

No. _____
Application No. 23A144
IN THE SUPREME COURT OF THE UNITED STATES
Meghan M. Kelly, Petitioner
v.
United States District Court, Eastern District of Pennsylvania

Petitioner Meghan Kelly's Petition for leave to exceed the page limit in her Writ of Certiorari of the Appellate Courts Orders

Petitioner Plaintiff Meghan Kelly, Esq. pro se pursuant to the 5th Amendment right to a fair proceeding, the 1st Amendment right to petition, the Court's equitable powers and Supreme Court Rules 22 and 32, and any other applicable rule this Court deems just, move this Court to permit me to exceed the page limit under Rule 34 (2)(b) in my petition for writ of certiorari of the United States Court of Appeals for the Third Circuit Case No 22-3372 decisions. I file the Petition for writ of certiorari, and Petitioner Meghan Kelly's Motion for Leave to file in Forma Pauperis simultaneously herewith and incorporate them herein, and state:

1. I Meghan Kelly, for good cause, respectfully request to be excused from the page limit. Rule 34 (2)(b) limits the page of briefs not provided in booklet format to 40.
2. 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.
3. 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.
4. 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.

5. This Reciprocal Order by Appellee is based on the Delaware Order I seek to overturn based on lack of subject matter jurisdiction, violations of my First Amendment rights, procedural due process violations and other claims, especially since the DE Supreme Court acted as witness, judge and prosecutor's assistant in a civil rights case, while it concealed evidence in my favor necessary to my defense.

6. Justice Diamond of the Eastern District Court entrapped me despite indicating it was not disciplining me because it knew I believed I was retired before the Court and required to call witnesses since I was deprived of that right in the original forum despite my assertion. So, the Court disbarred me as retired. This may cause 6 additional law suits and potential appeals needlessly wasting judicial resources while causing irreparable injury to me in terms not only of loss of my right to buy and sell but for my religious beliefs, but punishment and loss of 1st Amendment rights to petition, speak, believe, exercise belief and associate. US Amend I, XIV.

7. Given the severity of the order, and the risk of loss, and other additional important information I attempted to alert the court too including but not limited to my belief there is a scheme to overthrow the government after 2050, I require additional pages. This Court did not docket pleadings apprising this court of all of my concerns and the danger I believe the members of the US Supreme Court are in.

8. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice, including irreparable injuries in terms of loss of 1st Amendment rights. *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.

9. This Court must grant my request for additional words to prevent government abuse against my person, oppression, and injustice.

10. 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.

11. 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.

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

13. 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. ¹

¹ . 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,

14. “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).

15. “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.”²

16. “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)

17. 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.”

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.").

² *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).

18. 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.

19. That right 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.

20. 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.

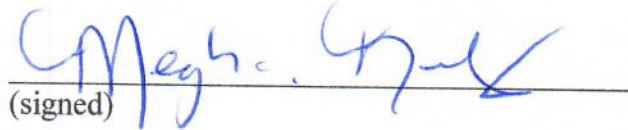
December 19, 2023

Respectfully submitted,
/s/Meghan Kelly
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Under Religious objection I declare, affirm that the foregoing statement is true and correct

Dated: 12/19/2023

Meghan Kelly
(printed)


(signed)