

24-1219

In the Supreme Court of the United States

Case No.

Supreme Court, U.S.
FILED
MAY 21 2025
OFFICE OF THE CLERK

DORA L. ADKINS,

Petitioner,

v.

JPMORGAN CHASE BANK, N.A.,

Respondent.

MOTION TO EXPEDITE

TO THE HONORABLE CHIEF JUSTICE AND THE ASSOCIATE JUSTICES OF THE SUPREME COURT OF THE UNITED STATES:

Dora L. Adkins, Petitioner/Applicant respectfully moves this Court to expedite consideration of the petition for a writ of certiorari in the case of *Dora L. Adkins, Applicant v. JP Morgan Chase Bank, N.A.* She shows the Court:

1. The Issue Presented:

- Petitioner, Dora L. Adkins, respectfully asks that a writ of certiorari issue to review the judgment issued by the United States Court of Appeals for the Fourth Circuit that affirmed by unpublished per curiam opinion and wrote the following: “On December 23, 2024, the Fourth Circuit wrote, “Adkins” proposed complaints fail to state plausible claims under Virginia law against Defendant for intentional infliction of emotional distress.”

2. The Importance of Expedited Review:

- Reasons why prompt resolution are crucial and concrete reasons are provided by the Petitioner/Appellant.
 - Petitioner/Appellant filed the Proposed Emergency Complaint and a Motion for Leave to Proceed *in forma pauperis* on May 28, 2024; and a Motion for Leave from the Court to File a Proposed Amended Emergency Complaint on June 1, 2024. Petitioner/Appellant filed three documents in the District Court in the case of *Dora L. Adkins, Applicant v. JP Morgan Chase Bank, N.A.*, as an *Emergency* because Petitioner/Appellant has entered the 20th Year of being Homeless with 10-Years of the 20-Years of living outdoors.

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- Petitioner/Appellant is faced with ongoing irreparable harm because 20-Years is too long for any Human to suffer and without GOD playing a vital role into Petitioner/Appellant's life Petitioner/Appellant would have been DEAD 19-Times ago.
- Petitioner/Appellant will clarify a critical legal question before it has broader consequences: "In essence, the denial of an emergency complaint does not automatically violate Petitioner/Appellant's fundamental rights, but it can do so because it deprived the Petitioner/Appellant's of a fair and just resolution to Petitioner/Appellant's claim, particularly because the denial results in irreparable harm or loss of a fundamental right."
- "Public policy often involves addressing immediate crises while also considering long-term societal goals. Finding the right balance between these competing needs is crucial for effective policymaking."
- The impact of this issue on a particular group or the nation will be beneficial to the nation because Petitioner must give back to the community that also aided in Petitioner/Appellant's life for the past 20-Years.

3. Specific Reasons for Expedited Consideration:

- The detail of specific facts that support Petitioner/Appellant's request for expedited review.
 - Petitioner/Appellant have suffered 50,000 physical and emotional injuries and 19-Deaths and relived through and by GOD'S DEVINE INTERVENTION.
 - The District Court's decision or denial is to all of Petitioner/Appellant's Proposed Emergency Complaints because of Petitioner/Appellant's prior pre-filing injunctions over a period of 28-Years.
 - The need to avoid the potential for further harm or confusion against the Petitioner/Appellant would become clear once a Court Order, especially this Honorable Court GRANTS an Order.

4. Statement of Legal Authority (if applicable):

“While there is not a specific Supreme Court rule or precedent that explicitly dictates “expedited review” in all situations, here’s a breakdown of relevant concepts and authorities that support the idea of seeking expedited review, particularly in appellate courts, along with examples.”

1. “Federal Rules of Appellate Procedure (FRAP) and Local Rules:”

- “FRAP Rule 2: Addresses “Suspension of Rules” and allows courts of appeals to expedite a decision or suspend rules for good cause. This rule provides flexibility for courts to manage their docket and prioritize certain cases.”
- “Local Rules: Individual courts often have specific rules regarding motions for expedited review, and these can vary widely. It is essential to consult the local rules of the relevant appellate court.”

2. “Good Cause and the Interests of Justice:”

- “Demonstrating Good Cause: A motion for expedited review typically needs to articulate a compelling reason or “good cause” for the court to prioritize the case, according to the U.S. Court of Appeals for the D.C. Circuit. This could involve a time-sensitive issue, the potential for irreparable harm, or a matter of significant public interest.”
- “Examples: Cases involving elections, public health crises, or imminent harm to individuals could be considered good cause for expedited review.”

3. “Case Law and Precedent (Analogies):”

- “Emergency Petitions and Stays: Although not precisely “expedited review,” precedents relating to emergency petitions, stays, or injunctions can demonstrate the court’s willingness to act quickly in certain circumstances.”
- “Habeas Corpus: Cases involving liberty interests, particularly those related to habeas corpus, often receive expedited consideration due to the importance of the rights at stake.”
- “Constitutional Rights: Cases involving fundamental constitutional rights might also be strong candidates for expedited review.”

4. “Statutory Deadlines and Directives:”

- “Specific Statutes: Some statutes mandate expedited review or set deadlines for court actions. For example, some cases brought by the Federal Deposit Insurance Corporation have statutory deadlines for appeals.”

5. Conclusion:

- Petitioner/Appellant request for expedited review fits perfectly under “Good Cause and the Interests of Justice,” and will prove to GOD that all of GOD’S investments into the Petitioner/Appellant were for a worthwhile cause even though Petitioner/Appellant is not sure why GOD chose the Petitioner/Appellant. Petitioner/Appellant has guessed that some unknown “egregious behavior” repeatedly occurred against the Petitioner/Appellant.

WHEREFORE, Dora L. Adkins, Petitioner/Applicant respectfully requests that this Court grant this “Motion to Expedite,” and expedite consideration of the petition for a writ of certiorari, in the case of *Dora L. Adkins, Applicant v. JP Morgan Chase Bank, N.A.*

Respectfully submitted,

Signature (Typed)

Dora L. Adkins

Printed Name of Attorney

Dora L. Adkins, *pro se*

P.O. Box 3825

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703-751-8653 (non-working telephone number)

DoraAdkins7@aol.com (inaccessible)

CERTIFICATE OF COMPLAINECE

Petitioner, Dora L. Adkins certifies as follows: As required by Supreme Court Rule 33.1(h), I certify that the document contains 924/5,200 words and 5/20 pages in length, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Respectfully submitted this 21st day of May, 2025.

Respectfully submitted,

Dora L. Adkins, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I filed the foregoing "Motion to Expedite." I further certify that all parties required to be served have been served.

JPMorgan Chase Bank, N.A.
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4701 COX RD STE 285
GLEN ALLEN, VA, 23060 - 0000, USA

Respectfully submitted,

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