

24-490

ORIGINAL

No.

IN THE  
Supreme Court of the United States

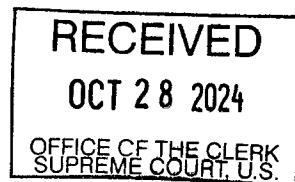
Petitioner Wei Qiu

Wei Qiu  
v.  
Board of Education of Anderson County, KY

On Petition for Writ of Certiorari to the U. S. 6th  
Circuit Court of Appeals for Its Denial of Qiu's  
Appeal of Her Employment Discrimination Case

**PETITION FOR WRIT OF CERTIORARI**

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Petitioner Qiu respectfully asks that a writ of *certiorari* be issued to review Order D 18 of the U. S. 6th Circuit filed on April 3, 2024 and Order DN 59 of the U. S. Eastern District Court of Kentucky filed on 8/28/23.

## OPINIONS BELOW

Order D 18 was issued from the U.S. Court of Appeals For the 6th Circuit which affirmed the order from the district court on April 3, 2024. The petition to rehear was denied on **April 25, 2024**. Order D 18 is attached as Appendix B.

Order DN 59 issued from the U. S. Eastern District Court of Kentucky which denied Qiu's summary DN 45 on 08/28/23. Order DN 59 was attached as Appendix A.

## JURISDICTION

Order D 21 which denied Qiu's petition to rehear was entered on April 25, 2024, in the 6th appeal court. Under 28 U.S.C. § 1254(1), the instant case is in the jurisdiction of the U.S. Supreme Court. Order D 21 is attached as Appendix C. The letter dated September 4, 2024, commands the last day for this case was November 3, 2024.

## **CONSTITUTIONAL PROVISIONS, STATUTES, AND POLICY AT ISSUE**

**The Rule of Law, EQUAL JUSTICE UNDER  
LAW, no one is above the law.**

### **AMENDMENT XIV of the Constitution Section**

#### **1. Rights**

.... nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

### **Title VII of the Civil Rights Act of 1964 UNLAWFUL EMPLOYMENT PRACTICES**

SEC. 2000e-2. *[Section 703]* (a) Employer practices It shall be an unlawful employment practice for an employer -

(1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin;

*If an employment practice which operates to exclude Negroes cannot be shown to be related to job performance, the practice is prohibited. GRIGGS v. DUKE POWER CO., 401 U.S. 424 (1971).*

**16 KAR 2: 120: *qualified teacher*" means a teacher who holds the appropriate certification for the position.**

**KRS 161.020(1)(a): No person shall be eligible to hold the position of ... teacher, ... for which certificates may be issued, or receive salary for the services rendered in the position, unless he or she holds a certification of legal qualifications for the position, issued by the Educational Professional Standards Board.**

## **STATEMENT OF THE CASE**

### **A. Introduction of the Case Procedure**

Qiu first depicts the events before introducing the filings.

Qiu was an American citizen of Chinese origin. Qiu landed in the U.S. in the early 90s when she was 29 that she spoke with an accent. Qiu was a certified high school chemistry teacher possessing the recognition of excellence of chemistry Praxis.

Anderson interviewed Qiu for the chemistry position in the spring of 2020. After the interview, Qiu kept on asking Associate Principal White to hire her. White held Qiu wait. Anderson hired Sutherland

on the day interviewing her that Qiu's waiting was over.

Qiu filed the discrimination happened to her with the EEOC. Anderson did not settle the case administratively. The EEOC issued the Right to Sue. Qiu sued Anderson in the federal court Eastern District of Kentucky under Title VII of the Civil Rights Act of 1964 based on Qiu's race, color, national origin. After discovery, each plaintiff Qiu and defendant Anderson filed summary motion. Order DN 59 granted Anderson's summary. By granting Anderson's summary, Order DN 59 denied Qiu's summary. Qiu appealed to the 6th Circuit Court, and Order D 18 affirmed Order DN 59 of the district court. Qiu is appealing to the Supreme Court.

The filings of the case are in the dockets:

*Wei Qiu v. Board of Education of Anderson County, KY, 3:21 cv 00027, U.S. District Court for the Eastern District of Kentucky.*

*Wei Qiu v. Anderson County, KY Board of Education, 23-5888, U. S. Court of Appeals for the 6th Circuit.*

The critical filings in the district court were:

1. DN 45, Qiu's Motion for Summary Judgment.  
DN 46 is the amendment added to DN 45.

2. DN 47, Anderson County's Response to Qiu's Summary DN 45 and DN 46.
3. DN 50, Qiu's Reply to DN 47.
  
4. DN 48, Anderson County's Cross Motion for Summary Judgment. Same as DN 47, the Response.
5. DN 49, Qiu's Response to DN 48. DN 51 is the amendment added to DN 49.
6. DN 52, Anderson County's Reply to DN 49 and DN 51.
  
7. DN 59, Order grants DN 48, Anderson County's Summary.
  
8. DN 61, Qiu's Recuse.
9. DN 63, Order Denies DN 61.
  
10. DN 62, Qiu's 59(e) motion.
11. DN 64, Order Denies DN 62.

The critical filings in the circuit court were:

1. D 12, Qiu's brief
2. D 15, Anderson's brief

3. D 16, Reply by Qiu
4. D 18, Order affirmed the district court's order

## **B. Statement of Facts**

The job was teaching chemistry. Page ID# 322 in Qiu's summary DN 45.

Qiu's qualifications for the chemistry teaching job: Qiu was a certified chemistry teacher. Qiu achieved the excellence of Praxis chemistry. Qiu's chemistry was at Professor Bush's level at the University of Kentucky. Qiu was a passionate educator who was able to maintain, and even instill, high standards in students. Qiu's chemistry teaching was outstanding. Qiu's personality and dedication to students made her classroom a safe place for students to learn. Qiu handled NTI (teaching online) better than most of other teachers. Page ID# 315, 328-337 in Qiu's summary DN 45.

Qiu emailed Associate Principal White to ask to be hired after the interview every week. White held Qiu wait. When White found the English speaker white Sutherland was available, White hired Sutherland on the day. Page ID# 316, 338-342 in Qiu's summary DN 45.

Sutherland was **not** certified for teaching chemistry. Sutherland had **no** chemistry education in

her resume. Sutherland had **no** experience in teaching chemistry in her resume. Page ID# 314, 324, 325-326 in Qiu's summary DN 45,

Anderson hired Sutherland over Qiu on Sutherland's interview day having been holding Qiu wait. Page ID# 316, 338-342 in Qiu's summary DN 45, By Kentucky laws 16 KAR 2: 120 and KRS 161.020(1)(a), Anderson illegally hired Sutherland and paid her to teach chemistry because Sutherland held no chemistry certificate. Page ID# 407, 429-430 in Qiu's response DN 49.

Anderson's counsel Lawyer Chenoweth had Drury the certificate expert of Anderson tell the open, direct material lie that Sutherland was properly certified to teach chemistry courses to solve the qualification problem of Sutherland to set up the fact of his summary. Page ID# 402 in Anderson's summary DN 48. Based on Druey's open, direct lie as his fact, Lawyer Chenoweth filed Anderson's summary. Lawyer Chenoweth knew he was filing his summary of the open, direct lie because he was an education lawyer. Lawyer Chenoweth filed the false document Anderson's summary into the federal court's docket which was a crime.

Lawyer Chenoweth triumphed with his summary of the lie while Qiu argued with Sutherland's certificate, the Kentucky laws 16 KAR 2: 120 and KRS

161.020(1)(a) to prove Drury's lie. Page ID# 411-412, 423-430 in Qiu's response DN 49. The fact that Anderson's summary was granted suggests the professional lawyer had known his summary of the lie would triumph in the district court that he dared to file his summary motion of lie. The court and Anderson were in the conspiracy.

## **REASONS FOR GRANTING THE PETITION**

### **PROBLEMS OF FACT AND LAW**

#### **The Qualifications of Sutherland and Qiu for the Chemistry Teaching Position**

The two Kentucky laws ruled the qualification of a public school teacher:

*16 KAR 2: 120: *qualified teacher*" means a teacher who holds the appropriate certification for the position.*

*KRS 161.020(1)(a): No person shall be eligible to hold the position of ... teacher, ...for which certificates may be issued, or receive salary for the services rendered in the position, unless he or she holds a certification of legal qualifications for the position,*

*issued by the Educational Professional Standards Board.*

By the two Kentucky laws, Anderson illegally hired Sutherland who held no chemistry certificate for the chemistry teaching position and paid her salary. Page ID# 324 in Qiu's summary DN 45, Sutherland's teaching certificate. Sutherland was unqualified for the chemistry teaching position factually (zero education in chemistry, see her resume) and legally (held no chemistry certificate, see her certificate). Page ID# 314, 324, 325-326 in Qiu's summary DN 45, Sutherland's certificate and resume. Anderson violated Kentucky laws 16 KAR 2: 120 and KRS 161.020(1)(a) to hire Sutherland and pay her salary in the chemistry position because Sutherland held no chemistry certificate. Anderson hired Sutherland to teach chemistry illegally.

Qiu was certified to teach chemistry. Page ID# 328 in Qiu's summary DN 45, Qiu's certificate. By the two Kentucky laws, Qiu was qualified to teach chemistry. Further, Qiu achieved the excellence of chemistry Praxis and other high qualifications of a chemistry teacher: Qiu's chemistry was at Professor Bush's level at the University of Kentucky, Qiu was outstanding teaching in her chemistry classroom, Qiu was able to maintain, and even instill, high standards in students, Qiu handled NTI (teaching online) better

than most of the other teachers. Page ID# 315, 328-337 in Qiu's summary DN 45.

Anderson hired Sutherland over Qiu for the chemistry teaching position.

**Anderson Discriminated against Qiu, and Lawyer Chenoweth had Drury the Certificate Expert Tell the Open, Direct Lie as His Facts for His Summary Motion**

Knowing Qiu was an accented Chinese, Anderson held Qiu wait after Qiu's interview. Qiu asked to be hired after her interview, Associate Principal White held Qiu wait to continue interviewing to search for a new applicant. On the day Sutherland was available to White, White hired the unqualified English speaker white Sutherland over the qualified accented Chinese Qiu. Page ID# 338-342 in Qiu's summary DN 45, the email exchanges of Qiu and Associate Principal White.

Based on the qualifications of Sutherland and Qiu for the chemistry teaching position, Anderson made the decision to hire the unqualified Sutherland on the day Sutherland was available after holding the qualified Qiu wait. Anderson made the hiring decision based on the race, color, and national origin of Sutherland and Qiu at the moment when Anderson found Sutherland, being driven by its racism.

Anderson disparately treated Qiu from Sutherland because of their race, color, national origin. Anderson violated Title VII of the Civil Rights Act of 1964 UNLAWFUL EMPLOYMENT PRACTICES SEC. 2000e-2. *[Section 703] (a)(1).*

Anderson discriminated against Qiu under the *McDonnell Douglas* framework. The first three elements of the *McDonnell Douglas* framework were undisputed. Page ID# 390 in Anderson's summary DN 48. Anderson disputed the 4th element which was about the qualifications of the applicants for the chemistry position.

Anderson's counsel Lawyer Chenoweth had Drury the certificate expert of Anderson tell that Sutherland was properly certified to teach chemistry courses to solve the qualification problem of Sutherland to set up the fact of his summary. Page ID# 402 in Anderson's summary DN 48. Drury materially lied under oath openly and directly because his affidavit was against the two Kentucky laws. Based on Druey's open, direct lie as his fact, Lawyer Chenoweth filed Anderson's summary. Lawyer Chenoweth knew he was filing his summary of the open, direct lie because he was an education lawyer. Lawyer Chenoweth filed the false document Anderson's summary into the federal court's docket which was a crime.

Lawyer Chenoweth triumphed with his summary of the lie while Qiu argued with Sutherland's certificate and the Kentucky laws 16 KAR 2: 120 and KRS 161.020(1)(a) to prove Drury perjured openly and directly under oath. Page ID# 407-408, 411-412, 423-430 in Qiu's response DN 49, Page ID# 530-537 in Qiu's amendment response DN 51. The fact that Anderson's summary was granted suggests the professional lawyer had known his summary of the lie would triumph in the court that he dared to file his summary motion of lie. The court and Anderson were in the conspiracy: Lawyer Chenoweth put Anderson's summary into the docket that the district court could and would grant it. Anderson's summary was a step of the teamwork of Anderson and the court.

#### **Order DN 59 from the District Court was a Lie to be on Anderson's Side**

Raising the Kentucky laws, Qiu argued Drury perjured in her response. Page ID# 407-408, 411-412, 423-430 in Qiu's response DN 49. Raising the laws, Qiu argued Drury perjured and faked documents to cheat the Education Professional Standard Board in her amendment response DN 51, Page ID# 530-537. Drury's under oath affidavit that Sutherland was properly certified to teach chemistry to the fact that Sutherland held no chemistry certificate directly conflicted with the Kentucky laws. Order DN 59 took

Drury's lie that Sutherland was properly certified to teach chemistry. Page ID# 594 in Order DN 59; **Second half in Page 35 in Appendix A.**

Order DN 59 misexplained the Kentucky laws: *That statute does not identify which certifications are required to teach which courses.* Page ID# 594 in Order DN 59. **Bottom two lines in Page 35 in Appendix A.** *There is insufficient evidence to show that a chemistry certificate is required to teach chemistry. Accordingly, there is no genuine issue over whether Ms. Sutherland was qualified for the position.* Page ID# 595 in Order DN 59; **Middle in Page 36 in Appendix A.** By misexplaining the laws, the district court legalized the illegal that Sutherland taught chemistry holding no chemistry certificate. By misexplaining the laws, the district court qualified the unqualified Sutherland.

Sutherland was not certified to teach chemistry, has no education in chemistry, and has no experience to teach chemistry were nude facts in Sutherland's certificate and resume. Page ID# 324, 325-326 in Qiu's summary DN 45, Sutherland's certificate and resume. Order DN 59 falsified the nude facts of Sutherland as *Qiu believes.* Page ID# 593 in Order DN 59; **Second half in Page 33 in Appendix A.** Having falsified the nude facts of Sutherland as *Qiu believes*, Order DN 59 did not have to make the decision based on the facts of Sutherland.

Order DN 59 brushed Qiu's qualifications: ... *presented references, evaluations, an award, and test scores.* Page ID# 593 in Order DN 59; **First half in Page 34 in Appendix A.** Qiu's chemistry was at Professor Bush's level in one of the references; the evaluation was 4.47; the award was the excellence of chemistry Praxis, the test score was her highly scored physics and math Praxis. The district court abated Qiu's qualifications.

Having falsified the qualifications of Sutherland and Qiu, the district court took Anderson's pretext that the uncertified white Sutherland with zero chemistry education was more qualified for the chemistry teaching position than the certified Chinese Qiu with excellence of chemistry Praxis to grant Anderson's summary. Page ID# 595 in Order DN 59; **Beginning in Page 37 in Appendix A.**

Therefore, Order DN 59 was a true lie of fact and law to be on Anderson's side. The district court violated Qiu's Constitutional right to Due Process and equal protection of the laws under Section 1 of Amendment XIV.

**Order D 18 from the Circuit Court Which Affirmed Order DN 59 was similar to Order DN 59**

Order D 18 cherrypicked the facts to affirm Order DN 59. The nude fact that Sutherland had NO education in chemistry which was in her resume. Page 7, 22-23, 47-48 in Qiu's brief D 12. Qiu's qualifications were in Page 8, 50-55 in Qiu's brief D 12 and Page 3-4 in Qiu's reply D 16. **The foregoing material facts of Sutherland and Qiu were not in Order D 18.** Order D 18 did not hear Qiu from the beginning to the end. In other words, Sutherland had no education in chemistry and Qiu's qualifications as a chemistry teacher were not in Order D 18. Order D 18 did not even mention Qiu was a certified chemistry teacher. Order D 18 was errors of fact by cherrypicking to affirm Order DN 59. When Sutherland had no chemistry education was mentioned and Qiu was a certified chemistry teacher with excellence of chemistry Praxis were presented, Order D 18 could not affirm Order DN 59.

Qiu argued Sutherland was not qualified to teach chemistry and Drury perjured raising the Kentucky laws. Page 11-14, 63-68 in Qiu's brief D 12, Page 1-3, 7-9, 13-14, 17-24 in Qiu's reply D 16. Order D 18 did not hear Qiu. Order D 18 opinioned that Sutherland was qualified to teach chemistry with her biology certificate which was against the Kentucky laws negatively and harmfully. Page 3-4 in Order D 18; **Page 46-47 in Appendix B.** Order D 18 was errors of fact and law to be on Andersons' side to affirm Order DN 59.

Therefore, the circuit court violated Qiu's Constitutional right to Due Process and equal protection of the laws under Section 1 of Amendment XIV.

**Order DN 59 and Order D 18 were against the Supreme Court's Decision *GRIGGS v. DUKE POWER CO.*, 401 U.S. 424 (1971).**

*If an employment practice which operates to exclude Negroes cannot be shown to be related to job performance, the practice is prohibited. GRIGGS v. DUKE POWER CO., 401 U.S. 424 (1971). See also Albemarle Paper Co. v. Moody, 422 U.S. 405, 95 S.Ct. 2296, 45 L.Ed.2d 245 (1975). The spirit of Griggs was that only job related performance was considered to decide if discrimination happened. White v. Columbus Metropolitan Housing Auth, 429 F.3d 232, 243, 244, 245, 247, 248 (6th Cir. 2005) was the same soul as Griggs in the hiring situation. To against White is to against the Supreme Court's Griggs. White only considered the qualifications of the applicants to perform the job to decide if discrimination happened that Title VII was violated. By White, only the better qualified applicant was hired that discrimination did not happen. Orders DN 59 and D 18 did not compare the qualifications of Sutherland and Qiu to perform the chemistry teaching job like White did. The Orders DN 59 and D 18 conflicted with White because they*

granted and affirmed the hiring of the unqualified with no chemistry education Sutherland over the qualified with the excellence of chemistry Praxis Qiu for the job of teaching chemistry as discrimination did not happen.

Anderson was impossible to proffer any reason to cover its discrimination against Qiu because it could not increase Sutherland's chemistry knowledge to perform the job of teaching chemistry. To solve the problem of the qualification of Sutherland, the courts screwed or ignored the Kentucky laws that the courts put Anderson above the two Kentucky laws. The courts violated the Rule of Law, EQUAL JUSTICE UNDER LAW, no one is above the law. The courts were against the spirit of the Constitution which set the equal foundation of every citizen.

The orders did more against *White*. The orders took the stuff which *White* declined as Anderson satisfied its burden. The courts took Sutherland was an ex-employee and other staff which could not help Sutherland increase her chemistry knowledge to teach chemistry. Page ID# 592-593 in Order DN 59; **Page 32-33 in Appendix A.** Page 4 in Order D 18; **First half in Page 47 in Appendix B.** *White* declined to consider such stuff. *White v. Columbus Metropolitan Housing Auth*, 429 F.3d 244, 245, 246 (6th Cir. 2005)

The courts took Anderson's attack on Qiu which was not Qiu's qualifications to teach chemistry. Page ID# 593-594 in Order DN 59; **Middle in Page 34 in Appendix A.** Page 3 in Order D 18; **Second half in Page 45 in Appendix B.** *White* declined to consider even a criminal background. *White v. Columbus Metropolitan Housing Auth*, 429 F.3d 244, (6th Cir. 2005).

Therefore, the orders conflicted with *White* in every aspect to favor Anderson that the orders were against the Supreme Court's *Griggs*. The orders were errors of law because of conflicting with *Griggs*. The orders should be reversed to purge the negative and harmful challenges the orders did to *Griggs*.

#### **More Evidence that The District Court and the 6th Circuit Court were on Anderson's Side**

Anderson proffered its reason attacking Qiu. Page ID# 384-385, 391, 396-398 in Anderson's summary and response DN 48. Qiu proved Anderson pretexts and lied to cover its discrimination. Page ID# 408-410, 414-416, 431-452 in Qiu's response DN 49. The district court only took Anderson's attack on Qiu not hearing Qiu's argument that Anderson pretexts and lied. Page ID# 593-594 in Order DN 59. **Middle in Page 34 in Appendix A.** Therefore, the district court was on Anderson's side.

Anderson did the same attacking on Qiu in the 6th Circuit Court in its brief. Page 13-15 in Anderson's brief D 15. Qiu proved Anderson lied in her reply and applied *falsus in uno*. Page 12-13 in Qiu's reply D 16. The 6th Circuit Court did not hear Qiu's proof that Anderson's attack on her were lies to fail Qiu's proving that Anderson pretexts to hide its discrimination. Page 3 in Order D 18; **Second half in Page 46 in Appendix B.** The 6th Circuit Court was on Anderson's side.

Therefore, the courts violated Qiu's Constitutional rights to Due Process and equal protection of the laws under Section 1 of Amendment XIV.

## QUESTIONS

### **Is it illegal to select an uncertified applicant over a certified applicant for a public position?**

Qiu asks the Justices to answer YES to this question to purge the toxin the judges released from federal court which would become the caselaw to harm the whole country if not reversed.

Without the chemistry certificate, Sutherland who had no education of chemistry got into the chemistry classroom to teach chemistry which she did not know

herself. The harm Sutherland did to the education of chemistry of the students in the public school did not erupt immediately, but a space missile would explode when a position is filled with an unqualified person like Sutherland. The waste Sutherland did to the public could be avoided in the presence of the certified chemistry teacher Qiu, but Vice Principal White hired Sutherland the white to satisfy his own racism at the cost of the public. Qiu asks the Justices to make the law that it is illegal to hire an uncertified applicant over a certified applicant to forbid corruption like White did.

The orders must be reversed to prevent it from becoming the caselaw that it is legal to hire an uncertified applicant over a certified applicant in a public body. The federal judges legalized anyone to be in a public classroom to fool for money all over the country like Sutherland did even at the presence of a certified applicant. Because Orders DN 59 and D 18 were from federal courts, the toxin the judges generated will ooze all over the states.

The abuse of public resources for personal interest in the instant case will even infect beyond discrimination if not reversed. For example, a principal will legally put his uncertified daughter like Sutherland into a classroom to get salary only because he wants his daughter to have an income by this case as his law, refusing the certified applicants. Worse,

once such a situation happens, the nasty corruption will be free of law that the harm to the public will be no cure. Therefore, Orders DN 59 and D 18 must be reversed to impede the vast detriment to the public of the states. In the AI time, people will find out the orders the judges issued in this case to apply to legalize their corruption. Order DN 59 and Order D 18 must be reversed to cease the corruption of satisfaction of personal interest at the cost of the public.

Therefore, Order DN 59 and Order D 18 must be reversed to cease the harm they will do to the whole country. Qiu asks the Justices to make it clear that it is illegal to hire an uncertified applicant over a certified applicant in a public body.

#### **Did the Orders conflict with the Supreme Court's *Griggs* on an employment discrimination case?**

The orders conflicted with the Supreme Court's *Griggs* in every aspect. The orders did not consider the qualifications of the applicants to perform the job. The orders considered the staff which could not be used to perform the job of teaching chemistry. The orders must be reversed for the negative and harmful challenges to the spirit of *Griggs* which was fundamental to guard the federal law Title VII.

Qiu asks the Justices to iterate that only the more qualified applicant to perform the job is hired that discrimination does not happen. Only by such clear statement of the law of the Supreme Court that the federal law Title VII can be securely guarded, or the Title VII violators will use Order DN 59 and Order D 18 as their precedence to give every kind of reasons to satisfy their burden for their violation of Title VII.

**Should a party be defaulted or dismissed when telling lies to win a case?**

The courts granted and affirmed Anderson's summary which was based on Drury's open, direct lie that the courts uprooted *falsus in uno* which was crucial to maintain the hygiene of courts. Very few cases could go so far to the Supreme Court with standing out lies. Qiu asks the Justices to take the opportunity to make the caselaw that the party tells a material lie will be defaulted or dismissed for the efficiency of justice and justice itself.

**Did the courts violate Qiu's Constitutional right to Due Process and equal protection of laws under Amendment XIV?**

Only by falsifying the facts and screwing the laws could the courts conclude that the uncertified

Sutherland with no chemistry education was more qualified for the chemistry teaching position than the certified Qiu with the excellence of chemistry Praxis. So did the courts. For example, the district court misexplained the Kentucky laws to legalize and qualify Sutherland to teach chemistry holding no chemistry certificate. For example, the 6th Circuit Court avoided the fact that Sutherland had no chemistry education and did not mention Qiu's qualifications for teaching chemistry. Therefore, the courts were on Anderson's side to falsify the facts and screw the laws to grant Anderson's summary. The courts violated Qiu's constitutional right to Due Process and equal protection of the laws under Section 1 of Amendment XIV. The courts were against the Rule of Law and EQUAL JUSTICE UNDER LAW.

Because Order DN 59 and Order D 18 violated the Constitution, Qiu asks the Justices to reverse the orders.

## **CONCLUSION**

For the foregoing reasons, this Court should grant this Petition for Writ of Certiorari.

Respectfully submitted.

Wei Qiu *Wei Qiu Oct. 22, 2024*

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