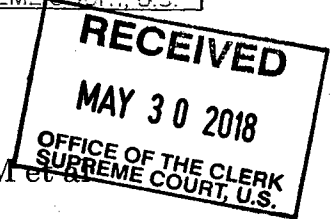


No. 17A1087

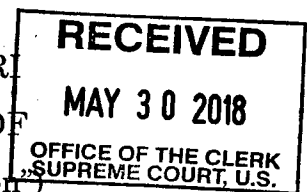
In The Supreme Court of the United States

Purushottam C, Kalola "Petitioner" "Kalola" "Plaintiff" v. IBM et al
"Respondent(s)" "Defendants"



CONFIDENTIAL DUE TO THE HEALT DOCUMENTS

See **Exh#1**. LETTER MOTION #1 TO STAY (PUT IT ON HOLD 17A1087) 17A1087 TO FILE A PETITION FOR WRIT OF CERTIORARI UNTIL APPEAL COURT'S 90 DAYS FROM THE FINAL DESCISON OF THE "RECALL TO MANDATE MOTION" (and "Evidence Hearing Motion") THAT KALOLA FILED Feb 22, 2018 AND IT HAS BEEN PENDING .



MOTION # 2 if Possible to Save Supreme/ Appeal Court Time and Tax Payers Money etc..See Exh #2 Supplements of Recall to Mandate Motion.

Kalola prays to grant this Motion because Court and Defendants' deprived Court Lawful Functions and Deprived Kalola's Civil and Constitution Rights in the 13CV7339 and 17-2543 DOC 40 Claims by dismissing Kalola 13Cv7339 DOC 224 and 225 Illegal Summary Judgements by dismissing 10s of Genuine Material Facts Difference that Jury must decide per Summary Standards per Castelluccio vs IBM 09-CV-01145TPS \$3.7M Jury Verdict Case DOC 108.

Also, District Court said that Kalola does not have money about Depositions that Court granted to take Depositions of 4 People. Later they denied. Court also selling Depositions by asking Defendants (Big Law Firm) "how many Depositions do you need..." during Discovery. The Federal Courts are Sale People Big Law Companies in the New York Area. Appeal/District/Favorite

Defendants Attorneys intentionally and willfully deprived (from 2015 to 20160) Kalola's Civil and Constitution Rights and Court's Lawful Functions to use Illegal Summary Judgement 13CV7339 DOC 224/225. These must be stopped from today across the USA Federal Courts by mailing a Court Order to all the Courts.

MOTION #3

Kalola, Employment Case Subject Matter was a President of AT&T Asian Dallas-TX Chapter in 1990s to stop the discrimination/retaliations/harassments / job transfers etc..

The 13CV7339 Very Complex DOC 1 and 6 Exhibits, 15 A to U Exhibits, 39, 46, 60, 88, 92, 163, 171, 177, 199, 210, 215, 216, 217, 224 and 225; and see 10s of Genuine Material Facts Direct Evidences (Audio Recordings, Emails, On Line Chat etc..) for the Jury Trial.

Sr. Federal judges criticized Summary Judgement at the NY Law School-NY (2012) at the "Trial by Summary Judgement or Trial by Jury" Sessions.

Kalola has Video of the Supreme Courts.

COURT CRIME: Appeal Court and/or District Court forced the NY Law School to remove all the Videos from youtube.com in 2018 when Kalola gave to the 2nd Circuit Appeal Courts Judges. They retaliated against Kalola.

**TO FILE A PETITION FOR WRIT OF CERTIORARI
AGAINST APPEAL COURT 17-2543 DOC 88 (Denied on Jan 14, 2017.
Final Decision DOC 89).**

See also claims in the Appeal 17-253 DOC 40, 40-1, 40-2, 40-3

AND

**DISTRICT COURT'S 13CV7339 (Kalola vs IBM et al) ILLEGAL DOC
210 ILLEGAL SUMMARY RECOMMENDATIONS, 224-ILLEGAL**

**SUMMARY JUDGEMENT, and 225-ILLEGAL DISMISSAL COURT
ORDER BECAUSE KALOLA IS PRO SE INDIAN AMERICAN ETC..**

**THESE MUST BE REVERSED AND JURY TRIAL MUST BE
GRANTED BY THE SUPREME COURT AND GRANT ALL 13CV7339
and 17-2543 DOC 40 MOTIONS/ DEMANDS.
KALOL WILL WIN THE JURY TRIAL BY 90% DUE OVERWHELMING
DIRECT EVIDANCES.**

By

Purushottam C. Kalola Pro Se Indian American, Petitioner

23C Surrey Lane, Wappingers Falls, NY 12590.

To the Honorable (Justice) of the (Court of the above circuit):

Background

**See 13CV7339 DOC 171 and 177-Kalola is HERO to help all the Courts
in the USA to save Tax People's Billions Dollars across the USA .**

**Please sent 13CV7339 DOC 171 and 177 of Kalola to all Federal/
States Courts across the USA to save Court and all people's time and
money.**

**This 13CV7339 is very complex #1 Employment, ADA and Court's and
Defendants Misconducts-Frauds Upon the Court etc.**

**This case is for the wellbeing of all the Americans and all
Communities and all Governments in the USA.**

1. Please accept Kalola's apology due to the Plaintiff's Poor Writing Skills due to his health issues since 2010 to now.
2. Kalola is considering to File a Lawsuit against Jackson Lewis PC and IBM because they deprived Court's Lawful Functions and Kalola Civil and Constitutional Rights by lying about the Similarly Situated Employees, Defamations Claims, etc..for \$100M, Dismiss Attorneys Law Licenses etc...
3. Kalola was considering to file Lawsuit against Justice Department, the USA, Judge Vincent Breccitti, Judge Lisa Smith (and Appeal Court Judges) to help all Fellow Pro Se Poor Americans because they used intentionally and repeatedly from 2016 to 2017 favoritisms to the IBM et al's Attorneys Fellow Bar Members by intentionally discriminating, retaliating, and harassing Pro Se Poor Kalola Indian American.
 - a. See 13CV7339 1, 15, 22, 39, 46, 60, 88, 92, 112, 171, 163, 177, 199, 215, 216, 217, 210, 224, 225. Kalola never used Type Writer on Documents.
4. Motion #2 to Grant Jury Trial or Forces Settlement with IBM \$150B Rich Defendants per due 13CV7339 is extremely complex for the Courts and Attorneys.

i. But, extremely easy for Kalola if the Supreme Court Grant the Jury Trial per Recall to Mandate Supplement. See Exh #2.

b. Kalola will WIN the Jury Trial due to the power of his Super direct evidences (Audio Recording, Emails. Jury Stories have been ready since 2012 etc..).

5. Kalola requests to put Application # 17A1087 on hold until the 90 Days from Final Decision on Kalola's Recall to Mandate Motion (see Attached Letter from Appeal Court) that has been Pending at 2nd Circuit Appeal Court since Feb 22, 2018.

a. This is to save the Tax Payers Money, Supreme Court Time and to save Kalola's Time due to his Disabilities since March 2015 to 2018.

6. See Kalola Disability and Doctors Letters that Kalola mailed to Supreme Court in March 2018.

7. See Attached Exhibit #1 (and See Recall to Mandate Supplement Motion) Appeal Letter of Recall to Mandate (Pending).

a. If Appeal Court grants the Recall to Mandate and re-open 17-2543, then, Kalola does not have file Writ of Certiorari for Appeal Court 17-2543 DOC 88 (Appeal Denied Feb 14, 2018) and District Court's Illegal 13CV7339 DOC 224 and 225.

8. One of the reasons that Appeal Court Denied and District Court dismissed 13CV7339 Kalola v IBM et al because Kalola was Pro Se Poor American and Kalola was legally disabled since March 2015 to now (and possibly until Kalola dies due to Defendants and Courts' Discriminations, Retaliations, and Harassments during the Discovery from 2015 to 2018.

a. The Federal or any Courts cannot do this.

b. This Super Unlawful and Illegal acts by the Appeal and District Courts.

9. Appeal Court, District Court, and Defendants intentionally and repeatedly (from 2015 to 2017) Deprived Kalola (Plaintiff Pro Se Indian Americans) Civil, Constitutional and Courts' Lawful functions by working with Courts' Favorite Attorneys during the Discovery.

10. Appeal Court, District Court, and Defendants intentionally and repeatedly (from 2015 to 2017) Deprived Kalola (Plaintiff Pro Se Indian Americans) Civil, Constitutional and Courts' Lawful functions that lied and lied and said from 2015 to 2017 at the following:

i. **The Court believed IBM (Defendants' Attorneys) who misrepresented information by stating that David McCree is only one Similarly Situated Employees under Tom Forsberg (Plaintiff's Department).**

- ii. Plaintiff stated in the ECF 1, 15, 46, Mc, 118, 119 etc..) that Mark Broat, Tom Tempestilli, Roy Galewski, Jane Lake, Peter Mendola, John Bachman are also Similarly Situated Employees (All Caucasians) under the Tom Forsberg (Caucasians) Manager of Kalola.

11. District Court issued 13CV7339 DOC 60-Proceeding Claims; but, Kalola filed many complaints to prosecute IBM's Attorneys, the Courts discriminated and retaliated against Kalola and dismissed Kalola's #1 Employment, Title VII, NY Human Rights, ADA etc.. Case in the entire USA (100s of Genuine Material Facts Super Direct Evidences) using the Illegal Summary Judgements 13CV7339 DOC 224 and 225 and Appeal 17-2543 DOC 88.

12. That is why Kalola filed Recall to Mandate/Reinstate etc. Motions on Feb 22, 2018

a. and other Motions (March 5, 2018) at 2nd Appeal Court-New York to Open 17-2543 for 30 Minutes evidences Hearing with 3 Judges.

b. If Appeal Court, Re-Open 17-2543 Appeal, then, Kalola will not file any PETITION FOR WRIT OF CERTIORARI etc.. in the Supreme Court.

13. Kalola will WIN Jury Trial with the 90% due Kalola 100s SUPER Direct evidences.

- c. New York Federal Court allowed 09-CV-01145TPS Castelluccio vs IBM \$3.7M 8 Day Jury Trial even Castelluccio did not have Single One Direct Evidences.

14. Kalola was treated differently by the Appeal and District Court and dismiss Kalola Employments case and 100s Genuine Material Facts Difference Super Direct Evidences.

- d. See more Kalola's claims in the 13CV7339 DOC 1, 15, 39, 46- Opposition, 60- Proceeding Claims, 88, 92, 90-Fraud, 91-Fraud, 112, 118, 163-Fraud, 171-Fraud, 177-Opposition, 163-Fraud, 199- Affidavit-Direct evidences, 215- Opposition, 216- Opposition, 217- Opposition, 210/224/225-Illegal-Unlawfully-Fraud-Conspiracy by the District Court Judges.

- i. These must be reverse by the Supreme Court to help all Title VII, ADA, ADEA, etc...to help to all Americans across the USA and improve wellbeing of all Americans and all Communities across the USA etc..

15. During the Discovery from 2016 to 2017, the District Court Discriminated, Retaliated and Harass Kalola (MS Electrical Engineer- NJIT-Newark-NJ-1985, AT&T Scientist etc..) because Kalola was Pro Se and Legally Disabled.

16. Kalola also provided his health evidences in the Summary Judgement 100s of Direct Evidences in the USB Flash Drive (2016 and 2017) to District Court and they dismissed all Kalola's 100s Direct Evidences.
- e. The District dismissed all Kalola Pro Se Indian American's 10s Genuine Facts Difference and 100s of Direct Evidences unlawfully.
17. Kalola also provided 3 –Copy of the Summary Judgement 100s of Direct Evidences in the USB Flash Drive (2016 and 2017) to Appeal Court for the 17-2543 around October 2017.
18. Kalola asked District Court-NY about the Judge's Trial on March 19, 2015. Defendants asked to Dismiss and Court granted to Defendants.
19. Kalola was asked for the Jury Trial from 2015 to 2017. Court dismissed 13CV3779 DOC 224 and 225.
20. Kalola has MS Degree in Electrical Engineering, 11 Year at AT&T, 11 Year at IBM, 4 Years at his own IT and Telecom Cost Reduction Services Company. Plaintiff has been an US Citizen since 1987.
- f. Kalola's Job is very complex Engineering Designs, Manufacturing, Manage Customer and Vendors, Complex Math Calculations etc..
21. Per his Doctors (3 Doctors), Kalola cannot do his Job effectively and satisfactorily since 2010 to now.
- g. Kalola is disabled since March 2015 to now with the Concentration, Extreme Anxiety, Sleeping Issues, Memory Loss

Attacks every day several times, Forgetfulness, Suicidal Thoughts
etc.. since 2010 to now.

h. The Appeal Court, District Court, and Defendants already had
Kalola's Health and Medical Record since October 2013.

i. Then, after Kalola file several complaints. See 13CV7339 DOC
171, 163, 171, 199 etc..

22. See Kalola's Pro Se Rights and Legal Claims and Cases (as US Citizen
since 1987) at this website:

j. <http://voidjudgements.net/articles/PROSERIGHTS.pdf>

23. Kalola pray to Supreme Court to grant Kalola's all Claims, Motions, All
Demands, etc.

24. Kalola apologizes for his poor English Writing due his disabilities from
March 2015 to now.

k. See Kalola's Doctors Letters that he mailed in March 2018 to
Supreme and Appeal Court and Defendants.

25. Thank you and God Bless the USA and all Americans across the USA.

Respectfully submitted,

Purushottam C. Kalola, Pro Se, 23C Surry Lane, Wappingers Falls-NY
12590. Phone: 845-401-2050.