

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Ms. Angel Peterson — PETITIONER
(Your Name)

vs.

Rocky Burris, et al. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

The UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

MS. ANGEL PETERSON, #240544
(Your Name)

WHV, 3201 BEMIS ROAD
(Address)

YPSILANTI, MI 48197
(City, State, Zip Code)

N/A
(Phone Number)

QUESTION(S) PRESENTED

1.

1. Should a Magistrate Judge, without extending the deadline for discovery, accept discovered material after the close of discovery with no justified explanation? Should prisoner civil rights cases be managed differently than non-prisoner 42 U.S.C. 1983 claims? Is it fraud for a defendant to submit discovery after its close with no permission in the hopes no one will notice?

2. If a Judges opinion only reflects the precedent and not the facts does it deny the Petitioner the seventh amendment right to a trial? Is an Order to Show Cause a procedural tool to protect due process when seeking a court appointed expert?

3. If a designee under Rule 30(b)(6) reveals a different position on a topic than the one given at the administrative procedure is this fraudulent concealment?

LIST OF PARTIES

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

Mr. Rocky Burris, supervisor

Mrs. Millicent Warren, former Warden

Michigan State Industries

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OTHER

IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

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

OPINIONS BELOW

☒ For cases from **federal courts**:

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

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☒ is unpublished.

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

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☒ is unpublished.

☐ For cases from **state courts**:

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

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

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

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

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was December 8, 2017.

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

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

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

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

☐ For cases from **state courts**:

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

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

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

seventh amendment

STATEMENT OF THE CASE

The Petitioner, Angel Peterson, is a Michigan Department of Correction's ("MDOC") prisoner proceeding pro se, filed her complaint under 42 U.S.C. 1983 against Michigan State Industries ("MSI"), Rocky Burris and Millicent Warren, alleging violations of state and federal law; Libel and Slander, Equal Protection and Deliberate Indifference.

When the Petitioner filed her complaint she also filed an application to Proceed without Pre-payment of Fees and Costs. The Honorable Thomas L. Ludington ruled that the available financial data provided by Plaintiff did not establish indigence and the complaint was dismissed without prejudice. After paying the filing fee the Petitioner was able to re-open her complaint.

Magistrate Judge Elizabeth A. Stafford was assigned to manage pre-trial affairs in civil case #14-cv-1300. As required by Fed. R. of Civil Proc. 16(b) a scheduling order was issued. Discovery was originally set to end on October 21, 2015

On October 27, 2015, the Petitioner moved the Court for relief from judgment. At a scheduled deposition on October 14, 2015 Defense Counsel represented that Mr. Burris was the only party to the complaint. All other had been dismissed. Defense Counsel Dean conceded that he only recently realized that he incorrectly concluded that the sole remaining Defendant in this case was Defendant Burris. When, in fact, Defendant's Warren and MSI

remained in the case and Plaintiff did not have an opportunity to depose Warren due to Dean's mistake during the original time set for discovery. On November 10, 2015, the parties submitted a stipulated order agreeing to enlarge the time for discovery by 120 days. The Court granted the parties' stipulation and extended the period for discovery for 120 days. An extension of discovery was conferred upon to extend discovery until February 21, 2015.

During discovery time the Petitioner conducted discovery through interrogatories and depositions. Petitioner believed Mr. Burris answers were vague so Petitioner filed a Motion for Evasive Answers under rule 37. In order denying Petitioners assertions for a Motion for Sanctions for Evasive Answers the Honorable Thomas L. Ludington in agreement with Magistrate Judge's Report and Recommendation stated, "In her first objection, Peterson "begs to differ" with the magistrate judges conclusion that Defendant Burris did not give evasive or incomplete answers during his deposition in stating that he did not recall if it was raining on August 27, 2012, and did not recall who worked in the set-up department in 2012. As noted by the magistrate judge, there is nothing extraordinary about the fact that Burris could not remember events that took place over three years ago, and the circumstantial evidence did not suggest Burris was being evasive within the meaning of Rule 37(a)(4)." It was so Ordered on April 14, 2016.

In a sworn Affidavit, dated March 21, 2016, Mr B urris swore,

"Plaintiff alleges that I discriminated against her in violation of her fourteenth Amendment equal protection rights by demoting her and another black inmate, Jones, from their lead positions and taking away their lead pay. While also demoting another white prisoner employee, Lemons, but allowing her to keep her lead pay. This is incorrect. I reviewed Janae Jones (#266195) file, and Jones wa not demoted

or reassigned. She requested that she be assigned to the Shipping & Receiving Department. Shipping & Receiving is a desirable position because it has more time in between tasks and it allows that person to bounce around to other Departments to broaden their skills more quickly than rotating through other areas. Jones' release date was getting close and we wanted to accelerate her progress in time for parole."

This Affidavit was sworn to after the close of discovery and before the Petitioners rule 37 motion was denied.

After the Defense Counsel erroneously stated that MSI was no longer a Defendant and discovery was extended the Petitioner tried to depose MSI. The request was denied. The Petitioner then moved the Court for sanctions for not making available a witness. The request was denied by stating,

"Defendant Burris was the proper agent for the MSI to testify as was the day-to-day supervisor for the entity at the Dental Lab. It is true that, at the time of his deposition, defense counsel mistakenly believed MSI was no longer a Defendant and agreed to an extension of discovery. However, a further review of the Complaint shows that there are no allegations against MSI specifically that are not also alleged against Burris. In fact, there does not appear to be any allegations against MSI as an individual entity separate from Burris. Therefore, Burris was not only appropriate as a witness, he was the best possible witness for MSI. ... Plaintiff had a full and fair opportunity to depose Burris and she did." Dated April 6, 2016

The Court agreed with Respondant's and the Petitioner's motion was denied.

The Prison Litigation Reform Act (PLRA) prohibits prisoners from bringing claims based on mental or emotional injury without a prior showing of physical injury. The Petitioner stated that she suffered from high blood pressure as a result of Defendant's actions. The Petitioner survived a Rule 12(b) Motion to Dismiss.

In deciding a Rule 12(b) motion the district court assumes every properly pled allegation in the complaint as true. However to survive a motion for Summary Judgment facts must be presented. For that reason the Petitioner sought an expert witness to collaborate her high blood pressure claims.

Prisoner right are limited. In addition prisoners have to adhere to the rules and regulations of the prison. So that is why the Petitioner turned to MDOC policy directive, ("PD"). Paragraph HH of PD 03.04.100 states, "prisoners may be allowed to receive health services by an outside qualified health professional with prior approval of the warden after consultation with appropriate Assistant Chief Medical Officer." As instructed by the policy the Petitioner wrote the Warden for his approval to receive outside health care services. The Warden never responded to the letter. The Petitioner then submitted a grievance. As allowed per PD 03.02.130 at paragraph E which states, "Grievances may be submitted regarding alleged violations of procedure for unsatisfactory conditions of confinement which directly affect the grievant." The Grievance Coordinator acknowledged receiving the Petitioner's grievance. The coordinator also provided the Petitioner with a grievance identifier number and a date for a response to her grievance. (please see attachment 8) As indicated by the Grievance Coordinator the Petitioner was seen by September 14, 2015 The Petitioner was seen by Health Care Administrator Ball. Mrs. Ball told the Petitioner her high blood pressure was being managed by health care and I could not see an outside doctor.

The Petitioner then filed a motion for Appointment of an

Expert Witness According to Federal Rules of Evidence (FRE) 707.
In a Report and Recommendation Magistrate Judge Elizabeth A.
Stafford denied the request. Judge Thomas L. Ludington agreed.
The reason given for denial was the precedent for denying a Motion
for Appointment of Experts Witness. However, an Order to Show
Cause was not done to obtain the facts. The precedent for denying
a Motion for Expert Witness is; (1) the Court will not assist
indigent individuals (2) nor help a litigant prove their case. The
order misapplied the fact scenario to Petitioners case. The facts
in Petitioners case are distinguishable from the precedent quoted.

On February 6, 2017 the Petitioner's entire case was dismissed
with prejudice.

REASONS FOR GRANTING THE PETITION

SHOULD A MAGISTRATE JUDGE, WITHOUT EXTENDING THE DEADLINE FOR DISCOVERY, ACCEPT DISCOVERED MATERIAL AFTER THE CLOSE OF DISCOVERY WITH NO JUSTIFIED EXPLANATION?

Did the Petitioner have the right to rely on Mr. Burris's sworn testimony from a deposition. Mr. Burris's answers seemed vague so the Petitioner was uncertain if she could rely on his testimony. This uncertainty made the Petitioner file a formal motion for Evasive Answers under Rule 37 of the Fed. R. of Civil Procedure. In an order denying the Petitioner's Motion the Magistrate reassured the Petitioner her assertions about Mr. Burris were wrong. The Court ruled in Peterson v. Burris 2019 U.S. Dist LEXIS 50159, "In her first objection, Peterson "begs to differ" with the magistrate judge's conclusion that Defendant Burris did not give evasive or incomplete answers during his deposition in stating that he did not recall if it was raining on August 27, 2012, and did not recall who worked in the set-up department in 2012. As noted by the magistrate judge, there is nothing extraordinary about the fact that Burris could not remember events that took place over three years ago, and the circumstantial evidence did not suggest Burris was being evasive within the meaning of Rule 37(s)(4)." The Order was dated for April 14, 2016.

Before denying Petitioner's Rule 37 Motion the Court had in its possession a sworn statement from Mr. Burris. His memory had been refreshed. On March 24, 2016 in a sworn affidavit Mr. Burris

said,

5. Plaintiff alleges that I discriminated against her in violation of her fourteenth amendment equal protection rights by demoting her and another black inmate, Jones, from their lead positions and taking away their lead pay while also demoting another white prisoner employee, Lemons, but allowing her to keep her lead pay. This is incorrect. I reviewed Janae Jones (#266195) file, and Jones was not demoted or reassigned. She requested that she be assigned to the Shipping & Receiving Department. Shipping & Receiving is a desirable position because it has more time in between tasks and it allows that person to bounce around to other Departments to broaden their skill more quickly than rotating through other areas. Jones' release date was getting close and we wanted to accelerate her progress in time for parole."

Despite the assurance of the Court that Mr. Burris's answers were not evasive and the evidence presented by the Petitioner was to circumstantial to prove that Mr. Burris's answers were evasive the Court issued an Order Denying Evasive Answers under Rule 37(a)(4).

After the close of discovery should previously undiscovered material be admissible? It is well settled in Softel Inc., v. Dragon Med & Scientific Comm'rs, Inc., 118 F.3d 955, 961 (2d Cir. 1997), "When assessing a late disclosure the court must consider (1) the party's explanation for the failure to comply with the discovery order, (2) the importance of the testimony of the precluded witness, (3) the prejudice suffered by the opposing party as a result of having to prepare to meet the new testimony and (4) the possibility of a continuance." None of this was done. Mr. Burris's sworn affidavit was just accepted by the Court.

Should the Petitioner be held to answer to an affidavit that used information obtained after the close of discovery. If not but

for Mr. Burris's employment with the State of Michigan he would not have been able to access prisoners employment files. Prisoner's employment files are kept with the classification director. The Classification Director works in another building The Petitioner definitely suffered prejudice when the Court accepted the Respondent's sworn affidavit. If not but for said affidavit Mr. Burris would not have been able to prove he did not commit an Equal Protection violation nor a Deliberate Indifference violation. The Petitioner's should only have to defend against information obtained during discovery.

Are prisoners entitled to the use of Fed. R. Civ. Proc. as other litigants? In the case of Kirby v. Blackledge 530 F.2d 533 (4th Cir. 1976) it states, "Pro se litigants are entitled to the use of discovery procedure on the same terms as litigants represented by counsel." The federal courts discovery rules are based on the idea that justice is best served if each side knows what the other side will try to prove. In the time prescribed for discovery the Petitioner used interrogatories and a deposition to discover information from each Respondent. The Petitioner was unsure about many of Mr. Burris's statements but was reassured by the Courts that I could rely on them. The Petitioner had every right to rely on what she knew was said at the deposition. As with Softel the Petitioner had every right to know in advance of any witness statements. As in Softel when the expert witness statements were not disclosed in a timely manner they were inadmissible as testimony. The decision in Peterson's case in the 6th Circuit is clearly in opposition to the Plaintiff's case in the

2nd Circuit. The Petitioners case clearly goes against precedent.

IF A JUDGES OPINION ONLY REFLECTS THE PRECEDENT
AND NOT THE FACTS DOES IT DENY THE PETITIONER THE
SEVENTH AMENDMENT RIGHT TO A TRIAL?

The FRE 706 governs the Appointment of Experts. The precedent used for deciding a Motion for Appointment of an Expert is as follows; Although appointment of an expert is within the Court's broad discretion, Dodson v. Wilinon, 304 F.Appx. 434 443 (6th Cir. 2008), such appointments are rare and are reserved only for those instances where expert testimony is necessary to aid the Court's fact-finding, Ledord v. Sullivan, 105 F.3d 354, 358*7th Cir. 1997) ("Generally, if scientific, technical, or other specialized knowledge will assist the trier-of-fact to understand the evidence or decide a fact in issue, a court will utilize expert witnesses."). Importantly, rule 706 is not meant as a vehicle for the Court to assist the plaintiff in proving her case against the defendants. Tangwell v. Robb, 2003 WL 23142190, *3-*4 (E.D. Mich. Dec. 23, 2003) ("Indeed, the appointment of an expert witness for the plaintiff in this case under Rule 706 would be tantamount to the Court assisting the plaintiff in proving his case against the defendants."). In the same vein, 28 U.S.C. 1915, which governs cases brought in forma pauperis, "does not provide for the appointment of an expert witness to aid an indigent litigant." Padraza v. Hones, 71 F.3d 194, 196 (5th Cir. 1995). The same precedent was used to decide Petitioner's case. Yet the precedent in the Order misapplied the fact scenario in Petitioner's case. The facts in Petitioner's case are distinguishable from the precedent quoted.

Did the sobering effects of FRE 706 make the MDOC resort to un-fair play by refusing to let its prisoner see an expert witness? It has been said that the availability of the FRE 706 in and of itself decreases the need for resorting to the Court to appoint an expert. The ever-present possibility that the judge may appoint in any given case will exert a sobering effect on the expert witness of a party and upon the person utilizing his services. The bedrock of prison philosophy is that its prisoners are to do "hard-time." MDOC was not going to let anyone show how all that "hard-time" affects its prisoners health.

Did the Court commit reversible error when it did not do an Order to Show Cause as required by FRE 706. If an Order to Show Cause is a procedural tool to ensure due process then in Sibbach v. Wilson & Co., 312 U.S. 1, it states, "If the matter involved in the order is one of procedure, then it is controlled by the Rules of Civil Procedure." In initial filings the Petitioner filed an Application to Proceed without Pre-payment of Fees and Costs. The Honorable Thomas L. Ludington ruled in Peterson v. Burris, 2014 U.S. Dist. LEXIS 126824 stating, "Although Plaintiff allegedly lacks funds to pay the filing fee for this action, she states that she received \$33,763.31 from a lawsuit, that she had \$11,007.11 in a checking account, that she has a mutual fund worth \$5,959.72, and that she has current spendable balance of \$221.27 in her prison account as of August 21, 2014 when an administrative officer at the prison certified her financial statement ... The available financial data provided by Plaintiff has not established indigence." The Court had before them a financially able party who

could not obtain an expert witness. Also, a capable inmate who is the only female prisoner in Michigan to ever depose various MDOC staff on her own. Instead the Court used precedent to deny Petitioner as indigent and in need of help to litigate her case. The Court's had this information to draw upon in its decision making process but did not use it.

If truth and fairness are not to be sacrificed, the judge must be more than a mere spectator. He should exert control over the legal proceedings. Through analogy the Courts have always said effective assistance of counsel is not a seventh amendment right. The Courts will not visit the sins of one counsel on another counsel. The litigant's only recourse is to file a legal malpractice claim. But when a Petitioner moves the Court saying that one counsel has interfered in such a way as to deny one counsel independent decision making. Thus making her counsel for herself ineffective. All be it, the counsel is pro se, none the less she is counsel for herself. In the case of Gader v. U.S., 425 U.S. 80, the prosecutor asked the judge to order the Petitioner and his counsel not to have overnight discussions because by chance they might discuss the case. The Court granted certiorari, "to consider whether a trial court order directing petitioner not to consult with his attorney during an overnight recess, called while the petitioner was on the stand as a witness and shortly before cross-examination was to begin, depriving him of the assistance of counsel." Truth and fairness should not be sacrificed to uphold an erroneous decision. The government interfered with the pro se counsel's decision making when it would not let its prisoner see an

expert witness.

Finally, the Order Denying Appointment of an Expert Witness never discussed the complexity of the medical issue before the Court. The Court insisted that the Petitioner had high blood pressure for years. That is odd when the Petitioner was never told so. Would not a person needs to know if they have a disease or not. I have never heard of the Attorney General being able to give a medical diagnosis before the doctor does.

IF A DESIGNEE UNDER RULE 30(B)(6) REVEALS A
DIFFERENT POSITION ON A TOPIC THAT AT THE
ADMINISTRATIVE PROCEDURE IS THIS FRAUDULENT
CONCEALMENT?

Does not the PLRA exhaustion requirement say, "No action shall be brought with respect to prison conditions under [42 U.S.C. 1983] ... or any other Federal law, by a prisoner confined in a jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Exhaustion also requires a party to proceed through the entire process correctly and pursue the process all the way to a final decision on the merits of the entire controversy. During the exhaustion process MSI area manager always said, "MSI operation and work manual states, three counseling memos in a six month period will result in termination." After reviewing counseling memos and inmate file, termination was warranted." Prisoner was a disruptive force to supervisor and inmates in work area." (please see attachment **B**)

Should the Courts have held MSI accountable for its representative answers at the deposition? under Rule 30 when MSI designated Mr.

Burris as its representative he was not giving his own personal opinion but rather MSI's position on the topic. Mr. Burris swore when asked did he witness the argument with inmate Lemon's which resulted in first counseling memo, Mr. Burris response for MSI was, "No, I didn't." He goes on to say,

"I was informed by my supervisor, Jeff Barrett, over the I interviewed the inmates, and took statements from them.

When the Petitioner again asked Mr. Burris as the MSI representative why did he write me a third counseling memo for having a bad attitude he goes on to say,

"the situation with you and the other inmates had gotten to the point to where it had just created to tense a work environment. And at the request of the other line leader inmate line leaders they asked me to do to do something about it."

However in the case of Starlight Int'l, Inc., v Herlihy 186 F.R.D. 626, 638 (D. Kan. 1999) the Court held, "holding a corporation has a duty under Rule 30(b)(6) to provide someone who is knowledgeable in order to provide "binding answers on behalf of the corporation.").

Under Michigan law, an affirmative action by a defendant which has the effect of fraudulently concealing the petitions cause of action in effect tolls the statue of limitations. As in the case of William v. Hartje, 827 F.2d 1203 this is the case of a 1960's jail death. It states, "Federal civil-rights actions are subject to the statues of limitations of the state in which suit is brought ... It can not be said that the plaintiff failed to exercise due diligence in not discovering this alleged cover-up, because their

only possible source of information was locked up in the mind of Charles Hackney and remained there until he was ready to come forward with his story ... which he did in 1984."

Did the deposition discover fraud thus affecting the running of the statue of limitations. MSI did not reveal its true stances on the Petitioners three counseling memo's until the October 14, 2015 deposition. Throughout the administrative procedure the Petitioner always said Mr. Burris after being on sick leave for months just returned to work and wrote her a counseling memo. Also, that she never said a word to anyone on the day she received her third counseling memo. Had Mr. Burris admitted to those things the Petitioner would have received her job back and we would not be here today. Does this new information estoppel MSI from claiming the one year statue of limitations in Michigan for Libel and Slander. In fact, the Courts never ruled on MSI only on Mr. Burris. MSI was given immunity regardless of his statements at the deposition.

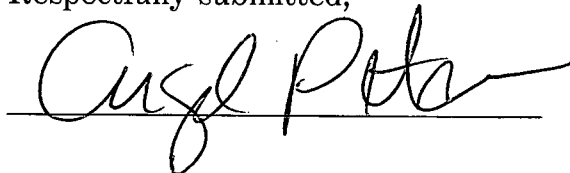
This issue is one of importance because the President of the United States ran and won on the platform that (1) the government needs to "clean the swamp," (2) That is is important who the judge is and (3) That not all judges are acceptable. Everybody wants to be treated fairly. Be it a prisoner or not. But especially a prisoner because our civil rights litigation is so heavily criticized by everyone. Congress lead by Newt Gingrich took up a whole piece of legislation to monitor it. If all that I say just happened to me is that fair when I played by the rules.

While reading a book it stated the best way to gather information is by oral depositions. I did this. It cost a lot of money. Yet it seems like no one is looking at the answers. Is justice only for the those whom have professional attorneys? Is the not also for those whom chose to so bravely represent themselves?

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Angel P. Pota", is written over a horizontal line.

Date: March 7, 2018