

No. \_\_\_\_\_  
Application No. 23A100

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

**Petitioner Plaintiff Meghan Kelly's Petition for Leave to exceed the page limit in her  
Petition for writ of certiorari to the United States Court of Appeals for the Third Circuit  
Case No 21-3198**

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US Supreme Court No 283696

## QUESTION PRESENTED

Whether I, Petitioner Meghan Kelly averred good cause requiring this Court to grant my request for leave to exceed the page limit given:

1. the voluminous amount of claims I must assert and not waive to prevent the vitiation of my fundamental rights, and other asserted claims, not merely my licenses to practice law, most importantly my private 1<sup>st</sup> Amendment exercise of religious belief in Jesus Christ, my private 1<sup>st</sup> Amendment right to petition the government regarding government incited substantial burdens upon my religious exercise of belief in Jesus as God not money as God; and my private 1<sup>st</sup> Amendment right to speech contained in my petitions applicable to the Defendants pursuant to the 14<sup>th</sup> Amendment;
2. the irreparable injury to me in terms of loss of Constitutional rights and other claims should pages be denied;
3. Justice Alito denied my second application for time I require to tighten up and more effectively and concisely draft my petitions;
4. the Third Circuit Court's mandate indicates my claims were not included on the record when I asserted them on the record and must include my verbatim claims and attach the records to prevent irreparable injury to me in terms of vitiation of my private Constitutional rights and other claims based in part on an error of fact by the Appellate court to show the facts were presented and preserved for appeal and included in my appeal in the appellate court.
5. Some of my claims will be vitiated by statute of limitations including but not limited to violations of my 1<sup>st</sup> Amendment right to petition without government retaliation but for the exercise of my right to petition the courts to alleviate a government incited substantial

burden upon attorneys facing economic hardship during a global pandemic for exemptions on bar dues filed January and February 2020. Other claims approach the statute of limitations,

6. I must assert my claims now since poverty and my religious beliefs against debt create an obstacle so great as to deny me access to the courts should I be compelled in bad faith to start all over again as I continue to fight other reciprocal cases or threats of reciprocal cases, and
7. the Constitutional issues and claims below must be addressed to protect not only me, but others beyond me from professional government backed persecution based on eliminating people's license to buy or sell based on exercise of fundamental rights, specifically in my case my religious belief in Jesus.

## **LIST OF PARTIES**

All parties appear in the caption of the case on the cover page.

## **CASES DIRECTLY RELATING TO THIS CASE**

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings Kelly v Swartz et al 22A747, Kelly v Swartz et al. 22-6783, Kelly v Swartz et al. 23A100.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 Kelly v DE Office of Disciplinary Counsel.

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court Kelly v Third Circuit Court of Appeals No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing Kelly v Pennsylvania Office of Disciplinary Counsel US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

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## STATEMENT OF CASE

I, 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 21-3198 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 pages.
2. I am appealing a decision dismissing a voluminous amount of claims. Some of the claims will expire by the statute of limitations should this appeal be denied, leaving me no remedy, including but not limited to violations of my exercise of my right to petition on behalf of all attorneys facing economic hardship for an exemption of bar dues (A-4, A-5), my right to petition for an exemption from notarizing pleadings while Defendant Trump had covid without government retaliation but for my exercise of the right to petition, (DI 2, DI58), for relief from violations of my right to petition to defend my exercise of religious belief from the substantial burden former President Donald J. Trump caused by his establishment of government religion under the First Amendment and Religious Freedom Restoration Act lawsuit ("RFRA"), right to petition the Chancery Court and Delaware Supreme Court concerning the Court's own violations of constitutional law, and other claims including but not limited to claims under 42 USC §§§ 1983, 1985, 1988, violations of procedural due process, Equal Protections claims, First Amendment violations of private right to petition, religious belief, exercise of belief, speech and

association, loss of employment opportunities, or other economic harm, harm to my reputation, and emotional distress manifesting in high blood pressure and other claims arising during *Kelly v Trump*.

3. My assertion that Defendants and coconspirators violated my right to petition in my January 2020, and February 2020 letters for relief from bar dues for all attorneys facing economic hardship during the global pandemic by retaliation but for the petition, some claims arising during *Kelly v Trump*, and other rights would be vitiated by statute of limitations if this case is dismissed. Other claims will expire soon after by the statute of limitations should this appeal be dismissed, including additional claims that arose after I filed this lawsuits which I preserved in the record on the trial and appellate court.

4. I have to assert claims arising during *Kelly v Trump*, and arising after this civil rights proceeding was filed which now approach the statute of limitations. Otherwise I will be without any forum to assert my rights. Given the government compelled me into poverty by placing my license to practice law on inactive disabled but for my private exercise of the 1<sup>st</sup> Amendment right to exercise religious beliefs averred in my private exercise of my 1<sup>st</sup> Amendment right to speech contained in my private 1<sup>st</sup> Amendment exercise of the right to petition applicable to the Defendants pursuant to the 14<sup>th</sup> Amendment, I could not afford to start over by swiftly filing a new law suit for remaining claims as I fight other outstanding reciprocal law suits or threats of law suits.

5. Further going into debt is against my religious beliefs. Any needless additional costs in terms of starting over creates a substantial burden and obstacle to my access to the Courts in contravention to my Equal Protection to the 1st Amendment right to access to the Courts to defend my exercise of fundamental rights applicable to the Federal Courts via the

Equal Protection component of the 5th 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) *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.”); *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004); (“Because this case implicates the [Constitutionally protected rights of exercise of religion, speech, petition, belief and association and the] right of access to the courts,” the government’s disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test.)

6. 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 is protected. In addition, fundamental rights are implicated. Delaware Disciplinary Counsel and Delaware agents violated my fundamental rights of religious beliefs, religious-political speech, religious-political petitions, religious-political-association, religious-political exercise, procedural and substantive due process opportunity to be heard, to prepare and present evidence, to subpoena witnesses, and to cross examine my accuser. US Amend I, VI, XIV

7. Delaware Disciplinary Counsel and reciprocating courts persecute me and seek to defame my character by taking away my property interest in my active license to practice law but for my exercise of Constitutionally protected conduct, in violation of my freedom to petition concerning my religious-political speech, religious-political exercise, religious-political belief, religious-political association, and association as a party, attorney, Democrat, Catholic and Christian when I believe there has been a grievance committed against me.

8. 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

9. For good cause I request additional pages to prevent irreparable injury in terms of the loss of my Constitutional rights. This United States Supreme Court has held ‘[t]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.’ in *Dr. A v. Hochul*, 142 S. Ct. 552, 555 (2021); Citing, *Elrod v. Burns* , 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)

10. I require pages pursuant to the 1<sup>st</sup> and 5<sup>th</sup> Amendment rights to fairly defend, assert, and preserve my private fundamental rights including but not limited to the denial of the 5<sup>th</sup> or 14<sup>th</sup> Amendment right to a fair proceeding, notice, opportunity to be heard, an accurate docket, access to the state record in matter No. 541 where I am the accused, and other claims, including but not limited to retaliation, collusion by members of the Delaware Supreme Court, Chancery Court, and other court staff to punish me and to cause me to forgo my 1st Amendment right to petition to cover up court misconduct and mistakes, not limited to court staff obstructing service in *Kelly v Trump* by writing on an October 5, 2020 praecipe, instructing me to cross off local counsel’s address to prevent service on another praecipe, and Court staff misleading me to miss my filing deadline.

11. I also seek to assert my 5<sup>th</sup> Amendment right to a fair proceeding without partial retaliation by the Appellate Court below in terms of threatening punishment for my petitions to remove items the Appellate Court's staff misfiled onto the matter below, and for the Clerk's inclusion of information the Court knew was untrue in threatening sanctions in response to my motions correct the Appellate Court's mistake. Namely I used US Mail per the postal envelop contained in the last few pages of App. DD attached to the petition. I did not use the emergency email to correct documents the Appellate Court misfiled in the civil rights case. The Clerk's order incorrectly and falsely alleges I used the emergency email to remove the docket items the court misfiled on this case that belong in another case.

12. I seek to show I preserved on the record for appeal in my motions for reargument and motion to amend the complaint the 6<sup>th</sup> Amendment right to cross examine witnesses, 6<sup>th</sup> Amendment right to self-represent as an accused, 1<sup>st</sup> Amendment rights to religious belief, my exercise of religious belief, association, speech, and right to petition in *Kelly v Trump*, this civil rights proceeding, the Disciplinary proceeding, regarding bar dues, other petitions to safeguard my private right to religious exercise of belief, claim for denial to access to the courts or obstruction to the courts, witness tampering, Defendants collusion to conspire with the Delaware Supreme Court members to attack me by sending the Courts arms DE-Lapp and Defendants to threaten me, to interfere with and to cause me to forgo my right to petition in *Kelly v Trump* by sending Court of Common Pleas Judge Kenneth S. Clark to attack me in a store, sending Defendants and DE-Lapp to threaten me with letters to punish me for petitioning regarding bar dues and for *Kelly v Trump*, and other claims including but not limited to equitable relief, nominal damages and damages for emotional distress, defamation, Constitutional claims applicable to Defendants pursuant to the 14<sup>th</sup> Amendment. Defendants violated Del. Law. R. of

Disciplinary Proc. Rule 9 (d) (3) by denying me notice, the right to perform discovery, subpoena, and call witnesses. I require additional pages to assert claims for equitable relief, nominal damages, and damages under US Amend I, XIV, 42 USC §§§ 1983, 1985, 1988, emotional distress, economic harm, defamation and other claims I included in my lengthy Complaint filed October 25, 2021 which are too voluminous to include without additional papers. I also preserved Constitutional arguments against the Disciplinary rules and proceedings which I reserved for appeal. (DI 58 for example).

13. Other claims must in the interest of justice be allowed to be included as I apprised the courts below concerning them after the latest notice of appeal was filed, and asserted my right to amend the complaint once as a matter of right. For Example, Defendants did not provide me documents they intended to cite in the Disciplinary proceeding which they were required to present to me 10 days prior to any hearing Del. Law. R. of Disciplinary Proc. Rule 12 (h). In fact I had to request the documents after the hearing on January 31, 2022, which prejudiced me by not affording me opportunity to prepare and to review the documents Defendants cited.

14. The unfair partial disciplinary proceeding brought in conspiracy by the Delaware Supreme Court, Chancery Court agents, ODC and Board, (collectively, and individually “State”) to conceal Court agents’ unconstitutional interference with the “due process” adjudication of *Kelly v Trump*, and thereby in interference with my personal-religious-political-speech; personal-religious-beliefs; personal-religious-political-exercise; and personal-religious-political-petitions has punished me and violated by constitutional protections by selective disparate treatment against me, for the exercise of fundamental rights, as a party of one, as an indigent individual with religious-political beliefs in God as savior and the state as civil authority curbed by the first amendment from establishing religion.

15. The hearings and actions taken against my professional license in retaliation for my exercise of Constitutional rights are in violation of the First Amendment, the Procedural and Substantive Due Process Clause and Equal Protection Clauses of the Fourteenth Amendment. They must be rejected as by “rule of law” rather than personal vendetta for my personal-religious-political speech contained in the petitions. (US Amend I, XIV)

16. The State denied me asserted substantive and procedural due process rights in this disciplinary proceeding. The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, in retaliation against me for filing *Kelly v Trump* and for petitioning the court regarding bar dues to safeguard my liberties.

17. The state abused its discretion by 1. Vindictive prosecution, which constitutes a violation of due process, and by Selective prosecution, which constitutes a denial of equal protection.

18. I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion by President Trump.

19. I uphold my oath by requesting government agents, judges, presidents and members of congress adhere to rule of law by allowing me to exercise my Constitutional rights. The steps taken to orchestrate this proceeding circumvent due process protections and, thereby, manifest selective; targeted; unjust persecution.

20. The amount of pages are necessary since the Third Circuit Court of Appeals and Delaware District Court did not read my filings, and asserted inaccurate false or misleading information. The District Court misrepresented the fact my pleadings in *Kelly v Trump* containing my religious beliefs and assertions of procedural due process violations in the **Delaware Supreme Court filings** were the admitted source of bringing a disability proceeding



against me by citing the August 23, 2023 letter attached to the petition, and only referring to the Chancery Court in its Orders, not the Delaware Supreme Court.

21. Moreover, the District Court ignored my assertion that the Delaware Supreme Court and its members incited the attacks against me to cause me to forgo *Kelly v Trump* to conceal its own misconduct in my initial complaint, motions to amend the complaint, motions for reargument and other pleadings. Both the trial court and appellate court ignored the proof I submitted on the record that the Delaware Supreme Court colluded in inciting its arms and agents to attack me during *Kelly v Trump* to cause me to forgo my petition, incited the subsequently brought Disciplinary proceeding, secretly concealed evidence in my favor by sealing my petitions in *Kelly v Trump*, attached to the petition at A-4 and A-5, without providing me notice or an opportunity to be heard to prevent the US Supreme Court and other courts from seeing the procedural due process violations so great as to eliminate subject matter jurisdiction in *Kelly v Trump*.

22. The Delaware Supreme Court then colluded in terminating the employment of two key witnesses, staff in the Chancery Court, to prevent their testimony in my cases through Delaware Supreme Court staff attorney Robinson. (Petition, DI 58). Then, during the disciplinary proceeding the Board and the Court ignored all of my motions until two days before the hearing I received an email the hearing was on, denying me notice within the scope of the state rules, a fair opportunity to be heard, to prepare, to call witness and defend myself. The Delaware Supreme Court denied me access to my records in the case against me, Number 541, ignored my asserted right to religious beliefs and the right to self-represent, notice, fair

opportunity to prepare, and perform discovery, despite never providing me formal notice within the purview of the 20 day requirement of the rules designed to protect me the accused <sup>1</sup>

23. On December 30, 2023 **fewer than two weeks before the tentative hearing** Judge Vaughn signed an order permitting me to self-represent causing me to get the shingle and fall ill, with insufficient time to call witnesses. I at no time sat on my rights. I called the Administrator of the Board from the law library, as I did not own a phone at the time, to check on the status of my motions which were ignored and never responded to. She did not accept my calls.

24. Then, the Board in bad faith rescheduled the proceeding with fewer days than State Disciplinary Rule 9 requires to call witnesses 8 days for a reason I did not request, the shingles, in the sham proceeding against me. I immediately appealed the new date as insufficient and prejudicial, essentially denying me the right to notice, a fair opportunity to prepare, call witnesses and effectively defend my 1<sup>st</sup> Amendment rights to religious belief in Jesus Christ not money as God, petition, speech, petition, exercise of belief, association, and other rights including but not limited to Equal protections, procedural due process, 6<sup>th</sup> Amendment right to self-represent, 6<sup>th</sup> Amendment right to cross examine witnesses, Constitutional challenges to the proceeding and certain rules, many of which compel 5th Amendment violations of the right to self-incrimination by allowing examinations which violate my religious beliefs. At the time of the hearing and prior to the hearing, I was unaware the Delaware Supreme Court sealed

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<sup>1</sup>Del. Law. R. of Disciplinary Proc. Rule 9 (d)(3) Provides:  
“The Administrative Assistant shall serve a notice of hearing upon the ODC and the respondent, identifying the members of the Board assigned to the matter, and the date and place of the hearing. The notice shall be given at least 20 days in advance of the date of the hearing. The notice of hearing shall state that the respondent is entitled to be represented by a lawyer at the respondent’s expense, to cross-examine witnesses, and to present evidence.”

documents in my favor and concealed two witnesses, but I fought for an opportunity to perform discovery to uncover collusion and misconduct such as this. I was actually prejudiced by the deprivation of a fair opportunity to prepare or uncover this additional bad faith misconduct by the members and agents of the Delaware Supreme Court.

25. The Delaware Supreme Court denied hearing my appeal of the new Order extending the hearing 8 days colluding in denying me the opportunity to call and to cross examine witness to collude to cover up the fact it fired or otherwise terminated Arline Simmins to conceal her testimony in my favor. The postponement was for 8 days, fewer than the 10 days prior notice subpoenaed witnesses are required to receive according to the state rules.<sup>2</sup>

26. I also have good cause to include the verbatim assertions I made to preserve the record below because the Third Circuit panel falsely claimed in a footnote, “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.” In its 4/20/23 Order.

27. These issues are within the scope of the appeal as I mentioned the threat of infringement to my bar license in my Motions for a preliminary injunction, a temporary restraining order and in my complaint filed October 25, 2021. I preserved the other issues by asserted them in my motions for reargument in the DE District Court and must show this US

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<sup>2</sup> Del. Law. R. of Disciplinary Proc. Rule 12 (h) provides:  
“Exchange of information. The ODC and the respondent shall exchange names of witnesses and copies of documents to be used by each side in its case in chief 10 business days prior to any hearing, and may supplement those lists thereafter with the approval of the opposing party or the chair of the Hearing Panel. Recorded statements, if any, of all witnesses so designated shall be exchanged at the same time. The exchange may take place by first-class mail to the respondent’s last known address. The Hearing Panel may exclude any evidence offered by a party who fails to comply with this Rule.”

Supreme Court by attaching them and placing them on the record to defend the most important thing in my life which is not my license to practice law. It is my faith in God, the father, the son, Jesus and the holy spirit. My religious belief is not for sale to be exchanged for a license to buy and sell as an attorney or to be eliminated for the convenience of any human or even for material gain of others under the deception of the public good. Other people's 1st Amendment right to religious beliefs and constitutional liberties will soon be sacrificed and no longer protected under the lie of sustaining the world when the 2030 and 2050 agendas sustain debt control, to sustain positions, profit, and power of the few who eliminate freedom by controlled order reflecting the image of the beast should this US Supreme Court not save us with the just rule of law to protect Constitutional liberties. 1 *John* 5:19. I am quite upset that the Third Circuit's mandate indicates this is not a subject for the appeal when I appealed these very issues and preserved them on the record below.

28. I trust no court, and must place the evidence I averred in my petition to safeguard my religious beliefs in Jesus and other claims should the court commit what I believe is lawlessness in the eyes of God by valuing its own vanity, productivity, avoidance of costs, profit and convenience more than upholding the Constitutional rule of law by justice as a matter of truth with mercy, not by barter or exchange. I believe this is the sin that damns people to hell on the last day should they not repent human sacrifice of freedom, life and health under the lie of the public good, common good or the welfare of the people when it is for mammon, material gain, not for justice. *Matthew* 6:24.

29. The Circuit Court also appeared to ignore all of my Motions for reargument and the evidence I presented in the initial complaint wherein I showed the members and agents of the Delaware Supreme Court incited the attacks against me during *Kelly v Trump*, colluded with the

Defendants, and other evidence showing the Delaware Supreme Court instigated and participated in inciting the disciplinary proceeding, and denied me Constitutional rights afforded to other attorneys and parties in the Disciplinary proceeding.

30. So, I must attach the pleadings and draft them into my petition. So this Court may not simply ignore and deny me the 1st and 5<sup>th</sup> Amendment rights to petition, for a full and fair opportunity to be heard to prevent the vitiation of my fundamental 1<sup>st</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 13<sup>th</sup>, 14<sup>th</sup> Amendment fundamental rights and other claims.

31. My duty is to uphold the Constitutional rule of law, not to the appearance of the members who sit in the three branches when they violate the Constitution and the law. I hold religious beliefs differently than most. Nevertheless, the government is charged with safeguarding even my private religious beliefs. Instead, the state prevents me from buying and selling but for asserting my right to believe in Jesus Christ not money and material gain as guide, savior and God of my life and eternal life.

32. I have good cause for additional pages. I have insufficient time to draft this petition, given my limited resources. Justice Alito denied my second application for additional time prejudicing my ability to assert my claims in this matter under application No. 23A100. I do not have sufficient time to tighten, shorten and draft my brief. I draft my pleadings imperfectly in haste in order to assert and not waive my rights and claims.

33. This case arises because of the Defendants and members of the Delaware Supreme Courts (hereinafter “the State”) attacks against me in *Kelly v Trump* to cause me to forgo my case but for their disdain for my religious-political beliefs contained in my petitions and poverty in violation of m private-1<sup>st</sup> Amendment rights to petition, religious belief, exercise

of religious belief, association and procedural due process applicable to the state via the 14<sup>th</sup> Amendment.

34. The Delaware Supreme Court sealed 4 documents wherein I asserted procedural due process violations, and fired 2 Chancery Court staff members to cover up evidence necessary to my defense in the disciplinary proceeding that was allegedly initiated on December 10, 2023, despite the fact no notice was sent to me that date. December 13, 2023, Counsel was appointed, I immediately refused and fired. Notice was sent to no one on December 10, 2023, since alleged counsel was not even appointed despite my horror in violations of my religious belief until 3 days later to my utter surprise and horror.

35. After I filed the case the State committed additional deprivations to my Constitutional rights including but not limited to placing my license on inactive/disability but for my religious beliefs contained in my speech in the 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.

36. The Delaware original disciplinary case represents an example of government persecution based on my exercise of religious beliefs, contained in my speech in my petitions to the Delaware Courts.

37. 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, as evidence of a disability. See Exhibits A-D attached to the petition.

38. I seek to overturn the Disciplinary Order based on lack of subject matter jurisdiction since the DE Supreme Court acted as witness, judge and prosecutor's assistant, and for violations of procedural due process that shock the conscience, concealing evidence, preventing me from subpoenaing witnesses to testify in my favor and many more unconstitutional acts that are too voluminous to outline herein. I face irreparable injury in terms of loss of fundamental rights should an application of time not be granted. I require pages to show the court I face irreparable injury should time not be granted since the State's persecution against me, but for my exercise of the 1<sup>st</sup> Amendment rights to petition and religious belief has been ongoing for about 20 years.

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

40. The Appellate Court below previously deprived me of access to this United States Supreme Court in appealing the original Delaware Disability order by denying me a stay due to poverty, lack of time and means to petition all cases simultaneously. (App. DD attached to petition) Similarly Judge Alito's denial of additional time deprives me of needed time to tighten my petitions.

41. The Constitutional issues and claims below must be addressed to protect not only me, but others beyond me from professional government backed persecution based on

eliminating people's license to buy or sell based on exercise of fundamental rights, specifically in my case my religious belief in Jesus.

42. 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. US Amend I, XIV.

43. I must not be compelled to violate my religious belief by compelled religious violations of my belief in order to regain my license as State Court's opinion requires. Nor should I be punished for my exercise of the right to access to the courts to exercise my private First Amendment right to petition 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. <sup>3</sup>

44. "To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." *Citing, Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981)

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<sup>3</sup> 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."; *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.").



45. “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.”<sup>4</sup>

46. “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).

47. 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.”

48. 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. 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.

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<sup>4</sup> 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.”)

49. 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.

50. I also assert my right to assert Constitutional arguments against Attorney disciplinary proceedings, certain disciplinary rules, federal judicial disciplinary proceedings and regulation of the United States Supreme Court by a Code of conduct or otherwise from a very rule attack against the United States supreme Court to preserve or otherwise assert the right to an impartial judiciary by limiting the scope of judicial correction or discipline within the purview of the United States Supreme Court by 1. Cases or controversies under Art III, and 2. by impeachment.

51. In order for the US Supreme Court to limit the correction of its justices and federal judges within the purview of the Constitutional limits, this court must allow attorneys to petition to correct courts and judges for mistakes and misconduct without threat of retaliation for upholding the rule of law.

52. This Court does not have a compelling reason to deny my request somehow more important than my fundamental rights. Whereas I face the loss of Constitutional liberties.

Wherefore, I pray this Court grants my motion.

Dated October 7, 2023

Respectfully submitted,

/s/Meghan Kelly

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Bar No. 283696, pro se, defending my religious belief in Jesus as God, not money and mammon as God. *Matt 6:24*