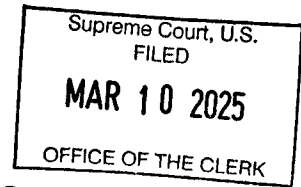


24-6832

ORIGINAL



IN THE  
SUPREME COURT OF THE UNITED STATES

Michael L Boyd — PETITIONER  
(Your Name)

vs.  
Tracy Bennett, Angela Davis, Angela Nixon  
Well Path Corporation Medical Service RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Michael L Boyd ADR# 115890  
(Your Name)

P.O. Box 970  
(Address)

Marionville, Arkansas 72360  
(City, State, Zip Code)

None  
(Phone Number)

## QUESTION(S) PRESENTED

QUESTION - Is Plaintiff entitled to Relief when Defendant's Failure to Respond to a Prisoner Pain and medical need Be intentionally denies and delays and interferes with medical treatment that caused harm.

## LIST OF PARTIES

[ ] All parties appear in the caption of the case on the cover page.

[X] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

Lynn L. Warden, East Arkansas Regional Unit et al.  
Tracy Bennett, Angela Davis, Angela Mixon  
Well Patti Corporation

## RELATED CASES

(1) District Court for the Eastern District of Arkansas  
MICHAEL L BOND V. Lynn L. Warden et al.  
NO. 2:23-CV-00050-ITR

(2) UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT  
MICHAEL L BOND V. Lynn L. Warden, East Ark Regional  
Unit, et al. NO. 24-2449

## TABLE OF CONTENTS

OPINIONS BELOW .....	1
JURISDICTION.....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	3
STATEMENT OF THE CASE .....	4
REASONS FOR GRANTING THE WRIT .....	5
CONCLUSION.....	6

## INDEX TO APPENDICES

APPENDIX A *COSENT OF APPEALS EIGHTH CIRCUIT*

*ORDER OF DECEMBER 10, 2024 CASE # 24-2449*  
*DISTRICT COURT FOR THE EASTERN DISTRICT OF IOWA CASE # 2123-CV-00050-JTK*

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

## TABLE OF AUTHORITIES CITED

### CASES

### PAGE NUMBER

Furman v. Brennan 511 U.S. 825, 837, 1994

Frazier v. Keller 460 F. Supp. 3d 799 E.D. Ark 2020

Schwartz v. VonLobbe 638 F.3d 905 914 8th Cir 2011

Soto-Ruiz v. United States of America

Washington v. Denver 900 F.2d 549 8th Cir 2018

Estelle v. Gumble 429 U.S. 97, 104-05 1976

Butler v. Fletcher 465 F.3d 340, 344 8th Cir 2006

### STATUTES AND RULES

Ark Code 20-47-602 Protocols and accountability  
Ark Code 2025 Edition

Public Health and Welfare Sec 20-2-101 to Sec 20-86-113

#4 Ark Code 12-29-401 Medical care (Arkansas Code 2025 Edition) (Sec. 12-29-401 Sec 12-29-408 Sec 12-25-101 to Sec 12-51-901 Inmates of State Facilities sec 12-29-101

#5 Arkansas Session Laws of the 2025 Regular Session 2025  
HB 1356 Act 172

~~Ark Code 16-86-106~~ Ark Code 16-86-106 Authority to arrest  
(Definition Arkansas Code 2025 Edition)

### OTHER

IN THE  
SUPREME COURT OF THE UNITED STATES  
  
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

The opinion of the United States district court appears at Appendix A to the petition and is

☒ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the \_\_\_\_\_ court appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

## JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was December 10, 2024.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: Dec 10, 2024, and a copy of the order denying rehearing appears at Appendix A.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from **state courts**:

The date on which the highest state court decided my case was \_\_\_\_\_.  
A copy of that decision appears at Appendix \_\_\_\_\_.

☐ A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Eight Amendment - Excessive bail shall not be  
Required nor shall excessive fines be imposed nor  
shall cruel or unusual Punishment be inflicted  
nor witnesses be unreasonably detained.

Estelle v. Gamble 429 U.S. 97 104-05 1976

Gress v. Georgia 428 U.S. 153. 173 1976

Ashcroft v. Iqbal 556 U.S. 662. 678 2009

~~Evans v. Ciccione 557 F.2d 1260 8th Cir 1977~~

Louder v. Hayes, 663 F.2d 778 8th Cir 1981

### Constitutional and Statutory

#1-ARL Admin Rules 016-26-20-003

ARL Admin Rules 016-15-10-006

ARL Admin Rules 016-22-18



## STATEMENT OF THE CASE

Cause was in 2016 appellant was exposed to Listeria coli and 2019 exposed to Salmonella and E. coli that destroy 80% of appellant large intestine and 1/2 of Rectum. First surgery was 5-19-22 and 2nd surgery 8-3-22 and on arrival from surgery defendant's nurse Douglas and NPO Bennett indicated appellant could not have the supplies to the ileostomy bag that stop leaks. Appellant leak for over a month appellant in bed had to leak around with my intestine in my hand with a big ball of toilet paper around the stoma intestine in my hand. August 24, 2022 I was call to infirmary for treatment to be placed and the wound for irritated skin around stoma. Nurse Douglas and NPO Bennett indicated appellant in bed could not have any toilet paper. The only thing defendant's gave me to use 10-4x4 gauze to clean and feces 1 box of wipes to use. Appellant had to use my clothing and did not have a bowl bag till the last day. Appellant in bed was released to go back to the barracks. Because I took it and more. After the first surgery appellant did not have any problems with the ileostomy bag because I was able to keep the supplies to bag. On "9-14-22" had follow up with surgeon Dr. Szeto pertaining to leak's, "see Exhibit-9"

## REASONS FOR GRANTING THE PETITION

Appellant Reasons is: Because Defendant's  
HAVE shown a net purposeful to respond  
to a Prisoner Pain and medical need and  
have caused intentionally delays and  
delays and interferes with surgeon  
ordered. Defendant's used Appellant need  
and had objectively serious medical need.  
Because Appellant walk around with my  
"stomach" in my hand Tell the "video"

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: March 4, 2025

(6)