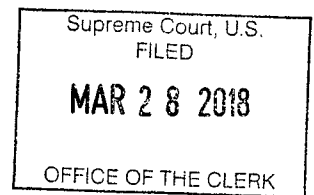


No. _____



IN THE
SUPREME COURT OF THE UNITED STATES
FREDRICK GOINGS - PETITIONER
VS
CAROLYN T. GROSBOLL - RESPONDENT
ON PETITION FOR A WRIT OF CERTIORARI TO
THE ILLINOIS SUPREME COURT
PETITION FOR A WRIT OF CERTIORARI

FREDRICK GOINGS, M36022
STATEVILLE CORRECTIONAL CENTER
P.O. BOX 112
JOLIET, IL 60434

QUESTION PRESENTED

I. Whether the Illinois Supreme Court Clerk Can unreasonably delay the issuance of official Court orders which denied discretionary review and reconsideration of that denial of review, So as to effectively operate as a procedural road block which precludes Petitioner from seeking further review and exhausting his remedies on direct appeal because of Petitioner's inability to obtain and append the lower Court's decision to his Petition For A Writ of Certiorari before the United States Supreme Court.

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APPENDIX B February 27, 2018 notice of extension of time within which to file a Petition For A Writ of Certiorari.

APPENDIX C1 May 25, 2016 notice letter from the Supreme Court of Illinois (unsigned) that states the Court denied the Petition For Leave To Appeal (PLA).

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APPENDIX C2 November 29, 2016, notice letter from the Clerk of the Illinois Supreme Court that Petitioner's motion for reconsideration of the order denying PLA was denied.

APPENDIX D December 15, 2017, notice letter from the Clerk of the Illinois Supreme Court advising that the judicial branch is not subject to the Freedom of Information request that Petitioner made to obtain copies of the requisite orders.

APPENDIX E January 11, 2018, letter from the Office of the Attorney General, Public Access Bureau, advising that they are unable to assist, because the judiciary is not a body subject to the requirements of the Freedom of Information Act, (FOIA).

OPINION BELOW

The Illinois Supreme Court denied Petitioner's Motion For Leave To File A Petition For An Original Writ of Mandamus on November 21, 2017, in the matter of Fredrick Goings V. Carolyn T. Grosboll, M.D. 014003. Included in this Petition For A Writ of Certiorari is a copy of the notice letter from Respondent, the Clerk of the Illinois Supreme Court, appears at Appendix A.

STATEMENT OF THE BASIS FOR JURISDICTION

The date on which the Illinois Supreme Court the Highest State Court denied Petitioner's Motion For Leave To File A Petition For An Original Writ of Mandamus was November 21, 2017. A copy of the letter which gives notice of the denial appears at Appendix A.

On February 27, 2018 Petitioner's Application For An Extension Of Time To File A Petition For A Writ of Certiorari was presented to and reviewed by Justice Kagan, who extended the time to and including April 20, 2018. A copy of the notice of extension appears at Appendix B.

The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a); U.S.S.Ct. Rule 13 and U.S.S.Ct. Rule 14.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

No person shall be ... deprived of life, liberty, or property, without due process of law. . . U.S. CONST., AMEND. V

[N]or 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...
U.S. CONST., AMEND. XIV

No person shall be deprived of life, liberty or property without due process of law nor be denied the equal protection of the laws
ILL. CONST. art. I, § 2

Proceedings in the Supreme Court in original actions in cases relating to... mandamus... and as may be necessary to the complete determination of any case on review, shall be instituted by filing a motion, supported by explanatory suggestions, for leave to file a Complaint seeking appropriate relief.
IL. S. Ct. Rule 381

All records, dockets and books required by law to be kept by Such Clerks shall be deemed public records, and shall at all times be open to inspection without fee or reward, and all persons shall have free access for inspection and examination to such records, docket and books, and also to all papers on file in the different Clerk's offices and shall have the right to take memoranda and abstracts thereto. 705 ILCS 105/16(6)

Every person shall find a certain remedy in the laws for all injuries and wrongs which he receives to his person, Privacy, Property or reputation. He shall obtain justice by law, freely, completely, and promptly. ILL. CONST. art. I, § 12

The Clerks shall attend the sessions of their respective Courts, preserve all files and papers thereof, make, keep and preserve complete records of all the proceedings and determinations thereof.
705 ILCS 105/13

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THE ILLINOIS SUPREME COURT

— PETITION FOR A WRIT OF CERTIORARI —
PREFACE

Now Comes Petitioner, Fredrick Goings,
a prisoner in the Illinois Department of Corrections,
Proceeding pro-se at this time, pursuant to
28 U.S.C. § 1257(a); U.S. S.Ct. Rule 13 and 14,
having previously tendered a Motion For Leave To Proceed
In Forma Pauperis, and been given an extension of time in
which to file this Petition. In support of states as follows:

STATEMENT OF THE CASE

On January 24, 2009, Ava and Nova Henry were found shot to death in their home at 51 W. 15th Street in Chicago, Illinois. (ROPV, SSSS 61-64, ROP VIII, UUUU 40, 45) After the victims were found in their home around 5:45 p.m., by the victims mother and her boyfriend, Petitioner, who had an off and on relationship with Nova the adult victim and had represented her in her child custody and child support battle against Eddy Curry, an NBA basketball player, immediately became the chief suspect. (ROPV, SSSS 40, 43, 88-89; ROPX, VVVV 21-22; ROPV, SSSS 152-157; ROP XIV, ZZZZ 147-149) Nova's three-year-old son, Noah was found in their home asleep, but he was unharmed. (ROPV, SSSS 141-142)

The Chicago Police Department (CPD) made attempts to locate Fredrick Goings in the Chicago area. (CLR IV, 808; CLR V, 1013; ROPX, VVVV 186, 198-199) They also began surveillance of Mr. Goings's cell phone and according to police reports tendered in discovery by the prosecution, used that cell phone information to track Mr. Goings to Michigan City Indiana. (ROPX, VVVV 199)

When the Chicago Police learned that Mr. Goings' phone had been traced to Indiana, they contacted Indiana Police and informed them that they (CPD) had located Mr. Goings "within Cell Phone reach" of Michigan City, requesting that Indiana law enforcement assist in finding Mr. Goings and his vehicle. (ROP VIII, UUUU 66; ROPX, VVVV 199-200)

From this initial contact onward, Indiana and Chicago Police remained in constant communication and worked together as a team, with the goal of arresting Mr. Goings for the Illinois murders. (CLR IV, 808)

Indiana law enforcement officials located Mr. Goings' vehicle in a hotel parking lot, immediately informed CPD, and were instructed to keep Mr. Goings and his vehicle under surveillance. (ROP VIII, UUUU 66-71; ROPX, VVVV 199-200) Indiana and Chicago law enforcement officers thereafter, sometime that morning surrounded the hotel and blocked Mr. Goings' vehicle in order to prevent him from leaving, a restriction that amounted to a seizure under the Fourth Amendment of the United States Constitution. (CLR IV, 809)

Then, on the morning of January 25, 2009, CPD had police from Indiana arrest Mr. Goings at a few minutes after 11:00 a.m., using the absurd pre-text that Mr. Goings was trespassing because he had not vacated his hotel room by 11 a.m. on the dot. (ROP XV, ZZZZ 299-300)

No one from the Comfort Inn contacted the police or any law enforcement to request that Mr. Goings be removed from his hotel stay. (ROP XV, ZZZZ 299-300) In fact, the hotel manager testified at trial that it was customary to allow guest until noon to checkout late if they like, and in this case Mr. Goings had requested to check out late. (ROP X, VVVV 137)

Mr. Goings bonded out of jail for the false trespass charge and returned to Chicago. (ROP X, VVVV 145; ROP XVI, AAAAA 38-39)

About a month later on February 20, 2009, Mr. Goings was again arrested by police, this time CPD charged Mr. Goings with double-murder. (CLR I, 24)

Prior to Capital Punishment being abolished in Illinois, the State prosecutor had elected to seek the death penalty against Mr. Goings. (CLR I, 70)

There are no eyewitnesses to the murders.
The case against petitioner is not an eyewitness case
and that fact was conceded to by the State prosecutor.
(ROPXV, ZZZZ333-334, 336)

Mr. Goings did not confess to committing
double-murder and he certainly gave no inculpatory
statements which incriminate him. (ROPXV, ZZZZ280-282)

There was no finger print evidence tendered in
discovery or presented at trial that connects
petitioner with double-murder. (ROPXI, XXXX16-20)

No murder weapon was reported as being discovered
in the case pre-trial and no murder weapon was presented
at trial. (ROPXII, YYYY129-130)

None of the neighbors of the victims that were
called as witnesses by the State at trial gave any
testimony that they saw the petitioner on the day
of the murders (1-24-09). (ROPVIII, UUUU128, 160-167)
And of all the witnesses who testified at trial, no one
positively identified who's SUV was in the surveillance
footage of the victims parking lot, including a CPD
detective who watched the surveillance video at trial
along with the jurors. (ROPVII, UUUU147; ROPX, VVVV227)

The prosecutions surveillance expert testified that from the cell-phone records he had analyzed in the case that were associated with the Law Office of Fredrick Goings, he had no cell site information to determine where Mr. Goings' Cell phone was located between approximately 12:52 a.m. and 11:16 a.m., and other times on January 24, 2009. (ROP XV, ZZZZ 237-238) The surveillance expert also testified that for the times he did have cell-site location data, he could not provide an address for the location of Petitioner's phone or opine that the phone was inside Nova's home, outside Nova's home or in the visitors parking lot outside Nova's home, but only that during certain times, Petitioner's phone pinged off cell towers with areas of coverage in which the victims home was included in. (ROP XV, ZZZZ 233)

The States gunshot residue expert testified that he would never give an opinion that gunshot residue that had been collected and analyzed in the case was deposited on the items on the day of the murders. (ROP XI, WWW 106) He further testified that Forensic Science is limited by being unable to determine the exact and precise moment that gunshot residue was deposited on an item. (ROP XI, WWW 106-107) The States expert further testified during trial that gunshot residue can be found on a person or persons clothing who had not been in the presence of a discharged weapon and that gunshot residue could remain on inanimate objects indefinitely. (ROP XI, WWW 108, 115)

At the request of the Chicago Police the Illinois-State Police ballistic expert made a comparison between a live round (unfired bullet casing) and an expended shell casing that the police testified to recovering in their investigation. (ROP XII, YYYY III-116, 164-165)

The ballistic expert gave a subjective opinion that the two pieces of evidence had similar marks. However, the ballistic expert testified that the marks could very well be from the manufacturing process and that there could be at least 1000 boxes of ammunition with unfired bullet casings with the same marks. (ROP XII, YYYY 135, 183-193)

The expert further testified that the source of the toolmarks that she identified on the unfired and expended (fired) casing are unknown. (ROP XII, YYYY 129-130)

One of the victims in the case testimony from an April 2007 unrelated order-of-protection hearing which had nothing to do with the 2009 murders was allowed to be introduced at the 2013 trial. (ROP XIX, A9) The order-of-protection hearing was entered into evidence despite multiple retractions and contradictions that the jurors not only never heard but also never considered. (ROP XIX, A10)

More importantly, the victim Nova Henry in her 2007 retractions and affidavit made clear that she did not need an order-of-protection and that she did not feel threatened by Mr. Goings and that there was never any physical abuse inflicted upon her by Fredrick Goings. (ROP XIX, A 11)

There was nothing overwhelming about the evidence presented in the case that supports a double-murder conviction. (CLR V, 1035, 1116)

Moreover, Fredrick Goings did not receive a fair trial, and he was also denied his right to be heard on multiple pre-trial motions including a meritorious motion to quash arrest and suppress evidence. (CLR IV, 808-809)

The trial Judge Maura Slattery-Boyle sentenced Petitioner to natural life even after trial Counsel had presented a motion with at least 140 reasons why Petitioner should have never been convicted; however the attorneys who represented petitioner at trial and post trial had rest on the motion for new trial without giving any argument during the hearing on April 4, 2013. (CLR V, 1035, 1116, 1180, 1277)

In mid April 2013 Petitioner was remanded back to the Cook County Department of Corrections for a hearing on his pro-se motion entitled, "Mr. Goings Pro Se Motion to Vacate Jury Verdict or in the Alternative for a New Trial", pursuant to People v. Krankel; Petitioner's effort to have the Krankel hearing prior to Sentencing was denied. (CLR V, 1138, 1228, 1235)

On May 28, 2013 the Circuit Court trial judge denied Petitioner's Krankel motion and remanded him back to the Illinois Department of Corrections; Petitioner appealed and the Office of the Illinois State Appellate Defender was appointed to represent him on direct appeal. (CLR VI, 1298, 1303-1304)

No issues pertaining to how Petitioner's Krankel hearing was conducted were addressed in the direct appeal and Petitioner's appellate lawyers did not raise ineffective assistance of trial counsel in their briefs. People v. Goings, 2015 IL App(1st)131868-u

On October 30, 2015 the Appellate Court affirmed the jury verdict and entered an Illinois Supreme Court Rule 23 opinion. People v. Goings, 2015 IL App (1st) 131868-u

On December 3, 2015 a Petition For Leave To Appeal was filed in the Illinois Supreme Court; however it was withdrawn on December 15, 2015 because the Appellate Court had granted Petitioner's pro-se motion for leave to file a petition for rehearing.

The Petitioner's prose petition for rehearing was filed on December 14, 2015, which was denied on December 17, 2015, thereafter Petitioner's attorney refiled substantially the same Petition For Leave To Appeal on February 18, 2016 and it was denied by the Illinois Supreme Court on May 25, 2016.
(Appendix C1)

The Illinois Supreme Court issued its mandate to the Appellate Court on June 29, 2016; then on July 5, 2016 the Illinois Appellate Court issued its mandate to the Circuit Court of Cook County.

Petitioner also filed and submitted to be filed multiple other prose motions to the Appellate Court that challenged the Appellate Court's observation of multiple facts which were inaccurate as written in the Rule 23 opinion; primarily the Appellate Court erroneously concluded that it lacked jurisdiction to hear the motions.

On November 8, 2016, Petitioner timely filed his Pro se motion for leave to file a motion for reconsideration of the order denying his Petition For Leave To Appeal (PLA), which was denied on November 29, 2016. (Appendix C2)

On February 28, 2017, the Clerk of the United States Supreme Court received Petitioner's application to extend the time in which to file a petition for a writ of Certiorari in the matter of Goings v. State of Illinois.¹

Petitioner received back two letters from the Office of the United States Supreme Court Clerk, both of which advised that the lower Court orders must be appended to his Pleadings and therefore his documents were returned for non-compliance; the letters were dated March 7, 2017, and March 15, 2017, respectively.

Thereafter, on September 18, 2017 Petitioner filed in the Illinois Supreme Court a motion for leave to file a petition for an original writ of mandamus. It was denied on November 21, 2017. In the mandamus Petitioner had sought to have a Court order compelling the Respondent - Carolyn Taft Grosboll, the Clerk of the Illinois Supreme Court to issue to Petitioner official Court orders which evidence that his PLA, and his motion for leave to file his motion for reconsideration of the Court order that denied his PLA was in fact denied by the State High Court.

¹ The matter Petitioner sought to have reviewed was *People v. Goings*, 2015 IL App (1st) 131868-U

On February 1, 2018 Petitioner mailed to the United States Supreme Court Clerk his pro-se application for an extension of time within which to file a petition for writ of Certiorari in order to seek review of the matter of Goings v. Grosboll, M.D. 014003; the application was presented to the Honorable Justice Kagan, who on February 27, 2018, extended the time to and including April 20, 2018.

COMPELLING REASONS FOR GRANTING REVIEW

Because Petitioner has been unable to obtain copies of Official Court orders from the Clerk of the Illinois Supreme Court he has been delayed in his ability to file his Petition For Writ of Certiorari before the United States Supreme Court.

Thus, in effect, Petitioner has been procedurally road blocked from exhausting his remedies on direct appeal, where the following arguments by appellate Counsel in Summary were rejected: (a) Crime scene photographic evidence and evidence as to the victims surviving family member, along with the States Commentary referring to such evidence was irrelevant and inflammatory and operated to deprive Fredrick Goings of a fair trial; (b) the deceased testimony from a Prior unrelated hearing from 2007 was improperly admitted in the 2013 murder trial;

(c) Cell phone surveillance evidence and other cell phone records were admitted in violation of Fredrick Goings' Constitutional rights; and (d) Petitioner's trial judge was biased.

This case is important for a number of reasons. First of all, the due process implications that affect not only Petitioner but many other members of the Public who may find themselves in similar circumstances.

Second of all, the Nations High Court will give direction to lower courts on the importance of providing timely issuance of lower courts opinions, decisions and orders, so as to not block a petitioner's ability to seek further review.

Third of all, if this Court accepts review, Petitioner would then be able to reach the underlying merits of his direct appeal in a subsequent and separate petition for Writ of Certiorari, which have issues of national importance.

Lastly, it would be fundamentally unfair for this Honorable Supreme Court to allow a State High Court to delay and impede an incarcerated litigant's ability to advance and prevail on the merits of a case because of an arbitrary decision to not furnish the requisite orders that pursuant to U.S. Supreme Court Rule 14 must be appended to his Petition For Writ of Certiorari.

No person shall be . . . deprived of life, liberty, or property, without due process of law . . . U.S. CONST., AMEND V [N]or 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 . . . U.S. CONST., AMEND. XIV

In the case at bar, the Respondent, Carolyn T. Grosboll the Clerk of the Illinois Supreme Court by failing to provide petitioner with copies of Official Court orders necessary to append to his Petition For Writ of Certiorari, has violated the due process and equal protection clauses of the United States Constitution, specifically Amendments V and XIV, respectively. U.S. CONST. AMENDS. V, XIV.

Furthermore, Respondent violated the due process and equal protection clauses of the Illinois Constitution, which in pertinent part provides that [N]o person shall be deprived of life, liberty or property without due process of law, nor be denied equal protection of the laws. ILL. CONST. art. I, § 2.

Prior to petitioner seeking relief pursuant to this Writ of Certiorari he had made multiple request to the Clerk of the Illinois Supreme Court to perform her ministerial duties of providing petitioner with copies of official Court orders. All to no avail.

It is important for this Honorable Supreme Court to know that Petitioner never received copies of official Court orders from the Clerk of the Illinois Supreme Court; when his Petition For Leave To Appeal (PLA), motion for reconsideration of the order denying PLA, and his motion for leave to file a petition for an original Writ of Mandamus, were all denied. More importantly the Clerk of the Illinois Supreme Court failed to provide any other means for Petitioner to obtain copies of the aforementioned requisite orders, despite his persistent pleas for copies.

Which is why Petitioner has asserted in the Statement of Facts a detailed Chronological summary that prodded the filing of this Petition For Writ of Certiorari. And prior to this, prompted petitioner to file his motion for leave to file a petition for an original Writ of Mandamus in the Illinois Supreme Court pursuant to Illinois Supreme Court Rule 381.

Illinois Supreme Court Rule 381 in pertinent part provides:

Proceedings in the supreme court in original actions in cases relating to... mandamus... and as may be necessary to the complete determination of any case on review, shall be instituted by filing a motion, supported by explanatory suggestions, for leave to file a complaint seeking appropriate relief. IL S.Ct. Rule 381

Barrons Law Dictionary defines ministerial act as "those acts performed by a subordinate official... the term 'ministerial'... is generic rather than specific, and ministerial acts may be divided into two classes: (1) those that are ministerial solely and involve no judgement or discretion; and (2) those that are quasi judicial or discretionary..." Barrons Law Dictionary, Steven H. Gifis (4th ed. 1996)

A purely ministerial act is one which a person performs on a given set of facts in a prescribed manner, and in obedience to the mandate of legal authority, without regard to or the exercise of his own judgement upon the propriety of the act being done. Id. at 317

Thus, the public servant or official in this case, the Clerk of the Illinois Supreme Court, upon Petitioner's Petition For Leave To File A Petition For An Original Writ - of Mandamus² and the filing and hearing thereon should have been compelled to perform her ministerial duties of her office and dispense without further delay copies of the orders Petitioner needs to append to his Writ of Certiorari - Petition, so that he can seek further review of his meritorious direct appeal in the matter of People v. Goings, 2015 IL App (1st) 131868-U, without which he has been blocked from addressing his claims in the United States Supreme Court, the Highest Court in our trusted and beloved Nation.

2

Petition and Motion in this instance are interchangeable

A ministerial task such as providing Petitioner with copies of Court orders imposes no burden or prejudice on Respondent. In fact Petitioner contends that Respondent by virtue of her office, she should be more than willing to comply so that Petitioner can seek further review of his direct appeal in the matter of People v. Goings, 2015 IL App (1st) 131868-U.

As such, the Clerk of the Illinois Supreme Court who has not allowed Petitioner to obtain copies of the requisite orders in question by any other means should be compelled to provide them immediately and without further delay.

In further support of Petitioner's contention Petitioner points to section 16(6) of the Clerk of Courts Act, which in pertinent part provides:

All records, dockets and books required by law to be kept by such clerks shall be deemed public records, and shall at all times be open to inspection without fee or reward, and all persons shall have free access for inspection and examination to such records, docket and books, and also to all papers on file in the different Clerk's offices and shall have the right to take memoranda and abstracts thereto. 705 ILCS 105/16(6) (West 2006)

In the case at bar, Petitioner had zealously attempted to obtain copies of the requisite court orders by purchase, freedom of information request and by natural operation of law pursuant to the Clerk of Court ministerial duties. See Appendix D and E.

Moreover, what Petitioner has requested multiple times from Respondent, petitioned the Illinois Supreme Court for and ultimately invoked this Honorable Supreme Courts authority to obtain, not only should have been provided to him without query but should be an essential act of the Office of the Clerk of the Illinois Supreme Court whenever the Justices of the Illinois Supreme Court make any determination on a petition or motion before it whether or not discretionary review is granted.

Petitioner contends that it befuddles the question of what action was taken by the Court when the Clerk of the Illinois Supreme Court sends notice by letter that the Court entered an order but yet refuses to release to the litigant a copy of the order in question. Besides, what good is a letter from the Clerk of Court which bears no official seal or stamp or signature of Justices or Justice; what assurance would a reviewing Court, the litigant or the public have that the Clerk's notice by letter is official and not issued in error?

Furthermore, the Court orders in question are judicial records and should be contained in a Court file, and absent an order by the Illinois Supreme Court sealing the case or the files contents should be available for inspection, copying and access to the public, and certainly to the parties in the case.

It is incontestable that the judicial records that Petitioner seeks to obtain copies of do not trigger any privacy rights of anyone. Additionally, notably not only did the Respondent, the Clerk of the Illinois Supreme Court fail to respond to Petitioner's motion for leave to file a Petition for Writ of Mandamus but no attorney filed any appearance in that case on the Respondents behalf.

The case at bar can be best rationalized by recognizing that the law already makes a distinction between public access to materials submitted, filed, or entered in open court with the Clerk of Court, and materials that are Confidential, filed under seal or otherwise have not been submitted in open court or made available for public inspection or copying. See, *Copley Press v. Administrative Office of the Courts*, 271 Ill. App. 3d 548, quoting *United States v. Corbitt*, 879 F.2d 224, 228 (7th Cir. 1989)

In this instance, even though Petitioner is currently confined in the Illinois Department of Corrections, he has no reason to presume that his motion for leave to file a Petition for an original Writ of Mandamus was reviewed by a Justice or Justices of the Illinois Supreme Court in a Confidential or closed manner.

Also, Petitioner has been deprived of his right to a remedy and Justice in violation of the Illinois Constitution. What happened to Petitioner's right to "obtain justice by law, freely, completely and promptly"? See ILL. CONST. art. I, § 12

It is uncontroverted that Petitioner has been delayed in his ability to seek further review and relief of his direct appeal in the United States Supreme Court. Petitioner contends that there is absolutely no culpable negligence on the part of Petitioner; the delay is totally attributable to Respondent.

In keeping with the spirit of the Clerk of Court Act, there can be no elimination of the due process violation that has occurred when it is obvious that the Clerk of the Illinois Supreme Court has provided no other means or alternatives in which Petitioner can obtain copies of the requisite Court orders necessary for him to seek further review of his direct appeal. See generally, 705 ILCS 105/13 (West 2006)

Moreover, Respondent already conceded in her letter to Petitioner dated December 15, 2017, that the notices in "letter form" that were mailed to Petitioner on May 25, 2016, November 24, 2016 and November 21, 2017, are official orders of the Illinois Supreme Court. Which, Petitioner contends are not orders at all, and the Clerk of this Honorable United States Supreme Court has determined are not compliant for appending to Petitioner's Petition For A Writ of Certiorari. See Appendix A, C1, C2 and D, respectively.

Furthermore, Respondent will be unable to prove the failure to provide Petitioner copies was Constitutional, and that Petitioner was not treated differently than other litigants. A clear equal protection violation.

Thus, there is no reasonable, non arbitrary relationship between Respondents refusal to furnish Petitioner copies of actual official orders and the obvious delay it has caused Petitioner.

CONCLUSION

The Petition For A Writ of Certiorari should be granted. Thereafter, Respondent, Carolyn T. Grosboll should be ordered to furnish official copies of the the requisite Court orders without delay, otherwise this Honorable Supreme Court should order Petitioner's immediate release from the Illinois Department of Corrections. Alternatively, this Honorable Court should grant leave for Petitioner to file his Petition For A Writ of Certiorari to Challenge the direct appeal decision in the matter of People v. Goings, 2015 IL - App(1st) 131868-U, without appending the requisite Court orders or allow him to file his Petition attaching and appending the "notice letters" in lieu of the "official orders", Petitioner has been painstakingly trying to obtain.

Additionally, as Petitioner has already submitted a Motion For Leave To Proceed In Forma Pauperis when he tendered his application for an extension of time in which to file this Petition For A Writ of Certiorari, Petitioner hereby request that this Honorable Supreme Court appoint Counsel.

Respectfully submitted,

 3-27-18
Fredrick Goings, M36022