

NO. 24-913

IN THE SUPREME COURT OF THE  
UNITED STATES

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NUBIAN NUH MOHAMMED,  
PETITIONER,

v.

UNIVERSAL PROTECTION SERVICE, LLC,  
D/B/A ALLIED UNIVERSAL PROTECTION  
SERVICES,  
RESPONDENT.

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ON PETITION FOR WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF  
APPEALS FOR THE FIRST CIRCUIT

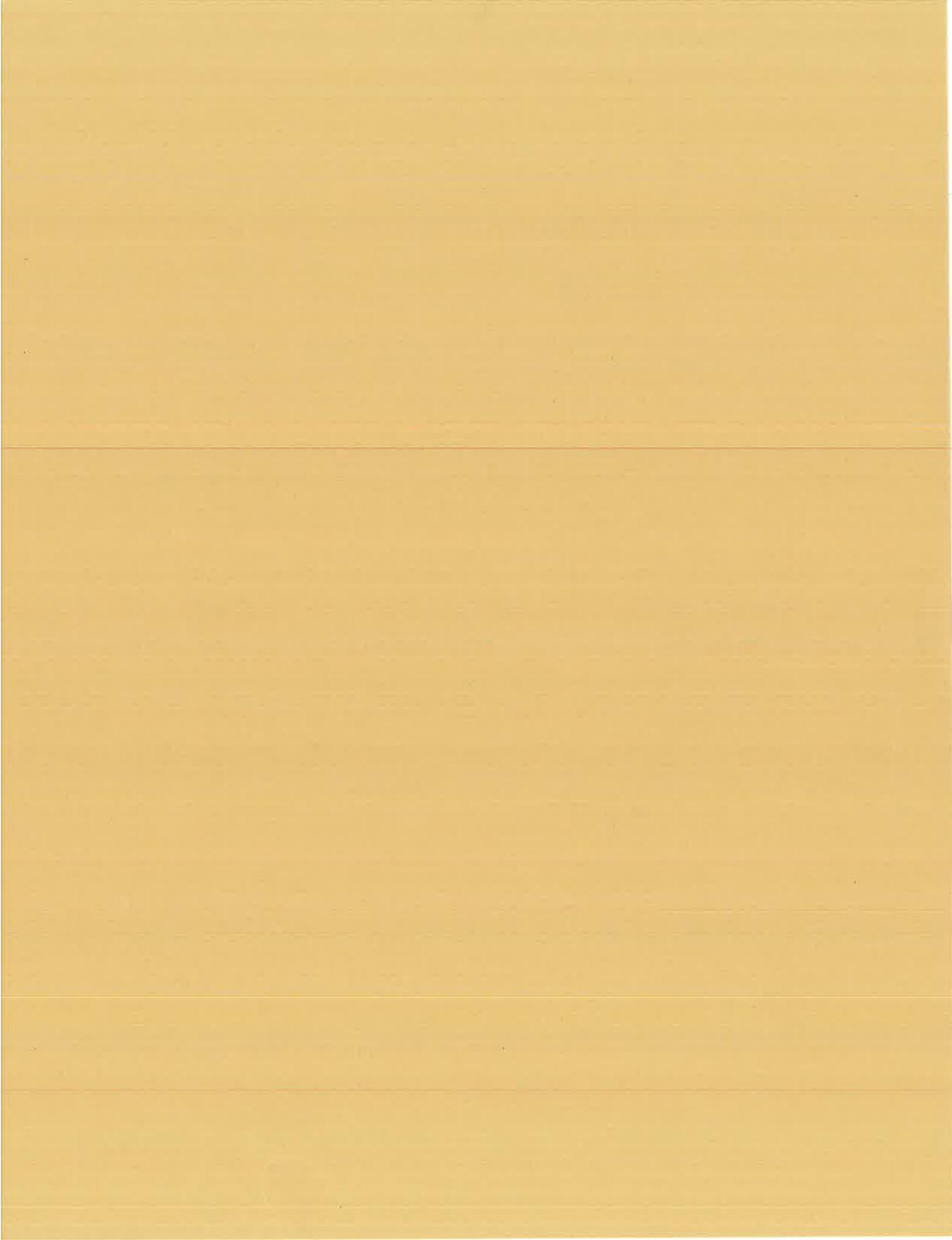
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SUPPLEMENTAL BRIEF FOR THE  
PETITIONER

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NUBIAN NUH MOHAMMED, Petitioner, ProSe, 15

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**MATTER(S) NOT AVAILABLE SINCE THE  
LAST FILING**

Pursuant Supreme Court Rule 15.8, Petitioner submits this supplemental brief in response to the Appeals Court judgment entered March 17, 2025 affirming the District Court dismissal which is an obvious error that took place as is demonstrated by the Appeals Court explanation of the decision and is additionally an obvious proof that the Appeals Court has far departed from the accepted and usual course of judicial proceedings to call for an exercise of this Court's supervisory power (See this Court Rule 10(a)).

The Appeals Court states what includes "We note that, on appeal, Mohammed complains that he should have been given an opportunity to amend his complaint, but he did not seek such

relief before the district court and has not identified any potential amendment to the complaint that might have been capable of curing the deficiencies identified by the district court” which shows the Appeals Court did not perform a thorough de novo review of the petitioner complaint as well as did not perform a thorough review of the petitioner submissions to Appeals Court.

The petitioner requested the petitioner complaint to be amended in District Court before the dismissal of the petitioner Complaint as noted within District Court Case No.1:24-cv-11066-AK Dkt.11 page 16 and the petitioner request was not considered.

Next, at page 23 and page 42 of the Petitioner Brief in the Appeals Court, the petitioner explicitly states District Court Case

No.1:24-cv-11066-AK Dkt.11 page 16 is exactly where the petitioner sought to amend the Petitioner Complaint in the District Court before the district Court dismissal and the Appeals Court has overlooked this fact. Further, petitioner proffered a statement of claim that cured any possible deficiency from the original complaint at pages 45-46 of the Petitioner Brief in the Appeals Court and the Appeals Court has overlooked this fact.

**THIS COURT SHOULD EXERCISE ITS  
POWER**

Unfortunately, and undoubtedly the following has taken place making the petitioner in need of this Courts supervisory power: The Respondent directly or via a representative has violated the E-Sign Act by using the electronic signature of the Petitioner on 20 different

instances without the express consent of the Petitioner, the District Court erred in the dismissal by not allowing petitioner Complaint against the respondent to be amended as requested by the petitioner before dismissal, the Appeals Court did not perform a thorough de novo review of the petitioner complaint as well as the Appeals Court did not perform a thorough review of the petitioner submissions to Appeals Court.

#### **CONCLUSION**

Granting the petition can be and should be done since this Court has jurisdiction for this Petition per 28 U.S.C. § 2101(e) as the petition has been docketed with this Court before the Appeals Court judgement took place in addition to the fact this Court has jurisdiction for this Petition per 28 U.S.C. § 1254(1) as the petition can be granted before or after rendition of judgment.

The United States is in need of having  
precedence set regarding how violation(s) of the E-  
Sign Act are to be dealt with, therefore, the  
petition is of imperative public importance and the  
petition should be granted.

Respectfully submitted,

Petitioner

/s / Nubian Nuh Mohammed

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Dated: March 25, 2025