Cornea clear

clear, no staining

Iris flat and intact

flat and intact

A/C deep and quiet

deep and quiet

Angles open

open

Lens clear

clear

OD

POSTERIOR SEGMENT

OS

C/D

H

V

H

Addendum:



KELLY, MEGHAN M 01/19/1978 Med Hx

Electronically signed by: Dr. Parker, Aimee 04/21/2023

page 1 of 1

X Past, family and social history and vital signs reviewed and confirmed by providing physician (documentation initiated 01/08/2014).  
PRIMARY CARE PHYSICIAN none

Prescribed Date - Medication Name - Status - Form - Prescribed Date - Medication Name - Status - Form  
- Empty List - - - - -

X No current medications

X Patient did not bring complete medication list and is unsure of dosage and/or frequency.

02:25 PM

Status - Allergy Agent - Reaction - Severity  
- Empty List - -

X No known drug allergies

OTC none

Vitamins multi, c, k, glucosamine, calcium, zinc, magnesium

PATIENT MEDICAL HISTORY:  
none

Injuries, Surgeries, Hospitalization  
none

Relationship - Disease or Condition  
Empty List -

SOCIAL HISTORY

Occupation: Not working

Smoking Status Never smoker (<100 cigs equiv)

Alcohol no

Recreational Drugs no

Addendum:

*Wrong I told the Dr. I have allergies  
RXN to drugs and other allergi*

*Went  
indicated complications  
loss of 5 lbs. due to surgery  
as a teenager requiring  
water and rest*

Notes:  
avoids allergy medications

Oriented x 3  
X Yes  
No

Mood/affect  
Normal affect/mood

Height: 5 4

Weight: 110

HbA1c Lab Test Result

Race White

Ethnicity Not Hispanic or Latino

Preferred Language English

*↑  
I said I  
same,  
5 lb.  
115.*

KELLY, MEGHAN M [REDACTED] 8 A & P

Electronically signed by: Dr. Sprague, Hayley 04/25/2023

page 1 of 1

99213

X Medical

ASSESSMENT:

1 H11.32 Conjunctival hemorrhage, left eye

2 H11.153 Pinguecula, bilateral

6

PLAN:

1 resolving Reassured pt on benign nature of condition, called in neo/poly/dex qid at patients request

2 pt ed on benign condition,

6

Bill Code	Procedure Codes	Description
1 99213	99213	Office outpatient visit est

RETURN TO CLINIC:

7



Date - Status - Prescribed Medication  
4/25/2023 - Active - dexamethasone 1 MG/ML / neomycin 3.5 MG/ML / polymyxin B 10000 UNT/ML Ophthalmic Suspension, Sig: INSTILL 1 DROP IN LEFT EYE 4 TIMES A  
DAY, Disp 5.0000, No Refills

Search Online For RxNorm Codes

RX:	Status	Active
Strength	Form	
SIG:		
Fill 0.00	Refills	0
Type Medication	Start Date	04/25/2023 1:41 PM
Category	End Date	04/25/2023 1:41 PM
Reason Done		
Reason Not Done		
Notes:		

CHIEF COMPLAINT painful eye

Location OS

Timing constant

Quality worse

Context with cls

Modifiers nothing relieves

Associated inner corner OS, redness, painful, bump on LUL

X Chief complaint and history of present illness obtained by providing physician (documentation initiated 01/08/2014).

VA OD cc 20/20-1

EYE MEDSnone

VA OS cc 20/20

PUPILS PERRL; neg APD

EOM FROM OU (-)pain, (-)diplopia

Blood Pressure 119 / 78

IOP (Ta) OD 20 mmHg

IOP (Ta) OS 23 mmHg

Time 01:11 PM

Dilated? No

		OD		ANTERIOR SEGMENT	OS
Adnexa	clear			clear	
Lids/Lashes	clear			clear	
Bulb conj	white and quiet, pinguecula temporal			resolving subconj heme interpalpebral temp, pinguecula temporal	
Palp conj	clear			clear	
Tear meniscus	normal			normal	
Cornea	clear			clear	
Iris	flat and intact			flat and intact	
A/C	deep and quiet			deep and quiet	
Angles	open			open	
Lens	clear			clear	

OD

POSTERIOR SEGMENT

OS

C/D 0.00 H

0.00 V 0.00 H

0.00



KELLY, MEGHAN M 01/19/1978 Med Hx

Electronically signed by: Dr. Sprague, Hayley 04/25/2023

page 1 of 1

X Past, family and social history and vital signs reviewed and confirmed by providing physician (documentation initiated 01/08/2014).  
PRIMARY CARE PHYSICIAN none

Prescribed Date - Medication Name - Status - Form  
- Empty List - -

X No current medications  
Status - Allergy Agent - Reaction - Severity  
- Empty List - -

01:03 PM

OTC none

Vitamins multi, c, k, glucosamine, calcium, zinc, magnessium

Notes:

pt states that she loses 5 pounds every month and has to drink lot of water to prevent dehydration  
pt has some bad reactions to meds- unsure of names

PATIENT MEDICAL HISTORY:  
Allergies

Injuries, Surgeries, Hospitalization  
Ovarian cyst sx (11/01/1994)

Oriented x 3  
X Yes  
No

Mood/affect  
Normal affect/mood

Relationship - Disease or Condition  
Empty List -

Height: 5 4 Weight: 110

HbA1c Lab Test Result

SOCIAL HISTORY

Occupation: Not working

Smoking Status Never smoker (<100 cigs equiv)

Alcohol no

Recreational Drugs no

Race White

Ethnicity Not Hispanic or Latino

Preferred Language English

# Exhibit L



21-1490 No luck getting a simple antibiotic or even a visit with general doctor/ERs are the worst care ever/I oppose going to the ER

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov; caneel.radinson-blasucci@delaware.gov; meghankellyesq@yahoo.com

Date: Thursday, April 27, 2023 at 11:47 AM EDT

Hello,

I have been on the phone all day. It is a nightmare. I believe people go to hell when they say trust the science or doctors by making them God in place of using your own free will to discern what is loving to overcome lusts.

The Primary care doctor refuses to see me since I have not been there since 2014. They require to gain money by an appointment to gather statistics on me. I believe people go to hell for using people as statistics for material gain, even to gain of knowledge, under the lie of the common good. The soonest the primary care doctor has for appointments is July where they would compel me to violate my religious belief by collecting my statistics so they may get more NIH and private money. It is disgusting. I am not going to violate my religious belief for bad care. Part of the 4th Industrial Revolution is exploiting people as products to use and experiment on. Thus, keeping track of health data and vitamins is intended to aide them in using people in wicked science made to harm and made to create waste by design.

The third leading cause of death used to be going to the doctors. They harm more than they heal. I oppose blindly going to the ER. The last time I did that when I fell from my house, they messed up and said whoops you sliced your liver and we missed it. They could have prevented a scar on my cheek but my deceased Doctor Brown gave me bad advice too. Never blindly rely on doctors. Think things out yourself please. Healthcare professionals often are blinded by dumbed down training and paychecks.

I have sincere religious objections to healthcare and mental healthcare. If you look at two of the books regarding the 4th Industrial Rev. I provided you, you will see made to create waste and harm healthcare proposed to sustain positions, power and profit for charities, businesses and banks. They create need and waste to serve their greed and gain not good.

My vision is blurry.

Thank you,  
Meg

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.	)	

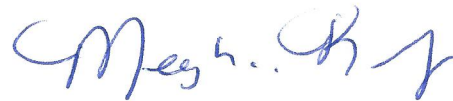
CERTIFICATE OF SERVICE OF  
PLAINTIFF MEGHAN KELLY' TWENTY SIXTH AFFIDAVIT

I, Meghan M. Kelly, Esquire, hereby certify on 4/27/23, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

Caneel Radinson-Blasucci  
Delaware Department of Justice  
820 North French Street  
6<sup>th</sup> Floor  
Wilmington, DE 19801

Dated April 27, 2023

Respectfully submitted,



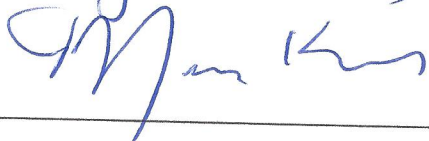
Meghan M. Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693



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: 4/27/23

Meghan Kelly (printed)

 (signed)