

No. 20-1513

IN THE SUPREME COURT OF THE UNITED STATES

JANE DOE, LUKE LOE, RICHARD ROE, and MARY MOE, individually and on behalf of all
others similarly situated

Plaintiffs,

RAJ K. PATEL

Intervenor-Plaintiff-Appellant-Petitioner,

v.

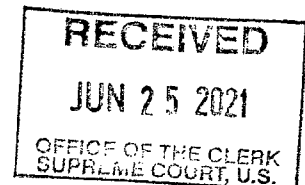
THE TRUMP CORP., DONALD J. TRUMP, in his personal capacity, DONALD TRUMP JR.,
ERIC TRUMP, and IVANKA TRUMP

Defendants-Appellees-Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the
Second Circuit in No. 20-1706, Circuit Judges Chin and Parker and
then-Chief Judge Stanceu of the United States Court of International Trade.

**PETITIONER'S MOTION TO RECUSE
ASSOCIATE JUSTICE BARRETT FROM PETITION FOR RE-HEARING**

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IN THE SUPREME COURT OF THE UNITED STATES

JANE DOE, LUKE LOE, RICHARD ROE,
and MARY MOE, individually and on behalf
of all others similarly situated,

Plaintiffs

RAJ PATEL,
Intervenor-Plaintiff-Appellant-Petitioner

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v.

THE TRUMP CORPORATION, DONALD
J. TRUMP, in his personal capacity,
DONALD TRUMP JR., ERIC TRUMP, and
IVANKA TRUMP,
Defendants-Appellees-Respondents

**PETITIONER'S MOTION TO RECUSE ASSOCIATE JUSTICE AMY BARRETT
ON THE PETITION FOR REHEARING (*PRO SE*)**

Petitioner, Raj K. Patel (*pro se*), under 28 U.S.C. § 455(a) and (b)(1), respectfully moves this United States Supreme Court that Hon. Amy Barrett, Associate Justice of the United States Supreme Court, recuse herself from deliberation on the Petition for Re-Hearing for the Petition of Writ of Certiorari, filed under Rule 10, in *Patel v. Trump Corp. et al.* (U.S. 202_), filed on June 15, 2021¹, for the pre-existing knowledge and as a possible witness to the happenings of this event while Petitioner and then-Professor Amy Barrett were both at the University of Notre Dame Law School in South Bend, Indiana.² See *Liteky v. United States*, 510 U.S. 540, 551-553 (1994) (“plain language” argument). See also *Downs v. Bidwell*, 182 U.S. 244, 382 (1901) (“No

1. This Motion for Recusal is filed *pro se* and with protections from *Fed. Exp. Corp. v. Holowecki*, 552 U.S. 389, 402 (2008) (*pro se* filings “are construed liberally and held to a less stringent standard than formal pleadings drafted by lawyers”).

2. Pet. for Writ of Cert., *Patel v. Trump Corp. et al.*, No. 20-1513, p. 16 (U.S. 202_).

higher duty rests upon this Court than to exert its full authority to prevent all violation of the principles of the Constitution.”) and *U.S. v. Lee*, 106 U.S. 196, 220 (1882) (Miller, J.):

No man in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law and are bound to obey it. It is the only supreme power in our system of government, and every man who by accepting office participates in its functions is only the more strongly bound to submit to that supremacy and to observe the limitations which it imposes upon the exercise of the authority which it gives.

Courts of justice are established not only to decide upon the controverted rights of the citizens as against each other, but also upon rights in controversy between them and the government, and the docket of this Court is crowded with controversies of the latter class.

Shall it be said, in the face of all this and of the acknowledged right of the judiciary to decide in proper cases statutes which have been passed by both branches of Congress and approved by the President to be unconstitutional, that the courts cannot give remedy when the citizen has been deprived of his property by force, his estate seized and converted to the use of the government without any lawful authority, without any process of law, and without any compensation, because the President has ordered it and his officers are in possession?

If such be the law of this country, it sanctions a tyranny which has no existence in the monarchies of Europe nor in any other government which has a just claim to well regulated liberty and the protection of personal rights.

It cannot be, then, that when in a suit between two citizens for the ownership of real estate, one of them has established his right to the possession of the property according to all the forms of judicial procedure, and by the verdict of a jury and the judgment of the court, the wrongful possessor can say successfully to the court, “Stop, here; I hold by order of the President, and the progress of justice must be stayed.” That though the nature of the controversy is one peculiarly appropriate to the judicial function, though the United States is no party to the suit, though one of the three great branches of the government to which by the Constitution this duty has been assigned has declared its judgment after a fair trial, the unsuccessful party can interpose an absolute veto upon that judgment by the production of an order of the Secretary of War which that officer had no more authority to make than the humblest private citizen.

In addition to Sections 455(a) and (b)(1) supporting Justice Barrett’s recusal from conference on the already-filed Petition for Re-Hearing, Canon 2B of the Code of Conduct for

United States Judges would support Associate Justice Barrett's recusal because Justice Barrett brings in outside influence (1) by possibly socializing about the matter-at-hand with her former colleagues, my professors, at the Notre Dame Law School, of the on-going battery,³ (2) by receiving an e-mail, from Petitioner, about facts stipulated, in the case-at-hand, possibly in Fall 2017, prior to him withdrawing from the Notre Dame Law School, and (3) by possibly having unethical discussions about the case-at-hand, which lays through four presidencies or more (e.g. George W. Bush, Barack H. Obama, Donald J. Trump, President Joseph R. Biden, etc.), by material facts for recusal emerge, saliently, under President Trump, while Hon. Barrett was vetted by then-President Trump and his Administration, including Respondents Ivanka and Don Jr. and possibly Respondent Eric, for nomination to United States Senate for confirmation to her incumbent position as Associate Justice of the United States Supreme Court.⁴

If the allegations stated in the Petition of Writ of Certiorari are true, Respondent Donald J. Trump and Associate Justice Barrett possibly have broken United States treaty on political succession against Petitioner,⁵ qualify for impeachment, and violated laws of recusal and Code of Ethics for United States Judges.⁶ Therefore, Due Process⁷ also demands that Associate Justice Barrett recuse herself.⁸

3. *See also* Grievance 23, Decl. of Independence (1776).

4. *See also* Grievances 8 & 9, Decl. of Independence (1776).

5. *See also* Grievance 6, Decl. of Independence (1776).

6. *See generally* International Covenant on Civil & Political Rights (ICCPR), United Nations General Assembly Resolution 2200A (XXI).

7. U.S. const., amends. V and XIV.

8. *See also* Grievances 8 & 9, Decl. of Independence (1776).

CONCLUSION

For the foregoing reasons, I, Raj K. Patel (Petitioner *pro se*), respectfully request this Supreme Court that Associate Justice Amy Barrett recuse herself from conference and deliberations for this case-at-hand, under 28 U.S.C. § 455(a) and (b)(1), the Code of Conduct for United States Judges, and the aforementioned Supreme Court cases.

I waive my right to oral argument.

Dated: June 18, 2021

Respectfully submitted,



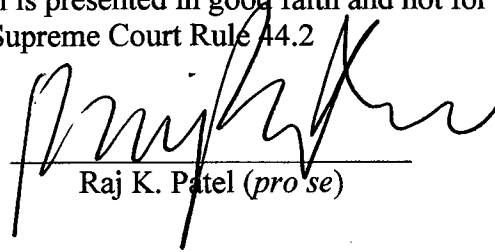
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Pro se

J.D. Candidate, Notre Dame L. Sch. 2021 or 2022
President/Student Body President, Student Gov't
Ass'n of Emory U., Inc. 2013-2014
Student Body President, Brownsburg Cmty. Sch.
Corp./President, Brownsburg High Sch. Student
Gov't 2009-2010
Rep. from the Notre Dame L. Sch. Student B. Ass'n
to the Ind. St. B. Ass'n 2017
Deputy Regional Director, Young Democrats of
Am.-High Sch. Caucus 2008-2009
Co-Founder & Vice Chair, Ind. High Sch.
Democrats 2009-2010
Vice President of Fin. (Indep.), Oxford C.
Republicans of Emory U., Inc. 2011-2012

CERTIFICATION OF A PARTY UNREPRESENTED BY COUNSEL

I hereby certify that this Motion for Recusal is presented in good faith and not for delay,
and that it is restricted to the grounds specified in Supreme Court Rule 44.2



Raj K. Patel (*pro se*)

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RAJ PATEL,

Intervenor-Plaintiff-Appellant-Petitioner

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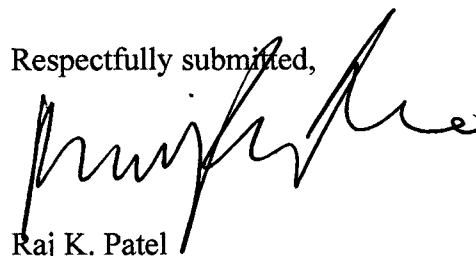
THE TRUMP CORPORATION, DONALD
J. TRUMP, in his personal capacity,
DONALD TRUMP JR., ERIC TRUMP, and
IVANKA TRUMP,

Defendants-Appellees-Respondents

CERTIFICATE OF COMPLIANCE

I, Raj Patel (pro se), hereby certify that, according to the word-count tool in Microsoft Word, Petitioner's Motion to Recuse Associate Justice Amy Barrett on the Petition for Rehearing (*Pro Se*) of 1,026 words, excluding the sections enumerated by Rule 33.1(d). The writ therefore complies with Rule 33.1(g).

Respectfully submitted,



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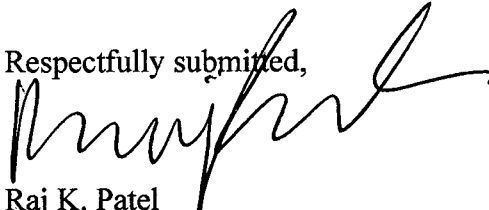
CERTIFICATE OF SERVICE

I, Raj K. Patel (*pro se*), certify I filed the preceding Certificate of Compliance on the Petition for Re-Hearing, by U.S.P.S. mail, and I certify I provided notice of filing to counsel of record below, by U.S.P.S. mail:

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New York, NY 10016-1387
Telephone: 212-210-1244
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Dated: June 18, 2021

Respectfully submitted,



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Pro se