

\_\_\_\_\_ The Supreme Court Of The United States, Reina Tea Wood-Jimenez. "On petition for Rehearing Rule 44 for to a writ Habeas Corpus e.g. 24-7438 for to." The United States Court of Appeals 24-6878 28 U. S. C. § 2403(a) may also apply and shall be served on the Solicitor General of the United States, Room 5616, Department of Justice, 950 Pennsylvania Ave., N. W., Washington, DC 20530-0001

No. \_\_\_\_\_

**IN THE SUPREME COURT OF THE UNITED STATES**

**Declaration Of In Compliance**

28 U.S.C. § 1746 and to Rule 29, 44 as required by the Supreme Court of The United States, I certify and I declare under penalty of perjury the foregoing is true and correct .

\_\_\_\_\_  
In re: Reina Tea Wood-Jimenez

**Affidavit of Compliance**

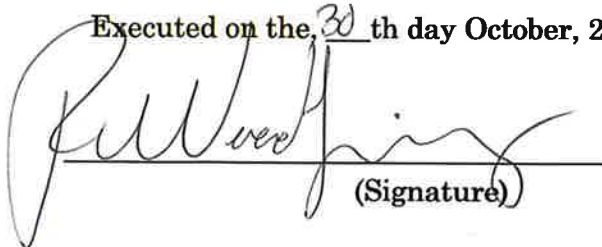
of the Rules of The Supreme Court Of The United States;  
Rule 29 (Filing and service on opposing party or counsel) when a party is unrepresented by counsel.service is made personally or by mail or commercial carrier.

Rule 29.4 Service shall be made onto the Solicitor General  
Rules 33.2 and 34 (Preparing pleadings on 8 1/2 x 11 inch paper)

Rule 39 (Proceedings in forma pauperis)

Applicant to proceed in *Forma Pauperis* as stated in Rule 39  
And in the form of a petition for Rehearing Rule 44, issues on the merit e.g to the petition 24-7438

Executed on the, 30 th day October, 2025

  
(Signature)

## Petition For Rehearing

This petition for rehearing prays the court to reconsider its own decision to deny a previous petition for review. To increase this case's chances of winning a petition for review, I would like to focus on critical legal issues rather than the facts of the case, and keep my argument narrow and focused. A petition for review is typically not an opportunity to relitigate the trial. Instead, I will demonstrate why the case warrants the highest court's attention, such as to settle an important legal "Federal Question" or resolve a review of laws and executive actions and strike them down if they are found to be unconstitutional and conflict with court orders.

Question one e.g [24-7438](#)

**This is a Petition for Rehearing; I would like to invoke previously presented petition for Writ of Habeas Corpus e.g. [24-7438](#) "Statement of The Case" as the issues. The appendix of the case to uphold the issues the appendix documentation does fact the legal issues and proves the petitioner's detention by The Department of Motor Vehicles to be unconstitutional and by illegal prolonged detention of 13 years well past their legal authority, unlawful detention. Rule 44 of this court "with the rehearing of any judgment or decision of the court. 'merits' are filed for rehearing within 25 days from denial of Habeas Corpus Petition" The order denying the prior petition of this court entered, On the 6th day of October, 2025. I hereby present reasons and the synopsis provided circumstances affecting the case, the specific request for action and the explanation of why that action is necessary and remedies cannot be resolved in lower court in review in e.g. Petition Of Habeas Corpus appendix "Related Cases" [24-7438](#) The petitioner had to suffer every court there after the original complaint.**

The original complaint was filed after the revocation period and tolling period was allowed by the law not before. Dated originally filed 2018 Tolling ended

2016. You will read the **department** judge state exactly the revocation begin and end dates on this court's docket.

The Limitation has not expired civilly because [NRS 233B.130](#). **2024 Nevada Revised Statutes Chapter 233B - Nevada Administrative Procedure Act**. The **conflict of the lower court decision** is with an administrative agency, named, The Department of Motor Vehicles and their personal decision to continue to enforce sanctions that conflict with court decisions. They have violated the statutes and violated the rights of Reina Tea Wood-Jimenez.

All the case merit is evaluated based on the evidence and legal arguments presented. In short, it is the core substance of why one party should win and another should lose, based on the facts and applicable law.

Original Complaint filed in the lower district court and thereafter. Each Court has labeled the “**Nature of The Case**” being 440 civil rights and labeled “**Jurisdiction**” as “**Federal Question**”. e.g Petition for Habeas Corpus [24-7438](#) in related cases [2:18cv02344APG-CHW](#) marks the original Civil rights complaint pursuant to [42 U.S.C. § 1983](#).

The “Petitioner” has followed proper lower court procedure to seek remedies under the provisions:

The “Mottley Rule” is a legal principle, also known as the well-pleaded complaint rule, which states that a federal court can only hear a case if the plaintiff's initial complaint demonstrates that the case arises under federal law. It cannot be based on an anticipated federal defense that the defendant might raise. This rule was established in the 1908 Supreme Court case, Louisville & Nashville Railroad Co. v. Mottley.

**Plaintiff's initial claim:** The rule requires that the claim for relief must be based on federal law. The federal question must be part of the plaintiff's cause of action from 28 USC §1331 - The Statutory Component to the Federal Ingredient required and pursuant to a U.S. 42 1983 claim.

For federal question jurisdiction to exist, the requirements of 28 USC 1331 must also be met. This statute gives federal courts jurisdiction only to those cases which "aris[e] under" federal law. 28 USC 1331. This requirement has been found to be narrower than the requirements of the constitution. The Supreme Court has found that a "suit arises under the law that creates the cause of action," American Well Works v. Layne, 241 US 257 (1916), and therefore, only suits based on federal law, not state lawsuits, are most likely to create federal question jurisdiction, Louisville & Nashville R. Co. v. Mottley, 211 US 149 (1908).to satisfy this "The Motley Rule" e.g. Original Complaint filed.

Under Article III of the Constitution, federal courts can hear "all cases, in law and equity, arising under this Constitution, [and] the laws of the United States..." US Const, Art III, Sec 2. The Supreme Court has interpreted this clause broadly, finding that it allows federal courts to hear any case in which there is a federal ingredient. Osborn v. Bank of the United States, 22 US 738 (1824)

*NRS 233B.130 - Judicial review; requirements for petition and cross-petition; statement of intent to participate; petition for rehearing or reconsideration; service; dismissal of certain agencies and persons from proceedings concerning final decision of State Contractors' Board;*

The requirements to proceed in review in this court under the exhaustion of remedies. The Supreme Court of The United States is the next step in remedies. **Jurisdiction:** State the legal basis for the court to hear the case, often citing 28 U.S.C. § 1331 and § 1343 for federal question

jurisdiction, and 42 U.S.C. §§ 1983 and 1988 for the civil rights claim and attorney's fees

2024 Nevada Revised Statutes Chapter 233B - Nevada Administrative Procedure Act NRS 233B.130 - Judicial review; requirements for petition and cross-petition; statement of intent to participate; petition for rehearing or reconsideration; service; dismissal of certain agencies and persons from proceedings concerning final decision of State Contractors' Board; exclusive means.

Key components exhausted as provisions set forth by law and provisions in the ruling of the Breath Interlock Device.

The "merits of this case" refer to the substantive issues and legal rights at the heart of a legal action, based on the evidence in lower court and facts presented, as opposed to procedural or technical matters. Evaluating the merits involves assessing the strength of a legal claim and the potential for success based on the applicable law. A decision made "on the merits" is based on these fundamental issues, after considering the evidence and applying the law, even if minor procedural issues exist in the case as a whole, the lower court wouldn't measure the case to the law.

Keeping this argument narrow and focused on the issues because of the Statute that limits the **Departments** Revocation and statutes that the defense violated, upon Reina Tea Wood-Jimenez the entire time that Reina Tea Wood-Jimenez spent in lower court after the original complaint is the time spent in court that Reina Tea Wood-Jimenez shouldn't have had to Suffered. The United States Constitution filed here today measured with Her prolonged sentence by the **Department** of Motor Vehicles is undeniable Unconstitutional.

**The Department** has violated the "Petitioners" Bills of Rights and came not to support the reason with Public Notice nor Public Record or an ORDER of their said requirement. According to every law in The State of Nevada.

Set forth is a presentation of opinions of the judges of all courts that labeled this case into "federal question" and each court ended without remedies to resolve the issues. The cases cited in the "Related Cases" section of the petition are the opinions of judges who have heard this case but cannot resolve this case. The plaintiff cause of action is [U.S. 42 1983 Civil Rights Act](#) and in the exhaustion of remedies. **e.g. the opinion section of this petition for review under related cases [24-7438](#)**

Provided the opinions in Synopsis and here to the exhaustion of state remedies are the "merits"

Wood-Jimenez v. DMV [2:2018cv02344](#) NEVADA DISTRICT COURT 12/11/2018-12/30/2019. ORIGINAL COMPLAINT and for the "Motley Rule" e.g. Petition for Habeas Corpus 24-7438 in related cases Reina Wood-Jimenez In re: Reina Wood-Jimenez, [0:2023oppri07114](#), U.S. COURT OF APPEALS, D.C. CIRCUIT, 09/11/2023-12/20/2023, Prescribed by Rule 21. Writs of Mandamus and Prohibition, and Other Extraordinary Writs. The outcome of case (LACK OF JURISDICTION)

The petitioner has attempted several times to put on the Breath Interlock Device anyways and has been denied by the vendor installation because, Reina Tea Wood-Jimenez is NOT under supervision of the parole or probation The 3rd party state Breath Interlock installer refused to install the device without proper documentation from the court setting out the stipulations. **NRS 484C.454 Ignition Interlock Program: Establishment; rules and regulations; contracts for services; creation of Account for the Ignition Interlock Program; use of money in Account; administration of Account; fees.**

**Division of Parole and Probation Nevada Pre Investigation Report reported April 12,2012 labeled Presentence Investigation Nevada Department of Nevada Department of Public Safety Reported Division of Parole and Probation p labeled PUBLIC NOTIFICATION REQUIREMENT**



NRS 630.307 and affirmed the documents. -The investigative and supervisory arms of the court in prosecution of criminal sanction and opinion.

Division of Parole and Probation Nevada Pursuant to NRSB176.145. The Presentencing Report, was filed to the Honorable Judge Brent Adams, with the original charges NRS484C.110 and NRS484C.400 and the PENALTIES that the judge can order from. This report also mentions the possibility of a SB277 program and recommended the court

- Probation Term Requirement N/A
- Recommendation of serving time on Probation NO

Parole Packet Information Provided in the petition for writ of Habeas Corpus labeled Expiration of Sentence and Honorable Discharge signed by the warden

The petitioner has followed the review process and no lower court would release sanction on the same evidence claimed here in this court. Original Review opinion e.g. **The Opinion Of Chief Administrative Law Judge, Tom Conner, in for STATE OF NEVADA DEPARTMENT OF MOTOR VEHICLES' IN THE MATTER OF THE BREATH IGNITION INTERLOCK REQUIREMENT OF: REINA WOOD-JIMENEZ, I ) CASE NO: HO CRH 1191** e.g. Petition Of Habeas Corpus appendix A 36-42 states the Department of Motor Vehicles Decision to impose and cites the aggravated party to seek judicial review

**BREATH INTERLOCK DEPARTMENT OF MOTOR VEHICLES STATEMENT OF CASE.** e.g.24-7438 Appendix A pg. 36-42 Read the document to its entirety Appendix A pg.36-42. I would like to address pg. 37 line 17-19 states that the **Department** of Motor Vehicles Hearings **Department** acknowledges that the revocation period began July 24, 2013 and expired June 26, 2016. Chief administrative law judge and his opinion in the matter he said e.g. 24-7438 labeled as the initiating document Appendix

Ap.g.36-42 the opinion, as to, the specific period requirement set forth by NRS Statute when The Breath Interlock is required NRS484c460.6The chief administrative law judge states that there is no doubt that the specific period could have been “more clear” and according to the records the judgment of conviction is not clear of the requirement nor single order for the Breath Interlock Devices is present at the Department of Motor Vehicles. He further states that the hearings department can not release the requirement and defers the petitioner to court for review.

(new information regarding sentence remitter) in cited case in petition

Wood-Jimenez (Reina) vs. State, Appeal from Judgment of Conviction, The Supreme Court of The State of Nevada [No. 61063](#), 06/05/2012-06/04/2013 **Clerk Certificate Judgment, Ordered Adjudged, and opinion Order receipt for remittitur May 6th, 2013 IMPOSITION OF SENTENCE** after Supreme Court of The States of Nevada, The Appeal of Judgment of Conviction The entry of Judgment and Imposition of Sentence is an opinion order “Judgment of Conviction” that was appealed from by the petitioner with remitter from the Nevada Supreme Court allowing the possibility of the SB122 program

Wood-Jimenez v. DMV [2:2018cv02344](#) NEVADA DISTRICT COURT 12/11/2018-12/30/2019 ORIGINAL ORIGINAL COMPLAINT for the “Motley Rule”

IFP denied,, Denied an Attorney

WOOD-JIMENEZ v. DEPARTMENT OF MOTOR VEHICLES NEVADA [1:2023cv01957](#) DISTRICT OF COLUMBIA DISTRICT COURT 07/07/2023-08/31/2023

IFP denied, Denied an Attorney



Reina Wood-Jimenez v. DMV, [0:2020cv15740](#) U.S. COURT OF APPEALS,  
NINTH CIRCUIT 04/21/2020-05/21/2020

IFP denied, Denied an Attorney

Reina Wood-JimenezIn re: Reina Wood-Jimenez, [0:2023oppri07114](#), U.S.  
COURT OF APPEALS, D.C. CIRCUIT, 09/11/2023-12/20/2023 ( LACK OF  
JURISDICTION ) IFP denied, Denied an Attorney

Wood-Jimenez v. **Department** of Motor Vehicles Nevada [3:2023cv00583](#)  
NEVADA DISTRICT COURT 08/31/2023-11/20/2023

IFP Denied, Denied an Attorney

Wood-Jimenez v. **Department** of Motor Vehicles Nevada [2:2023cv01359](#)  
NEVADA DISTRICT COURT- (TRANSFERRED TO RENO) Appealed to  
USSCOTUS 07/07/2023-08/31/2023

IFP denied, Denied Attorney

Wood-Jimenez v. Nevada **Department** of Motor Vehicle Office [0:2024cv063,8](#)  
U.S. COURT OF APPEALS, NINTH CIRCUIT

IFP Denied, Denied Attorney

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Heart of legal dispute by The Administrative agency and their legal  
significance when asking to weigh the law versus the facts presented with  
any merit and all facts appended.

All the procedures in the LAW actually belong to the Court =**court  
discretion**, which are handled separately according to Chief administrative  
law judge and The **Department** is supposed to follow ORDERS.

In the, facted, NON-excluded evidence provided on every court docket and provided in the petition for writ of Habeas Corpus 24-7438 and for review in this court. Facts: The Department of Motor Vehicles only has the, Judgment of Conviction, the Department uses the, Judgment of Conviction to hold Reina Tea Wood-Jimenez in sanctions illegally to enforce the Breath Interlock Device upon Reina Tea Wood-Jimenez it has BEEN 13 years the Department Continues to illegally confines Reina even when the NRS Statute limits the

length of the revocation granting or expiring authority called "Tolling Periods" NRS484c460(6) in the Matter of The Breath Interlock Device.

The entry of Judgment and Imposition of Sentence is an opinion order "Judgment of Conviction" that was appealed from by the petitioner with remitter for to, The Nevada Supreme Court, The remitter states allowing the possibility of the SB122 program for the more The Department does not have any actual orders from the court to issue or enforce the Breath Interlock Device OR it would be made public record as required by the Statute and placed as the defenses evidence in the lower court's proceedings and also on the Departments Records Department for Public Records as required NRS 484c460(6) Not one document supporting the weight of their claim against Reina Tea Wood-Jimenez nor has ever been provided to the court for public record e.g. in the petition marked "Related Cases" as FACT to support the issue presented by me to the "Petitioner". The Issue of the petition.

The Department of Motor Vehicles Statute of limitations in the law that only allows the Department to "tolls" with the offender pursuant to NRS 484c110 with their provision as 484C.480. 6. The running of the period during which a person is required to have an ignition interlock device installed pursuant to this section commences when the Department issues an ignition interlock privilege to the person and is tolled whenever and for as long as the person is, **with regard to a violation of** NRS 484C.110, 484C.120, 484C.130 or 484C.430, imprisoned, serving a term of residential confinement,

placed under the supervision of a treatment provider, on parole or on probation.

Legal rights = Procedure and response on dates provided by the Breath Interlock Device and it's procedural in law

**NRS 484C.460 When court is required to order installation of ignition interlock device; exceptions; installation and inspection; tolling of period for which ignition interlock device required.**

*-. (a) the court is required to immediately prepare and transmit a copy of its order to the Director of the Department of Public Safety. This order must explicitly state that an ignition interlock device is mandatory and the specific period for which it is required. The Director then incorporates this information into the Department's records and notes it on the individual's ignition interlock privilege.*

The only extension of the requirement of the Breath Interlock Device is only the courts to extend the issues and illegal confinement of the **Department** without a court or is the issues presented. 13 years is how long Reina Tea Wood-Jimenez is illegally confined by the **Department** of Motor Vehicles ordered not once; this device is the violation of her rights and she demands release immediately. e.g. question 1 and 2 of the Petition for writ of Habeas Corpus. When taken into the consideration of the court for her release.

**NRS 484C.470 Extension of order to install ignition interlock device; penalties for tampering with or driving without ignition**

**interlock device; probation and suspension of sentence prohibited; plea bargaining restricted.**

1. The court may extend the order of a person who is required to install an ignition interlock device pursuant to [NRS 484C.210](#) or [484C.460](#), to one-half of the period during which the person is required to have an ignition interlock device installed, **if** the court receives from the Director of the **Department** of Public Safety or the manufacturer of the ignition interlock device or its agent a report that 4 consecutive months prior to the date of release any of the following incidents occurred:

(a) Any attempt by the person to start the vehicle with a concentration of alcohol of 0.04 or more in his or her breath unless a subsequent test performed within 10 minutes registers a concentration of alcohol lower than 0.04 and the digital image confirms the same person provided both samples;

(b) Failure of the person to take any random test unless a review of the digital image confirms that the vehicle was not occupied by the person at the time of the missed test;

(c) Failure of the person to pass any random retest with a concentration of alcohol of 0.025 or lower in his or her breath unless a subsequent test performed within 10 minutes registers a concentration of alcohol lower than 0.025, and the digital image confirms the same person provided both samples;

(d) Failure of the person to have the ignition interlock device inspected, calibrated, monitored and maintained by the manufacturer or its agent pursuant to subsection 4 of [NRS 484C.460](#); or

(e) Any attempt by the person to operate a motor vehicle without an ignition interlock device or tamper with the ignition interlock device.

2. A person required to install an ignition interlock device pursuant to NRS 484C.210 or 484C.460 shall not operate a motor vehicle without an ignition interlock device or tamper with the ignition interlock device.

3. A person who violates any provision of subsection

The court holds the burden to order not the Department of Motor vehicles. The only extension order to install a device would be a failure while the device is on and the court would have to order the extension per the Statue. The Department of Motor Vehicles does not have orders of any kind concerning Reina Tea Wood-Jimenez in the matter of the Breath Interlock Device. NOT ONE FORM, from THE COURT giving them ANY extension or original reason to prolong my sentence and hold, Reian Tea Wood-Jimenez, illegally.

Facts = appendix and questions

Issues = claim the "merits" are the core questions of law and fact that must be decided to resolve the case. Preponderance of proof and heavy burdens of the petitioner and most importantly heavy burden of the court and requirement to resolve any question or the explanation definition in law.

Key aspects of the merits of a case

**Substantive issues: Distinction from procedure:** This concept is separate from questions of procedure, form, or

**Factual basis:** A claim has merit if it is supported by facts that make the claim plausible and legally sound.

**Legal significance:** It is a measure of a case's legal significance and worth.

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**Substantive issues:** The "merits" are the core questions of law and fact that must be decided to resolve the case.

**Distinction from procedure:** This concept is separate from questions of procedure, form, or, which are handled separately.

**Factual basis:** A claim has merit if it is supported by facts that make the claim plausible and legally sound.

**Legal significance:** It is a measure of a case's legal significance and worth.

**Judgment on the merits:** A court's final decision is based on the evidence presented and the applicable law, resolving the underlying legal dispute.

**Affidavit of merits:** A defendant may provide this to prove they have a good, substantial defense to the action, based on the facts rather than technicalities.

**Hearing on the merits:** A hearing where the court examines the facts and legal arguments presented by both sides to make a final judgment.



## CONCLUSION

The petition for a writ of <sup>Habeas Corpus Rehearing</sup> ~~certiorari~~ should be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "J. Westling", written over a horizontal line.

Date: October 30th 2025

**Certification Of A Party Unrepresented By Counsel**

**Good faith certification 12 CFR § 747.7§ 747.7 Good faith Certification** and to Rule 44 Rehearing 44.1 on the 6th day of October petition for writ of Habeas Corpus Was denied 24-7438

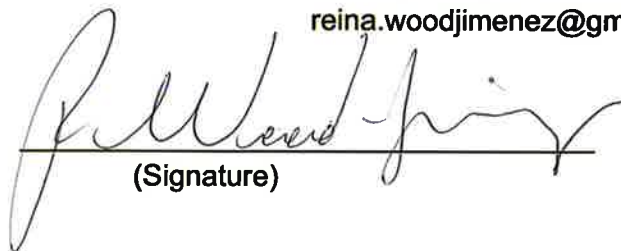
**(a) General requirement.** Every filing or submission of record following the issuance of a notice must be signed by at least one counsel of record in the counsel's individual name and must state that counsel's mailing address, electronic mail address, and telephone number. A party who acts as the party's own counsel must sign that person's individual name and state that person's mailing address, electronic mail address, and telephone number on every filing or submission of record. Electronic signatures may be used to satisfy the signature requirements of this section.

**(b) Effect of signature.**

**(1)** The signature of counsel or a party will constitute a certification: the counsel or party has read the filing or submission of record; to the best of the counsel's or party's knowledge, information, and belief formed after reasonable inquiry, the filing or submission of record is well-grounded in fact and is warranted by existing law or a **good faith** argument for the extension, modification, or reversal of existing law; and the filing or submission of **record is not made for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.**

I, Reina Tea Wood-Jimenez hereby, certify that it is presented in good faith and not for delay.

Reina Tea Wood-Jimenez  
PO BOX 7753  
Washington, DC 20044  
775-240-1587  
reina.woodjimenez@gmail.com

  
(Signature)

No. 24-7438

Petition for Rehearing

IN THE

SUPREME COURT OF THE UNITED STATES

Reina Tea Wood-Jimenez — PETITIONER  
(Your Name)

VS.

Department of Motor Vehicles RESPONDENT(S)

**PROOF OF SERVICE**

I, Reina Tea Wood-Jimenez, do swear or declare that on this date, 11th day of June, 2025, as required by Supreme Court Rule 29 I have served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS and PETITION FOR A WRIT OF Habeas Corpus on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows: The petition for Rehearing on October 30th 2025

<u>Nevada Attorney General Office</u>	<u>Solicitor General of the United States</u>
<u>100 N Carson St</u>	<u>Room 5616 Department of Justice</u>
<u>Carson City, NV 89701</u>	<u>950 Pennsylvania Ave NW</u>
	<u>Washington, DC 20530-0001</u>

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

Executed on October 30th, 2025

Service is Executed Envelope  
Containing the documents in United States  
mail properly address to each as addressed  
above on October 30th 2025

[Signature]  
(Signature)

