24-207

Appeals: 23-12413-AA & 23-13392-AA

IN THE SUPREME COURT OF THE UNITED STATES

Carlos A. Alonso Cano,
Fé Morejón Fernández,
Jany Alonso Morejón — *Petitioners*

v.

245 C & C, LLC and
C.F.H. Group, L.L.C — *Respondents*

On petition for a Writ of Certiorari to the United States Court of Appeals for the 11th Circuit, Atlanta, Georgia

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REPLY BRIEF TO BRIEF IN OPPOSITION

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QUESTIONS PRESENTED

1. - ***Whether***, Respondents' Brief in Opposition, ***should be disregarded***, pursuant this Court's **Rule 15.2**, saying "the brief in opposition should address "any perceived misstatement of fact or law in the petition" and "Counsel are admonished that they have the obligation to the Court to "**point out**" in the brief in opposition, **and no later**, any perceived misstatement made in the petition," *and*

2. - ***Whether*** Respondents' Brief in Opposition, considered as "**misstatements**" "**all**" the facts and legal arguments mentioned in our petition, and

3. - ***Whether*** **Respondents' Brief in Opposition, was able to "appropriately point out," "contradict**," and "**defeat**" each of the legal arguments included in our Writ of Certiorari, which are supported by legal decisions of other Circuit Courts of Appeals and even this Court itself (**emphasis added**).

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REPLY BRIEF TO BRIEF IN OPPOSITION

STATEMENT

A. Respondents' Brief in Opposition "**is not**" supported by competent and substantial evidence in the record. ***Rather***, the record shows that their "**defensive arguments here**" are "**without merit**" and "**based solely**" on: (1) the "**sworn affidavits**" with "**misleading information**" they filed in this case; (2) on the "**perjurious statements**" they used to evict us and those made in the bench trial ***here***, by Vilma Hernandez (manager of Villas of Hialeah (VOH)) and Tom Cabrerizo (**CEO**) (both who denied all the accommodations we requested for Angie); (3) and on those made by their "**fabricated witnesses**" ***without personal knowledge of the facts***.

a. ***Relevant is that***, the "**misleading information**" contained in such affidavits, is "**directly contradicted**" by **our four (4) affidavits, and several videos and photos** included in our USB, called (**PSUSB**).[1]

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[1] The evidence included in the (**PSUSB**) filed **with the (DE 502, 8/9/21) of our case (No. 1-19-cv-21826-JAL), contains our** four (4) affidavits, and (**64**) files **with videos and photos** that ***never were considered*** by the DC, **before entering the ORDERS** (**DE 555**, 8/17/22) & (**DE 678 & 679**, 7/20/23), ***as we requested*** in the (**DE 491 & 492**, 8/3/21) Id, ***because***: (1) **the DC did not mention any of those videos and photos in the factual analysis it made in such orders**; (2) in the ORDER (**DE 555**),(**pg. 10: 21-22**), the DC said "the new USB does not contain "Appendix A," **nor does it appear anywhere else in the record**" and (3) ***we suggest*** that

b. ***Relevant is***, that Respondents' arguments **used to evict us and to defend this case**, "**are directly contradicted**" by the "**REPORT**"[2] of Carlos Hernandez (security guard of VOH) for the days (9/12/17) & (9/13/17) after the passage of the **hurricane Irma**, which "**WAS HIDDEN BY THEM**" because **it never was provided** by Vilma, the Respondents or Mr. Lowenhaupt (their lawyer): (1) ***neither*** **to the HUD investigator** Adoniram

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our (**PSUSB**), **never was viewed by the trial judge**, because "***it always remained in the drawer of my desk***" as personally said Mr. Randy Tobie (manager of the Records' Department of the DC), to Carlos in two different occasions. See (**Doc. 102**, 9/30/24),(pg. 91: **pt. 83 & 84**) & (pg. 92: **pt. 85**) of USCA11 case (**No. 23-12413**).

"A genuine issue of material fact exists where "**there is sufficient evidence favoring the nonmoving party for a jury to return a verdict for that pa**rty." *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986).

See *Briggs v. Univ. of Detroit-Mercy*, 611 F. App'x 865 (6th Circ. 2015), **cited 32 times**, 463 F.3d at 511 ("**noting that a district court can abuse its discretion by 'misapply[ing] the correct legal standard' when reaching a conclusion**").

[2] The "**REPORT**," shown in (**DE 470**, 6/1/21), (**pg. 95 & 96**) of DC case (**No. 1-19-cv-21826-JAL**), "**clearly and convincingly**" shows that our Apt. # 1301 of VOH: (1) "**did not have a generator**" and (2) "**the police was called because tenant of Apt. # 1316, refused to turn off her generator**," but the "**firefighters**" who came to VOH, said that "**they had no orders that the generators should be turned off**" **(emphasis added).**

Vargas, during the HUD investigation held between (Sept. - Dec., 2017); (2) ***nor*** **to** **Mr. Brochyus** (our lawyer), during the eviction case (**No. 2018-000236-CC-21**) filed by Respondents against us, **in which we prevailed**.[3]

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[3] See the (DE 26, 6/25/19),(pg. 3:3-8) Id, showing the "**correct verdict**" of the Hon. Judge Milena Abreu, in which she said "Instead of advising Defendants (us) **this was a fire code violation or a breach of any lease provision**, the property manager, Ms. Vilma Hernandez testified a "**7 day Notice to Cure**" was issue on (**9/25/17**)" which is shown in the (**DE 430**, 1/22/21),(pg. 208) *Id*, **in which was not mentioned the word "GENERATOR**," ***but*** "Plaintiff (Vilma) immediately sent a "**Notice of Termination of Month-to-Month Tenancy** (**MMLC**)" the very next day, (**9/26/17**). See (**DE 26**),(**pg. 3**: 6-8) Id and the (**DE 430**, 1/22/21),(**pg. 209**), in which Respondents, **DID NOT SAY** that they terminated our MMLC, because ***we violated a fire code***, or **any rule or regulation of VOH**, or that, **we disrespected Vilma**, or because **the smoke of our generator** forced the tenant Mariela Hernandez (who lived above us in the Apt. # 1401), to leave her apartment of VOH, as they "**falsely**" **declared during the eviction trial against us (emphasis added)**.

The (**DE 430**, 1/22/21),(**pg. 186**) & (**DE 470**, 6/1/21),(**pg. 45**) *Id*, shows that the "**NONRENEWAL NOTICES**" dated on (**8/1/13**) & (**8/3/16**) respectively, that Vilma sent to us, **did not include any good or legitimate reas**on. ***But***, **they were sent in retaliation** as the Hon. Judge Mirela Abreu stated in the (**DE 26**),(pg. 3, **paragraphs 3, 4 & 5**) *Id.*

c. ***Relevant is that***, on (**9/12/17**) & (**9/18/17**), ***before Vilma sent us the termination letter*** of our MMLC on (**9/26/17**), Carlos and Jany, gave Vilma the **two "written requests" to accommodate Angie during the hurricane season,** shown in the (**DE 430**, 1/22/21), (**pg. 205 & 207**), ***but*** Vilma denied "**outright**" and "**without entering in an interactive process with us**." So on (**9/18/17**), Carlos told Vilma that on June, 2017, we already had filed a complaint in HUD against them, ***but*** HUD did not investigate it; then, since Vilma **denied the** "**two reasonable accommodations**" made on (**9/18/17**), ***we would file another complaint at HUD***. See (**DE 470**, 6/1/21), (pg. 78: **pt. 6**) *Id*, (**emphasis added**).

d. ***MORE RELEVANT IS THAT***, "**THE LETTER**" written by Respondents' lawyer Mr. Kenneth Lowenhaupt, hand-delivered to Adoniram Vargas on (**10/31/17**) during the HUD investigation, **that never was provided to Mr. Brochyus during** the eviction lawsuit against us, and shown in the (**DE 470**, 6/1/21), (**pg. 86, 87, 94**), ***DIRECTLY CONTRADICT*** Vilma's and Respondents' **arguments to evict us and confirms that**: (1) **Vilma knew that Angie was a disabled person from May, 2012** (**DE 470**),(pg. 87: **3-8**); (2) that *other tenants used generators and had tapes in their windows*; **(3) "Mr. Alonso was never given a Seven Day Notice to Cure or asked to remove a generator in View of the fact that he did have a disabled son**," (**DE 470**),(pg. 94: **33-35**); (4) that "**The Fire Department** ***said*** that "***they were not making anybody remove their generators at this***

time," (**DE 470**),(pg. 94: **36-37**); and (4) pursuant Mr. Lowenhaupt own statement "**the tenants that operated a generator, *DID IT LEGALLY*" (DE 470),(pg. 94: 42**), ***which later Mrs. Langbein have denied in every paper drafted and filed by her in the Appellate Court of Florida*** **(eviction case) and in the DC (federal case)**, (**emphasis added**).

e. ***Besides*** of the "**verbal requests**" we made in different years from (**2/3/13**) to (**4/7/17**), ***that were eliminated from the transcripts of our depositions***, as we denounced in our motions (**Doc. 45**, 3/7/24) & (**Doc. 73**, 4/29/24) of USCA11 case (**No. 23-12413**), we also made the "**written requests**" shown in the (**DE 430**, 1/22/21),(**pg. 23 to 25**), of the DC case (**No. 1-19-cv-21826-JAL**), **during the conciliation process** ***proposed by the Respondents*** during the HUD investigation, after we filed our (2nd) HUD complaint. ***But*** they ***denied*** "**all**" of them "**outright**" and "**without entering in an interactive process with us**."

The worst part is that "**Respondents have denied until now that we made those** "**written requests**" during the conciliation process" and **Mrs. Langbein is refusing to provide the Zoom recording** in which ***should appear Carlos' declarations about such written requests***.

f. See our motions (**DE 358**, 11/5/20); (**DE 430**, 1/22/21) and (**DE 470**, 6/1/21) of the DC case (**No. 1-19-cv-21826-J**AL), containing competent substantial evidence to demonstrate that **fraud** and **discovery abuse** was committed, because

Respondents withheld relevant evidence, filed affidavits with misleading information in them, and Mrs. Langbein and the Court Reporter Mr. Elías Martínez, provided "**redacted transcripts**" of our depositions.

Therefore, Respondents' statement in their Brief in Opposition (**pg. 3**) saying that we "have never produced an iota of evidence to establish that fraud was committed by respondents or their counsel" is "**false**" and a "**mere pretext**" ***to avoid their responsibility and the disbarment of Mr. Lowenhaupt and Mrs. Langbein from the Florida Bar***.

REASONS TO GRANT THE PETITION

B. Our Writ of Certiorari has full merit, and Respondents failed to defeat it. See **Rule 15.2**

a. ***Read***, the (**Doc. 2**)(**pg. 55 to 66**) of the USCA11 case (**No. 23-12413**), **demonstrating that** the district court (**DC**) committed a "**plain, evident and reversible error**" **by imposing us bench trial for Counts I and III**, **when we were entitled to a JURY TRIAL**, pursuant: (1) the FRCP 38(a), and (2) the ruling in Curtis v. Loether, 415 U.S.. 189, 194, 94 S. Ct. 1005, 1008, 39 L/Ed. 2d 260 (1974)" in which this court ***stated that***:

"**The Fair housing provisions of the Title VIII of the Civil Rights Act of 1968**, which authorizes **private plaintiffs to bring**

actions to redress violations of the Act's fair housing provisions, **entitled 'either party'** to **demand a jury trial**". See (**Doc. 102**),(pg. 65: **pt. 36**) of USCA11 case (**No. 23-12413**) and see (**DE 1**, 5/6/19) & (**DE 92**, 12/2/19) of DC's case (**1:19-cv-21826-JAL**), demonstrating that **we always requested a JURY TRIAL**.

Besides that, **neither party consented to the jurisdiction** of the magistrate judge John J. O'Sullivan (DE 46, 7/30/19) *Id*, **to rule on Respondents' motion** (**DE 106**, 12/17/19) *Id*, **to strike** our **demand for JURY TRIAL** (**emphasis added**).

b. ***Read***, the (**Doc. 102**),(**pg. 69 to 85**) of appeal case (**No. 23-12413**), in which was demonstrated that Respondents' lawyer **Leslie W. Langbein**, (1) **committed fraud upon** the Appellate Division of the 11th Judicial Circuit in and for Miami Dade County, Florida, by ***repeatedly and egregiously misstating the record on appeal seven (7) times***, see (Doc.102),(**pg. 76(h) to 79**); (2) by providing "**redacted transcripts of our depositions**", see (**Doc. 102**),(pg. 79 & 80: **pt. 59**) *Id*, ***but*** **it was not the first time that the law firm** "**Langbein & Langbein, P.A.**," representing Respondents here, ***participated in a scheme of fraud***, because this law firm, already helped Mr. Charles McKnight to file a **false suit for automobile negligence** in which the court concluded that "**the misrepresentations of McKnight permeated the case**" and ***affirmed the dismissal of the case*** (**emphasis added**).

c. ***Read***, the **ORDER** (**DE 555**, 8/17/22), (**pg. 76 to 87**), in which the DC **committed** a "**plain and reversible error**" by **dismissing the Count V of our SAC**, after we have sent to Vilma various emails in different years (**within the two years statute of limitation of the FHA**), which were "**written request**" **to accommodate Angie and provide him a quite enjoyment of the premises**, specifically asking Respondents, **to remove farther** from our **Apt. # 1301**,the "**industrial and noisy tree trimmer machine**" that they "**unnecessarily**" and "**intentionally**" & "**repeatedly**" **placed during various hours** "**in front of Angie's bedroom**," **causing him a lot of discomfort, distress and even tears,** showed in the videos at (**Files # 42, 42-A, 43, 50, 53 & 55**) of the (**PSUSB**) filed with the (**DE 502**, 8/9/21), which the DC "**totally disregarded**" by saying:

> "The Court rejects Plaintiffs' argument that Defendants were required to engage Plaintiffs in an interactive process to determine whether a reasonable accommodation was necessary." See (**DE 555**, 8/17/22), (**pg. 86**: **22-24**),(last paragraph).

Relevant here is that: the DC **not only applied the above** "**wrong legal standard**" in the **Count V**, **but in other Counts of our SAC**, that were dismissed with the order (DE 555, 8/17/22) which entitles us to reversal of the ORDERS (**DE 555**, 8/17/22) and (**DE 678 & 679**, 7/20/23), because that statement, demonstrate that the **trial judge was not impartial and applied here**, a

doubled and erroneous legal standard, ***AGAINST ITS OWN RULING in*** "*Jacobs V. Concord Village Condominium X Association*, No. 04-60017-Civ, U. S. Southern Dist. Fla.,(2/17/04), **Lenard/Simonton**, in which was stated:

> '**As the Seventh Circuit stated, "If a landlord is skeptical of a tenant's alleged disability or the landlord's ability to provide an accommodation, it is incumbent upon the landlord to request documentation or to open a dialogue** (citing *Jankowski Lee Associates v. HUD*, 91 F.3d 891, 895 (7th Cir. 1996))

See, that in our "Response" (**DE 491**, 8/3/21), (pg. 9: **pt. 18**(a) of 26), **WE ALSO CITED** "*Jankowski Lee Assocs. v. Cisneros, 91F.3d 891, 895 (7th Cir.1996) and Jacobs v. Concord Vill. Condo, X Ass'n Inc.*, (D. Fla. 2004), but the trial's judge "***totally disregarded these two cases***," which **suggests BIAS**[4] with Respondents and

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[4] A federal trial judge, as the fact-finder **could be considered biased** if they commit a "**plain err**or" by ("**ruling against their own previous ruling in a different case**"), as this inconsistency **could indicate a lack of impartiality** and **judge's inability to apply the law fairly**. Judges have been cautioned **to voluntarily recuse if necessary** "**to assure that litigants have no cause to think their case is not being fairly judged**." *McClelland v. McClelland*, 359 N.W.2d 7, 11 (Minn. 1984). In Caperton v. Massey (6/8/09) was ruled "***Due to a serious risk of actual bias***," the Due Process Clause ***required the recusal*** of Judge Brent Benjamin. After that, H. Thomas Wells, Jr., President of the American Bar Association, applauded the decision."

Mrs. Langbein. See (**Doc. 2**),(pg. 124 to 126) in USCA11 case (**No. 23-12413**).

d. ***Read*** the (Doc. 102),(pg.126: pt. 149 to pg. 159: pt. 222) Id, in which was demonstrated that Respondents retaliated against us under the FHA.

e. Read the (**Doc. 102**),(pg. 184: pt. 268 to pg. 211) demonstrating that ***Respondents obtained our eviction by fraud***, because in the case (**No. 2018-236-CC-21**): (1) their witnesses, and specifically Vilma (manager of VOH) **besides of withholding relevant evidence from our lawyer Mr. Brochyus and from the court, she repeatedly and egregiously** "**lied at stand**" during the eviction trial, (2) **their lawyer Mr. Lowenhaupt**, ***committed fraud upon the state court***, by "**lying at stand**" and **by leading Vilma to commit** "**perjury under oath**" **repeatedly**, and (3) ***because*** in the appeal case (**No. 2019-208-APL**), Mrs. Langbein, **committed fraud upon** the Appellate Division of the Miami Dade County. See (**Doc. 102**),(pg. 76: **pt. 53** to pg. 78: **pt. 55**) in USCA11 case (**No. 23-12413**)

f. ***Read*** the **BILL OF REVIEW**, that **we introduced** in the (**Doc. 102**),(pg. 187(v): **pt. 273** to pg. 206: **pt. 293**) *Id*, **for the USCA11 to review the judgment obtained by fraud upon** the Appellate Division of the Miami Dade County in the case (**No. 2019-208-APL**), which "**erroneously**" reversed the

correct verdict entered by the Hon. Judge Milena Abreu, shown in the (**DE 26**, 6/25/19) of case (**No. 1:19-cv-21826-JAL**). See (**DE 372-10**, 11/16/20) Id, showing the "**erroneous ruling**" of that Appellate Court of FL., **after fraud was committed upon it by Mrs. Langbein** on **seven (7) different occasions**, and because Respondents "**WITHHELD**" the "**REPORT**" and "**THE LETTER**" of Mrs. Lowenhaupt, mentioned above in the pages (**pg. 2 & 4**), (**emphasis added**).

g. ***Read*** the (**Doc. 102**),(pg. 207: **pt. 295** to pg. 211: **pt. 302**) of appeal case (**No. 23-12413**), the "**Appellants' Joint Reliefs for Counts IX, XI & XII**" because of Respondents' ***repeatedly*** "**coerce**d" and "**intimidated**" us in "**retaliation**" **without good and legitimate reasons**.

h. ***Read*** the (**Doc. 102**),(pg. 217 to 238) *Id*, showing our arguments **for reversal** in the Count XIV of our SAC.

i. ***Read*** the (Doc. 102),(pg. 239 to 245) Id, demonstrating that the Respondents **again discriminated and retaliated against us**, on (**9/20/21**), after we made a **written request for a reasonable accommodation to keep Angie at VOH**, during the covid-19 pandemic.

j. ***Read*** the (**Doc. 102**),(pg. 245: **pt. 348** to pg. 247: **pt. 351**) *Id*, demonstrating that **the DC committed a** "**plain and evident error**," (**FN 4**), which entitled us to reversal of the ORDER (**DE 555**, 8/17/22) of case (No. 1:19-cv-21826-JAL) for the

Counts V and XIV of our SAC, because the Hon. Judge Lenard, "**erroneously**" **denied our request** for "**Judicial Notice**" ***because*** the documents we presented "**are public records**" and "**of common knowledge**," ***therefore subjected for judicial notice*** **(emphasis added)**

k. ***Read*** the (**Doc. 102**),(pg. 247: **pt. 352** to pg. 252: **pt. 358**) of appeal case (**No. 23-12413**), appealing the ORDER (**DE 555**) of case (**No. 1:19-cv-21826-JAL**), for the **Count XV** of our SAC.

l. Read the (**Doc. 102**),(pg. 252: **pt. 359** to **pg. 258**: pt. 379) *Id*, , demonstrating that the DC committed a "**plain and evident error**," **that entitles us to reversal of the ORDERS** (**DE 88, 98 & 160**) respectively, because the DC "**sanctioned Carlos**" to pay ($ **3000**.00) for an alleged **but false** "**discovery abuse**" that "**was fabricated**" by Mrs. Langbein, **to harass Carlos**, ***because she knew or should have known that***: (1) the legal standard says that **such sanction should be applied against the lawyer representing us** (Mr. Michael Lutfy), **because she knew** that Mr. Lutfy sent to Carlos her discovery requests (1) **with a delay of (33) days** and (2) **three (3) days after the (30) day deadline to respond them had passed.**

m. ***Read*** the (**Doc. 102**),(pg. 259**: pt. 380** to pg. 264: **pt. 391**), of appeal case (**No. 23-12413**), demonstrating that Respondents: (1) ***retaliated against us*** and (2) **denied housing to us** on (**9/9/16**), by imposing the MMLC, "**only one month**"

after we requested reasonable accommodations and a modification for Angie to Tom Cabrerizo on (**8/4/16**), which he also denied "**outright**" that day (**emphasis added**).

n. ***Read*** the (**Doc. 102**),(pg. 259: **pt. 380** to pg. 264: **pt. 391**) *Id*, demonstrating that the MMLC was "**unconscionable**," which is sufficient reason to vacate the "**erroneous verdict**" given in the appeal (**No. 2019-208-APL**) and **reverse our eviction**.

o. **Read** the (**Doc. 102**),(**pg. 326 (H)**: **pt. 53**6 to **pg. 340: pt. 559**) Id, ***demonstrating that we are the prevailing party in the bench trial and in various Counts of our SAC***, because: (1) ***we made*** the "**written requests**" shown in (**DE 430**, 1/22/21), (**pg. 23 to 25**), on (**10/2/17**) and (**10/3/17**), (2) ***within the two year statute of limitation***, (3) ***which*** Respondents "***denied outright***" and (4) ***Mrs. Langbein have been*** "**HIDING**" ***during all these years of litigatio***n (**emphasis added**).

p. **Neither the DC nor the Florida Bar**, ordered Mr. Langbein, **to turn over the Zoom recordings**, ***to properly and effectively investigate the fraud upon the DC*** that we denounced ***about the redacted transcripts***.

q. The DC ***committed*** a "**plain and evident error**" (1) by granting Mr. Dunlavy's (**2nd**) motion to withdraw, (2) ***leaving*** Angie & Katy **without**

representation, and (3) ***by ruling against its own*** "**report and recommendation**" shown in (**DE 727**, 10/12/23), ***WHICH SHOWS BIAS***. See (**FN 4**).

CONCLUSION

Our Writ of Certiorari should be granted on the merits.

Respectfully submitted on (10/24/24)

1. - Carlos Alonso Cano
(individually, and for Angie and Katy) 

2. – Fé Morejon Fernandez (individually) 

3. – Jany Alonso Morejon (individually) 

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