

No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

Elizabeth Gonzalez — PETITIONER
(Your Name)

VS.
Charlotte A. Burrows,
Chair of the U.S. Equal — RESPONDENT(S)
Employment Opportunity Commission

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

☒ Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

United States District Court For The Northern District of Illinois
United States Court of Appeals For The Seventh Circuit

☐ Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

☒ Petitioner's affidavit or declaration in support of this motion is attached hereto.

☐ Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

☐ The appointment was made under the following provision of law: _____, or

☐ a copy of the order of appointment is appended.

Elizabeth Gonzalez
(Signature)

**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Elizabeth Gonzalez, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0	\$ N/A	\$ 0	\$ N/A
Self-employment	\$ 0	\$ N/A	\$ 0	\$ N/A
Income from real property (such as rental income)	\$ 0	\$ N/A	\$ 0	\$ N/A
Interest and dividends	\$ 0	\$ N/A	\$ 0	\$ N/A
Gifts	\$ 0	\$ N/A	\$ 0	\$ N/A
Alimony	\$ 0	\$ N/A	\$ 0	\$ N/A
Child Support	\$ 0	\$ N/A	\$ 0	\$ N/A
Retirement (such as social security, pensions, annuities, insurance)	\$ 0	\$ N/A	\$ 0	\$ N/A
Disability (such as social security, insurance payments)	\$ 914.	\$ N/A	\$ 942.	\$ N/A
Unemployment payments	\$ 0	\$ N/A	\$ 0	\$ N/A
Public-assistance (such as welfare)	\$ 271.	\$ N/A	\$ 271.	\$ N/A
Other (specify): <u>N/A</u>	\$ 0	\$ N/A	\$ 0	\$ N/A
Total monthly income:	\$ 1185.	\$ N/A	\$ 1213.	\$ N/A

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
N/A	N/A	N/A	\$ 0
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
N/A	N/A	N/A	\$ N/A
			\$
			\$

4. How much cash do you and your spouse have? \$ _____
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
Checking	\$ 1.84	\$ N/A
	\$	\$
	\$	\$

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☐ Home
Value None

☐ Other real estate
Value None

☐ Motor Vehicle #1
Year, make & model N/A
Value None

☐ Motor Vehicle #2
Year, make & model N/A
Value None

☐ Other assets
Description None
Value None

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
N/A	\$ 0	\$ N/A
	\$	\$
	\$	\$

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
N/A	N/A	N/A

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ 600.	\$ N/A
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 300.	\$ N/A
Home maintenance (repairs and upkeep)	\$ 0	\$ N/A
Food	\$ 271.	\$ N/A
Clothing	\$ 0	\$ N/A
Laundry and dry-cleaning	\$ 0	\$ N/A
Medical and dental expenses	\$ 0	\$ N/A

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ <u>N/A</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>N/A</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>N/A</u>
Life	\$ <u>0</u>	\$ <u>N/A</u>
Health	\$ <u>0</u>	\$ <u>N/A</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>N/A</u>
Other: <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>N/A</u>
Credit card(s)	\$ <u>25.</u>	\$ <u>N/A</u>
Department store(s)	\$ <u>0</u>	\$ <u>N/A</u>
Other: <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>N/A</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>N/A</u>
Other (specify): <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Total monthly expenses:	\$ <u>1196.</u>	\$ <u>N/A</u>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? N/A

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes ☒ No

If yes, how much? N/A

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

I'm on a fixed income; I can't afford to pay the costs of this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 17, , 20 24

Elizabeth Gonzalez
(Signature)

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Elizabeth Gonzalez — PETITIONER
(Your Name)

^{vs.}
Charlotte A. Burrows,
Chair of the U.S. Equal — RESPONDENT(S)
Employment Opportunity Commission

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals For The Seventh Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Elizabeth Gonzalez
(Your Name)

2402 S. Race St.
(Address)

Marion, IN 46953
(City, State, Zip Code)

(765) 613-2034
(Phone Number)

QUESTION(S) PRESENTED

LIST OF PARTIES

- ☒ All parties appear in the caption of the case on the cover page.
- ☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

- Gonzalez v. Burrows, No. 20-CV-02111, U. S. District Court For the Northern District OF Illinois. Judgment entered November 15, 2022.
- Gonzalez v. Burrows, No. 23-1284, U. S. Court of Appeals For the Seventh Circuit. Order entered January 17, 2024.

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TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

I'm a person with Severe
mental illness and disabilities.

Due to my disabilities I am not able
to conduct legal research.

STATUTES AND RULES

OTHER

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was January 17, 2024

☒ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A .

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from **state courts**:

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A .

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Petitioner Elizabeth Gonzalez filed this present employment discrimination action alleging national origin (Mexican), Sex (female) and retaliation discrimination under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000 et seq, and disability discrimination under the Rehabilitation Act, 29 U.S.C. § 701, et seq.

The U.S. District Court For the Northern District of Illinois has jurisdiction over Petitioner's federal law claims pursuant to 28 U.S.C. § 1331.

The U.S. Court of Appeals For the Seventh Circuit has jurisdiction over the appeal under 28 U.S.C. § 1291, which gives it jurisdiction over appeals from all final decisions of the U.S. District Court For the Northern District of Illinois.

STATEMENT OF THE CASE

The U.S. District Court For the Northern District of Illinois abused its discretion in granting the Defendant's Motion to Compel Production of Plaintiff's unredacted Medical Records that are overbroad and not relevant to the disabilities at issue. Petitioner Elizabeth Gonzalez was not seeking emotional distress damages.

Defendant cited about 50 cases that are not applicable to Plaintiff's case and the District Court judge erroneously relied upon the cases cited that are not related to Plaintiff's case.

The District Court's decision was based on an erroneous conclusion of law and the decision was based on clearly erroneous factual findings.

The U.S. Court of Appeals For the Seventh Circuit failed to provide Petitioner a reasonable accommodation due to her disabilities (severe mental health illness; depression, anxiety, bipolar, post traumatic stress disorder and suicidal ideation) and denied the Motion to appoint Counsel and denied Motion for an extension of the Brief.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Elizabeth Gonzalez

Elizabeth Gonzalez

Date: April 17, 2024

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Everett McKinley Dirksen
United States Courthouse
Room 2722 - 219 S. Dearborn Street
Chicago, Illinois 60604



Office of the Clerk
Phone: (312) 435-5850
www.ca7.uscourts.gov

ORDER

January 17, 2024

Before
DIANE S. SYKES, *Chief Judge*

No. 23-1284	ELIZABETH GONZALEZ, Plaintiff - Appellant v. CHARLOTTE A. BURROWS, Chair of the U.S. Equal Employment Opportunity Commission, Defendant - Appellee
Originating Case Information: District Court No: 1:20-cv-02111 Northern District of Illinois, Eastern Division District Judge Matthew F. Kennelly	

The following is before the court: **MOTION TO REQUEST A REASONABLE ACCOMMODATION FOR AN EXTENSION OF THE BRIEF AS A REASONABLE ACCOMMODATION DUE TO PLAINTIFF-APPELLANT, ELIZABETH GONZALEZ' DISABILITIES**, filed on January 8, 2024, by the pro se appellant.

On December 7, 2023, this court warned Elizabeth Gonzalez that further extensions of time would be granted only in extraordinary circumstances. Gonzalez does not identify any new circumstances in support of her request for more time to file her opening brief and does not indicate that she can complete the brief if given another extension. Accordingly,

IT IS ORDERED that the motion for extension is **DENIED**.

IT IS FURTHER ORDERED that this appeal is **DISMISSED** for failure to prosecute.

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS

Elizabeth Gonzalez,

Plaintiff(s),

v.

Janet Dhillon,

Defendant(s).

Case No. 20 C 2111

Judge Matthew F. Kennelly

JUDGMENT IN A CIVIL CASE

Judgment is hereby entered (check appropriate box):

☐ in favor of plaintiff(s)
and against defendant(s)
in the amount of \$

which ☐ includes pre-judgment interest.
☐ does not include pre-judgment interest.

Post-judgment interest accrues on that amount at the rate provided by law from the date of this judgment.

Plaintiff(s) shall recover costs from defendant(s).

☐ in favor of defendant(s)
and against plaintiff(s)

Defendant(s) shall recover costs from plaintiff(s).

☒ other: Case dismissed with prejudice as a sanction under Rule 37 of civil procedure.

This action was (check one):

☒ tried by a jury with Judge Matthew Kennelly presiding, and the jury has rendered a verdict.
☐ tried by Judge without a jury and the above decision was reached.
☐ decided by Judge on a motion.

Date: 11/15/2022

Thomas G. Bruton, Clerk of Court

Melissa Astell

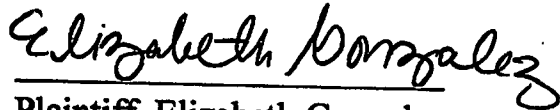
, Deputy Clerk

Appendix B

Appendix C

CERTIFICATE OF SERVICE

The undersigned, Elizabeth Gonzalez, certifies that on March 6, 2023, she served a copy of the foregoing MOTION FOR ATTORNEY REPRESENTATION, to be filed with the Clerk in the UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT, located at 219 South Dearborn Street, Chicago, IL 60604, which will provide a copy and notice to all counsel of record.



Plaintiff, Elizabeth Gonzalez

Pro Se

5944 South Tripp Avenue

Chicago, IL 60629

(773) 494-4714

Elizabeth_gonz2@hotmail.com

IN THE UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

2023 MAY 26 PM 5:36

ELIZABETH GONZALEZ,
Plaintiff-Appellant,
No. 23-1284

v.

CHARLOTTE A. BURROWS,
Chair of the U.S. Equal Employment
Opportunity Commission,
Defendant-Appellee.

) Appeal from the United States
) District Court for the Northern
) District of Illinois, Eastern
) Division
) Case No. 1:20-CV-02111
)
)

) Judge Matthew F. Kennelly
)
)

) **FILED** ^{KRA}
)
)

) MAY 26 2023 ³⁰
)
)

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

MOTION TO REQUEST A REASONABLE ACCOMMODATION

Plaintiff-Appellant Elizabeth Gonzalez, hereby submits this Motion to Request A Reasonable Accommodation. Plaintiff-Appellant Elizabeth Gonzalez is an individual with disabilities (severe mental health illness; depression and anxiety.) Due to my disabilities and mental health conditions, I am not able and do I have the mental capability to submit the Brief due on May 26, 2023. Plaintiff-Appellant Elizabeth Gonzalez is requesting the court to appoint an attorney to Plaintiff-Appellant as a reasonable accommodation due to my disabilities (severe mental health illness; depression and anxiety) and in the interest of Justice. Plaintiff-Appellant Elizabeth Gonzalez is also requesting for an extension of the Brief as a reasonable accommodation due to my disabilities (severe mental health illness; depression and anxiety.)

Dated: May 26, 2023

Respectfully submitted,

Elizabeth Gonzalez

Plaintiff, Elizabeth Gonzalez

Pro Se

5944 South Tripp Avenue

Chicago, IL 60629

(773) 494-4714

Elizabeth_gonz2@hotmail.com

Appendix D

RECEIVED

2023 MAY 26 PM 5:40

CERTIFICATE OF SERVICE

The undersigned, Elizabeth Gonzalez, certifies that on May 26, 2023, she served a copy of the foregoing Motion to Request A Reasonable Accommodation, to be filed with the Clerk IN THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT, located at 219 South Dearborn Street, Chicago, IL 60604, which will provide a copy and notice to all counsel of record.

Elizabeth Gonzalez

Plaintiff, Elizabeth Gonzalez

Pro Se

5944 South Tripp Avenue

Chicago, IL 60629

(773) 494-4714

Elizabeth_gonz2@hotmail.com

JUL 24 2023 2

IN THE UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

ELIZABETH GONZALEZ,
Plaintiff-Appellant,
No. 23-1284

v.

CHARLOTTE A. BURROWS,
Chair of the U.S. Equal Employment
Opportunity Commission,
Defendant-Appellee.

) Appeal from the United States
) District Court for the Northern
) District of Illinois, Eastern
) Division
) Case No. 1:20-CV-02111

) Judge Matthew F. Kennelly
)
)
)
)

**MOTION TO REQUEST A REASONABLE ACCOMMODATION TO APPOINT AN
ATTORNEY TO PLAINTIFF-APPELLANT, ELIZABETH GONZALEZ AS A
REASONABLE ACCOMMODATION DUE TO HER DISABILITIES (severe mental
health illness; depression, anxiety, bipolar, post-traumatic stress disorder and suicidal
ideation).**

Plaintiff-Appellant, Elizabeth Gonzalez, hereby submits this MOTION TO REQUEST A REASONABLE ACCOMMODATION TO APPOINT AN ATTORNEY TO PLAINTIFF-APPELLANT, ELIZABETH GONZALEZ AS A REASONABLE ACCOMMODATION DUE TO HER DISABILITIES (severe mental health illness; depression, anxiety, bipolar, post-traumatic stress disorder and suicidal ideation).

Due to my disabilities and my current mental health conditions (severe mental health illness; depression, anxiety, bipolar, post-traumatic stress disorder and suicidal ideation). I am not currently able and I currently do not have the mental capability to read, respond or submit to legal correspondence, legal pleadings, briefs, etc., related to Case No. 23-1284. Plaintiff-Appellant Elizabeth Gonzalez is hereby requesting for an appointed attorney as a reasonable accommodation due to her disabilities (severe mental health illness; depression, anxiety, bipolar, post-traumatic stress disorder, suicidal ideation) and in the interest of Justice.

Dated: July 20, 2023

Respectfully submitted,

Elizabeth Gonzalez
Plaintiff, Elizabeth Gonzalez

Pro Se

27755 W. 89th St.

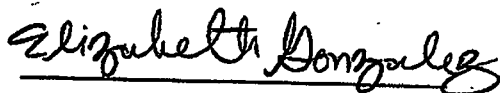
Lenexa, KS 66227-4047

Email: elizabeth_gon22@hotmail.com

Appendix E

CERTIFICATE OF SERVICE

The undersigned, Elizabeth Gonzalez, certifies that on July 20, 2023, before 5:00 p.m., she mailed a copy of the foregoing MOTION TO REQUEST A REASONABLE ACCOMMODATION TO APPOINT AN ATTORNEY TO PLAINTIFF-APPELLANT, ELIZABETH GONZALEZ AS A REASONABLE ACCOMMODATION DUE TO HER DISABILITIES (severe mental health illness; depression, anxiety, bipolar, post-traumatic stress disorder and suicidal ideation), to the Clerk IN THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT, located at 219 South Dearborn Street, Room 2722, Chicago, IL 60604, which will provide a copy and notice to all counsel of record.



Plaintiff, Elizabeth Gonzalez

Pro Se

27755 W. 89th St.

Lenexa, KS 66227-4047

(773) 494-4714

Elizabeth_gonz2@hotmail.com

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Elizabeth Gonzalez — PETITIONER
(Your Name)

VS.
Charlotte A. Burrows,
Chair of the U.S. Equal — RESPONDENT(S)
Employment Opportunity Commission

PROOF OF SERVICE

I, Elizabeth Gonzalez, do swear or declare that on this date,
April 17, 2024, as required by Supreme Court Rule 29 I have
served the enclosed MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*
and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding
or that party's counsel, and on every other person required to be served, by depositing
an envelope containing the above documents in the United States mail properly addressed
to each of them and with first-class postage prepaid, or by delivery to a third-party
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Solicitor General of the United States, Room 5614,
Department of Justice, 950 Pennsylvania Ave., N.W.,
Washington, D.C. 20530 - 0001

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2024

Elizabeth Gonzalez
(Signature)