No. 24–5084

In the Supreme Court of the United States

TERRENCE E. GILCHRIST,
Petitioner,

–v.–

SIMONE R. CRAIG, *ET AL.*,
Respondents.

On a Petition for Rehearing
an Order Denying a Writ of Certiorari
to the Tenth District
Court of Appeals of Ohio

PETITION FOR REHEARING AN ORDER

QUESTIONS PRESENTED

After this Court decided *Turner* v. *Rogers*, 564 U. S. 431 (2011), many state courts adjusted contempt proceedings in child support cases under Title IV, Part D, of the Social Security Act. In December 2016, the United States Department of Health and Human Services, which funds programs under that same Part, promulgated revised regulations that implemented due process safeguards, based upon the three–prong test from *Mathews* v. *Eldridge*, 429 U. S. 319 (1976), as discussed in *Turner* v. *Rogers*. States likewise revised corresponding regulations for their courts and tribunals. The federal legislative branch also made changes such as an expression of a "Sense of the Congress regarding offering of voluntary parenting time arrangements," by enacting the Preventing Sex Trafficking and Strengthening Families Act, in September 2014, and expansion of "529 Account Funding for Elementary and Secondary Education," within the enactment of the Tax Cuts and Jobs Act in December 2017. The questions presented herein are as follows:

> Whether non–adherence to Turner procedural protections, under 45 CFR § 303.6(c)(4–5), violates substantive due process as well as privileges and immunities when fundamental rights and liberties are implicated, affronts the Takings Clause of the Fifth Amendment as well as the Due Process and Equal Protection Clauses of the Fourteenth Amendment, from which equitable relief is available, as found by Massachusetts, Nebraska, and Nevada as well as the First, Third, Sixth, Eighth, Ninth, and Eleventh Circuits, or is instead moot, as found in Ohio and Texas.
>
> Whether a dignity factor, scrutiny under substantive due process, or with privileges and immunities, as well as by specific Amendments may supplant the *Mathews* factors and *Turner* procedural protections in proceedings under Part D of Title IV of the Social Security Act when fundamental rights and liberties are at stake.
>
> Does lack of perfection of service divest a trial court of subject matter jurisdiction under the Due Process Clause of the Fourteenth Amendment, for "any matters," after confirmation of the registration of an order under the Uniform Interstate Family Support Act.

LIST OF PARTIES

Other parties with privity to the matter include The Honorable Monica E. Hawkins, Franklin County Court of Common Pleas; the Honorable Terri B. Jamison, Tenth District Court of Appeals of Ohio, Franklin County, Susan A. Brown, Esq., Director, Franklin County Child Support Enforcement Agency; and Lucy D'Anna, Supervisor, Superior Court of New Jersey, Morris County, Probation Division, Child Support Enforcement.

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TABLE OF AUTHORITIES CITED

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Constitution, Statutes, and Rules

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In the Supreme Court of the United States

TERRENCE E. GILCHRIST,
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SIMONE R. CRAIG, *ET AL.*,
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On Petition for Rehearing an Order Denying a Writ of Certiorari to the Tenth District Court of Appeals of Ohio

Petitioner respectfully prays that writ of certiorari issue to review the judgment below by the court of appeals, tenth district, of Ohio.

OPINIONS BELOW

JURISDICTION

This petition has been filed, pursuant to Rule 29.2, within the extension of time allowed by Justice Brett Kavanaugh, Circuit Justice for the Sixth Circuit, to and including April 26, 2024. The statutory provisions conferring jurisdiction upon this Court include 28 U. S. C. § 2106, "Determination," and 28 U. S. C. § 1257(a), "State courts; certiorari." The constitutional provision conferring jurisdiction upon this Court is U. S. Const., Art. III, § 2, with regard to how the matter below draws into question the following statutory provision of the Full Faith and Credit for Child Support Orders Act, 28 U. S. C. § 1738B(h), and the statutory and regulatory provisions of Title IV Part D of the Social Security Act: 42 U. S. C. §§ 658a(c), 666(a)(7)(A–B), and 666(f) as well as 45 CFR §§ 303.6(c)(4–5) and 303.12.

The date of entry by the supreme court of Ohio to deny an amended motion for reconsideration was November 28, 2023. The state appellate decision for review and entry were issued December 13, 2022 with a subsequent filing in the state lower common pleas court, of the same appellate entry of the same appellate decision, on December 21, 2022.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Full Faith and Credit Clause, U. S. Const., Art. IV, § 1, provides that "Full Faith and Credit shall be given in each State to the public Acts, Records, and judicial Proceedings of every other State. And the Congress may by general Laws prescribe the Manner in which such Acts, Records and Proceedings shall be proved, and the Effect thereof."

The Privileges and Immunities Clause, U. S. Const., Art. IV, § 2, cl. 1, provides that "The Citizens of each State shall be entitled to all Privileges and Immunities of Citizens in the several States."

The Supremacy Clause, U. S. Const., Art. VI, cl. 2, provides that "This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; . . . shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, . . ." Liberty of Intimate Association under U. S. Const., Amdt. 1, provides that "Congress shall make no law . . . abridging the freedom . . . of the right of the people peaceably to assemble . . ."

The Takings and Just Compensation Clause of Amdt. 5 provides that "[N]or shall private property be taken for public use, without just compensation."

Unenumerated Rights under U. S. Const., Amdt. 9, provide that "The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people."

The Privileges or Immunities, Due Process, and Equal Protection Clauses, of Amdt. 14, § 1, provide that "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; 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."

[RELEVANT STATUTORY PROVISIONS INVOLVED]

[REGULATORY PROVISIONS INVOLVED]

STATEMENT OF THE CASE

The Petitioner became a displaced government work in September 2013. With the exception of 1994, he had either full-time or part-time employment every year from 1993 through 2013. In the year prior, the Appellant initiated Title IV–D services in New Jersey in October 2012, for the purpose of ensuring parenting time and establishing the child as his beneficiary via paternity testing. After an almost mediation in December 2012, a child support order was issued from the Superior Court of New Jersey, May 2013. Inexplicably, a few months later, the Appellant lost employment with the Governor's Office, State of Maryland, and the Petitioner never again worked in government. From May 2013 to October 1, 2013, the Appellant had reduced the instantaneous retroactive arrears of $4,554, plus $94.25 fee for two genetic test, to $3,148.25.

From September 4, 2013 through January 10, 2017, the Appellant endured 3 years, 4 months, and 1 week, or 1,225 consecutive days, of long-term unemployment. As a last resort, after conversing with a therapist in July 2019, the Appellant returned to substitute teaching, after having been a substitute teacher for the Columbus City School District intermittently from December 2001 to March 2017 then was a substitute teacher for the Columbus Diocese from September 2019 to June 2021.

During that time, in January 2017, a "petition" from an administrative unit within the Superior Court of New Jersey, called Morris County Child Support Enforcement, for to register the New Jersey support order and for enforcement upon arrears was sent and eventually received by the Franklin County Child Support Enforcement Agency in March 2017 then filed with the Franklin County Court of Common Pleas, April 2017. Perfection of service upon Appellant, of that same petition and accompanying documents, was never accomplished within twelve months of the initial registration of the petition with the Franklin County Court of Common Pleas, April 6, 2017.

In oral argument at the purge hearing by the Attorney for this Petitioner, (Tr. 215 12/21/2021 at 9), and subsequently pressed with the state intermediate appellate court and state highest court, a federal question was raised as to whether child support payments submitted into the Superior Court of New Jersey by the Petitioner has verity to a state court in Ohio under the Full Faith and Credit Clause of U.S. Const., Art. IV, § 1; the Choice of Law provision of the Full Faith and Credit for Child Support Orders Act, under 28 U.S.C. § 1738B(h); as well as statutory and regulatory provisions granting credit for an interstate child support order to both the respective Title IV Part D state agencies in New Jersey and Ohio for payments made in either state under 42 U.S.C. § 658a(c) and 45 C.F.R. § 304.12.

Also presented and pressed with the state intermediate appellate court and state highest court was whether the Franklin County Court of Common Pleas and the Franklin County Child Support Enforcement Agency failed to adhere to the mandated safeguards, of the *Turner* v. *Rogers* procedural protections under 45 C.F.R. § 303.6(c)(4–5), in disregarding the valid evidence from the Superior Court of New Jersey, which revealed the Petitioner in 2021 having (a) paid $5,789.67 surpassing by $1,109.67 the $4,680 due for child support, (Record 190 and 191), as well as (b) thirty court–ordered reunification therapy sessions, for which the Petitioner paid $3,209.25 in 2021, (Record 194).

REASONS FOR REHEARING AN ORDER

I. Intervening Circumstances of a Controlling Effect

During June 28, 2024, this Court issued its Opinion deciding the case *Loper Bright Enterprises* v. *Raimondo*, 603 U. S. __ , 144 S. Ct. 2244, 219 L. Ed. 832, which held that "courts may not defer to an agency interpretation of the law simply because a statute is ambiguous." *Ibid.*, slip op., at 35, 2273, 867. The same Opinion does not affect the Title IV–D statutes, with unambiguous plain statements, that delegate Congressional authority to the Secretary of the United States Department of Health and Human Services to promulgate regulations binding upon state Title IV–D tribunals such as state courts, state agencies, and county agencies. Therefore, as implementing regulations, 45 CFR § 303.6(c)(4–5) remain binding upon state Title IV–D tribunals and mandates adherence to the due process safeguards of *Turner* procedural protections expressed in the controlling case *Turner* v. *Rogers*, 564 U. S. 431 (2011).

Recently, the state highest courts of Hawai'i and New Jersey, have determined the extent of the *Loper Bright* decision upon judicial review of state agency interpretation of regulations. In September 2024, the supreme court of Hawai'i stated "Chevron's well–reasoned analysis allowed agencies to function in a modern nation using older statutes — statutes that, at the time they were written, could not possibly account for the many nuanced situations that arise in a rapidly changing world. Justice Kagan's dissent in *Loper Bright* cites to paradigmatic examples of agency deference. See *Loper Bright*, 144 S. Ct. at 2296–97 [(KAGAN, J., dissenting) (slip. Op., at 5–6)]. … We do not believe the expertise of courts outstrips that of the agencies charged with implementing complex regulatory schemes on a day–to–day basis. In Hawai'i, we defer to those agencies with the na'auao (knowledge/wisdom) on particular subject matters to get complex issues right. 'Ku'ia ka hele a ka na'au ha'aha'a (hesitant walks the humble hearted).' *Sunoco*, 153 Hawai'i at 363, 537 P.3d at 1210 (2023) (Eddins, J., concurring). A court's domain is the law, and judges should recognize the limits of their expertise." See *Rosehill* v. *Land Use Comm'n*, 155 Haw. 41, 43–44, 556 P.3d 387 (2024).

In August 2024, the supreme court of New Jersey expressed the limits of the *Loper Bright* decision in *Board of Educ.* v. *M.N.*, 258 N. J. 333, 318 A.3d 670 (2024), in relevant part, asserting "We note that since the Appellate Division issued its decision, the United States Supreme Court held, in *Loper Bright Enterprises* v. *Raimondo*, that federal courts 'may not defer' to a federal agency's interpretation of a federal statute even if the statute is ambiguous. 603 U.S. ___, 144 S. Ct. 2244, 2273, 219 L. Ed. 2d 832 (2024). Although *Loper Bright* is not binding on this Court and we do not rely on it here, the Appellate Division did not explain why it was correct to defer to a state agency's interpretation of a non-ambiguous federal regulation that the state agency did not promulgate. No such deference is appropriate under our caselaw." *See Board of Educ., supra*, 683 and n. 4.

II. Intervening Circumstances of a Substantial Effect

Interstate child support cases are routine. Unfortunately, when state courts and local child support agencies make mistakes, the state courts have become reluctant to correct the glaring plain error. With lack of accountability and a belief that no one is watching, state courts and local child support agencies commit mistakes with adverse effects upon children and their parents.

1. To address numerous harmful mistakes by the state courts in Ohio and New Jersey, the Petitioner is awaiting a dispositive order from the respective Superior Court of New Jersey, Chancery Division, Family Part that can end as well as close child support proceedings in Ohio. Another Order to Show Cause hearing is pending November 7, 2024, to address matters involving the best interests of the child as well as rights of the child and the Petitioner under federal statutes and the United States Constitution. The filings for the Order to Show Cause hearing entail briefs, certified statements, and exhibits in support of declaratory and prospective relief. Prior Order to Show Cause hearings were held in May 2024, July 2024, August 2024, and October 2024.

2. As to federal government, the Petitioner has a pending administrative reconsideration of an appeal for Supplemental Security Income benefits from the United States Social Security Administration. Also, in May 2024, with the help of an United States Senator, an omission was found with the child's Numerical Index Record, or "Numident", within the databases of the United States Social Security Administration. This was despite a voluntary genetic test result from March 2013 and the Natural Father voluntarily amending the same child's Birth Certificate in the Vital Statistics of the New Jersey Department of Health in July 2013. As indicated by the Presiding Judge of the respective Superior Court of New Jersey, Chancery Division, Family Part, rectifying the omission of the Natural Father's name from the same "Numident" will ensure Social Security benefits to the same child from the Social Security benefits of the Natural Father.

3. Finally, since June 2024, the Petitioner has been enrolled and attending graduate school courses within a residential Master in Education program. An asynchronous virtual course began in June 2024 with a subsequent set of three in-person short courses in an August term before the start of the remaining, regular in-person Fall semester.

REASONS NOT PREVIOUSLY PRESENTED FOR GRANTING THE WRIT

I. Lack of Uniformity Exists in State Appellate Court Review of the Application of the Mandated Due Process Safeguards under *Turner* v. *Rogers* (2011) and 45 CFR § 303.6(c)(4-5).

A. With Respect to the Turner Procedural Protections, the State Highest Courts of Massachusetts, Nebraska, and Nevada and Several State Intermediate Appellate Courts Opine toward Adherence Whereas the State Courts of Appeal of Ohio, South Carolina, and Texas Allow Abuse of Discretion.

With the split in determinations, the problem is that some state courts grant appellate review and recognize abuse of discretion while others use appellate review to avoid finding abuse of discretion.

The decision in the instant case by the state intermediate appellate court of Ohio is similar to a recent decision by a state intermediate appellate court in Texas; however, both conflict with the state highest courts of Massachusetts, Nebraska, and Nevada.

State intermediate courts of appeal in Ohio, Iowa, and Texas conflict with the state highest courts of Massachusetts, Nebraska, and Nevada as well as conflict with the state intermediate appellate courts of Arizona and Kentucky.

With the split in determinations, the problem is that some state courts grant appellate review and recognize abuse of discretion while others use appellate review to avoid finding abuse of discretion. The decision in the instant case by the state intermediate appellate court of Ohio is similar to a recent decision by a state intermediate appellate court in Texas; however, both conflict with the state highest courts of Massachusetts, Nebraska, and Nevada. State intermediate courts of appeal in Ohio, Iowa, and Texas conflict with the state highest courts of Massachusetts, Nebraska, and Nevada as well as conflict with the state intermediate appellate courts of Arizona and Kentucky.

B. For Nearly Fifty Years, State Appellate Courts Have Known That the Respective Federal Regulatory Enforcement Procedures under 45 CFR § 303.6 Are Mandatory.

All of these state courts are required to follow the federal law. In *Rose* v. *Arkansas State Police*, 479 U. S. 1 (1986), "There can be no dispute that the Supremacy Clause invalidates all state laws that conflict or interfere with an Act of Congress." *Ibid.*, 3. In *Armstrong* v. *Exceptional Child Center, Inc.*, 575 U. S. 320, "this Clause creates a rule of decision * * * It instructs courts what to do when state and federal law clash, but is silent regarding who may enforce federal laws in court, and in what circumstances they may do so." *Ibid.*, 1383. State courts are to adhere

to the interpretation of federal law by this Court. See *DirecTV, Inc.*, v. *Imburgia*, 577 U. S. 47, 53 (2015).

In matters of interpreting conflicts of state and federal regulations, the federal law preempts state law. See *English* v. *General Electric Co.*, 496 U. S. 72, 89 (1990). State administrative agencies in Spending Clause fields are to abide by federal guidelines unless a permissible exception is authorized. See *Kansas* v. *United States*, 214 F. 3d 1196 (CA10 2000).

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State administrative agencies in Spending Clause fields are to abide by federal guidelines unless a permissible exception is authorized
Kansas v. *United States*, 214 F. 3d 1196 (CA10 2000)

Massachusetts, Grullon
Nebraska, *Sickler* v. *Sickler*
Nevada, *Foley* v. *Foley*

Ohio
Texas

With the Full Faith and Credit Clause, evidence from one court is valid evidence to another court.

The problem is that some state courts recognize the veracity of the judicial documents from the court of another state while other state courts impeach the documents.

Massachusetts
New York

Ohio

Under the Equal Protection Clause, indigent status is not a justification for denying the liberty of fundamental rights and vested interests.

The problem is that depending upon where an indigent litigant accesses the judicial process, by state, the same indigent litigant with the same case will have different outcomes by state.

II. Strict Scrutiny and a Dignity Factor May Augment or Supplant the *Mathews* v. *Eldridge* Factors in Title IV Part D Proceedings When Fundamental Rights and Vested Interests, Beyond Bodily Restraint, Are at Stake.

For affiliational rights, interstate travel, education, and child rearing, the due process safeguards of Turner procedural protections are not effective as heightened protection of these fundamental rights and liberties.

Kansas v. *United States*, 214 F. 3d 1196 (CA10 2000)

South Dakota v. *Dole*, 483 U. S. 302 (1987)

. Development of guidelines for visitation and alternative custody arrangements
45 CFR § 303.109(c)(2)
42 U .S. C. § 669b(a)
"grants under this section to enable States to establish and administer programs to support and facilitate
noncustodial parents' access to and visitation of their children,
by means of activities including []
visitation enforcement (including monitoring, supervision and neutral drop-off and pickup), and
development of guidelines for visitation and alternative custody arrangements."

Harmonize federal regulations and statutes
with first and third prong of test in South Dakota v. Dole
first prong is "the general welfare"
third prong is legitimacy of conditions
"to the federal interest in particular national projects or programs"
45 CFR § 303.6(c)(4-5) with 45 CFR § 303.109(c)(2)
42 U. S. C. § 666 with 42 U .S. C. § 669b(a)

III. The Decision of the Court of Appeals of Ohio Is Irreconcilable with this Court's Rulings as to Prudential Mootness, Federal Preemption, and Contempt and Thereby Threatens Consequential Adverse Effects to Children and Families.

A. The Inadequate Reasons for Prudential Mootness by the Court of Appeals of Ohio Contradict This Courts Corresponding Mootness Considerations in *Turner* v. *Rogers*, 564 U. S. 431 (2011) and *United States* v. *Sanchez-Gomez*, 584 U. S. 381 (2018) and Similar Mootness Considerations by the Third, Sixth, Eighth, Ninth, and Eleventh Circuits as well as the United States Tax Court and State Highest Judicial Courts of Massachusetts and Michigan

1. Arrears, or a Financial Obligation, Allows the Exception.

2. Equitable Relief Permits the Exception.

3. With the Same Complaining Party, the Exception Is Allowed.

4. Only Inadequate Grounds Are under the Ohio Constitution in This Matter.
The Ohio Constitution is not an adequate ground when the Ohio General Assembly limited the jurisdiction of the state lower court to adherence to the Title IV Part statutes and to the corresponding implementing regulations, under Ohio R.C. 3125.25, "Administrative rules governing operation of support enforcement," effective October 17, 2019.

B. The Lower Court Decision Contradicts This Courts Opinions of the Full Faith and Credit Clause as well as Affronts the Intendment of Congress with the Full Faith and Credit for Child Support Orders Act to the Disadvantage of Interstate Family Law Litigants.

1. Under the Supremacy Clause, Federal Law Preempts State Law and Judicial Proceedings from Out-of-State Courts Are Accorded Comity.
2. The Lower Court Accomplishes the Opposite of the Full Faith and Credit for Child Support Orders Act.

C. In Proceedings under Title IV Part D of the Social Security Act, Incarceration No Longer Has a Legal or Scientific Basis.

Has no penological basis
Adversely affects health of the individual and their family
Inability to pay is already a defense to incarceration
State highest – Nebraska, Mississippi
Circuits – Fifth, Seventh, Ninth, Ninth citing Eighth from 1902

Supreme - *Shillitani* v. *United States*

IV. Equitable Relief Is Available for "Any Matters" *Post* Confirmation of a Registered Interstate Child Support Order and the Decision by the Court of Appeals of Ohio Deepens the Split in Uniformity Among States Toward Access to Justice for Substantive Issues

Alaska, Florida, New Hampshire, New York, and South Carolina, West Virginia
- exercised judicial review of a country or state agency

Iowa, Mississippi, Montana, and Wyoming
- Restraint, deferring to legislature

California, Ohio, and North Carolina have done both; in fact, California intervened by issuing an exception to estoppel

Iowa, which stated that a 'conference' with the agency suffices for due process, the highest court in Alaska was open to being persuaded. In *Blessing* v. *Freestone*, (1997) and *Gonzaga University* v. *Doe*, (2002), if a statute has a federal right designated for a set of individuals and the regulatory scheme is not comprehensive enough to effectuate a regulatory remedy, then a private cause of action arises under that same statute.

From *Blessing* v. *Freestone*, the Supreme Court of the United States delineated three factors for determining whether a statutory provision affords a federal right: (1) "Congress must have intended that the provision in question benefit the plaintiff"; (2) "the plaintiff must demonstrate that the right assertedly protected by the statute is not so 'vague and amorphous' that its enforcement would strain judicial competence"; and (3) "the provision giving rise to the asserted right must be couched in mandatory, rather than precatory, terms." In that case, the Supreme Court of the United States stated "We do not foreclose the possibility that some provisions of Title IV–D give rise to individual rights." From Gonzaga v. Doe, the Supreme Court of the United States held further additional factors for determining whether a statutory provision affords a federal right: (4) "For a statute to create such private rights, its text must be 'phrased in terms of the persons benefited'"; (5) "where a statute is phrased in such explicit rights-creating terms, a plaintiff suing under an implied right of action still must show that the statute manifests an intent 'to create not just a private right but also a private remedy'; and (6) "an aggrieved individual lacked any federal review mechanism * * * ."

The provisions of 42 U.S.C. 666(a) (7) satisfies these factors. For the first and fourth prongs, Congress specified "noncustodial parent" twice. 42 U.S.C. 666(a)(7)(A–B). For the second and fifth prongs, Congress in a plain statement used the phrase "such parent has been afforded all due process required under State law" in a way that is not ambiguous and clearly denotes a private remedy. 42 U.S.C. 666(a)(7)(B)(i). For the third prong, Congress mandates the provision

with the phrase "each State must have in effect laws requiring the use of the following procedures." 42 U.S.C. 666(a). Also, for the third prong, Congress mandated "all due process required under State law." 42 U.S.C. 666(a)(7)(B)(i). For the sixth prong, in *Blessing*, *supra*, the Supreme Court of the United States held that a parent may seek redress, such as under civil rights laws.

> The enforcement scheme that Congress created in Title IV–D is far more limited than those in Sea Clammers and Smith. Unlike the federal programs at issue in those cases, Title IV–D contains no private remedy—either judicial or administrative—through which aggrieved persons can seek redress. * * * To the extent that Title IV–D may give rise to individual rights, therefore, we agree with the Court of Appeals that the Secretary's oversight powers are not comprehensive enough to close the door on § 1983 liability.

Kenck v. *Montana*, 2013–MT–380, 373 Mont. 168, 315 P.3d 957 (2013)

- Other statutes: 42 U. S. C. § Credit for payments
- Other regulations: 45 CFR

CONCLUSION

Wherefore the reasons presented herein, this Court should grant a writ of certiorari.

Respectfully submitted,

November 1, 2024

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Pro Se

No. 24–5084

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SIMONE R. CRAIG, *ET AL.*,
Respondents.

CERTIFICATE OF PARTY UNREPRESENTED BY COUNSEL

Under Rule 44.2, hereby I certify that this Petition for Rehearing an Order is filed in good faith, not for delay, and restricted to the grounds limited to intervening circumstances or to other substantial grounds not previously presented.

November 1, 2024

TERRENCE E. GILCHRIST
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Terrence_Gilchrist@yahoo.com

Supreme Court of the United States
Office of the Clerk
Washington, DC 20543-0001

Scott S. Harris
Clerk of the Court
(202) 479-3011

October 7, 2024

Clerk
Court of Appeals of Ohio, Franklin County
Franklin County Courthouse
373 South High St., 23rd Flr.
Columbus, OH 43215-6312

Re: Terrence E. Gilchrist
v. Simone Craig
No. 24-5084
(Your No. 22AP-52, 22AP-55)
17JU4732

Dear Clerk:

The Court today entered the following order in the above-entitled case:

The petition for a writ of certiorari is denied.

Sincerely,

Scott S. Harris

Scott S. Harris, Clerk