

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  

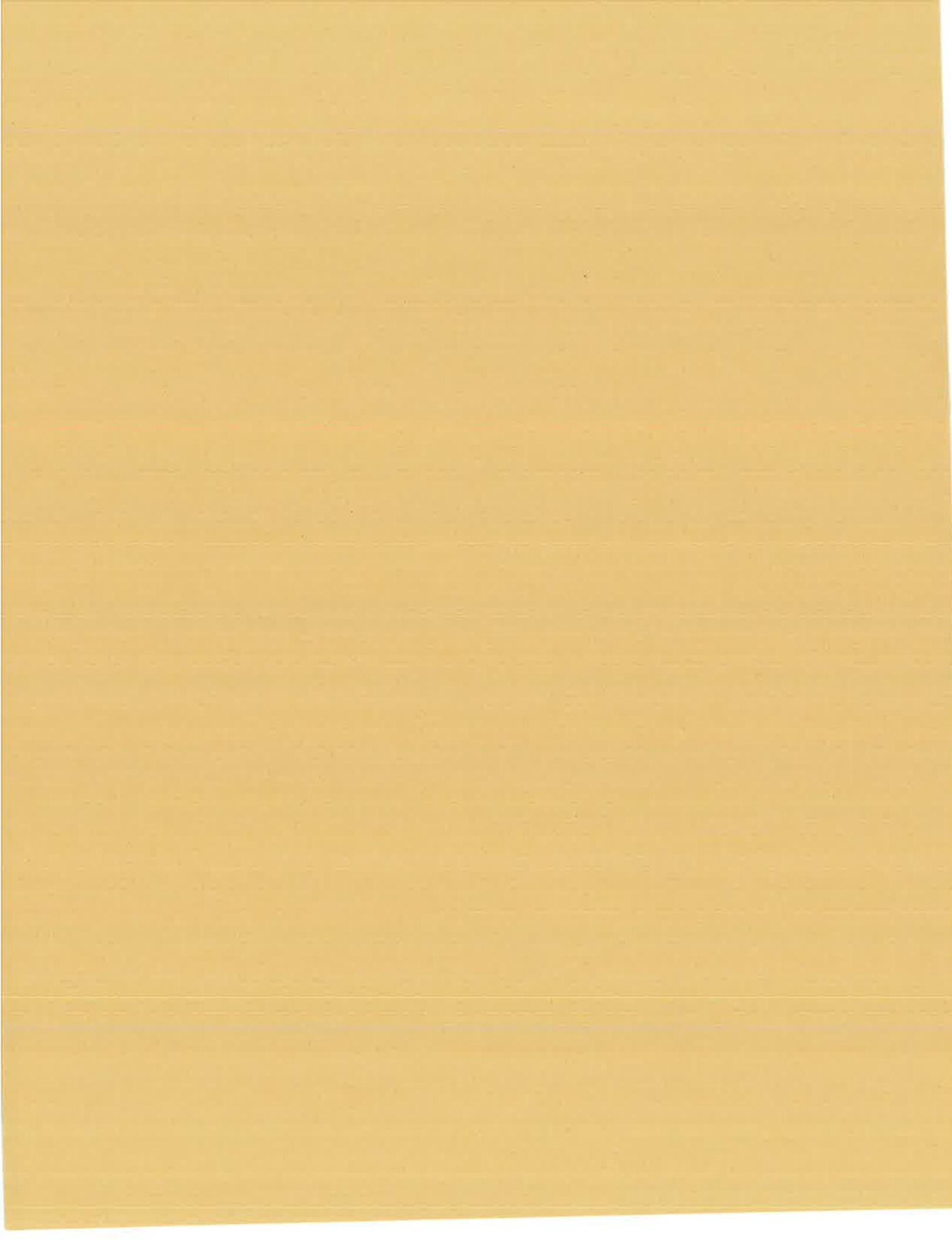
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PETITION FOR REHEARING

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NUBIAN NUH MOHAMMED, Petitioner, Pro Se

15 Charlotte Street Boston, MA 02121, 617-407-3454



## TABLE OF AUTHORITIES

### CASES

*Conley v. Gibson*, 355 U.S. 41 (1957).....2,5

*Jorgensen v. Massachusetts Port Authority*, 905

F.2d 515 (1st Cir. 1990).....4

*Scheuer v. Rhodes*, 416 U.S. 232 (1974).....2

**PETITION FOR REHEARING**

Per Supreme Court Rule 44.2, Petitioner submits this Petition For Rehearing and certifies that this Petition For Rehearing is limited to intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented and that this Petition is presented in good faith and not for delay.

**ESTABLISHED PRECEDENCE OF THIS  
COURT SUPPORTS GRANTING  
CERTIORARI FOR THIS CASE NO. 24-913**

1. This Court has established that “In appraising the sufficiency of the complaint, we follow, of course, the accepted rule that a complaint should not be dismissed for failure to state a claim unless it appears beyond doubt that the plaintiff can prove no set of facts in

support of his claim which would entitle him to relief.” *Conley v. Gibson*, 355 U.S. 41 (1957), *Scheuer v. Rhodes*, 416 U.S. 232 (1974).

2. It is impossible for the Petitioner complaint on its face to appear beyond doubt that the Petitioner can prove no set of facts that would entitle the Petitioner to relief and it is a grave error for the District Court/Appeals Court to make it seem as such.

3. The Petitioner complaint in short states the job descriptions of the Respondent HR Coordinator and Respondent Regional Human Resources Manager demonstrate that the Respondent via *Respondeat Superior* neglected a duty of care toward the Petitioner 40 different times because imitation of the Petitioner electronic signature without the Petitioner authorization took place on 20

different Respondent documents dated from a time in which the Petitioner Nubian Nuh Mohammed as so legally named did not exist; further, this unauthorized imitation of the Petitioner electronic signature has inflicted lasting and ongoing harm upon the Petitioner through a form of PTSD known as emotional flashbacks for the Petitioner when the Petitioner signs the Petitioner signature.

4. Henceforth, on its face, the Petitioner complaint can arguably prove the facts of the Petitioner claims showing that the Petitioner is entitled to relief; the time frame of the legal name of the Petitioner, the Respondent duty of care towards the Petitioner, the ensuing breach of said duty of care, and lastly, the Respondent being the proximate cause to the Petitioner injury, are all together provable facts in

addition to being the elements of a negligence claim (defendant duty of care to a plaintiff, defendant breached the duty, proximate or legal cause, and damage or injury (*Jorgensen v. Massachusetts Port Authority*, 905 F.2d 515 (1st Cir. 1990))).

5. Therefore, the precedence of this Court of “In appraising the sufficiency of the complaint, we follow, of course, the accepted rule that a complaint should not be dismissed for failure to state a claim unless it appears beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief” makes it clear that the Petitioner complaint against the Respondent must not be dismissed.

## CONCLUSION

Accordingly, in light of the general principles of *Conley v. Gibson*, 355 U.S. 41 (1957), the Petition For Rehearing should be granted, the order denying the Petition For a Writ of Certiorari Before Judgment should be vacated and the Petition For a Writ of Certiorari Before Judgment should be granted even if it means doing so without holding oral argument during the latter stage of proceedings.

Respectfully submitted,

Petitioner

/s / Nubian Nuh Mohammed

Nubian Nuh Mohammed

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Dated: June 20, 2025

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UNIVERSAL PROTECTION SERVICE, LLC, d/b/a Allied Universal Security

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**Rule 44 Certificate**

Per Supreme Court Rule 44.2, Petitioner certifies 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 presented in good faith and not for delay.

Per 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 20, 2025.

Petitioner,

*/s/ Nubian Nuh Mohammed*

Nubian Nuh Mohammed

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