

IN THE  
SUPREME COURT OF THE UNITED STATES

No. 24-5334

Russell G. Conlon,

Applicant

v.

Oklahoma Department Of Human Services, Child Support Services *et. al.*,

Respondents

---

**APPLICATION TO THE HON. JUSTICE NEIL GORSUCH  
TO FILE CORRECTED PETITIONER'S FIRST SUPPLEMENTAL BRIEF**

---

Pursuant to Fed. R. Civ. P. 15(a) and Supreme Court Rule 22, the above-captioned Applicant hereby moves to file a corrected brief of Petitioner's First Supplemental Brief filed with this Court on September 16, 2024.

In support of this request, Applicant states as follows:

1. Applicant discovered post-filing of Petitioner's First Supplemental Brief, hereafter referred to as "Supplemental Brief", that there was an incorrect case law citation and a few grammatical errors that could create some confusion for this Court.
2. Applicant has attached hereto as Exhibit 1, the draft of the corrected version of Supplemental Brief for review.

### **Corrections To Supplemental Brief**

3. Applicant outlines the following corrections as follows, corrections emphasized in boldface:
  - a. On page 3 of Supplemental Brief, second paragraph, Petitioner cited *Washington v. Glucksberg*, 521 U.S. 702 (1997) that found that it is a fundamental constitutional right per *Due Process Clause Of the 14<sup>th</sup> Amendment Of The United States* of every parent to direct the care, upbringing and education of their children. *Washington v. Glucksberg* pertains to an individual's constitutional right to assisted suicide and has no application to petition for writ of certiorari that Petitioner has brought before this Court. The case Petitioner meant to cite is ***Troxell v. Granville*, 530 U.S. 67 (2000)**.
  - b. On page 2 of Supplemental Brief, second paragraph, Petitioner stated in the following sentence in said paragraph:

Petitioner will move this Court to amend his appendix to Petition as this Supreme Court is aware of and familiar with the Affordable Care Act given there have been there have been several challenges seeking to overturn said act before this Court.

Petitioner corrects and states he **will not** move this Court to amend his appendix to Petition.

- c. On page 5 of Supplemental Brief, Petitioner corrects the sentence near the bottom of the page to read as follows:

The Oklahoma Code Of Judicial Conduct mirrors code of judicial **conduct** outlined by the American Bar Association.

4. This case originated out of the State of Oklahoma which falls within the 10<sup>th</sup> Circuit of the United States Court Of Appeals. Justice Neil Gorsuch is assigned circuit justice over the 10<sup>th</sup> circuit currently and is the appropriate justice to make application to herein.
5. Should application herein be granted, Petitioner will promptly submit the appropriate number of copies as shown in Exhibit 1 verbatim to this Court in conformance to specifications outlined in Supreme Court Rules 15, 29, and 33.

WHEREFORE, for the foregoing reasons, Applicant requests to file a corrected brief as to Petitioner's First Supplemental Brief filed with this Court on September 16, 2024.

Respectfully submitted,

Russell G. Conlon  
4800 N. Henney Rd.  
Choctaw, OK 73020  
Phone: (405) 489-5315  
Email: russ.conlon74@gmail.com