

Cause Number: **24-7055**

# IN THE SUPREME COURT OF THE UNITED STATES

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Willie Lee HavMmeri, Petitioner

vs.

Methodist Health Systems (Dallas), Respondent

On Petition for Writ of Certiorari to the United States Supreme Court

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## Petition for Rehearing

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Willie Lee HavMmeri, Petitioner

- Pro se

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# IN THE SUPREME COURT OF THE UNITED STATES

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Willie Lee HavMmeri (Petitioner)

vs.

Methodist Health Systems (MHS) (Respondent)

## Petition for Rehearing August 12<sup>th</sup> 2025

Pursuant to Supreme Court Rule 44, Petitioner Willie Lee HavMmeri respectfully petitions this Court for rehearing on its June 16<sup>th</sup> 2025 dismissal of Writ of Certiorari in case number: 24-7055

On June 16<sup>th</sup> 2025, I received a letter from the United States Supreme Court in regards to my on going attempt at justice as the plaintiff, Willie Lee HavMmeri, versus the defendant, Methodist Health Systems (**Employment terminated on April 10<sup>th</sup> 2020**).

For reasons unknown to myself as the petitioner, this Supreme Court Dismissal Letter was a one sentence dismissal of my case with no explanation and no instructions to continue further. I believe as a citizen of the United States before the highest court in the land, my pleadings are entitled to liberal construction and explanations towards correction of fault in my argument.

### REASONS FOR GRANTING PETITION

Supreme Court Rule 44.2 states that grounds for a petition for rehearing "shall be limited to intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented." I as the Petitioner present four (4) intervening grounds of substantial or controlling effect:

1. **I ask the Court to Overturn Case Dismissal at the District Court Level and allow for my initial "Right to Sue" from the EEOC to be enforceable with a Retrial at the Federal Court Level.** I ask that the Supreme Court of the United States rule on whether the Federally mandated lockdowns played any significant factor in the equitable tolling of time and the Inaccessibility of the Clerk's Office. If the Justices agree that it did play a significant factor in the timely filing of claims during that tumultuous period, I only ask that I be allowed to file my claim in another Federal District Court. Again, I am not asking the court to rule on the merits of my case as it relates to the Defendant's wrongful termination of my employment, only that the

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court reviews my case, hear my objections and determines whether dismissal should be overturned based on the facts I am to state. If overturned, I simply request a new “Right to Sue/Rehearing” in another court.

2. **I have seen very little evidence that a pro-se plaintiff can successfully bring a case to trial.** From the US District Court level, to the US Courts of Appeal Level to, now, the US Supreme Court Level, I have yet to interact nor physically stand before an actual human being with decision making authority and present my case. From the year 2020 (filed with the EEOC) until currently 2025, each and every instance of my attempts at seeking justice have been fought via qwerty keyboard and electronic filings. My request to conference with my District Court Magistrate Judge (Rebecca Rutherford) and my District Court Assigned Judge (Ada Brown) before dismissal were either categorically denied or outright ignored. From the TWC (Texas Workforce Commission) Unemployment Appeal verdict (unemployment benefits granted), to the EEOC (Equal Employment Opportunity Commission) Case Worker (Dismissal with “Right to Sue” Letter & Instructions) to the District Courts to Appellate Courts to the Supreme Court, I have yet to stand before any human beings nor interact with any human beings to make arguments as to why my case should move forward. Any my case (before this Supreme Court) is very simple and an easy point to make, which brings me to point two (2).
3. **The Pandemic of 2020 negatively affected the ability to timely file documents before the courts.** My case was dismissed at the District Court level, not because I failed to state a claim (as the Defendant Methodist Health petitioned the Court) but for having to file by fax to the EEOC on the 181<sup>st</sup> day and missing the 180 day deadline. Again, this has been explained at every court level that **\*ALL GOVERNMENT INSTITUTIONS AND FACILITIES WERE SHUT DOWN\*** due to the pandemic. My objection to dismissal clearly stated that according to the Federal Rules of Civil Procedure, the Inaccessibility of the Clerk’s Office must allow for **\*EQUITABLE TOLLING OF TIME\*** The very document used to dismiss my case by the defendant (my Initial Claim before the EEOC) was clearly dated September 28<sup>th</sup> 2020, which was well before the 180 day deadline. **\*I mailed this Initial Claim to the EEOC on September 28<sup>th</sup> 2020\***. After a week of calling the Dallas Branch (my home location) and getting no answers, I finally found the National Number online called the national number where after a 6 hour phone wait, I was given a fax number where the very next day (the 181<sup>st</sup> day) I was able to locate a fax facility in my city that was open, despite Covid-19 restrictions and resend the document I had mailed weeks earlier. Which brings me to point three (3).

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4. **The EEOC “Right to Sue” was never respected by the District Court.** Upon being granted a right to sue, I was given instructions on timely filing of my claim before the U.S. District Court, which I did with no issue. Neither the Defendant nor their Legal Team made any argument that my claim was invalid because of the aforementioned 181<sup>st</sup> day to the actual EEOC when they were doing their investigation. This can be easily proven by reading through their 64 page “Position Statement” to the EEOC. Again, nowhere in their history with this case with the EEOC did MHS (Defendant) argue that the case should be dismissed due to filing a day late in a pandemic. As the EEOC did, IN FACT, grant the Right To Sue, I only ask that such a Right be respected.

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**RELEVANT CASE HISTORY:**

Texas Workforce Commission – **AWARDED UNEMPLOYMENT APPEAL** (Cause: 262-4641)  
Equal Employment Opportunity Commission – **Granted RIGHT TO SUE** (Cause: 450-2020-06863)  
US District Court of Northern Texas – **DISMISSAL**- Cause Number: 3:22-cv-00594-EBT)  
US Court of Appeals 5<sup>th</sup> Circuit – **DISMISSAL**- Cause Number: 23-10880)  
US Supreme Court – **DISMISSAL**- Cause Number: 24-7055

In each of these cases I have presented overwhelmingly evidence in the pleading stages that I was, in fact, **WRONGFULLY TERMINATED** due to **RETALIATION** for **GENDER DISCRIMINATION**.

Again, not only am I able to prove that my termination alone was wrongful, but I can also prove without doubt that it was retaliatory in nature because of a gender discrimination grievance I filed with the Respondent (MHS).

The EEOC (Equal Employment Opportunity Commission), a government agency, granted me a **RIGHT TO SUE**, that has yet to be respected by any court of law.

I believe that being **SELF REPRESENTED** has limited my ability for my claims to be taken seriously and have called upon the United States of America’s Supreme Court to please **REVIEW** and **REHEAR** my cause, as I have no other means of receiving justice/judgement by law.

**On the following page I shall lay out my claim and ask for further instructions from the court.**

**Initial CLAIM & CASE HISTORY: Wrongful Termination, Retaliation due to Gender Discrimination**

**March 17<sup>th</sup> 2020** – I, Willie Lee HavMmeri (plaintiff), informed my immediate supervisor **\*BY EMAIL\*** of clear and consistent workplace harassment and violence to which I would like to formally file a grievance. I was informed by email reply that the grievance would be investigated and filed.

**April 10<sup>th</sup> 2020** – I was summoned to work on my day off and informed that I would be terminated, effective immediately, for manipulation of financial documents (stealing time). This, despite my clear and convincing evidence to the contrary and the lack of any suspension pending an investigation which was company policy.

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**September 28<sup>th</sup> 2020** – I filed \*BY MAIL\* a complaint with the EEOC for Gender Discrimination, Retaliation and Wrongful Termination. This was by mail due to **ALL GOVERNMENT OFFICES BEING SHUT DOWN DUE TO “STAY AT HOME” PANDEMIC ORDERS FOR NON-ESSENTIAL WORKERS.**

**October 7<sup>th</sup>/8<sup>th</sup> 2020** – Upon constant calls to the EEOC local branch and national hotline to inquire about the status of receiving my complaint, I was finally given a fax number to RE-SUBMIT my initial mailed in claim. This was at the end of the business day on October 7<sup>th</sup> 2020 and, again, during **MANDATORY LOCKDOWNS** in the nation. Page | 4

**December 28<sup>th</sup> 2020** – The Texas Workforce Commission determined that my termination was wrongful and that I was entitled to unemployment benefits. **(Case No: 262-4641)**

**December 2021** – After reviewing the Position Statements by both myself as the plaintiff and Methodist Health as the defendant, the EEOC granted me as the plaintiff the **\*RIGHT TO SUE\*** and informed both myself and the defendant that I would have 90 days to file a formal claim with the U.S. District Court in the county to which this misjustice occurred (Dallas County). **(Case No: 450-2020-06863)**

**March 17<sup>th</sup> 2022** – I filed with the US District Court of North Texas, citing wrongful termination, gender discrimination and retaliation.

**April 27<sup>th</sup> 2023** – Magistrate Judge Rebecca Rutherford recommended **CASE DISMISSAL**, granting the defendant's Motion to Dismiss for failure to state a claim. Judge Rutherford notably cited the failure to submit the claim to the EEOC within the 180 days following termination. Please note: The EEOC received the fax on the 181<sup>st</sup> day. **Assigned Judge Ada Brown APPROVED dismissal.**

**June 2023** – I filed with the US 5<sup>th</sup> Circuit Court of Appeals contesting the case dismissal and arguing **EQUITABLE TOLLING OF TIME** and the **INACCESSIBILITY OF THE CLERK'S OFFICE** to file claims **\*DUE TO THE PANDEMIC AND COMPLETE GOVERNMENT SHUTDOWNS ON ALL INSTITUTIONS AT TIME OF FILING\***

**April 2024** - US 5<sup>th</sup> Circuit Court of Appeals agreed with dismissal, notably citing delivery to the EEOC does not adhere to “Inaccessibility of the Clerk's Office” as the EEOC is not the Clerk of a court.

**June 16<sup>th</sup> 2025** - **United States Supreme Court dismissed my claim in a one sentence letter with no explanation given.**

**REQUEST FOR INSTRUCTIONS FROM THE US SUPREME COURT FOR REHEARING SUBMISSION**

I would like to ask the United States Supreme Court and it's esteemed Clerks for further instructions regarding this submission of Petition for Rehearing.

Upon this filing and future filings in support after further instructions are given, copies of all documents submitted shall be mailed/pdf emailed to the legal team representing the defendant (Ogletree Deacons- John Barcus as counsel).

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I ask the clerks to please provide instructions on any formal format/page limits/copies necessary to ensure full compliance with regards to this filing as a pro-se litigant.

**REQUEST FOR LEGAL ASSISTANCE & DOJ INVESTIGATION**

Upon this filing, I would like to mail a copy to the United States Department of Justice (DOJ) for legal aid and assistance. I would also like to speak with the DOJ and my local congress men/women regarding the percentages of pro-se litigants who are allowed to successfully bring a case to trial \*AS PLAINTIFFS\* in the US District Court of Northern Texas and the 5<sup>th</sup> Circuit Court of Appeals.

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If the Court or the Clerk's office have any resources that can aid in my attempts to obtain legal assistance and my aforementioned investigation regarding pro-se litigants successfully bringing cases to trial in the District Court of Northern Texas and the 5<sup>th</sup> Circuit Court of Appeals, it would be greatly appreciated and I await instructions.

**Conclusion**

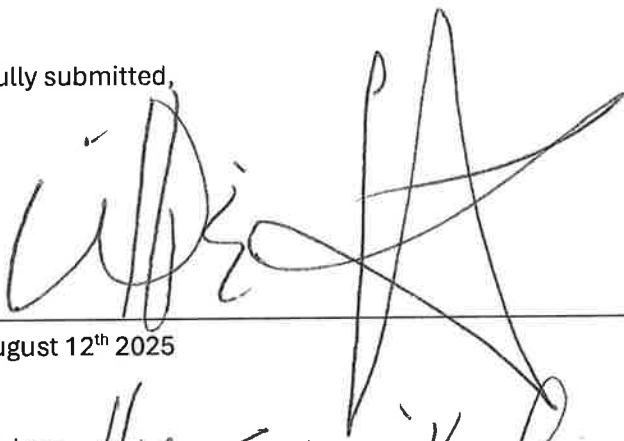
I, Willie Lee HavMmeri, have now fought for over five years simply for the right to face an actual **HUMAN BEING** with decision making authority regarding my wrongful termination. I have attempted numerous times to settle this matter with the defendant peacefully and quietly to no avail. The Courts have been of no help in my attempts to see justice for myself and family.

**I HAVE YET TO MAKE IT PAST ANY "PLEADING STAGE"** of these cases. It is not due to lack of effort.

**I HAVE YET TO FACE ANY HUMAN BEING** in any of these cases from the Texas Workforce Commission to the EEOC to the US District Court to the 5<sup>th</sup> Circuit Appeals to the US Supreme Court level.

This **PETITION FOR REHEARING** should further prove my passion for answers and justice. I have not given up on the Judicial System. If I ever make it past THE PLEADING STAGES, I shall prevail in court. The facts are on my side. I simply need my cause to matter.

Respectfully submitted,



/s/ Willie Lee HavMmeri

Dated: August 12<sup>th</sup> 2025

Originally Submitted July 8th 2025 WA

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## **RULE 44 CERTIFICATE**

Pursuant to Supreme Court Rule 44.2, I, Willie Lee HavMmeri, certify that the Petition for Rehearing is limited to “intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented,” and that the Petition is in good faith and not for delay.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2025.



Willie Lee HavMmeri, Petitioner