

25-104

No. _____

ORIGINAL

Supreme Court, U.S.
FILED

JUL 12 2024

OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

JOE L. ADAMS JR.,

Petitioner

Vs

3D Systems Inc,

Respondent.

On Petition For A Writ Of Certiorari
To the United States Court of Appeals
For the Fourth Circuit

PETITION FOR WRIT OF CERTIORARI

Joe L. Adams Jr.
721 Ogden Rd
Rock Hill, SC
29730
8588487311

RECEIVED

JUL 28 2025

OFFICE OF THE CLERK
SUPREME COURT, U.S.

RECEIVED

APR 24 2025

OFFICE OF THE CLERK
SUPREME COURT, U.S.

QUESTIONS PRESENTED

1. Plaintiff submits agreement to the court that was used to set the Counter claim for the defendant... The plaintiff notes in the order from the judge that she sites information contained in the agreement all aspects except the part of the agreement for arbitration; part 13. Plaintiff contends that the defendant has been allowed "double jeopardy". If the agreement has an arbitration clause the court is ignoring the demand and agreement for arbitration and has commenced proceedings using self-serving excerpts from the Arbitration and Confidentiality agreement. Judge Lewis never made reference to the arbitration clause on the first page and section 13.5. Plaintiff ask if the district court has jurisdiction to enforce the trade agreement past the arbitration clause that was agreed upon and signed prior to any dispute.
2. The plaintiff would like to present a question of jurisdiction. In Order USCA4: 23-1147 Doc

41 the appeals court denied review of appeal 23-1147 due to lack of jurisdiction and on the “Cumulative Finality Doctrine”. Is it applicable, as the appeal was filed in last resort and the orders did not change? The plaintiff submitted appeals and a request for recusal but was denied with no notification from the court for more than the last 8-10 submissions the court never addresses the plaintiffs motions other than denial. All were denied.

3. The Federal District Court in Columbia South Carolina does not allow “Pro Se” litigants to use the ECF System for Electronic Filing Privileges. The mail from Columbia SC to Rock Hill SC has to pass several cities and sometimes can take as much as 6-7 days. The court allows 3 days for delivery of USPS mail. Are Pro Se litigants with Pacer accounts prejudiced as the opposing council received correspondence from the court instantly, sometimes 6 days prior to the pro se litigant waiting to receive the USPS mail especially

during holiday season.. Is it prejudicial for the court to deny Pro Se Litigants ECF notification privileges if they are a party in a case in the Federal District Court of Columbia South Carolina and liable for Sanctions if they don't get the mail?

4. Is it prejudicial for the Federal District Court to ignore pleadings from Pro Se Litigants and not acknowledge the submission to answers to pleadings as if they were never submitted? Is it fair to require Pro Se Litigants to have to repeat the same pleadings over and over because the court is ignoring the submission of pleadings due to Pro Se Status? Plaintiff ask as the court refuses to acknowledge the plaintiff motion to show cause without return but allows the defendant leniency and favoritism always, and always says yes to whatever they ask. Plaintiff ask if it is favoritism because of the prior work history and because Judge Childs is a Legal Partner to Nexsen Pruettt? Is the relationship between

Judge Childs and Nicole Mergo from Nexsen Pruettt 9 years causing problems with favoritism and prejudice? Both Trained and worked together at Nexsen Pruettt with overlapping tenures in the same exact office in Columbia??

5. Is a violation of the plaintiffs Civil Rights under "Color of Law" and of civil procedure Rule 37(e) to collusively hide a plaintiffs pleadings and evidence from the Public and the court through over sealing and concealing submitted evidence? In this case the plaintiffs educational and invention history and so much more information is "sealed" as the court almost erase the plaintiff's whole "heart of the case" by sealing everything it seems. All the education and accomplishments at the company were concealed so Judge Lewis never mentioned anything positive about the plaintiff in her final Order and has shown she hates the plaintiff without merit making

disparaging statements that were not true about the plaintiff in her order.

6. 3D Systems brought a counter-claim regarding trade violation and trade secret violation lawsuit against the plaintiff. The confidentiality and arbitration agreement was used as the basis for all the court proceedings with Magistrate Judge Kaymani West, Judge Childs and Ultimately with Judge Lewis of the District Court of Columbia SC. Plaintiff ask the court if it is prejudicial to allow a Defendant "Double Jeopardy" through ignoring line 13 requiring arbitration? Plaintiff contends that the Trade Agreement that is being unfairly enforced by the court clearly states that "any violation of the trade agreement must be settled through arbitration" but the Federal District Court is not acknowledging article 13 and allowing the defendant to have "Double Jeopardy" and denied the "Jury Trial" that the plaintiff has demanded. Plaintiff ask if "Double Jeopardy"

is permitted because it is a no win for the plaintiff?

7. New discovery of important public evidence of Lawsuits filed connect the plaintiff with The Department of Justice Investigation in the Activities of 3D Systems in Rock Hill SC. The Defendant 3D systems was found guilty of Fraud among a barrage of trade violations and through the publications online and time frame of the violations, connects the plaintiff's employment and location directly to a larger crime involvement discovered by the Department of the State and Department of Commerce, and the Department of Justice cases against 3D Systems of Rock Hill SC. Please see App. 61 – App 75. Plaintiff contends that it was his drawings and technical documentation that were used by the defendant as they were regularly hiding other companies printers disassembled them and steal the technology. Plaintiff made an original invention called the "Versa II". The

defendant stole the invention and denied the plaintiff his right to file for patent as granted with other employees but instead wanted to steal the idea, assault the plaintiff with 3,000.00 medical bills, deny the plaintiff engineer title and be caught by the Department of Defense and the State for the same issues? Plaintiff ask is this prejudice "Under Color of Law"?

8. Plaintiff was denied an upward mobility to an "Engineer" Title for not having the 4 year degree while plaintiff was able to identify 19 coworkers that were Caucasian and had no 4 year degree that were promoted to "Engineer" and were given more pay and more lucrative job benefits due to the Engineer Title but did not have the 4 year degree and some no degree.. but were promoted to "Engineer" due to race. Plaintiff has two degrees and several inventions he has made for the company. The plaintiff proof of education and career accomplishments and Original Inventions

were all sealed by the court and hidden from the plaintiff as they did not appear on the public docket as seen in the sealed documentation submitted in the first entry to the case as supporting evidence but also sealed. The plaintiff contends that he was denied a fair trial due to not having any access to the empirical proof of his accomplishments, education, and skill set in comparison to the Caucasian employees that were allowed "Engineer Titles" with less education but because they were Caucasian they were given preference.

9. Was the plaintiff prejudiced by an all-female defense staff and District Court Female Judge that all worked together for up to 9 years at Nexsen Pruette law firm in the same office located in Columbia South Carolina, not even 1 mile from the Federal District Court building on Richland Steet? Plaintiff ask if Judge Childs should have voluntary recuse due to 9 years employment tenure; from trained as an intern to advancing to the First

Black Female Partner at Nexsem Pruet law firm who is representing the defendant 3D Systems with Nicole Mergo as lead attorney. Is there allegiance for Nexsum Pruet causing prejudicial and is there any way to avoid allegiance if the judge is the first Black Female Partner with the Nexsum Pruet?

10. Is it fair to the plaintiff for the Court of Appeals 4th Circuit to consolidate the separate appeals from the plaintiff and giving blanket judgements without ever directly addressing any appeal. Plaintiff ask if the same judges are ignoring pleadings due to the age of the case and looking to get rid of the case denying the plaintiff oral argument or question? Plaintiff contends Court of Appeals 4th Circuit ignored pleadings regarding over sealed information and did nothing to allow plaintiff a fair trial and access to use his evidence in support of his case. The appeals Court ignored the pleadings without oral argument, finding of fact, or any type of answer to the plaintiffs pleadings of prejudice "Under Color of Law".

Plaintiff has pleading from 2022 as well that were never addressed and dismissed without any type of finding of fact or oral argument and the evidence remained unheard and over-sealed.

LIST OF PARTIES

*ALL PARTIES APPEAR ON THE CAPTION IN
THE COVER PAGE..*

RELATED CASES

Federal District Court of South Carolina

901 Richland St Columbia South Carolina

Case: 0:19-cv-00663-JMC-KDW

Dates 3-2019 til 3-2022

Federal District Court of South Carolina

901 Richland St. Columbia South Carolina

Case: 0:19-cv-00663-MGL Dates 6-2023 til 3-2024

Federal Court of Appeals 4th Circuit

1100 East Main Street, Suite 501, Richmond, VA

23219

Consolidated Case: 23-1147

Originating Case Sub Appeals –

USCA, 22-01025 USCA, 22-01147

USCA, 22-01289 USCA, 23-01356

USCA, 22-01301 USCA, 23-01473

USCA, 22-01372 USCA, 23-01659

TABLE OF CONTENTS

	Page
OPINIONS BELOW.....	1
JURISDICTION.....	1
STATUTORY PROVISIONS INVOLVED.....	2
STATEMENT OF THE CASE.....	3
REASONS FOR GRANTING WRIT.....	40
CONCLUSION.....	43

INDEX TO APPENDIX

**United States Superior Court motion for more
time**

February 13, 2024..... App. 2

**United States Court of Appeals for the Fourth
Circuit,**

Denial of Rehearing

February 13, 2024..... App. 6

**United States Court of Appeals for the Fourth
Circuit, Judgment, January 17, 2024..... App. 8**

**United States Federal District Court of
Columbia South Carolina**

Reopened Case has pending case activity. App. 11

**Federal United States District Court of South
Carolina, Columbia Division:**

Order Judge Lewis Order, Feb 2024..... App.10

**United States Court of Appeals for the Fourth
Circuit, Interlocutory Appeal from Federal District
Court of Columbia SC Appeal**

Number..... App15

United States District Court of Columbia SC

Order and Opinion 09/30/21 Entry: 248.. App13

United States District Court

Findings of Fact and Conclusions of law

Filed 3/31/23 Entry 386..... App 42- 52

United States District Court Columbia SC

Order Filed 3/15/22 Entry 296..... App 53 – 55

Federal District Court Columbia South

**Carolina Motion: 3D Systems inc “Notice of
Stipulated dismissal of request for legal damages as
to counterclaims and motion to transfer case to non
jury roster”**

Date 1/09/23 Entry 348 App. 33

3D Systems Corporation Employee

**Confidentiality and Non-Solicitation and
Arbitration Agreement App. 37**

Federal District Court Columbia South

Carolina

Order Entry 313 date 3/22/22 App. 70 -72

**Federal District Court of Columbia South Carolina
3D Systems “Order to Show Cause why Counter
Defendant Joe L. Adams, Jr. should not be held
in contempt for failure to comply with Prior
Orders”.**

Order Entry: 426 Date 9/11/23 App. 73

**Federal District Court of Columbia South
Carolina**

Emergency “Motion to Show Cause” “Second Motion
to Show Cause” by Plaintiff.

Order Entry: 437 Date 2/23/24 App. 71

United States Postal Service

Claim Damage Injury or Death

form 28-cfr-14.2 Date 11/8/23

TC202368453 USPS

**FD Associates Inc. 3D Systems Corporation’s
Trifecta Of Violations of U.S. Export Control
Laws.**

Entry: 437-1 date: 2/23/24

**Press Release: US Attorneys Office, Northern
District of Texas**

*3D Printing Company to Pay Up to \$4.54 Million to
Settle False Claims Act Allegations for Export
Violations in Connection with NASA and DOD
Contracts.*

Entry: 437-1 Date: 2/23/24

SC Biz News:

“Printing Company settles fraud Claims for \$50 M”

Entry: 437-1 Date 2/23/24

United State Court of Appeals 4th Circuit

Richmond Virginia

**“Motion to Unseal Confidential and Trade
Secret Evidence for Appeals Court and
District Court”**

Appeal: 23-1147 re: Inf. Brief 23-1473..... App. 80

TABLE OF AUTHORITIES

Page

Cases

Civil Rights Act of 1964 Title VII

Statutes and Rules

Title 18, U.S.C., Section 242 - Deprivation of Rights
Under “Color of Law”

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a Writ of Certiorari be
issued to review the judgement below.

OPINIONS BELOW

The opinion of the United States Court of Appeals
appears at App 1 to the petition and is Unpublished.

The opinion of the United States District Court appears
at App. 5 to the petition and is unpublished.

JURISDICTION

The date on which the United States Court of Appeals
decided my case was January of 2024.

A timely petition for rehearing was denied by the United
States Court of Appeals on the February 13, 2024 and a
copy of the order denying rehearing appears at App. 25.

The jurisdiction of this Court is invoked under 29 U. S.
C. 1254 (1)

STATUTORY PROVISIONS INVOLVED

Statement of the Case

To the Supreme Court of the United States and all of its respected Justices I am submitting this request for a Writ of Certiorari. I am not going to go into this statement as if I am a lawyer because I am not.. I am a regular American male with a Double Degree in Electronic Engineering Technology specializing in Automation and Control Systems. I graduated from Central Piedmont Community College in the top 10% of my class. Prior to my decision to go back to college I was employed by many Military Defense Companies such as Lockheed Martin and Smits Industries. I graduated from Central Piedmont Community College in 2012.

I am submitting this Writ of Certiorari to the Supreme Court in hopes that the court will allow for a Jury Trial in this case.

1. The plaintiff contends that he has been denied a jury trial at every corner and not allowed to have his chance in court or ever give any oral argument for his case but

defendant was given all opportunity as well as be able to choose their own judge.

- a. The defendant has long reaching connections in Columbia South Carolina and was able to have 88 documents removed from the public docket secretly (ECF 437 2/23/24).. The defendant has sealed all the voluminous Evidence that the plaintiff submitted to the court as well as lost evidence submitted (ECF-234 6/04/2021 Line 7, ECF 443, 444, 442). Plaintiffs discovered in September that the court had sealed the evidence that he submitted from him as well.
- b. allowed the defendant to seal all the documents further proving that they were doing illegal activities at the plant to China and other countries..
- c. Plaintiff supplied pictures and documentation proving that the illegal trade was happening (EFC

437 P4 -7; EFC 437-1 P1-P21) and was responsible for making many of the technical drawings that were investigated by the Department of Defense (ECF 437 – 437-1) for the years of 2015 – 2018. That is during the same time that the plaintiff worked for the plant corporate location in Rock Hill SC. The plaintiff was assaulted through racial discrimination and desperation to get rid of the plaintiff due to the pending complaints with the Charlotte EEOC and the Columbia SC Branch of the Human Affairs Commission (ECF-1-4 P51-52; P66-72).

2. The defendants have the privileges of being notified by email and ECF.. During the time when my mail was put on hold it was not announced and the USPS did not return the mail to sender but allowed the mail to collect at the main post office and I

missed court dates.. a complaint and claim were filed with the USPS (ECF 437-1 P1-2). If there were ECF notification for Pro Se Litigants in the Federal District Court of South Carolina in Columbia on Richland St it would be a Blessing to all Pro Se litigants as the court house is 50 miles away. If there was ECF notification I would have gotten all the court notifications through the email and not suffer the unannounced postal holds and other issues preventing mail from arriving on schedule.. The Court punishes Pro Se litigants for lateness and other issues and does not consider the amount of time missed waiting for the mail presents an advantage for the defense or opposing parties that do have ECF notification..

COVID

The next Feb 2021 daddy transitioned.. Magistrate Judge West persecuted me for not being on time with all of my responses..

Magistrate Kaymani West erased all of my case history through denying discovery for the several years that were submitted to the court. During the court hearing held on 10/28/2020. She denied reopening the full discovery for many years that were included in the original case pleading (ECF 167). She permitted the defendant to seal everything I submitted to the court and judges (ECF 1 – 1-4).. Magistrate West never signed the order for the sealing document presented to the appeals court by the defendant as reason to strike the use of the image to the 4th circuit appeals court document but because it exist no one questioned the lack of official signature.. That is when the plaintiff realized the court had not seen any of the voluminous evidence submitted by the plaintiff or the evidence revealed in discovery as mentioned by Judge West in her text orders..

Judge West requested that we write documents on what we wanted from the proceedings and ask us to bring them or send them to her chambers.. I went to Columbia in person to submit the documents to the judge's Chambers and

witnessed first hand Judge West and the same lawyer from the previous court hearing getting her documents hand delivered from the defendant.. I was walking right behind the young lady and passed Judge West.. Judge West was introduced to the new African American woman on the defense team during a hearing on 10/28/2020 (ECF-167) where more than half of the Plaintiffs evidence was omitted due to the early cut off date set by Magistrate West.. During the hearing Nicole Mergo took time to introduce the young new attorney to Judge West and they all stood around the bench laughing and talking.. it was so wrong I felt; for the judge to be so cordial with the defense but at that time I was not aware of the prior association with Judge Childs being the first Black Woman Partner at Nexsen Pruet and her tenure overlapping with the lead attorney Nicole Mergo. They worked together in the same office not 3 miles from the district court where the cases for 3D Systems were heard in the past. The plaintiff found that the defendants have some kind of connection in the court that they can chose their judges that will hear their cases and was allowed to

change my demand from 5.5 million dollars to 50 million by Nicole Mergo and my original pleading was hid along with 88 more documents.. .

Plaintiff also complains of the timeline of events. Plaintiff contends that the court did not allow time for the plaintiff to receive any responses from the court. Plaintiff was criticized by Magistrate Kaymani West for deadlines during Covid.. There were obstacles with my father being sick and suffering through to his transition and being able to reply and keep track of the dates driving 1 hour both ways from Rock Hill to the District Court in Columbia South Carolina. From Plaintiff home to Columbia SC is a 1 hour drive one way and the plaintiff made the trip at least it seems 100 times or more.. The plaintiff ask the Supreme Court is it fair that the plaintiff has to pay sanctions to the defendant for their salaries and driving mileage cost because he missed the court date due to an unannounced hold from the United States Post office? The plaintiff filed a complaint regarding the unannounced hold as the post office held the mail in the office and did not return it to the court causing

the plaintiff to be sanctioned for missing the court date ((ECF 437 P1-2).

The plaintiff contends that the court continued its session and the plaintiff had no idea of any of it because the mail was so slow during the Covid crisis and the US Post Office had an unannounced hold on the mail to the plaintiff's address that prevented him from receiving any of the mail from Nov 2020 to Feb 2021. The plaintiff has filed a complaint with the post office for the amount of the sanctions and the case is under review.. the plaintiff has submitted the application file number on the application. (ECF 437 P1-2)

The plaintiff was discriminated against for being a pro se litigant. Plaintiff complained that the court was putting days of advantage between the messages and court text orders for the defendant. (ECF 141 – 142) The district court did not send the notification of the hearing cancelation and other scheduling changes but the motion submitted by the plaintiff for more time to prepare for the medication was received days prior to the mediation hearing but the District Court of Columbia waited until the day

before the mediation to send a reply that the mediation motion for more time was denied (ECF-266, 277). The plaintiff did not know the motion was denied and went to work where he was called by Judge McDonald who was demanding to speak to my manager because he was a Federal Judge and that he would be able to get the time (ECF-272).. I was told By Judge Mcdonald during the mediation that Nexsen Pruette was likely to file an appeal siting that there were two Black Women as judges in my case why would I have any objection?" he also went on to say that the fact may be the reason why they bring the appeal. Judge McDonald made threats to have the US Marshals come and pick me up and I felt very threatened and didn't understand that the motion for more time was denied (ECF-277). I filed the interlocutory appeal because I thought it was the right thing to do I didn't not know of any kind of certifications but I knew that referencing to the possibility of the Black Women Judges being brought up for bias was unthinkable when I was suspecting that they were both paid off by the defendant before I suspected reverse racism?? Judge McDonalds

brazen brutal outspokenness opened my eyes to what was really going on. I realized why the judge and the magistrate were both so unwilling to entertain my complaints and review the evidence I submitted. They allowed the defendant to seal all of my evidence and rewrite my original complaint and increase the demand from 5.5 million dollars to 50 million dollars which made the complaint unheard of.. (ECF-1) I didn't know the docket system was corrupt so I submitted a "Certified Copy" of the Docket report that I had them to run at the clerks office in Columbia SC and stamp.. Now as they have received my complaint regarding the documents many changes have been made to cover up the discovery.. I have listed all the missing documents in my Emergency Motion to Show Cause submission to the District Court of South Carolina.. I found many changes had been made and could clearly see why the Appeals court was not able to review the case in clarity because more than 88 documents were missing from the record... Documents that held my supporting evidence. Document that could help to show my accomplishments.. The Court allowed the

defendant to sealed all of the drawing I made that were given to white employees to be used for raises when they never drew anything.. It made sense why the magistrate lost the audio tape and had me to rush and bring another copy to Columbia South Carolina when she stated that it would not make a difference before she got it... Her mind was made up but the audio was the audio of the actual meeting where I was assaulted and you can clearly hear the attack in the conference room.. When the Magistrate finally listened she determined that it didn't sound severe enough.. even with the x-rays of the injuries Magistrate Judge West denied it even with the medical bill s and x-rays presented by the plaintiff as to the injuries to both shoulders caused by the attack from Darshan Pandya who was enraged that I reported the discrimination to the South Carolina Human Affairs Committee.. I later discovered that there was a hidden history between the Judges and the defense attorneys.. A history that would later make more sense of why I was treated with so much prejudice and so much disrespect from the court being an African American Pro Se Litigant in court

facing the largest Law Firm in the country representing one of the richest companies in America. They hated me.. I was taken advantage of and even though I sought to ask the court to allow me an attorney the court denied it.. I could not keep a job because the company was blackballing me everywhere I went to make it even harder to stay in the fight but I continued the best I could.

There were more violations and racial discrimination to the plaintiff that the court became angry at the plaintiff and scolded him for missing the hearing in January.. They were all women on both sides and the plaintiff could not reason with them especially since they were all former or present employees of Nexsen Pruet. The post office held my mail and the defendant pounced on the opportunity to present me as a person that was purposely and intentionally causing disruption to the court proceeding and was granted sanctions by Michelle Childs.. The plaintiff contends that the sanctions were not legal or morally acceptable. The sanctions from the defendant were for the plaintiff to have to pay their gas mileage and employment hourly wages

and other personal expenses when the case was not continued.. The case was heard in court that day and all of them did their jobs not instructed to go back home... The plaintiff contends that the judge was more heavily influenced by her relationship with Nexsen Pruett and allowed them to persecute me not believing a word I said that the post office held all the mail and I was never notified of the haring.. They all work within 1 mile of the courthouse because the Nexsen Pruet office is very close to the Federal District Courthouse and there is a very good chance they all see each other quite frequently.. They were all women.. All have tenure with Nexsen Pruet including Judge Childs who is also the first Black Female Partner to Nexsen Pruet. No one could see my side and didn't seem to want to as they were unified in wrongness Under Color of Law.

The plaintiff ask the appeals court is it fair to apply sanctions to a Pro Se litigant that has been restricted from EFC Notifications The plaintiff complains that this is retaliation because the plaintiff filed a interlocutory appeal against the

mediation hearing.. The plaintiff was not notified of the hearing due to the mail hold.

The plaintiff was restricted for EFC privileges and was forced to wait on mail to be delivered for more than 3-4 cities and sometimes the Federal District Court would have mail sent from Greenville? This caused even more delays.. The plaintiff was restricted after so many times he motioned for the privilege to get the electronic filing but the Judges said no (ECF 346; ECF350).. Then Kaymani West the magistrate Judge in her report stated all the times I was late with my documents even though we were dealing with Covid and my father was dying in the hospital.. I appealed to the Supreme Court of the United States at the time, while Nicole Mergo submitted my fathers case into this case hurtfully. I tried to explain about the mail hold even had statements from the post office that the mail didn't come, but the Court was hard on me and still held me accountable for the failure of the Federal United States Post office.. The plaintiff submitted the statements and evidence to the courts but was ignored and denied any opportunity for a jury trial

as promised (ECF-341; 345; 351; 356).. There was also a problem on 2/06/2024. The notice of the trial was mailed from Columbia SC by the clerk.. The mail was returned on 2/21/2024(ECF-374)but the clerk purposely did not reach out to the plaintiff or remail the notice but allowed the Plaintiff to blindly miss the hearing. If there was ECF privileges this kind of nefarious act would not be possible. Plaintiff contends that all the problems from the clerks office are from Mr. Jeff Brown.. He has set out to make sure the plaintiff will lose and has tried to bias the judge and is responsible for the lack of notifications from the court since 2023. Plaintiff has been treated very badly by Jeff Brown and Judge Lewis because he did not allow the magistrate Judge West to take Judge Lewis place as Judge after Judge Childs left for the Supreme Court nomination. Plaintiff motioned for recusal but was denied (ECF-377)

United State Department of Justice
Investigation and Stock Holder Fraud

Plaintiff contends that behind the scenes not publicly announced on the news was an investigation by the Department of Defense.. The years of the investigation were the same years I complained of the Title VII discrimination, assault and battery, and I submitted empirical evidence to the court of the illegal copying of other companies trade secrets.. I confessed to my participation as an unknowing participant in bringing in the Nexgen printers that Darshan Pandya wanted to steal the invention so 3D Systems could resell the printer under the 50,000.00 price mark.. They had me to make the drawings for many of the control systems that were used in the Quick Parts and Pro jet systems that manufactured the products that were in question in the lawsuit from the Department of Justice.

Plaintiff contends that the evidence was improperly sealed by Khamani West and hidden from the judges and officials of the Federal District Court. Due to the Sealing of the evidence the plaintiff

was denied being able to use the evidence in support of his claims. The evidence was sealed and after repeated request to unseal the documents the court finally in their last transmission to the plaintiff admitted being ble to see the evidence. Plaintiff contends that the court also hid the document number and access from the Pacer system that the plaintiff had to use for his primary source of document number for reference in his pleadings. By the District Court hiding these number it crippled the plaintiffs ability to present the evidence he submitted as proof in his case.. But instead the court allowed the Defendant to use the same evidence against the plaintiff and did not acknowledge that the district court could see the evidence in a response from the court === start here..

The plaintiff believes that Judge Childs was aware of the evidence but because of her relationship with Nexsen Pruet being the first Black Female Partner to the firm I believe she ignored it all and supported her colleges that were the reason for her becoming a federal Judge as Judge Childs did the full

internship at Nexsen Pruet with her tenure overlapping for years working with Nicole Mergo the lead attorney for the defense team.

The plaintiff submitted pictures of the printers brought in from china through the back of company all wrapped and hidden in the warehouse. The plaintiff was the engineering technician and was instructed to set up the printers and fill them with material.. Then the plaintiff was told to go through the full system and document every single electrical component and get the pricing and availability and others were instructed to decipher the Chinese manual and rewrite it in English.. This activity is all documented in the pleadings but no matter how much evidence I submitted NONE of it was ever mentioned by the court. There were no questions ask from the court no time to have any type of clarity discussions.. The court just believed everything Nicole Mergo said and Magistrate West and Judge Childs did not question the defendant for any argument.. Judge Childs never saw the evidence.. at the time she didn't believe me that 3D Systems was involved in illegal overseas activity but I feel she was

more distracted by allegiance to the company that she is associated with almost in every article that was presented online.. I took no joy in the discovery of her past with Nexsen Pruett. I was aware at the time that the Judge Childs had been nominated to sit on the Supreme Court and I was very proud of her. I felt wrong that I had to divulge the relationship and how things were being manipulated.. I also realized that Judge Childs was the judge in the 3D lawsuit against NexGen technologies where they sued the company while stealing their technology at the same time.. No one believed me I thought but the Department of Justice revealed in 2022 that the lawsuit had commenced.. My question is why are they still allowing the evidence and testimonies from me to be remain sealed as I was working for the company at the time and I reported the findings to the appeals court but they denied to even investigate the news reports.. so I reported the whole thing to the Department of Justice Civil Department in hopes that they will see that crimes are being committed "Under Color of Law" and there needs to be an immediate

investigation regarding the behavior and irregularities of the Federal District Court to be sure there are no unhealthy relationships and collusive agreements between some of the richest and the most powerful of their District Court Judges.. The plaintiff contends that Judge Childs should have recused herself from the proceedings and also submitted a complaint requesting that Judge West also be recused due to her exparte indirect involvement with purposely not resending the notice of hearing in march of 2023 after the court got the returned mail.. The judge should have known I was not notified and that there was a problem if the mail was returned but she proceeded and criticized the plaintiff in her findings of fact report where she enters into the report stating on the first line...

“This matter came before the Court for a Bench Trial on March 6, 2023. Counter- Claimant 3D Systems, was represented by Nikole Stezler Mergo, Esquire, and Jennifer Cluverious, Esquire, while Counter Defendant, Joe L. Adams, Jr. (Adams), who is proceeding pro se, failed to appear for the proceedings.”

Then the judge went on to lie in the record. She stated that that I had ample notice but never mentioned it was returned to the court though the mail and they never remailed that notice.. The judge was prejudicial because I had submitted a request for to her to recuse herself after the problems with Mr. Brown and the exparte communication.

Judge Lewis went on to describe her inaccurate description on the plaintiff.. She described me in the report as noticing:

“The Court, having heard and considered the evidence presented, having observed the demeanor of the witnesses and having evaluated their credibility and candor, and having considered the pleadings of 3D systems in light of Adams’ default , as well as pretrial and other relevant filings submitted, makes the following Findings of Fact and Conclusions of Law Pursuant to Federal Rule of Civil Procedure 52”

The judge stated that she noticed the demeaned of the witnesses who were all white.. All the witnesses were white and the court refused to allow any of the witnesses testimonies that were

submitted in direct support of the plaintiff to be heard.. All the witnesses were supervisors and other management that were directly responsible for the hostile environment at the workplace.. Three of the Defense witnesses were seen by the plaintiff admiring a “Nazi Soldier War Uniform in a conference room that turned out to be the direct managers for the plaintiff.) They all rehearsed their parts and there was no one there to contradict them.. Then the judge through Mr. Brown sent emails to the defendant asking them to hurry up and send in their answers and demands. I complained through my submissions but no one listened an they continued with the image assassination and prejudices as if nothing was wrong as they were all protected under “color of law” because Judge West was mad that the plaintiff for not allowing the case to be heard by a magistrate judge.. The defense quickly chose Khamani who in the past had open ex parte communication with the defense so I said no (ECF 377; 379). Mr. Brown explained that “it would not be good” if I didn’t agree and they tried to force me to agree.. After no submitted to the pressure Judge

West began calling for a jury trial continuing with Judge Childs direction and suddenly 3D Systems dropped all pending monetary charges to avoid a jury trial (ECF 348; 345; 356).. They were already in litigation with the Department of Defense (so they dropped all charges.. Plaintiff ask why does he need to pay any sanctions if the defendant dropped all charges to avoid a jury trial the very thing they used the sanction to punish the plaintiff for not attending a pretrial conference for the counter claims..

Plaintiff contends that the court is protecting the defendant and offering them "Double Jeopardy" by allowing them to violate the trade agreement even though there is a clear arbitration clause listed in Article 13 of the agreement that is there is any dispute regarding violations of the agreement they have to be held through arbitration (ECF 386 L8-11). Court acknowledges agreement but never mentions that there is an Arbitration agreement (ECF 386) . It is clear so why is the court allowing the defendant to seek a court decision on a trade violations case when the prior agreement between the parties was to

resolve through arbitration and each of the parties pay their part..

Judge denied his ability to testify at a Jury hearing as instructed and set up my Michelle Childs for jury selection.. Suddenly 3D Systems Drops all the monetary charges for the counterclaim and demand a bench trial.. At the time I had ask for Judge Lewis recusal as there was an intervention in the case by a clerk Mr. Brown who was highly prejudiced against the plaintiff and supplied the judge with bias (ECF 377).. He would not identify himself but the plaintiff was able to get a transcript of the conversation and submitted it to the appeals court of the 4th circuit.

The plaintiff was harassed by Mr. Brown who was the life clerk for Judge Lewis.. He had special meetings and offered training to the employees from Nexsen Pruettt who were scheduled to appear at court so "they" would be able to operate the systems in the court.. I am pro se but was denied any opportunity for any training and I have never been inside a Court other than when we had the hearing regarding the continued Black Balling from 3D

Systems (ECF 150; 169) who were sending photographs of me to other employers and making choice comments to let them know I had sued their company it was horrible so I motioned for a Cease and Desist but was told by Magistrate Judge West that the court does not have "resources" for that kind of thing at trial.. The judge also restricted me from getting a transcript of the deposition I was forced to attend due to threats and unsafe location. I was not able to keep a job from the blackballing and now the judge would not allow a transcript of the deposition even though I was already on grant from the court to proceed without payment because my income was so low.. I had to ask the court for help there were too many of them.

**Court of Appeals in Richmond Virginia.. 4th
Circuit**

The appeals have been all heard by the Court of Appeals 4th circuit.. The plaintiff contends that the court has not properly done the investigation because 88 of the documents were missing and the original case complaint was replaced by the

complaint written by Nicole Mergo that intentionally falsely represented the demand amount and other wording.. Nicole Mergo is the lead attorney in this case. She is also a highly skilled English major and through the course of these proceeding has sought to make subtle changes to my wording that provides a platform for doubt or question.. The Magistrate Judge Kaymani West ignored my pleas and motions that the defendant was changing my pleadings.. she mentioned it in her motions that I could either use the versions of my pleadings the defendant wrote or write another.. This made me feel as though she already had made up her mind especially since I saw her myself with the defendants attorney who was hand delivering her the letters we were supposed to send to her chambers.. The way she wrote the Report and recommendation was very biased and it was clear she did not like me as a pro se litigant but I still decided that there was hope because so much truth was being hidden and diluted.. All of my submissions from friends (Chatney Merrill, Derek Johnson (a director) and Roney Hall) all submitted statements and character references but Judge Childs and

Magistrate Judge West ignored them but they allowed the testimonies and statements from the 3D Systems employees that were all the managers that were responsible for the discrimination. I am asking the Court of Appeals to review the Court of Appeals in this case.. I had an appeal a while back in 2021.. The court dismissed them as they were premature.. I did not ask them to reconsider because I was in unfamiliar territory with the Court and did not want to make any mistakes.. But the plaintiff has noticed that the same 3 justices that said it was lack of jurisdiction because it was premature are saying the same thing again regarding the denial of 23-1147 which refers to Informal Brief 23-1473 and also submits a motion to Unseal Confidential and Trade Secret evidence for Appeals Court and District Court. This appears in the appendix at App.86 – App. 109 and was denied review by the Appeals Court as premature.. The plaintiff checked with the Court before submitting any appeals as there were issues with the appeals in the first submission of the interlocutory appeal.

Plaintiff contends that the Appeals court merged all the plaintiffs informal briefs together but did not address them as separate issues.. Each of the Appeals were sent after speaking with Mr. Brewster who is the case manger for this case with Judge West. He told me that the cases were good for appealing and that I was not submitting the documents prematurely.. I did believe Mr. Brewster and submitted the appeals.. I even went over parts of Judge Lewis orders that I ask Mr. Brewster to explain them to me and he did some.. But he definitely told me they were the final orders and I was ok to appeal.. I knew something was final because Mr. Brown who is the judges life clerk sent emails to the defendant that Judge Lewis ask if they could hurry to get their documents in to the court.. I thought it was prejudicial for the judge to give legal advice to the defendant and communicate her thoughts through a "career clerk that admits he tries to sway judges opinions in the past" so why would I think he is not doing the same thing with Judge West.. Through her orders it was very clear she had a preconceived notion of the type of person I am so I

have submitted in App 76 my Federal SLED police report as well as the background check completed by 3D Systems to show what others say.. I had no problems, just graduating from college I didn't know I was being taken advantage of until I invented the Versa II.. That was when the company really turned up the harassment and prejudice all the way up to assault.. The Court of Appeals Denied my chance for oral argument and any chance that I still had to have a jury trial.. I would like a jury trial because it is an unfair advantage.. they have hundreds of attorneys on call at Nexsen Pruet and I am only one man.. I would like the opinion of a jury so they will not be able to pay off everyone like the judges and clerks at the courthouse in Columbia.. I don't know for sure they are paying them off but there is definitely a problem there with favoritism and unsavory administration.. I am asking for the Supreme Court to step in and investigate the claims I have made.. There are many more incidences but I am not aware of how much I can send.. they never gave me a chance to tell my story.. Judge Lewis was already convinced I was a bad person and all the people in that court

that day hated me and were ready to pounce on me legally but because the Lord did not let the mail flow and there were restrictions against the plaintiff things went like they did.. No one from the court ever ask any questions for finding of fact..

REASON FOR GRANTING THE PETITION

I wish I was able to get fair trial.. The plaintiff notes that the reason no jury trial was held in the counter-claim as the defendant pleaded to the court to allow for a bench trial by dropping all charges (ECF .. after all the allegations.. after all the sanctions and arguments.. they dropped the charges to prevent the plaintiff from ever standing in testimony in front of a jury.. Judge Childs and Judge West seem to be Great Individuals, but it is unavoidable to not be prejudiced if you are the first Black Woman Partner at the law firm Nexsen Pruet, and your coworkers are representing a client for.. The Judge and the Defense Lawyers have the same training and grooming through the more than 9 years Judge Childs worked for Nexsen Pruett. There is something wrong in Columbia SC.. The restriction

of Electronic Filing privileges is a real hard stop for most people that live far away.. I noticed that there is no paper trail when you hand deliver only what they put in the record unlike the Electronic filing privileges where the plaintiff is notified as soon as a decision is reached and can respond faster.. I have a Pacer account but was still restricted from Electronic Filing Privileges and criticized for timeliness when during Covid and other times the mail is incredible (ECF 346; 350).. Judge West required the plaintiff in error, to submit a position statement on whether the plaintiff could attend a telephone conference by 10/8/2024 (ECF 452) but she forgot the plaintiff cannot file any response through ECF for the District Court in Columbia SC. The plaintiff again applied to pacer and was denied.

The plaintiff is asking that the court will investigate this case and review how the defendant oversealed the Submitted evidence and crippled the plaintiff (ECF 429). It is impossible for me to support my case without the original evidence that I submitted.. So on 10/25/2023 plaintiff submitted a second motion to unseal documents (ECF 433).

Plaintiff has submitted orders (ECF 429, 433,434,437) but it was not until 8/20/2024 that the court answered and addressed the question regarding Sealing and unsealing and explained that all this time they could see the sealed document to my surprise.. But through the Superior court process the plaintiff found the method and realized the reason why the court of appeals never addressed the sealed documentation and evidence. After discovering all the sealed documentation was not available to the plaintiff through the clerks office the plaintiff realized he had been tricked.. He could never prove his case without being able to have access to the sealed evidence that he submitted in support of his claims and this was never addressed by the court after repeated request. Plaintiff submitted ((9/3/24 ECF 441 Motion to Stay, 9/3/2024 ECF 442 Motion to Hold in Abeyance, 9/12/24 ECF 443 Motion for Access to "All Sealed Materials and Evidence (consequently the court lost the audio disc ECF-44), 9/20/2024 ECF 444 Motion to Declare an Unfair Hearing, Motion to Reopen Case, 9/20/2024 ECF 445 Motion to Compel and Response to

Motion426 Motion for Order to Show Cause)) and all have had absolutely no response.. There has been no response from the District Court unless the defendants attorney submits it..

CONCLUSION

The plaintiff has made some mistakes.. but has honestly made them and not of any sinister intention. Plaintiff tried to get help with the Writ preparation but was asked for 8,000.00 to print the writ.. The District court has allowed the defendant to what I consider "criminally seal" all of the evidence and cripple the plaintiffs ability to present his case. The plaintiff contends that 3D systems is being allowed Double Jeopardy as they are being allowed to persecute the plaintiff despite the fact that they signed an arbitration agreement section 13 restricts the proceedings to arbitration and has a no implied waiver clause .. Due to the injustice done to the plaintiff and being denied a chance to have a jury trial and due to the blatant changing of the plaintiffs demand amount by the defense and more that is included in this writ, the plaintiff ask for this Writ of

Certiorari to be Granted for justice honesty to prevail
in this case..

Respectfully submitted,

Joe L. Adams Jr.
721 Ogden Rd.
Rock Hill SC 29730
858-848-7311