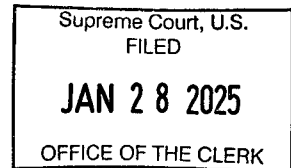


24-895



No.

IN THE
Supreme Court of the United States

Petitioner Wei Qiu

Wei Qiu

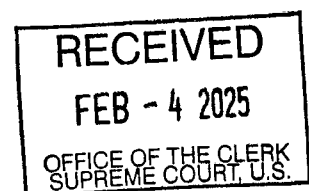
v.

Board of Education of Oldham County, KY

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

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED FOR REVIEW

Qiu the accented U.S. citizen of origin of China applied for employment with Oldham. Principal Woosley held Qiu waiting to search for Qiu's skills after the interview, having no questions about Qiu's qualifications. Woosley kicked Qiu off waiting when annoyed by Qiu's emails asking to be hired. Qiu sued Oldham under Title VII of the Civil Rights Act of 1964 based on her race, color, and national origin. Qiu's complaint covered the four elements of 411 U.S. at 802. Oldham filed the motion to dismiss Qiu's complaint. Qiu responded with the attachment of the email exchanges of Woosley and Qiu to support the facts in her complaint. The district court rejected Qiu's evidence of the emails attached to her response. The district court dismissed Qiu's complaint, and the circuit court affirmed the dismissal.

1. Should the evidence attached to the response to the motion to dismiss be declined?
2. Does the complaint meet the standard "state a claim to relief that is plausible on its face" when setting up the *prima facie* under 411 U.S. at 802?
3. Did the judges violate Qiu's Constitutional right to due process and equal protection of the laws in Section 1 of Amendment XIV? Were the judges against the Rule of Law?

LIST OF PROCEDURE

Wei Qiu v. Board of Education of Oldham County Schools, KY, 3:22 cv 00383, U.S. District Court for the Western District of Kentucky. Judgment entered on 03/02/23; 59(e) was denied on 03/20/24.

Wei Qiu v. Board of Education of Oldham County, KY 24-5306, U. S. Court of Appeals for the 6th Circuit. Judgment entered on Oct. 11, 2024; Petition to rehear to the en banc was denied on Nov. 18, 2024.

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<i>Ashcroft v. Iqbal</i> , 556 U.S. 662, 678 (2009) (quoting <i>Bell Atl. Corp. v. Twombly</i> , 550 U.S. 554, 570 (2007))	13, 19, 21

Petitioner Qiu respectfully asks that a writ of certiorari be issued to review Order D 17 of the U. S. 6th Circuit filed on 10/11/2024, and Order DN 14 of the U. S. Western District Court of Kentucky filed on 03/02/2023.

OPINIONS BELOW

Order D 17 filed on Oct. 11, 2024, from the U.S. Court of Appeals For the 6th Circuit, affirmed the order from the district court. Order D 17 is attached as Appendix B. Order D 21 denied the petition to the en banc to rehear on Nov. 18, 2024. Order D 21 is attached as Appendix D.

Order DN 14 filed on 03/02/23, from the U. S. Western District Court of Kentucky, dismissed Qiu's Complaint. Order DN 14 is attached as Appendix A. Order DN 21 denied Qiu's 59(e) on 03/20/24. Order DN 21 is attached as Appendix C.

JURISDICTION

Order D 21 which denied Qiu's petition to the en banc to rehear was entered on Nov 18, 2024, in the 6th appeal court. Under 28 U.S.C. § 1254(1), the instant case is in the jurisdiction of the U.S. Supreme Court. Order D 21 is attached as Appendix D.

CONSTITUTIONAL PROVISIONS, STATUTES, AND POLICY AT ISSUE

The Rule of Law, EQUAL JUSTICE UNDER LAW.

AMENDMENT XIV of the Constitution Section

1. Rights

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

Title VII of the Civil Rights Act of 1964

UNLAWFUL EMPLOYMENT PRACTICES

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

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

FRCP Rule 8(a)(2) a short and plain statement of the claim showing that the pleader is entitled to relief;

FRCP Rule 11(b)(3) the factual contentions have evidentiary support,

FRCP Rule 56 Summary Judgment (a) Motion for Summary Judgment or Partial Summary Judgment. A party may move for summary judgment, identifying each claim or defense — or the part of each claim or defense — on which summary judgment is sought.

(i) he belongs to a racial minority; (ii) he applied and was qualified for a job for which the employer was seeking applicants; (iii) despite of his qualifications, he was rejected; and (iv) after his rejection, the position remained open and the employer continued to seek applicants from persons of plaintiff's qualifications. 411 U.S. at 802.

(1) is a member of a protected class; (2) was qualified for the position and applied for the position; (3) suffered an adverse employment action; (4) was treated differently than similarly situated non-protected employees. *McDonnell Douglas Corp. v. Green*, 411 U.S. 792, 802-803 (1973).

“state a claim to relief that is plausible on its face”. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007))

STATEMENT OF THE CASE

A. Introduction of the Case Procedure

Qiu first depicts the events before introducing the filings.

After the interview, Principal Woosley held accented Qiu waiting to search for Qiu's skills because Woosley did not like Qiu's accent, having no questions about Qiu's qualifications. Woosley was annoyed with Qiu's emails asking to be hired that Woosley stated Qiu's persistence for the job was borderline unprofessional. Qiu stated back that it was unprofessional to say Qiu's effort for the job for which she was highly qualified was unprofessional. Woosley revenged on Qiu that she kicked Qiu off waiting.

Qiu filed the discrimination against her with the EEOC. Oldham did not settle the case. The EEOC issued the right to sue. Qiu sued Oldham in the U.S. Western District of Kentucky.

Qiu wrote her complaint based on the email exchanges between Woosley and Qiu. Oldham filed its motion to dismiss DN 4 stating the complaint does not contain factual basis for a discrimination claim. Qiu responded with DN 5 attaching the email exchanges between Woosley and Qiu to support the facts in the complaint. Oldham replied with DN 7 stating Qiu's attachment in her response were not

incorporated even by reference into the complaint. The district court granted Oldham's dismissal with Order DN 14.

Qiu filed 59(e) motion DN 15 to alter Order DN 14. Oldham filed DN 16 to respond. Qiu filed DN 17 to reply.

Qiu filed sanction motion DN 18. Oldham filed DN 19 to respond. Qiu filed DN 20 to reply.

The district court denied Qiu's 59(e) motion and sanction motion with Order DN 21.

Qiu appealed to the 6th Circuit Court. The 6th Circuit Court affirmed the district court's order.

Qiu is appealing to the Supreme Court.

The filings of the case are in the dockets:

Wei Qiu v. Board of Education of Oldham County Schools, KY, 3:22 cv 00383, U.S. District Court for the Western District of Kentucky.

Wei Qiu v. Board of Education of Oldham County, KY 24-5306, U. S. Court of Appeals for the 6th Circuit.

The critical filings in the district court were:

1. DN 1: Qiu's Complaint written by the email exchanges between Woosley and Qiu

2. DN 4: Oldham's Motion to Dismiss
3. DN 5: Qiu's Response
4. DN 7: Oldham's Reply
5. DN 14: Order dismissed the Complaint
6. DN 15: Qiu's 59(e) Motion to alter Order DN 14
7. DN 16: Oldham's Response to Qiu's 59(e)
8. DN 17: Qiu's Reply to Oldham's Response
9. DN 18: Qiu's Sanction
10. DN 19: Oldham's Response to Sanction
11. DN 20: Qiu's Reply to Oldham's Response
12. DN 21: Order denied Qiu's 59(e) DN 15 and Sanction DN 18.

The critical filings in the 6th Circuit Court were:

1. D 12: Qiu's Brief
2. D 14: Oldham's Brief
3. D 16: Qiu's Reply Brief
4. D 17: Order affirmed the district court's Order
5. D 19: Qiu's Petition to rehear to the three judges
6. D 20: Qiu's Petition to rehear to the en banc
7. D 21: Order denied Qiu's Petition to the en banc

B. Statement of the Facts

BACKGROUND

Qiu the American citizen was accented because of her national origin of China.

Qiu saw Oldham opened a chemistry and physics position on the Education Professional Standard Board website, and Qiu contacted Oldham for the position. Mr. Blackburn called Qiu, and Qiu asked about the position. Mr. Blackburn informed Qiu the position was to teach AP chemistry and AP physics. Qiu immediately attached her support for teaching AP chemistry and AP physics to email Principal Woosley and Mr. Blackburn. Page ID# 93 in Qiu's 59(e) motion DN 15. Qiu's support were: the reference from the director of Advance Kentucky in which "Qiu demonstrated an exceptional grasp of the fundamental principles of chemistry", Qiu's AP chemistry exam report in which her 5 rate was 38% while it was 6% in Kentucky, her excellence of chemistry Praxis, her Praxis report in which Qiu scored 163 to the passing score 133 for her physics Praxis, the reference from Professor Bush at the University of Kentucky in which Professor Bush indicated Qiu's chemistry level was at Dr. Bush's. Page ID# 93-99 in Qiu's 59(e) DN 15.

Oldham interviewed Qiu.

Two weeks after the interview, Qiu emailed Principal Woosley to ask to be hired. Principal Woosley held Qiu waiting to search for Qiu's skills because Woosley disliked Qiu's accent, having no questions about Qiu's qualifications. Woosley was annoyed with Qiu's emails that she stated Qiu's persistence for the job was borderline unprofessional. Qiu stated back that it was unprofessional to say Qiu's effort for the job for which she was highly qualified was unprofessional. Principal Melissa Woosley revenged on Qiu that she kicked Qiu off waiting. Page ID# 24 - 48 in Qiu's response DN 5.

Qiu filed the discrimination that happened to her with the EEOC. Oldham did not settle the case. The EEOC issued the right to sue. Qiu sued Oldham in the U.S. Western District Court of Kentucky under Title VII of the Civil Rights Act of 1964.

FACTS IN THE DISTRICT COURT

The Complaint

Based on the email exchanges between Woosley and Qiu, Qiu wrote her complaint. Page ID# 24-48, the emails, in Qiu's response DN 5. Qiu's complaint formed as the following:

- 1. Wei Qiu the plaintiff is an American citizen with the origin of China. She is an excellent licensed*

chemistry teacher. She is also highly Praxis qualified to teach physics. She is highly qualified for defendant's chemistry/physics open in early June 2021.

2. After two weeks of the interview on June 25, 2021, plaintiff started to email Principal Melissa Woosley to ask to be hired. Principal Melissa Woosley held her wait, keeping searching for new applicant. Principal Melissa Woosley disliked plaintiff the accented Chinese.

3. Principal Melissa Woosley was annoyed with plaintiff's enthusiasm for the job. On July 7, 2021, she indicated she was still looking for applications. She held plaintiff wait. She stated plaintiff's persistence for the job is borderline unprofessional. Plaintiff stated back that it is unprofessional to say her effort for a job for which she is highly qualified is unprofessional. Principal Melissa Woosley revenged on plaintiff that she kicked plaintiff even off waiting.

4. Plaintiff asks Principal Melissa Woosley to ask question about her quality for the job again and again, Principal Melissa Woosley never had a question for plaintiff's quality for the position. Principal Melissa Woosley kept searching for new applicant is only because she does not like an accented Chinese.

5. Plaintiff applied for a chemistry position with defendant in August 2019. Defendant discriminated against her as a Chinese because she was a high-quality teacher, but she got nothing for her application.

Defendant discriminates against plaintiff as an accented Chinese is a violation of Title VII.

Qiu's complaint covered the first three elements of the *prima facie* of the *McDonnell Douglas* Framework, ready to start the discovery to have Oldham disclose what it hired to complete the 4th element of the *McDonnell Douglas* Framework.

Qiu's complaint covered all the elements of 411 U.S. at 802, ready to start summary motion by direct evidence based on 411 U.S. at 802 under FRCP Rule 56.

Oldham's Motion to Dismiss

Oldham filed its motion to dismiss Qiu's complaint stating "the complaint does not contain factual basis for a discrimination claim...." Page ID# 17 in Oldham's dismiss DN 4. Oldham avoided the discrimination facts in the complaint that Woosley held Qiu waiting to search for Qiu's skills having no question about Qiu's qualifications. Page ID# 17-18 in Oldham's dismissal DN 4. Woosley was searching for an English speaker.

Qiu's Response to Oldham's Motion to Dismiss

Qiu attached the email exchanges between Woosley and Qiu in her response to Oldham's dismissal to support the facts in the complaint. Page ID# 21-48 in Qiu's response DN 5. The facts in Qiu's complaint were fully evidence supported.

Oldham's Reply

Oldham stated that Qiu's attachment in her response were not incorporated even by reference into the complaint. Page ID# 55 in Oldham's reply DN 7. Oldham was opposite to the coherence and identification of the facts in the emails and the complaint.

Order DN 14 Which Dismissed the Complaint

The district court declined to consider the evidence attached to Qiu's response DN 5 which were all about the complaint. Page ID# 72-73 in Order DN 14; **Page 29-30 in Appendix A.**

The district court put the job application situation into a working place and applied the workplace caselaws. Page ID# 75 in Order DN 14; **Page 32-34 in Appendix A.** The district court dismissed the complaint based on its made up facts: "Qiu does not allege that Board or its employees 'made any statements concerning [Qiu's] race,' or that 'they

engaged in any conduct whatsoever that could be reasonably be interpreted as racially motivated.” “Furthermore, nothing in the complaint gives rise to a reasonable inference that Qiu was treated differently than anyone outside of her protected class.” “Qiu does not state whether any other applicants applied for the position, and if they did, whether the other applicants were of a different race, color, or national origin. (See D.N. 1). Nor does she allege whether the individual who eventually filled the role was of a different race, color, or national origin.” Page ID# 75 in Order DN 14; **Page 32-34 in Appendix A.** The district court falsified facts.

The actual facts in this job application case were Qiu the job applicant did not know about the other applicants. Qiu did not see other applicants at the interview which was at the time of covid when people keeping away by space and time. Qiu went home 80 miles away after the interview hour, never knowing what Oldham interviewed or hired for the position. Nor could Qiu hear Oldham and its employees talking about her. The district court falsified the facts and applied the wrong case laws to its falsified facts.

Based on the falsified facts and misplaced caselaws, the district court granted Oldham’s dismissal DN 4.

Circumstantially, Oldham and the district court did the teamwork: Oldham put the dismissal motion

in the docket that the district court could and would grant it.

Qiu's 59(e) Motion and Sanction Motion

Qiu filed 59(e) motion to alter Order DN 14. Qiu was impossible to change the result of the teamwork of Oldham and the district court. Order DN 21 denied Qiu's 59(e) motion DN 15.

Qiu filed the sanction motion on Oldham. The district court denied Qiu's sanction DN 18 because the court granted Oldham's dismissal and denied Qiu's 59(e) motion. Page ID# 144 in Order DN 21; **Page 52 in Appendix C.** The district court did not give a legal accordance for the way it denied Qiu's sanction motion, not hearing the facts and laws in the sanction motion.

Qiu appealed to the 6th Circuit Court.

FACTS IN THE 6TH CIRCUIT COURT

Qiu's Brief

Qiu displayed the complaint and argued that the complaint set up *prima facie* under 411 U.S. at 802 that the complaint surpassed the standard of a complaint "state a claim to relief that is plausible on its face". *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570

(2007) . Page 1-3 in Qiu's brief D 12. Qiu further argued that the district court falsified facts and misused case laws to its falsified facts to dismiss the complaint. Page 3-7 in Qiu's brief D 12.

Oldham's Brief

Oldham copied the facts the district made up and the case laws the district court misused in Order DN 14. Page 14, 21, 22 in Oldham's brief D 14. Oldham did not rebut Qiu's argument that the district court falsified facts and misused the case laws to its falsified facts to dismiss the complaint. Oldham did not rebut that Qiu's complaint set up *prima facie* under 411 U.S. at 802.

Qiu's Reply Brief

Qiu displayed the complaint and applied the evidence of the email exchanges between Woosley and Qiu to 411 U.S. at 802. Page 1-3 in Qiu's reply brief D 16. Qiu displayed the facts the court made up and the misused case laws to the faked facts. Page 3-5 in Qiu's reply brief D 16.

Qiu argued Oldham's motion to dismiss DN 4 was a lie because it avoided the discrimination facts in the complaint that Woosley held Qiu waiting to search for Qiu's skills having no question about Qiu's qualifications. Page 7 in Qiu's reply brief D 16. Order DN 14 was an error of fact and law and injustice

because it granted a lie. Page 7 in Qiu's reply brief D 16. Qiu argued Oldham and the district court did teamwork. Page 8, 14-15 in Qiu's reply brief D 16.

Qiu argued that the district court rejected Qiu's evidence attached to her response was an error of the procedure because evidence should not go with the complaint. Page 10 in Qiu's reply brief D 16. Evidence could only go with the response to the motion to dismiss. Qiu attached her evidence to her response to Oldham's motion to dismiss by Rule 11(b) (3) the factual contentions have evidentiary support. Page 10 in Qiu's reply brief D 16. Qiu argued that the emails attached to her response DN 5 did not amend to add new allegations. Page 11 in Qiu's reply brief D 16. Qiu argued that the district court told a judicial lie to prevent Qiu's evidence from getting into the case. Page 11 in Qiu's reply brief D 16.

The Three Judges' Order D 17 Which Affirmed the District Court's Order DN 14

The three judges in the 6th Circuit Court agreed with the district court that Qiu's evidence of the email exchanges between Woosley and Qiu attached to her response should not be considered. Page 2-3 in Order D 17; **Middle in Page 40 in Appendix B.**

The three judges did not hear Qiu. The three judges did not hear that the district court falsified facts and misused the case laws to its falsified facts to dismiss

the complaint. The three judges did not hear that Oldham and the district court did the teamwork to dismiss the complaint. The three judges did not hear Qiu's complaint set up *Prima facie* under 411 U.S. at 802. The three judges did not hear that the district court's Order DN 14 was an error of fact and law and injustice because it granted Oldham's dismissal DN 4 which was a lie for avoiding the discrimination facts in the complaint that Woosley held Qiu waiting to search for Qiu's skills having no questions about Qiu's qualifications. The three judges did not say Qiu's argument were nonsense. The three judges did not hear Qiu.

The three judges had their own point to affirm Order DN 14: But she alleges no facts supporting this conclusive inference, such as who was ultimately hired for the position, the details about her initial interview, or the details of her email correspondence. Page 3 in Order D 17; **Bottom in Page ID# 41 in Appendix B.** "*But she alleges no facts supporting this conclusive inference, such as who was ultimately hired for the position*" was making up the fact. "... *the details about her initial interview, or the details of her email correspondence*" violated the FRCP Rule 8(a)(2) which ruled a complaint "a short and plain statement of the claim showing that the pleader is entitled to relief".

REASONS FOR GRANTING THE PETITION

QUESTION 1

Should the evidence attached to the response to the motion to dismiss be declined?

Oldham stated “the complaint does not contain an adequate factual basis for a discrimination claim” to dismiss the complaint. Page 17 in Oldham’s dismissal DN 4. Qiu attached the emails in her response to prove all the statements in the complaint were facts including Woosley holding Qiu waiting to search for Qiu’s skills having no question about Qiu’s qualifications. Page ID# 21-48, Qiu’s response DN 5.

The district court refused to consider the evidence of the email exchanges between Woosley and Qiu attached to Qiu’s response DN 5. Page ID# 72-73 in Order DN 14; **Page 29-30 in APPENDIX A.** The 6th Circuit Court agreed with the district court. Page 2-3 in Order D 17; **Middle in Page 40 in Appendix B.**

The evidence of the email exchanges of Woosley and Qiu attached to Qiu’s response DN 5 fully supported the facts in the complaint. The district court had to get rid off the evidence demonstrating Woosley discriminated against accented Qiu before

dismissing the complaint. Thus the district court declined to consider the evidence attached to Qiu's response. If the evidence of the email exchanges between Woosley and Qiu attached to Qiu's response DN 5 were considered, the result of the case would be the opposite. Injustice happened.

The three judges in the 6th Circuit Court had the same problem: the evidence of the email exchanges between Woosley and Qiu attached to Qiu's response must be eliminated before affirming the dismissal of the complaint. Thus the three judges agreed with the district court. **"First, the district court did not need to consider the exhibits attached to Qiu's response to the Board's motion to dismiss."** Bottom in Page 2 in Order N17; **Middle in Page 40 in Appendix B.**

The judges set a caselaw to reject evidence of fact which will destroy justice. The judges' orders must be purged to maintain the U.S. courts.

Question to the Justices:

Should the evidence attached to the response to the motion to dismiss be declined?

QUESTION 2

Does the complaint meet the standard “state a claim to relief that is plausible on its face” when setting up the *prima facie* under 411 U.S. at 802?

The complaint covered the first three elements of the *prima facie* of the *McDonnell Douglas* Framework

Qiu’s complaint covered the first three elements of the *prima facie* of the *McDonnell Douglas* Framework. (1) is a member of a protected class (Qiu was accented because of her national origin of China. 1, 4 in the complaint); (2) was qualified for the position and applied for the position (Qiu was highly qualified for the position, and Principal Woosley interviewed Qiu. 1, 2, 3, 4 in the complaint); (3) suffered an adverse employment action(Woosley did not hire Qiu, searching for Qiu’s skill having no question on Qiu’s qualifications. Woosley kicked off Qiu from waiting when Qiu asked to be hired. 2, 3, 4 in the complaint); (4) was treated differently than similarly situated non-protected employees (Because Qiu the job applicant did not know what Oldham hired for the position she was interviewed for, Qiu could not finish the 4th element). *McDonnell Douglas Corp. v. Green*, 411 U.S. 792, 802-803 (1973).

Qiu's complaint set up well to start the discovery to have Oldham disclose what it hired to complete the 4th element of the *McDonnell Douglas* Framework.

The complaint was even better under 411 U.S. at 802.

The complaint covered all four elements under 411 U.S. at 802 setting up the *prima facie*

Qiu's complaint covered all the elements of 411 U.S. at 802. (i) he belongs to a racial minority (Qiu was accented because of her national origin of China. 1, 4 in the complaint); (ii) he applied and was qualified for a job for which the employer was seeking applicants (Qiu was highly qualified for Oldham's open and Principal Woosley interviewed Qiu. 1, 2, 3, 4 in the complaint); (iii) despite of his qualifications, he was rejected (Woosley kicked Qiu off waiting when Qiu asked to be hired. 3 in the complaint); and (iv) after his rejection, the position remained open and the employer continued to seek applicants from persons of plaintiff's qualifications (Woosley had to continue her searching for Qiu's skills after kicking Qiu off. 2, 3, 4 in the complaint). 411 U.S. at 802.

The complaint was ready to start summary motion by direct evidence based on 411 U.S. at 802 under FRCP Rule 56.

The standard for a complaint “state a claim to relief that is plausible on its face”

The standard for a complaint was “state a claim to relief that is plausible on its face”. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 554, 570 (2007)).

Question to the Justices:

Does the complaint meet the standard “state a claim to relief that is plausible on its face” when setting up the *prima facie* under 411 U.S. at 802?

QUESTION 3

**Did the judges violate Qiu’s Constitutional right to due process and equal protection of the laws in Section 1 of Amendment XIV?
Were the judges against the Rule of Law?**

The district court made up facts and misused case laws to its faked facts to dismiss Qiu’s complaint. Page ID# 75 in Order DN 14; **Page 32-34 in Appendix A.** The district court was on Oldham’s side to dismiss the complaint.

The three judges in the 6th Circuit Court had their own grounds to affirm the district court's order: But she alleges no facts supporting this conclusive inference, such as who was ultimately hired for the position, the details about her initial interview, or the details of her email correspondence. Page 3 in Order DN 17; **Bottom in Page 41 in Appendix B.** The three judges made up facts (who was ultimately hired for the position). The three judges were against the FRCP Rule 8(a)(2) (the details about her initial interview, or the details of her email correspondence). The three judges were on Oldham's side that they misconducted judicially to affirm the dismissal of the complaint.

The three judges did not hear Qiu. The three judges did not hear that the district court falsified facts and misused the case laws to its falsified facts to dismiss the complaint. The three judges did not hear that Oldham and the district court did the teamwork to dismiss the complaint. The three judges did not hear Qiu's complaint set up *Prima facie* under 411 U.S. at 802. The three judges did not hear that the district court's Order DN 14 was an error of fact and law and injustice because it granted Oldham's dismissal which was a lie. The three judges did not say Qiu's argument were nonsense. The three judges did not hear Qiu.

Question to the Justices:

Did the judges violate Qiu's Constitutional right to due process and equal protection of the laws in Section 1 of Amendment XIV? Were the judges against the Rule of Law?

CONCLUSION

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

Respectfully submitted.

Wei Qiu *Wei Qiu Jan. 28, 2025*
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