Appendix A

DISTRICT OF COLUMBIA COURT OF APPEALS

Nos. 23-CV-0625, 23-CV-1038, 24-CV-0651, 24-CV-0583

GAYLE GEORGE, APPELLANT,

v.

U.S. BANK NATIONAL ASSOCIATION, AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST, APPELLEE.

Appeal from the Superior Court
of the District of Columbia
(2022-LTB-002161)

(Hon. Juliet McKenna, Motions Judge)

(Submitted November 7, 2024 Decided February 7, 2025)

Before BECKWITH, EASTERLY, and SHANKER, *Associate Judges*.

MEMORANDUM OPINION AND JUDGMENT

PER CURIAM: Appellant Gayle George appeals a number of orders issued by the Superior Court in an eviction case commenced against her by appellee U.S. Bank N.A., including an entry of default followed by a default judgment, orders denying two motions to vacate the judgment and two motions to stay the judgment, and several orders relating to writs of restitution that have since expired. For the reasons set forth below, the default judgment is affirmed, the denials of Ms. George's motions to vacate the judgment and one motion to stay the judgment are affirmed, and all other challenges are dismissed as moot.

I. Factual and Procedural Background

Ms. George defaulted on her mortgage, and her property, 412 Quackenbos Street, NW, was foreclosed upon pursuant to a final judgment in a judicial foreclosure action, which Ms. George did not appeal. U.S. Bank purchased the property in 2018 in a foreclosure sale, which the Superior Court ratified, and recorded a Trustee's Deed in 2020. The foreclosure and sale are final and are not the subject of this appeal.

In 2022, U.S. Bank, now the owner of the property, filed a complaint for eviction against Ms. George in the Landlord and Tenant Branch of the Superior Court.[1] The bank served Ms. George with its written discovery requests and, when Ms. George did not respond, it moved for sanctions and an order to compel discovery. Following a hearing, the court granted U.S. Bank's motion to compel discovery on October 20, 2022, and ordered Ms. George to respond to the discovery requests by the end of the month. The court specifically advised Ms. George that if she did not provide her discovery responses by the deadline, the court "will be proceeding with an entry of default." Instead of complying with the court's order, Ms. George filed a one-page "Opposition to Discovery," in which she stated that she "do[es] not have any fiduciary relationship with [U.S. Bank] in this matter" and that "the issue of discovery and eviction is now rendered moot." As forewarned, the court entered a default against Ms. George on November 1, 2022, for her failure to provide her discovery responses to U.S. Bank. U.S. Bank then filed a motion for default judgment, which the court granted on January 27, 2023, following an ex parte proof hearing. On March 14, 2023, the court entered a non-redeemable judgment of possession against Ms. George.

Since the court entered the default judgment in March 2023, this case has proceeded in fits and starts. U.S. Bank tried multiple times to obtain a writ of restitution, *see infra* Part IV, which, as relevant here, resulted in orders on June 23 and July 28, 2023, granting U.S. Bank's motions to request the issuance of a writ of restitution and an order on May 17, 2024, granting U.S. Bank's motion to issue a writ.[2] A new alias writ was finally issued in January 2025 but it appears an eviction has not yet been scheduled. Ms. George has appealed from the order authorizing the active writ of restitution, *see* No. 24-CV-1188, but that appeal is not before this division.

In the meantime, in May 2023 Ms. George filed a motion to vacate the default judgment and dismiss the eviction case on the grounds that more than ninety days had passed since the entry of judgment without the issuance of a writ of restitution; the Superior Court denied this motion on June 8, 2023. Ms. George then filed her first notice of appeal challenging the court's (1) October 2022 order granting U.S. Bank's motion to compel discovery; (2) November 2022 order entering a default

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[1] The case was later certified out of the Landlord and Tenant Branch because Ms. George declined to consent to magistrate judge jurisdiction.

[2] An alias writ was issued on May 28, 2024. An eviction was scheduled for July 10, 2024, but was canceled after Ms. George filed for bankruptcy.

against Ms. George; (3) January 2023 order granting U.S. Bank's motion for default judgment;[3] (4) June 2023 order denying her motion to vacate the judgment and dismiss the case; (5) June 2023 order granting U.S. Bank's motion to request the issuance of a writ of restitution; and (6) July 2023 order granting U.S. Bank's leave to seek issuance of a writ.

Continuing her litigation in Superior Court, Ms. George next filed a Rule 60 motion for relief from the default judgment and two motions to stay the judgment, all of which the court denied on December 6, 2023.[4] Ms. George then filed a second notice of appeal challenging the court's order denying these three motions.

After the court issued a May 17, 2024, order granting U.S. Bank's motion to reissue a writ of restitution, Ms. George filed a third notice of appeal. And after the court in June 2024 denied her motion to stay execution of the writ, she filed a fourth notice of appeal.

All four appeals were consolidated before this court.

II. Analysis

A. Default Judgment

We turn first to Ms. George's challenge to the default judgment entered against her,[5] which we review for abuse of discretion. *Boone v. Cedro Ltd.*, 908 A.2d 1165, 1167 (D.C. 2006). The Superior Court is authorized to impose sanctions for a party's failure to comply with a discovery order, including "rendering a default judgment against the disobedient party." Super. Ct. Civ. R. 37(b)(2)(A)(vi). While "[t]he range of available sanctions is extremely broad" and "the only real limitation [is] that a sanction must be just under the circumstances," *Workman v. United States*, 255 A.3d 971, 977 (D.C. 2021) (quoting *Ashby v. United States*, 199 A.3d 634,

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[3] Ms. George's notice of appeal references this January 2023 order, though the final judgment was not formally entered until March 2023.

[4] Ms. George also filed a motion to stay the writ of restitution pending appeal with the Court of Appeals, which we denied.

[5] Ms. George's notice of appeal also challenges the Superior Court's two orders granting U.S. Bank's motion to compel discovery and entering a default against Ms. George, which served as the precursors to the ultimate entry of default judgment, but her brief does not distinguish between these orders.

646-47 (D.C. 2019)), "[t]he sanction of default judgment . . . is reserved for 'extreme circumstances,'" *Boone*, 908 A.2d at 1167 (quoting *Iannucci v. Pearlstein*, 629 A.2d 555, 559 (D.C. 1993)). For circumstances to qualify as "extreme," they should involve (1) "deliberate or willful noncompliance with court rules and orders," (2) "resulting prejudice to the movant's ability to successfully pursue the litigation," and (3) "the conclusion that alternative, less severe sanctions will not suffice." *Id.* (quoting *Iannucci*, 629 A.2d at 559).

The Superior Court did not in fact go all the way to imposing a default judgment against Ms. George as a discovery sanction; it entered a default against her, ordered U.S. Bank to file a motion for default judgment, and ultimately held an evidentiary hearing before entering the final judgment. Ms. George has not argued that the circumstances were not present to support an entry of default as a discovery sanction,[6] and the record is clear that Ms. George did not comply with the court's directive to provide her discovery responses to U.S. Bank within the timeframe set by the court. She instead filed a one-page document asserting that "the issue of discovery and eviction is now rendered moot." The court could certainly have taken Ms. George's response both as a sign of "willful noncompliance" and an indication that lesser sanctions would be unproductive. *See Coleman v. Lee Washington Hauling Co.*, 392 A.2d 1067, 1070 (D.C. 1978) (dismissal justified as sanction where there was not just "a mere failure to serve answers" but "a continued failure to provide answers after repeated requests by appellee and, finally, after a court order directing answers before a specific date"); *see also* 27 C.J.S. *Discovery* § 69 (Dec. 2024 Update) ("A decision to order terminating sanctions should not be made

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[6] Ms. George was granted a waiver of court fees and costs and was thus entitled to free transcripts, *see* D.C. App. R. 24 and D.C. App. R. 10(b)(5), and she requested a number of transcripts in conjunction with her appeals. But she did not request a transcript of the hearing on U.S. Bank's motion to compel discovery, at which the court apparently discussed forthcoming sanctions if Ms. George failed to comply. We thus do not know precisely what factors the court considered in deciding that an entry of default was an appropriate sanction. But as we have previously explained, "[t]he appellant . . . bears the burden of presenting us with a record sufficient to show affirmatively that error occurred at trial. Thus, if the trial transcript is incomplete and the appellant does not make any reasonable efforts to fill the gap . . . he forfeits any claim of prejudice resulting from the total or partial absence of a transcript." *See Romero v. United States*, 956 A.2d 664, 668 (D.C. 2008) (citations omitted).

lightly. But where a violation is willful, preceded by a history of abuse, and the evidence shows that less severe sanctions would not produce compliance with the discovery rules, the court is justified in imposing the ultimate sanction." (footnote omitted)). As for prejudice, Ms. George has not argued that the court's assessment of the bank's prejudice was incorrect, and the monthslong delay caused by Ms. George's failure to provide discovery would seem to provide ample foundation for any prejudice assessment.

The arguments Ms. George makes before this court largely bear no relation to the Superior Court's decision to enter a default and then a default judgment. Nowhere does she acknowledge her failure to comply with the court's discovery order or provide an explanation for why a default was not an appropriate sanction for that failure. In fact, the only specific argument she makes against the entry of default judgment is that, under D.C. Code § 42-3605, default judgment is only appropriate where "the Court determines that the rental unit is a drug haven," and that "[t]he record is absent any evidence of such determination or even that the property qualifies as a commercial 'rental unit.'" Ms. George is mistaken. Section 42-3605 is a provision of the code that refers specifically to residential *drug-related evictions*, which this is not. *See generally* D.C. Code §§ 42-3601 to 3610. Instead, U.S. Bank sought to evict Ms. George as a tenant-at-will, a tenancy that is created when a mortgage is foreclosed upon and the property is subsequently sold. D.C. Code § 42-522 ("[I]n case of a sale of real estate under mortgage or deed of trust or execution, and a conveyance thereof to the purchaser, the grantor in such mortgage or deed of trust . . . shall be held and construed to be tenants at will . . . ."). The only requirement for an eviction of a tenant-at-will is that the landlord provide "30 days notice in writing." D.C. Code § 42-3203.

For these reasons, we affirm the Superior Court's order of default judgment.

B. Motions to Vacate Judgment

Next, Ms. George challenges an order from June 2023 denying her motion to vacate the default judgment.[7] We review that order for abuse of discretion. *Crosby v. Brown*, 289 A.3d 696, 699 (D.C. 2023). The court may "relieve a party . . . from a final judgment" on the basis of, inter alia, "mistake, inadvertence, surprise, or excusable neglect," or "any other reason that justifies relief." Super. Ct. Civ.

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[7] Ms. George's notice of appeal in 23-CV-1038 also listed a December 2023 order denying, among other things, a second motion to vacate judgment, but she does not reference this order in her brief.

R. 60(b). Due to the "strong judicial policy favoring adjudication on the merits of a case[,] . . . even a slight abuse of discretion in refusing to set aside a judgment may justify reversal." *Crosby*, 289 A.3d at 699 (first quoting *Nuyen v. Luna,* 884 A.2d 650, 656 (D.C. 2005), then quoting *Starling v. Jephunneh Lawrence & Assocs.*, 495 A.2d 1157, 1159 (D.C. 1985)).

In her first motion to vacate the judgment, which the court denied in its June 2023 order, Ms. George relied on Super. Ct. L&T R. 16(c)(1), which states that "[e]xcept as provided in Rule 16(c)(2), a writ of restitution must be issued within . . . 90 days after entering the judgment." Because more than ninety days had passed since the entry of judgment, Ms. George argued that the "Rules of Procedure for the Landlord Tenant Branch have been violated." But—as Ms. George acknowledged—Rule 16(c) further provides that "[i]f the writ is not issued within [90 days], the plaintiff may file a request for issuance of the writ," with notice to the defendant, and "[t]he clerk will schedule a hearing." *Id.* R. 16(c)(2). In denying her motion, the court concluded that because U.S. Bank had "attempted multiple times, although unsuccessfully, to secure a writ of restitution," and was taking steps to successfully secure one, the court "d[id] not find good cause or any other legal basis to vacate the judgment and dismiss the case." And in keeping with Super. Ct. L&T R. 16(c)(2), the court ordered U.S. Bank to "file a Notice of Intent to Seek Writ in the Landlord & Tenant Branch of the Court."

In her brief to this court, Ms. George argues that "[i]nstead of honoring the equitable maxim that regards intent over form, [the court] granted [U.S. Bank] leave-of-court to pursue the writ of restitution, even though [U.S. Bank] had failed to execute even one step of the proper procedures." But we fail to see how this is a matter of "intent over form." Super. Ct. L&T R. 16(c)(2) dictates the processes that should occur in the event that a writ has not issued after ninety days, the court's order reflected those instructions, and Ms. George has pointed to nothing that suggests the "intent" of the rule is anything to the contrary. We therefore discern no abuse of discretion in the court's order denying this motion to vacate.[8]

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[8] Nor are we persuaded that the court somehow erred in allowing U.S. Bank to remove the phrase "All Occupants" from the case caption in order to seek a writ against Ms. George. Even if there were other occupants in the property, Ms. George offers no explanation for why their dismissal from the case would impact U.S. Bank's action against *her*.

III. Motions to Stay Judgment

Ms. George also challenges the Superior Court's December 2023 order denying two motions to stay the judgment: the first requesting a stay pending appeal in this court, and the second seeming to argue that she was entitled to arbitration in the original foreclosure action. In her brief to this court, Ms. George says only that "a motion for stay [was] denied on grounds which do not apply to the equitable relief [Ms. George] has been seeking." The meaning of this statement is unclear to us, and as a general rule this court will decline to address arguments that are inadequately developed in briefing; "[i]t is not enough merely to mention a possible argument in the most skeletal way, leaving the court to do counsel's work." *Comford v. United States*, 947 A.2d 1181, 1188 (D.C. 2008). In any event, with respect to the denial of the former motion, the issue is now moot. We review the denial of the latter motion for abuse of discretion and discern none. *Akassy v. William Penn Apartments Ltd.*, 891 A.2d 291, 309 (D.C. 2006). As noted above, the foreclosure matter was fully litigated, a final judgment was rendered, and the sale to U.S. Bank was ratified in a separate civil action. A motion for relief from judgment in this subsequent eviction proceeding was not the place for relitigating those issues. *See Richardson v. McCabe, Weisberg & Conway, LLC*, 323 A.3d 446, 453 (D.C. 2024) ("Under the doctrine of res judicata, or claim preclusion, a final judgment on the merits bars relitigation in a subsequent proceeding of all claims that were actually litigated or 'could have been litigated in the prior proceeding' between the same parties or their privies." (quoting *Faulkner v. Gov't Emps. Ins. Co.*, 618 A.2d 181, 183 (D.C. 1992))). The Superior Court thus did not abuse its discretion by denying the motion to vacate the judgment in the eviction case based on Ms. George's arguments about how the foreclosure case should have been resolved.

IV. Challenges to Writ of Restitution

Several of the orders that Ms. George challenges relate to prior writs of execution: a June 2023 order granting U.S. Bank's motion to request the issuance of a writ of restitution, a July 2023 order granting U.S. Bank leave to seek issuance of a writ, a May 2024 order granting U.S. Bank's motion to issue a new writ of restitution, and a June 2024 order denying her application to stay or quash the writ. All of these writs have since expired, however. (As noted above, a new writ issued in January 2025 and Ms. George has separately appealed from the order authorizing its issuance, *see* No. 24-CV-1188.) We therefore dismiss each of these challenges as moot.

V. Other Arguments

Ms. George's brief consists primarily of arguments with no clear connection to the specific orders she purports to challenge on appeal. Nonetheless, we briefly address her remaining arguments here.

Ms. George appears in several places to seek to challenge the validity of her mortgage or the prior foreclosure action. But for reasons already explained, the time has come and gone for Ms. George to raise any such arguments.

Ms. George also cites to a series of federal laws and regulations to argue that an eviction is inappropriate because "the record does not show any proof of a commercial lease, rents paid or agreed to, or any commercial, industrial or agricultural uses of the subject property"; that U.S. Bank "described [her] as a 'holdover tenant' in the absence of any proof of tenancy, commercial ownership of a foreclosed property, or terms of any legitimate equitable contract which were [breached]"; that evictions are authorized, under the Code of Federal Regulations, only with respect to certain kinds of property, including farmland or other income producing property; and that federal laws authorizing evictions "pertain exclusively to public housing" and private property can be "seized or encumbered" only under eminent domain laws. None of the federal statutes or regulations she cites have any bearing on this case, which, as already explained, was brought pursuant to District laws relating to evictions of at-will tenants. D.C. Code §§ 42-522, 42-3203; *see supra* Section II.A.

Ms. George also presents a "delegation of authority" argument in which she asserts that: the lawyers representing U.S. Bank "have provided no proof of any alleged debt or enforceable contract for which [a]ppellant could legitimately be held in [breach]"; "[t]he record is absent any proof of a designated authority of corporate powers to litigate, administer, or even represent US Bank"; and "[a]ppellant has repeatedly asserted no fiduciary relationship, no prior dealings, no signed contracts and no record of evidence with [a]ppellee or any of the debt collector attorneys." It is not clear to this court what, exactly, Ms. George is alleging with respect to the attorneys representing U.S. Bank, but in any event litigants have a right to be represented by counsel of their choosing, *see Hull v. Celanese Corp.*, 513 F.2d 568, 569 (2d Cir. 1975), and there is nothing in the record to suggest that these attorneys are acting as "debt collectors" or in any other capacity than that of attorney. Further, the fact that there is no alleged relationship—contractual, fiduciary, or otherwise—between Ms. George and the attorneys representing U.S. Bank is of no significance. The bank's authority to bring the eviction complaint comes from its own status as

the owner of the property and Ms. George's status as an at-will tenant, *see supra* Section II.A.

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For the foregoing reasons, we affirm the trial court's orders entering default judgment against Ms. George, denying both motions to vacate the judgment, and denying her November 22 motion to stay the judgment. We dismiss as moot all other challenges.

So ordered.

ENTERED BY DIRECTION OF THE COURT:

Julio A. Castillo
JULIO A. CASTILLO
Clerk of the Court

Copies emailed to:

Honorable Juliet McKenna

Director, Civil Division
QMU

Copies e-served to:

Gayle George

Matthew D. Cohen, Esquire

Christine Johnson, Esquire

Appendix B

DC COURT OF APPEALS

Gayle George Appellant v US Bank as legal title trustee for Truman 2016 SC6 Title Trust Appellee	Case: #24-cv-01188 : **Petition for Rehearing**

PETITION FOR REHEARING

COMES NOW, Gayle George, "Appellant" with this petition for rehearing of its affirmation the decisions rendered by the landlord tenant branch of DC Superior Court in trial court's decision in

The court's opinion is rife with hearsay, bias, and sweeping generalizations that read more like a tone deaf justification of the Appellee's position than a true unbiased opinion of the facts and law laid out in the briefing documents and on the record. The fact that the opinion is signed by Julio Castillo, Clerk of the DC Court of Appeals, instead of any judicial officer on whose behalf he purports to consistently rule adds further curiosity to the court's findings along with the curious alignment of every judicial officer paid by the DC Government employee betray a determination to protect a judicial process which violates constitutional protections and not the oaths of office they swore to uphold as public servants.

Sweeping generalities like "the time has come and gone " "to challenge the validity of mortgage or prior foreclosure case" or "None of the federal statutes or regulations she cites have any bearing on this case" reflect the type of protectionist assertions common to the judiciary in the District of Columbia which have no basis in law. Even the Fed. Rules Civ. Proc., Rule 60(b)(4),28 U.S.C.A., U.S.C.A. Const. state that a judgment is void if the court that rendered judgment lacked jurisdiction of the subject matter, or of the parties, or acted in a manner inconsistent with due process. This determination is not restricted or time bound. The fact that the "judicial foreclosure" to which the court's order refers is currently on appeal speaks to the error of this statement.

Any competent judge or judicial officer of the court knows or should know the hierarchy of law dictates that no code of the District of Columbia trumps provisions made by the US Constitution, Laws (statutes) enacted by Congress, Rules promulgated by federal agencies, as local laws enacted by the DC Council are inferior. Since the affirmed judgment is predicated on a "judicial foreclosure" which was void ab initio, it is a valid concern of this court to consider the laws and facts that renders it void. Further, "The law is well-settled that a void order or judgement is void even before reversal", VALLEY v. NORTHERN FIRE & MARINE INS. CO., *254* U.S. 348,41 S. Ct. 116 (1920) A court' cannot confer jurisdiction where none existed and cannot make a void proceeding valid. It is clear and well established law that a void order can be challenged in any court", OLD WAYNE MUT. L. ASSOC. v. McDONOUGH, 204 U. S. 8,27 S. Ct. 236 (1907).

To that end, the appellant court's decision fails to address important considerations raised in the Appellant's brief. For example, the fact that federal banking regulations established by National prohibit US Bank from taking interest in private, non-commercial property speaks to the intrinsic fraud Appellant asserts that makes any precipitating judgement void ab initio. The affirming opinion's failure to acknowledge the limitations established by the enumerated powers of Congress which retains ultimate legislative authority over the District of Columbia under article 1 section 8 of the US Constitution also betrays a judicial disability that may be rooted in criminal negligence, incompetence, or criminal conspiracy with US Bank with whom the District of Columbia has significant financial ties may render its courts unable to rule objectively. The fact that this entire judicial proceeding is a living example of the type of state-sponsored equity theft declared unconstitutional by the US Supreme Court merits closer investigation..

"Woe to you lawyers! For you have taken away the key of knowledge. You did not enter yourselves, and you hindered those who were entering". Luke 11:52.

Grounds for Reconsideration:

Appellant requests that the court reconsider its decision based on the following grounds:

1. **Ground 1: Legal Error in the Appellate Court's Decision**

   The clerks' rejection of Appellant's motion for stay and petition for judicial review after three separate attempts and inability to provide direction on how DC Court of Appeals provisions to fulfill its obligation under DC Code 2-510 may easily be construed as a kind of suppression of due process and the right to redress grievances also guaranteed by the constitution. These constitutional violations are inexcusable since the supremacy clause identifies the constitution and corresponding federal law supreme over any local law or judicial process which stands in opposition. Such violations of constitutional protections are repugnant to the constitution.

2. **Ground 2: New Evidence or Developments**

   In Tyler v Hennepin, the Supreme Court held in a unanimous decision that the type of state sponsored equity theft the District of Columbia has enacted with Appellant in this procedure is unconstitutional. Research by the Pacific Legal Foundation identified several states and the District of Columbia that still maintain laws and processes on its books to facilitate this unlawful taking of private property without due process as just compensation given in advance. Laws and processes that conflict with limitations and guaranteed protections articulated and in the enumerated powers of congress are repugnant to the constitution . Judicial officers have a sworn obligation and a duty of care to ensure that they do not violate the rights of private people with private property acting in their private capacity.

3. **Ground 3: Inconsistent or Conflicting Precedent**

Appellant is not a trained attorney and versed in the law so she has been unable to provide the statute or code that authorizes the Clerk of Court to sign final orders on behalf of Judges en banc. The rules of civil procedure have strict requirements about what actually constitutes an official judgement of the court which do not include signatures by its clerks. For Appellant's edification, please provide the citing which justifies this practice in the District of Columbia.

4. **Ground 4: Misapplication of Facts**

The Appellant court's Mandate issued on March 3, 2025 is a formal order from a court to a lower court or government official to carry out a duty or correct an abuse of discretion. In DC courts, a mandate is issued in certain circumstances, such as when a petition for rehearing is denied. Since the court denied Appellant's motion for judicial review of the fraudulent order which was issued by the lower court, there has been no official means of redress for the fraud of which the court was made aware. This makes the mandate an affirmation of a fraudulent order which reveals complicity of the Appellant court.

CONCLUSION

The appellate court's prior decision has significant legal implications, and a reconsideration would ensure that justice is properly served in this matter. Appellant submits this petition for a rehearing en banc and requests the court to reconsider its decision to affirm the trial court's judgment; grant a rehearing or rehearing en banc in this matter; and/or reverse or modify the trial court's decision based on the identified legal errors and grounds set forth above.

Respectfully submitted by Gayle George

VERIFIED STATEMENT IN SUPPORT OF PETITION

Petitioner, Gayle George, declares under penalty of perjury that the foregoing is true and correct. Executed in the District of Columbia on the 7th day of March 2025.

By: Gayle George

I, the undersigned, a Notary Public for the District of Columbia, hereby certify that Gayle George, personally known, acknowledged and sworn before me on this day that, being informed of the contents of this affidavit, executed the same voluntarily on this date.

Given by my hand and seal on this date:

March 7, 2025

Ray Savoy

Masai Oakes

D.C. Court of Appeals E-Filing Rejection Notice - 23-CV-0625 - GAYLE GEORGE V. U.S. BANK NATIONAL ASSOCIATION, AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST

Summary by Copilot

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noreply1@dcappeals.gov

To: gaylegeorgei@hotmail.com

Fri 3/7/2025 11:10 AM

This is a notice to inform you that the PETITION - Petition For Rehearing En Banc filed on 23-CV-0625 has been rejected by the Court Clerk for the following reason(s):

Other

Clerk's Comments: mandate was issued 3/3/25

Please see Clerk's comments. If appropriate, please follow the directions below to edit and resubmit this filing to the court.

Steps to Edit and Resubmit a Rejected eFiling:

From	Subject		Received
Top results			
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	Fri 3/7
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	1/13/2025
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	2/3/2025
All results			
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	Fri 3/7
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	2/3/2025
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	1/16/2025
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	1/16/2025
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	1/13/2025
noreply1@dcappeal...	D.C. Court of Appeals E-Filing Rejection No...	Inbox	7/24/2024

Appendix C

DC COURT OF APPEALS

Gayle George Appellant v US Bank as legal title trustee for Truman 2016 SC6 Title Trust Appellee	Case: #24-cv-01188 **Petition for Judicial Review**

PETITION FOR JUDICIAL REVIEW

COMES NOW, Gayle George, "Appellant" with this § 2–510 petition for judicial review.

Pursuant to DC Code § 2–509. Contested Cases. "**(e)** Every decision and order adverse to a party to the case, rendered by the Mayor or an agency in a contested case, shall be in writing and shall be accompanied by findings of fact and conclusions of law. The findings of fact shall consist of a concise statement of the conclusions upon each contested issue of fact. Findings of fact and conclusions of law shall be supported by and in accordance with the reliable, probative, and substantial evidence. A copy of the decision and order and accompanying findings and conclusions shall be given by the Mayor or the agency, as the case may be, to each party or to his attorney of record."

On January 15th, 2025, Appellant received notice by mail of an "ex-parte proof hearing" which was allegedly conducted before an unnamed judge in the Superior Court of the District of Columbia finding in favor of Appellee, a bank whose alleged interest in private, non-commercial, non-industrial, non-agricultural property stands in violation of the federal banking regulations[1] by which it is governed. With no corresponding docket entry, any reasonable observer may conclude that alleged counsel for the Appellee, who has never produced proof of the authorities by which it was allegedly retained to litigate on behalf of the nation's fifth largest bank, was the only party privy to the unscheduled "hearing" which allegedly rendered a new "judicial" decision in its favor.

[1] 12 U.S.C.632, the National Bank Act of 1864, which is 12 U.S.C. 1 et seq. the Home Owners' Loan Act of 1933, which is 12 U.S.C. 1461 et seq. and title 12 of the Code of Federal Regulations, "Banks and Banking" (12 CFR 1–199)

Upon further investigation, the court reporter confirmed that there was no record of any "ex-parte proof hearing" described in the clearly fraudulent notice. For this reason, no transcript of the proceedings could be generated. Despite this fact, the Superior Court of the District of Columbia issued a writ of restitution for possession of Appellant's home on the same date this fraudulent notice indicated the unlawful hearing never actually took place.

Deputy Clerk of the DC Court of Appeals, Jason LeVey, rejected Appellant's Petition for Judicial Review three times between January 19-30, 2025. The first time was through the court clerk whose submission instructions changed after LaVey rejected the filing. The second rejection was when LaVey advised Appellant that the Superior Court of the District of Columbia is not an agency of the District of Columbia and therefore the court's decisions were not subject to judicial review. The Inspector General of the District of Columbia lists the Superior Court of the District of Columbia as an agency of the DC Government. The third rejection was because Appellant's consolidated appeals were placed on the summary calendar in November.

Appellant presents the following enumerated errors for judicial review:

ENUMERATED ERRORS FOR THE COURT'S REVIEW

1. An unannounced ex-parte "proof hearing" allegedly held before an unidentified judge in the Superior Court of the District of Columbia absent findings of fact and conclusions of law for the court's decision to hold such a clandestine hearing, render an adverse decision in this manner, or provide any evidence of the "proof duly presented" directly violates DC Code § 2–509 for Contested Cases, canons of judicial conduct, and the oaths taken by each of its judicial officers and public servants sworn to act in good faith and with clean hands.
2. A fraudulent writ of restitution issued the same day the ex-parte proof hearing that never took place evidencing a criminal conspiracy on the DC Superior Court docket.

3. · Pursuant to the District of Columbia Self-Government and Governmental Reorganization (Home Rule) Act of 1973, Congress retains ultimate legislative authority over the District of Columbia under Article 1, Section 8 of the US Constitution wherein the enumerated powers of Congress limit congressional jurisdiction to commercial property, public lands owned and controlled by the United States of America, or private property condemned and seized by eminent domain with due process as just compensation paid in advance.

4. The Superior Court of the District of Columbia lacks subject matter jurisdiction to adjudicate private, non-commercial, non-industrial, non-agricultural, non-income producing property which the record clearly reflects never qualified under this congressional jurisdiction.

5. The Superior Court of the District of Columbia is restricted to adjudicating civil and other noncriminal matters and all cases arising under criminal laws applicable exclusively "in the District of Columbia" defined in § 47–2201. Definitions: (d) " In the District" and "within the District" mean within the exterior limits of the District of Columbia and include all territory within such limits **owned by the United States of America**. Thus, jurisdiction is territorial, not geographic,[2] and exclusive of non-commercial, private property.

6. McKenna presided over this action under misapplied estates-at-will codes from section § 42-522 in title 42 of the District's **commercial** Real Property title absent express contract, evidence of a lessee-lessor relationship, legitimate estate conveyance, or record that the property is or has ever been commercial, industrial, or agricultural in nature.

7. Transcript records reflect McKenna's testimony from the bench that she was not acting in a fiduciary capacity, as a judicial officer adjudicating the District's "estates-at-will" statutes.

[2] "As used in this title, the term 'territories' generally refers to the political subdivisions created by congress, and not within the boundaries of any of the several states."[86 Corpus Juris Secundum (C.J.S.), Territories, §1 (2003)]

8. Transcript records also reflect McKenna's testimony that the self-described debt collector attorneys who were never authorized to appear in this matter were not debt collectors.
9. Sworn fact-witness testimony from the detailed chain of title analysis entered into evidence indicates that all assignments, recordings, and conveyances by which Appellee claims possessory interest in the property were fraudulent and therefore unlawful, there is no enforceable obligation, and no "true sale" of the property ever took place.
10. Unauthorized attorneys also cited DC Code§ 42–3203. Tenancies-at-will under Chapter 32. Landlord and Tenant which falls under Subtitle VII. Rental Housing and Commercial Tenancy without any evidence of a rental housing designation or commercial tenancy.
11. McKenna granted a default judgment for possession absent any official designation of the property as a drug nuisance in violation of DC Code § 42–3605. Default Judgments.
12. The record is absent evidence that Appellant ever qualified as a legitimate party to an ultra vires legal action brought outside of this court's subject matter jurisdiction with any lawful obligation to comply or obey which could rightfully be sanctioned.
13. McKenna granted the judgment to Brandon Moultrie (INACTIVE #1046807) whose inactive bar license rendered him unauthorized to practice law or represent a corporation in the District of Columbia pursuant to DC Court of Appeals Rule 49 and Superior Court Rule 9.
14. Pursuant to DC Superior Court Rule 16. Execution, the judgment for possession, erroneously granted by default to counsel unauthorized to practice law or represent a corporation in the District of Columbia, expired by law in April of 2023.
15. McKenna subsequently approved a change in the case caption to facilitate the issuance of a writ of restitution based on unauthorized counsel's stated "belief" despite admitted evidence used to initiate the case which contradicts this subsequently claimed "belief."

16. Since DC Superior Court Rule 16 states (d)"No writ of restitution shall be issued later than 90 days after entry of judgment, the original writ expired by statute in April of 2023.
17. McKenna granted leave of court four times to allow a writ to issue on an expired judgment.
18. McKenna even did so after an automatic disqualification by law for demonstrating bias and inherent conflicts of interest with the litigating party of which the lower court was noticed.
19. Substitute counsel was allowed to appear in this matter without proof of the authorities by which it was allegedly delegated to litigate on behalf of US Bank's alleged title interest in private non commercial property as required by the Uniform Power of Attorney Act in Chapter 26 of the District code and ABA rules of professional conduct 1.16, 3.3, and 5.5. [3]
20. These disclosures are particularly important in matters allegedly involving national banking associations or bank holding companies' since the Code of Federal Regulations definitively limits the types of properties in which banks can take interest to commercial properties "necessary for the transaction of its business." [4]
21. The record is absent evidence that Relator's private, non-commercial, non-industrial, non-agricultural, non-income producing shelter of the last 18 years qualifies as such.
22. The Bank Holding Company Act of 1956 prohibits national banking associations from hiring state-licensed law firms or attorneys to act as debt collectors; assigning substitute trustees for conveyances, or using state law to enforce any perceived enforceable contract.[5]
23. US Bank's alleged interest in private, non-commercial property by attorneys with no proof of the delegated authorities could only be held in violation of federal banking regulations. [6]

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[3] 7 C.J.S. Attorney and Client § 62 (1937): An attorney may not even appear in a cause of action without some form of authority from the party on whose behalf he appears. Lofberg v. Aetna Cas. & Sur. Co., 264 Cal. App. 2d 306, 308, 70 Cal. Rptr. 269, 270 (1968).
[4] 12 CFR § 7.1024 - National bank or Federal savings association ownership of property.
[5] The Bank Holding Company Act of 1956 gave the Federal Reserve broader regulatory powers over banks and holding companies.
[6] 12 U.S.C.632, the National Bank Act of 1864, which is 12 U.S.C. 1 et seq. the Home Owners' Loan Act of 1933, which is 12 U.S.C. 1461 et seq. and title 12 of the Code of Federal Regulations, "Banks and Banking" (12 CFR 1–199).

24. DC Municipal Regulation 10-B2208 limits "Eviction" in the District of Columbia to (statutory) "Persons occupying any building or property owned by the District."

25. Appellant noticed the court of her beneficial interests and superior equitable title to the private property accrued by its prescriptive use as her primary shelter for the last 18 years.

26. Appellant noticed the court of its duty as trustee to protect her beneficial interests as the sole benefactor and beneficiary in this matter pursuant to the Uniform Trust Code in Chapter 13 under Title 19 on Estates and Fiduciary Relations of the DC Code.

27. A void judgment which includes a judgment entered by a court which lacks jurisdiction over the parties or the subject matter, or lacks inherent power to enter the particular judgment, or an order procured by fraud, can be attacked at any time, in any court, either directly or collaterally, provided that the party is properly before the court, *Long v. Shorebank Development Corp.*, 182 F.3d 548 (C.A. 7 Ill. 1999).

28. As a provider of cash management, payment and card services to facilitate substantial DC government services and programs, the District of Columbia maintains significant fiscal ties to US Bank which might impact its courts' ability to rule impartially.[7] A truly impartial judiciary could never allow criminal violations of DC codes [8] punishable under title 22 on Criminal Offenses and Penalties for Chapter 32. Theft; Fraud; Stolen Property; Forgery and Extortion to prevail. At the federal level, grand theft larceny by false pretense, identity theft, misappropriation of property, securities fraud, tax evasion, and misprision of felony apply for every public servant, judicial officer, and clerk of court who facilitated unlawful proceedings for which Appellant is seeking judicial review. The court's obligation to rule

[7] The District of Columbia received proceeds from a significant payout ordered by the CFPB for illegal conduct in the provision of those services just over a year ago.CFPB Orders U.S. Bank to Pay $21 Million for Illegal Conduct.

[8] § 22–1402. Recordation of deed, contract, or conveyance with intent to extort money; § 22–1403. False personation before court, officers, notaries.; § 22–2405. False statements.; and, § 22–3221. Fraud.

on facts and law would hinder the proliferation of fraud, waste, and abuse generated by hearsay, logical fallacy arguments, and misleading testimony from attorneys with no verified title interest or proven standing to even appear in these proceedings.

29. The law is well-settled that a void order or **judgement is void even before reversal",** VALLEY v. NORTHERN FIRE & MARINE INS. CO., *254* U.S. 348,41 S. Ct. 116 (1920) "Courts are constituted by authority and they cannot go beyond that power delegated to them. **If they act beyond that authority, and** certainly in contravention **of it, their judgements and orders are regarded as nullities; they are not voidable,** but simply void, and this even prior to reversal." WILLIAMSON v. BERRY, 8 HOW. *945,* 540 12 L. Ed. 1170, 1189 *(1850).* It has also been held that"It is not necessary to take any steps to have a void judgment reversed, vacated, or set aside, It may be impeached in any action direct or, collateral.' Holder v. Scott, 396 S.W.2d 906, (Tex.Civ.App., Texarkana, 1965, writ ref., n.r.e.). A court'cannot confer jurisdiction where none existed and cannot make a void proceeding valid. It is clear and well established law that a void order can be challenged in any court", OLD WAYNE MUT. L. ASSOC. v. McDONOUGH, 204 U. S. 8,27 S. Ct. 236 (1907). Judgment is a void judgment if court that rendered judgment lacked jurisdiction of the subject matter, or **of the parties, or acted in** a **manner** inconsistent with due **process, Fed. Rules Civ. Proc., Rule 60(b)(4),28 U.S.C.A., U.S.C.A. Const.**

CONCLUSION

WHEREAS, DC Code § 2–510 provides litigants in contested cases with the opportunity to seek a judicial review of adverse decisions made by any and especially when those decisions are made in violation of DC code, Appellant submits this petition for judicial review and requests the court apply appropriate sanctions and provide all other relief deemed just and proper.

VERIFIED STATEMENT IN SUPPORT OF PETITION

Petitioner, Gayle George, declares under penalty of perjury that the foregoing is true and correct. Executed in the District of Columbia on the 13th day of February 2025.

By: Gayle George
Gayle George

I, the undersigned, a Notary Public for the District of Columbia, hereby certify that Gayle George, personally known, acknowledged and sworn before me on this day that, being informed of the contents of this affidavit, executed the same voluntarily on this date.

Given by my hand and seal on this date:

February 13, 2025

E-Filing
- Draft Filings
- Pending Filings
- Rejected Filings
- Approved Filings

Case Information: 24-CV-1188

Short Caption:	GAYLE GEORGE V. U.S. BANK NATIONAL ASSOCIATION, AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST	**Classification:**	Appeals - Civil - Landlord And Tenant
Superior Court or Agency Case Number:	2022-LTB-002161	**Filed Date:**	12/27/2024

Save as Draft | Submit to Court | Cancel

Edit E-Filing

Edit

Type:	PETITION
Subtype:	Petition For Initial Hearing En Banc
Filed on Behalf of:	Gayle George
E-Filer Comments:	
Submission Information	
Confirmation No.:	79581
Submission Date/Time:	02/13/2025 5:49 PM
Rejected Date/Time:	02/14/2025 10:07 AM
Status:	Rejected
Rejection Reason:	Other
Clerk's Comments:	a judicial review can not be filed in a matter where a notice of appeal has already been established. lastly, judicial review motions are not recognized in our rules, and that 2-510 only relates to administrative proceedings. if you have further questions you may contact the office directly at 202-879-2700.

Edit Redaction Certification

Edit

Redaction Certification:	Y

Documents

Add Document

Date	Document Name	Status	Comments	
02/13/2025	PETITION - Petition For Initial Hearing En Banc	Pending Approval	**Pursuant to 2-510 of the DC Code, the petition for Judicial Review is not duplicative to an appeal because it is supposed to happen within 30 days and go to the attention of the Mayor. The DC Court of Appeals' repeated rejection of this filing for Judicial Review with no capacity to fulfill the law or provide clear directives rooted in law for how to provide the redress sought is a denial of due process and dereliction of its legal duty to redress grievances.** *The Petition for Judicial Review is recognized in the DC Code § 2-510 which directs petitioners to file the petition in the DC Court of Appeals. Please advise how the court's refusal to accept this filing reconciles this section of the DC Code. * The section of the DC Code under which this redress is sought requires the petition to be named as it is. Please provide the section or rule from which your suggestion draws or direct me the Appellate Court procedures for filing this Petition for Judicial Review.	Edit Remove

District of Columbia
Court of Appeals

Appellate E-Filing System

C-Track, the browser based CMS for Appellate Courts

Gayle George
Logout

Cases | E-Filing | Account

Find Case...

E-Filing

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Case Information: 23-CV-0625

Short Caption:	GAYLE GEORGE V. U.S. BANK NATIONAL ASSOCIATION, AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST	**Classification:**	Appeals - Civil - Landlord And Tenant
Superior Court or Agency Case Number:	2022-LTB-002161	**Filed Date:**	07/28/2023

Save as Draft | Submit to Court | Cancel

Edit E-Filing — Edit

Type:	PETITION
Subtype:	Petition For Initial Hearing En Banc
Filed on Behalf of:	Gayle George
E-Filer Comments:	
Submission Information	
Confirmation No.:	79111
Submission Date/Time:	01/31/2025 8:42 PM
Rejected Date/Time:	02/03/2025 11:30 AM
Status:	Rejected
Rejection Reason:	Other
Clerk's Comments:	Ms. George, this case was submitted to a merits panel on 11/24.

Edit Redaction Certification — Edit

Redaction Certification:	Y

Documents — Add Document

Date	Document Name	Status	Comments	
01/31/2025	PETITION - Petition For Initial Hearing En Banc	Pending Approval	The Inspector General lists the Superior Court as an agency of the Government of the District of Columbia as part of the Judicial Branch.	Edit Remove

Service List — Edit

The following parties will be served electronically:

Matthew D. Cohen

N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Thu 2/13
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Thu 2/13
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Thu 2/13

All results

N	**noreply1@dcappeals...**	**D.C. Court of Appeals E-Filing Rejection No...**	Inbox	Fri 2/14
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Thu 2/13
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Thu 2/13
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Thu 2/13
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	Wed 2/12
N	noreply1@dcappeals....	D.C. Court of Appeals E-Filing Rejection Noti...	Inbox	2/11/2025

Appendix D

District of Columbia Court of Appeals

No. 24-CV-1188

GAYLE GEORGE,

Appellant,

v. **2022-LTB-002161**

U.S. BANK NATIONAL ASSOCIATION, AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST,

Appellee.

BEFORE: Easterly and Deahl, Associate Judges, and Ruiz, Senior Judge.

ORDER

On consideration of appellant's motion to stay the trial court proceedings pending appeal, it is

ORDERED that appellant's motion to stay the trial court proceedings is denied. *See Barry v. Washington Post Co.*, 529 A.2d 319, 320-21 (D.C. 1987) ("To prevail on a motion for stay, a movant must show that he or she is likely to succeed on the merits, that irreparable injury will result if the stay is denied, that opposing parties will not be harmed by a stay, and that the public interest favors the granting of a stay.") (citing *In re Antioch Univ.*, 418 A.2d 105, 109 (D.C. 1980)).

PER CURIAM

Copies e-served to:

Honorable Juliet McKenna

QMU – Civil Division

cml

Christine Johnson, Esquire

Gayle George

Appendix E

Case Style: U.S BANK, NATIONAL ASSOCOCIATION AS LEGAL TITLE T VS GEORGE, GAYLE

To: Gayle George **Case Number:** 2022-LTB-002161

JUDGMENT

This action came before this Court for an Ex Parte Proof Hearing before Associate Judge Judge Landlord & Tenant With proof being duly presented and the judge having rendered a decision it is on this the 3rd day of January, 2025.

ORDERED that a non-redeemable judgment for possession is entered in favor of U.S Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust C/O BWW Law Group, LLC and against Gayle George

Clerk of the Superior Court

Seeking Review or Appeal

If a Magistrate Judge decides your matter, you have fourteen calendar days from the date that the judgment is entered to file a Motion for Judicial Review in your case. A party may not submit any new evidence with a Motion for Judicial Review The Motion for Judicial Review of the Magistrate Judge's decision will be reviewed by an Associate Judge.

If an Associate Judge decides your matter or Motion for Judicial Review, you have thirty days from the date that the judgment or order is entered to file a Notice of Appeal with the Clerk of Superior Court's Office who will transmit the Notice of Appeal to the Court of Appeals

From: Cary, Pamela L. Pamela.Cary@dccsystem.gov
Subject: RE: Remote Transcript Order
Date: January 24, 2025 at 1:00 PM
To: Gayle George gaylegeorgei@hotmail.com

Good afternoon, Ms. George. There was no ex parte hearing on 1/2/25. The last hearing was 12/13/2024.

Pam Cary

From: Gayle George <gaylegeorgei@hotmail.com>
Sent: Wednesday, January 22, 2025 3:38 PM
To: Cary, Pamela L. <Pamela.Cary@dccsystem.gov>
Subject: Fw: Remote Transcript Order

Sure thing Ms. Cary. Please see attached.

I am not sure why this message ended up in your junk folder. Do you think it was because of the ccs I added to the thread?

Gayle George

From: Gayle George <gaylegeorgei@hotmail.com>
Sent: Wednesday, January 22, 2025 10:34 AM
To: pamela.cary@dccsystem.gov <pamela.cary@dccsystem.gov>; charlotte.mathes@dccsystem.gov <charlotte.mathes@dccsystem.gov>; vickie.cunningham@dccsystem.gov <vickie.cunningham@dccsystem.gov>; crrdcasemanagers@dccsystem.gov <crrdcasemanagers@dccsystem.gov>; transcriptrecordsclerks@dccsystem.gov <transcriptrecordsclerks@dccsystem.gov>
Subject: Remote Transcript Order

Good morning Ms. Cary and Happy New Year!

I trust this message finds you well. Attached you fill find a Motion for Appeal transcript form for proceedings that allegedly took place in the landlord tenant branch on January 3, 2025 according to the attached order. Please do not hesitate to let me know what more you need from me in order to fulfill this request. I look forward to hearing from you.

Best always,

Gayle George

Appendix F

Default - Rule 55A

(CD 49 Revised-6 2019)

UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA

GEORGE

Plaintiff(s)

Civil Action: 1:24-cv-01598

v

US BANK et al

Defendant(s)

BWW LAW GROUP

RE:

DEFAULT

It appearing that the above-named defendant(s) failed to plead or otherwise defend this action though duly served with summons and copy of the complaint on 9/25/2024 . and an affidavit on behalf of the plaintiff having been filed, it is this 28 day of October , 2024 declared that defendant(s) is/are in default.

ANGELA D. CAESAR, Clerk

By: /s/ Dwight Patterson
Deputy Clerk

Default; Rule 55A

(CO 40 Revised 6 2019)

UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA

GEORGE

Plaintiff(s)

Civil Action: 1:24-cv-01598

v.

US BANK et al

Defendant(s)

RE: US BANK

DEFAULT

It appearing that the above-named defendant(s) failed to plead or otherwise defend this action though duly served with summons and copy of the complaint on 9/30/2024, and an affidavit on behalf of the plaintiff having been filed, it is this 28 day of October, 2024 declared that defendant(s) is/are in default.

ANGELA D. CAESAR, Clerk

By: /s/ Dwight Patterson
Deputy Clerk