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No. 25-1395

In the Supreme Court of the United States

AZAD ALAMGIR KABIR,

Petitioner,

v.

WEBMD, LLC, ET AL.,

Respondents.

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

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether the systematic denial of Electronic Case Filing (ECF) access to *pro se* litigants violates the **Equal Protection** component of the **Fifth Amendment** by creating a discriminatory two-tiered system that grants represented parties instantaneous docketing while subjecting self-represented litigants to a 5-to-12-day “paper-filing blockade,” disproportionately impacting minority communities and small inventors.

2. Whether Federal Rule of Civil Procedure 5(d)(3)(B)(i) is unconstitutional as applied to a geographically distant *pro se* inventor in a complex intellectual property case, where the mandatory use of paper-filing creates a “procedural vacuum” that allows institutional defendants to exploit timing asymmetries and moot opposition before it is even docketed.

3. Whether the venue doctrine articulated in *TC Heartland LLC v. Kraft Foods Group Brands LLC*, 581 U.S. 258 (2017), when combined with restrictive local procedural regimes and unequal electronic access, violates the Due Process Clause of the Fifth Amendment by denying individual inventors “meaningful access” to the courts in distant, defendant-controlled forums.

4. Whether a venue and procedural regime that permits institutional defendants to consolidate litigation in forums that effectively “blockade” *pro se* evidence and expert analysis through administrative labels of “abuse” creates an irreparable structural harm that cannot be remedied on standard appeal.

5. Whether federal courts must consider access-to-courts consequences and the disparate impact on

minority *pro se* litigants—as identified in empirical studies of the “Civil Justice Gap”—when applying discretionary procedural rules that burden individual inventors.

6. Whether the use of Generative AI as a “force multiplier” to bridge the “manpower gap” for *pro se* litigants constitutes a protected form of “meaningful access” to the courts, and whether striking a primary opposition in its entirety due to a single, noncritical AI-generated “hallucination”—rather than allowing for curative measures—violates the Due Process Clause of the Fifth Amendment as a grossly disproportionate terminal sanction.

PARTIES TO THE PROCEEDING

Petitioner, and plaintiff-petitioner below, is Azad Alamgir Kabir, M.D., M.S.P.H.

Respondents, and defendants-respondents below, are WebMD LLC and THOUGHTi LLC.

RELATED PROCEEDINGS

United States District Court (D NJ):

Azad Kabir v. WebMD, LLC, et al., No. 2:25-cv-15207-EP-JSA (Feb. 3, 2026) (ADS privileges revoked and motions denied)

United States Court of Appeals (CAFC):

In re Azad Alamgir Kabir, No. 26–128 (Feb. 24, 2026) (petition for writ of mandamus denied)

In re Azad Alamgir Kabir, No. 26–128 (Apr. 14, 2026) (rehearing denied)

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<i>Mullane v. Central Hanover Bank & Trust Co.</i> , 339 U. S. 306 (1950)	18
<i>TC Heartland LLC v. Kraft Foods Group Brands LLC</i> , 581 U. S. 258 (2017)	7, 9, 18

Constitutional Provisions, Statutes, and Rules

U. S. Const., Amdt. I	1, 5
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OPINIONS BELOW

The Federal Circuit's order denying the petition for a writ of mandamus is reproduced in the Appendix at App. 1–2. The district court's text order and memorandum and order are reproduced in the Appendix at App. 3–14. The Federal Circuit's order denying rehearing is reproduced in the Appendix at App. 15–16.

JURISDICTION

The Federal Circuit's decision was entered on February 24, 2026. The Federal Circuit denied rehearing on April 14, 2026. This Court has jurisdiction under 28 U. S. C. § 1254(1).

CONSTITUTIONAL PROVISIONS INVOLVED

U. S. Const., Amdt. I, in relevant part: "Congress shall make no law . . . abridging . . . the right of the people . . . to petition the Government for a redress of grievances."

U. S. Const., Amdt. V, in relevant part: "No person shall . . . be deprived of life, liberty, or property, without due process of law."

STATEMENT OF THE CASE

This case presents a fundamental challenge to the procedural "blockade" that prevents small inventors from defending their property rights. Petitioner, a physician and inventor, filed suit to protect trade secrets and patented technology from infringement by multiple major corporations.

Throughout the litigation, Petitioner has been denied equal access to the court's electronic filing system. While corporate defendants utilize instantaneous

CM/ECF filing, Petitioner is restricted to a manual paper-filing system (or the Alternate Document Submission (ADS) system, which is the practical equivalent of a paper-filing system). This “procedural asymmetry” forces a 5-to-12-day delay on every pleading, effectively granting corporate defendants a narrative monopoly and procedural “head start.”

Even before this Court, procedural equality is maintained by requiring all parties—whether represented by elite counsel or proceeding *pro se*—to submit physical paper copies of their filings. This uniform requirement ensures that no party gains a narrative or timing advantage based solely on their status. While many federal districts have modernized to allow universal electronic access, others, such as the District of New Jersey, continue to treat electronic filing as a selective privilege rather than a procedural necessity. By granting represented parties the power of instantaneous digital docketing while relegating *pro se* litigants to an alternative or manual, mail-based system, these courts have engineered a *two-tiered judicial system*. In this framework, procedural speed becomes a weapon, allowing institutional defendants to moot the pleadings of small inventors before they are even processed by the Clerk’s Office.

The Federal Circuit denied rehearing on April 14, 2026, refusing to address the constitutional injury caused by this two-tiered framework.

REASONS FOR GRANTING THE PETITION

I. The Denial of ECF Access Creates a Two-Tiered System of Justice

The federal judiciary currently lacks a uniform rule for *pro se* electronic access, with approximately 88 percent of courts either prohibiting it or requiring discretionary permission. This creates a "Civil Justice Gap" where *pro se* litigants, who are statistically more likely to reside in minority communities, are denied the tools necessary for modern litigation.

II. Protecting Small Inventors is a National Security Interest

American ingenuity—and by extension, national security—depends on the survival of independent inventors. The future of United States leadership in the global innovation race, particularly in critical fields like artificial intelligence and biotechnology, is at risk if the creators of that technology are systemically barred from defending their intellectual property. When a "Civil Justice Gap" allows institutional defendants to misappropriate technology through procedural attrition and "paper-filing blockades," it chills the entire ecosystem of independent research and development. If the judiciary permits a two-tiered system where corporate infringers can exploit procedural asymmetries to moot the claims of individual inventors, it does not merely harm the Petitioner; it compromises the very infrastructure of American innovation required to compete against global adversaries.

III. The “Paper-Filing Blockade” Violates Constitutional Rights

The discretionary application of Federal Rule of Civil Procedure 5(d)(3)(B)(i) to “blockade” a geographically distant inventor from filing timely pleadings is unconstitutional as applied. It transforms a procedural rule into a terminal sanction, violating both the right to petition and the guarantee of due process.

IV. Generative AI as a Constitutional “Force Multiplier” and the Inequity of Terminal Sanctions

The 97 percent loss rate for *pro se* litigants in federal civil cases is a documented crisis of access. This disparity is driven by the “manpower gap”—the inability of self-represented inventors to afford “gold standard” case law resources or the specialized legal teams available to corporate defendants.

a. The Force Multiplier Argument

For a small inventor balancing primary employment with the defense of his intellectual property, Generative AI is the only means of maintaining the pace of litigation against well-funded institutions.

b. Grossly Disproportionate Sanctions

The district court struck Petitioner’s entire opposition—effectively granting a terminal sanction—based on a single technical “hallucination” despite dozens of correctly cited, noncritical authorities. In the context of a “good faith” attempt to protect lifelong intellectual property, such a sanction is grossly disproportionate.

c. Good Faith versus Bad Faith

Nationwide, federal judges are increasingly sanctioning the use of AI due to "hallucinations." However, when a *pro se* litigant includes a noncritical, hallucinated citation in a good-faith effort to protect intellectual property, striking the entire opposition as "unopposed" constitutes a terminal procedural sanction. Using that error to strike the filing turns a technological tool for access into a trap for dismissal, further widening the "Civil Justice Gap."

d. A New Horizon for Access

This case presents a timely question: *Should federal courts utilize the "least restrictive alternative" to address technical AI errors, or is it constitutionally permissible to use such errors to trigger case-ending sanctions that widen the "Civil Justice Gap"?*

V. The "Gold Standard" Barrier

The federal procedural standard currently revolves around who has the most expensive representation rather than consideration of the merits. Without the assistance of AI to overcome procedural deficiencies, the "narrative monopoly" of corporate defendants remains unchallenged, effectively silencing the constitutional right to be heard.

VI. The Mischaracterization of Multi-Disciplinary Expertise as "Abuse" Violates the First Amendment Right of Access to the Courts

The district court's use of the "abusive" label to strike Petitioner's Alternate Document Submission (ADS) privileges and threat of future sanction

represents a dangerous precedent where technical density is mistaken for procedural misconduct. Petitioner is not a typical *pro se* litigant; he is a physician with decades of clinical experience, a statistician, an economist, a psychologist, a published researcher, and a software developer who serves as a subject-matter expert in the cognitive processes of medical providers.

a. Density is Not Volume

Petitioner's filings were strictly compliant with local-rule page limits. However, because Petitioner utilized his multi-disciplinary expertise to provide advanced statistical and technological infringement proofs and medical AI analysis, the court characterized these expert-level explanations as "abusive." This mischaracterization penalizes an inventor for the complexity of his invention. By effectively ruling that a *pro se* defense must be "simple" to be "acceptable," the court has chilled the First Amendment right of a citizen to use his professional expertise to defend his property.

b. The "Merit Free Zone"

By striking these expert-supported pleadings, the court created a "merit-free zone" where litigation is decided by the size of a defendant's legal team rather than the accuracy of the evidence. This weaponization of procedural rules allows institutional defendants to avoid rebutting sophisticated intellectual property claims by hiding behind administrative labels.

c. Weaponized Procedural Rules

The court used the "abusive" label to avoid engaging with the merits of a sophisticated intellectual

property claim that corporate defendants were unable to substantively rebut.

VII. The Convergence of *TC Heartland* and Procedural Blockades Creates a “Dead Zone” for Innovation

a. The Unintended Consequences of *TC Heartland*: The “Home Court” Tax on Innovation

While this Court’s decision in *TC Heartland LLC v. Kraft Foods Group Brands LLC*, 581 U. S. 258 (2017), was intended to curb forum shopping, its practical application has produced an unintended and severe structural inequality. By tethering the venue strictly to the defendant’s residence, the ruling has effectively granted institutional infringers a “home court advantage” while imposing a “litigation tax” on independent inventors.

For the *pro se* inventor, this creates a form of procedural double jeopardy: he is forced to litigate in geographically distant and procedurally hostile forums where he must either incur the prohibitive expense of local counsel or navigate a complex “paper-filing” blockade from afar. This geographic and economic barrier raises a fundamental constitutional question: whether a venue regime that systematically isolates an individual inventor from meaningful access to the courts violates the Due Process Clause of the Fifth Amendment.

b. Irreparable Structural Harm

When an individual inventor is forced to litigate more than 1,000 miles from home in a forum that denies electronic filing, the resulting “paper-filing

blockade” is not a mere inconvenience—it is a structural defect. As documented in CAFC ECF No. 20-1, the combined weight of travel, mailing delays, and the “human chain” of paper docketing creates a reality where the inventor is effectively barred from the court.

c. Inequity of the Venue Regime

Institutional defendants with massive legal departments and local counsel in every district face no such burden. They utilize the predictability of current venue doctrines to consolidate litigation in districts where the local rules—such as those restricting *pro se* ECF access—serve as an additional layer of defense against the merits of an infringement claim.

d. The Due Process Mandate

The Due Process Clause in the Fifth Amendment requires “meaningful access” to the courts. This Court should grant certiorari to clarify that venue and procedural rules cannot be applied in a vacuum. If the application of *TC Heartland* results in a “procedural vacuum” that silences an inventor’s multi-disciplinary expertise (as a physician, statistician, economist, and software developer), the system has ceased to provide the “neutral forum” promised by the Constitution.

VIII. This Case is an Ideal Vehicle to Resolve the Growing Conflict Between Procedural Traps and Constitutional Access

This case presents a clean procedural record, a developed mandamus history, and a concrete illustration of how venue doctrine interacts with access-to-

courts principles. The issue is recurring, nationally significant, and remains unresolved by this Court.

**a. Transition from Access to Blockade:
A Comparative Record**

This case provides a unique “controlled experiment” for the Court. In the Middle District of Georgia, Petitioner—a *pro se* litigant—was granted CM/ECF access, allowing for a level playing field and instantaneous docketing. However, following the transfer of venue under *TC Heartland* to the District of New Jersey—the domicile of Respondent WebMD—Petitioner was stripped of his existing electronic filing privileges. He was initially relegated to a restrictive Alternate Document Submission (ADS) system, which is the practical equivalent of a manual paper-filing system, and was subsequently deprived of even that limited digital access, forced instead into a legacy manual paper-filing system. This secondary “technological transfer” created a systemic delay that favored the local institutional defendants and effectively isolated the Petitioner from the real-time record of his own case. This record proves that the “blockade” is not a function of the litigant’s ability, but a function of inconsistent and discriminatory local rules that vary by geography.

**b. The “Home Court Advantage” and
Resulting Terminal Sanctions**

The transfer to the District of New Jersey created a “procedural vacuum” that corporate defendants—including WebMD and THOUGHTi—exploited. The record demonstrates that:

1. **Selective and Delayed Docketing:** While defendants utilized instant filing, Petitioner's expert-level oppositions were subject to 5-to-12-day delays, selective docketing, and instances where filings simply "disappeared" from the record.
2. **The Weaponization of AI Hallucination:** The district court struck Petitioner's entire opposition regarding copyright and trade secret claims based on a single, noncritical AI-generated "hallucination." In doing so, the court ignored dozens of correctly cited precedents and used a technicality to grant a "terminal sanction" that avoided the merits of the infringement.
3. **The Penalization of Expertise:** The court labeled the dense, multidisciplinary expertise of the Petitioner—a physician, statistician, and software developer—as "abusive." This demonstrates a judicial preference for "procedural traps" over "technical merit," effectively silencing a subject-matter expert because he lacked the "gold-standard" procedural manpower of a corporate firm.

c. Structural Harm Irremediable on Appeal

The harm in this case is not merely a "bad ruling" that can be fixed later. It is a structural failure of the adversary system. When a court uses a "paper-filing blockade" to allow a defendant's narrative to go unopposed for nearly two weeks, the "Home Court Advantage" becomes an absolute barrier to justice.

This case is the ideal vehicle to determine whether the federal courts will embrace generative AI as a “force multiplier” for access or allow it to be used as a “trap for dismissal” that reinforces the 97 percent loss rate for *pro se* litigants.

IX. Summary of Procedural History and Incorporated Record

The constitutional and procedural injuries described in this petition are documented in the comprehensive record developed in *In re Kabir*, No. 26–128 (CAFFC), and the related jurisdictional history in the Third Circuit.

In *In re Azad Kabir*, No. 26–1076 (CA3), petitioner sought immediate review of the structural blockades in the underlying litigation. On February 5, 2026, petitioner transferred the action to the Federal Circuit after recognizing that the underlying claims were patent-related and fell within that court’s exclusive jurisdiction. This matter was subsequently consolidated into the primary mandamus record in *In re Kabir*, No. 26–128 (CAFC), which includes the following critical milestones.

A. The Primary Mandamus and En Banc Record

- I. *CAFC ECF No. 25 (Petition for Rehearing En Banc)*: The core record articulating the “Two-Tiered Framework” and the “Paper-Filing Blockade” that created a procedural vacuum in the District of New Jersey.
- II. *CAFC ECF No. 20-1 (Notice for Panel Rehearing)*: Petitioner’s appeal for rehearing regarding the misapprehension of facts concerning the electronic filing disparity.

- III. *CAFC ECF No. 27 (Order Denying Rehearing, April 14, 2026)*: The final action of the Federal Circuit refusing to address the constitutional hierarchy over administrative filing rules.

B. Documentary Evidence of the "Blockade" and Structural Harm

- I. *CAFC ECF No. 2 (Appendix & Supporting Materials)*: The foundational technical and clinical evidence submitted by Petitioner (physician/subject-matter expert), which was refiled in the proper appellate forum (Federal Circuit) following a jurisdictional notice from the Third Circuit.
- II. *CAFC ECF No. 6 (Supplement on Filing-Access Constraints)*: A detailed accounting of the physical barriers, including the 5-to-12-day ADS processing delay and the 1,000-mile geographic gap.
- III. *CAFC ECF No. 21-1 (Supplemental Factual Development)*: Notice to the Court of the continuing disparate treatment and the specific impact of the "Home Court Advantage" enjoyed by Respondents.

C. Jurisdictional and Outcome Milestones

- I. *CAFC ECF No. 16 (Jurisdictional Notice)*: The record reflects the notice of supplemental constitutional arguments and clarification regarding the venue challenge.
- II. *CAFC ECF No. 19 (Order Denying Writ of Mandamus)*: The initial refusal of the Court to intervene in the District Court's

discretionary denial of ECF access, setting the stage for the terminal sanctions that followed.

- III. *CAFC ECF No. 6 (First Supplement)*: Documentation of the asymmetry in filing speeds between the *pro se* Petitioner and corporate Respondents includes record preservation, docketing irregularities, and inability to litigate on equal footing.

D. The Appellate Vacuum: Futility of Alternative Remedies Regarding Generative-AI Sanctions

Petitioner's attempts to address the structural prejudice of the generative-AI-based terminal sanctions (see CAFC ECF No. 1–3) were met with a series of jurisdictional dismissals that left the constitutional injury unaddressed. Specifically, in *In re Azad Kabir*, No. 26–1063 (CA3 Feb. 18, 2026), ECF No. 7, the court dismissed the petition as being neither a writ of mandamus nor an appeal on the merits.

E. These materials collectively document:

- I. Repeated difficulties associated with Alternate Document Submission (ADS) processing;
- II. Manual docketing delays and filing-visibility limitations;
- III. Contradictory clerk-level procedural instructions;
- IV. Post-transfer filing-access constraints;
- V. The absence of parity-based electronic filing access available to represented parties.
- VI. The district court's issuance of a *terminal procedural sanction*—striking a primary

opposition in its entirety based solely on a *single, noncritical AI-generated citation error*—constitutes a grossly disproportionate penalty that violates the Due Process Clause.

F. Petitioner does not allege intentional misconduct by any court personnel. The incorporated filings were submitted solely to preserve the record of procedural mechanics affecting docket visibility and filing reliability.

G. *Table of Selective Delays (Filed / Received Dates versus Docket Entry Dates)*

Petitioner respectfully observes that the sequence of docketing failures, missing entries, selective uploads, and out-of-sequence events has consistently operated to the procedural benefit of the Respondents. When analyzed alongside the strict procedural deadlines and the tactical postures of the defense teams, these irregularities reveal a pattern of “selective speed.” Specifically, noncritical filings or those favoring the defense were docketed with standard efficiency, while Petitioner’s critical oppositions were subjected to a “paper-filing blockade” that often rendered them moot before they were even visible on the record.

Because the corporate Respondents maintain direct and unfettered CM/ECF access, they are entirely insulated from these delays. This creates a severe structural advantage where the defense can react in real-time while the Petitioner is trapped in a multi-day manual processing lag. When the court permits this timing asymmetry to persist in a complex intellectual

property matter, it effectively denies the Petitioner *constitutional due process under the Fifth Amendment* by stripping him of a meaningful opportunity to be heard before the court takes dispositive action.

The following table summarizes documented discrepancies in the district court's docket, where the systemic delay in processing Petitioner's filings through the ADS system provided a recurring tactical advantage to Respondents. In a few cases, filing dates were corrected to reflect the actual filing date from original filings. These discrepancies illustrate the "procedural vacuum" and "information blackout" inherent in the mandatory ADS or paper-filing system, which effectively grants represented parties an *ex parte* window to act while Petitioner's positions remain invisible to the Court:

Filed Date	ECF	Docket Text	Docketed Date (Days Delayed)
11/20/2025	107	Notice of Motion to file Ex. 32.2 under seal	11/21/2025 (1)
11/20/2025	111	Motion for leave to file under seal (Opp to WebMD MTD)	11/24/2025 (4)
11/18/2025	115	MOTION for leave to file oversized brief	11/26/2025 (9)
11/21/2025	108	Letter to Judge Padin	11/21/2025 (0)
11/21/2025	114	Response to Court Order ECF 110	11/26/2025 (5)
11/20/2025	112	Motion for leave to file out of time/extension	11/25/2025 (5)

11/20/ 2025	113	Motion for leave to file oversized brief	11/25/2025 (5)
11/20/ 2025	119	Motion for leave to file under seal (Opp to THOUGHTi MTD)	12/04/2025 (14)
11/24/ 2025	120	Notice re record preser- vation/docketing issues	12/04/2025 (11)
12/01/ 2025	124	Motion for leave to file under seal (Opp to THOUGHTi MTD) cover	12/08/2025 (7)
12/01/ 2025	125	Motion for leave to file under seal (Opp to WebMD MTD) cover	12/08/2025 (7)
12/01/ 2025	126	Motion for leave to file oversized brief (WebMD MTD) cover	12/08/2025 (7)
12/01/ 2025	127	Motion for leave to file out of time/extension (cover)	12/08/2025 (7)
12/02/ 2025	121	Motion for leave to file supplemental ex- hibit/addendum	12/05/2025 (3)
12/02/ 2025	132	Notice re record preser- vation/docketing issues (cover letter)	12/09/2025 (7)
12/02/ 2025	133	Opposition to WebMD MTD (filed subject to leave)	12/09/2025 (7)
12/02/ 2025	134	Opposition to THOUGHTi MTD	12/09/2025 (7)

12/02/2025	135	Response re THOUGHTi mischaracterization (ECF 116)	12/09/2025 (7)
12/07/2025	130	Response in Opposition re THOUGHTi MTD (w/ exhibits)	12/09/2025 (2)
12/07/2025	131	Exhibits for WebMD opposition (redacted version)	12/09/2025 (2)
12/07/2025	136	Opposition to WebMD MTD (40 pp; subject to leave)	12/09/2025 (2)
12/07/2025	140	Exhibits to ECF 136	12/10/2025 (3)
12/11/2025	142	Letter re Appendix S DCO (attachments)	12/11/2025 (0)
12/11/2025	147	Letter requesting 1-week extension for 30-page oppositions	12/16/2025 (5)
12/15/2025	148	Notice of Plaintiff execution of DCO (Appendix S)	12/16/2025 (1)
12/17/2025	150	Court GRANTS the extension request.	12/17/2025 (0)
12/16/2025	151	Updated motion for leave to file under seal (attachments)	12/19/2025 (3)
12/12/2025	152	Letter to Judge Padin and Judge Allen	12/22/2025 (10)
12/27/2025	153	Notice of Record Preservation Regarding Docketing Burdens	12/30/2025 (3)

on Pro Se Litigants:
Step 1

**X. The Denial of a “Meaningful Manner” of
Litigation**

The intersection of this Court’s holding in *TC Heartland LLC v. Kraft Foods Group Brands LLC*, 581 U. S. 258 (2017), and the categorical denial of electronic filing (CM/ECF) access to *pro se* litigants creates a procedural environment that is constitutionally unsustainable. Under *Mullane v. Central Hanover Bank & Trust Co.*, 339 U. S. 306 (1950), and *Mathews v. Eldridge*, 424 U. S. 319 (1976), due process requires an opportunity to be heard at a “meaningful time and in a meaningful manner.” In the modern era of high-velocity patent litigation, this “meaningful manner” is inextricably linked to electronic filing and real-time docket visibility.

While *TC Heartland* was intended to regulate venue and prevent forum shopping, its practical synergy with restrictive local electronic-access rules has stripped the individual inventor of these fundamental protections. By forcing a Petitioner to litigate in a distant “home court” forum for the infringer—while simultaneously tethering the Petitioner to a legacy paper-filing system plagued by “information blackouts” and docketing delays—the lower courts have effectively erected a pay-to-play barrier to the judiciary. Under the *Mathews* balancing test, a court’s administrative convenience in maintaining a two-tiered filing system cannot outweigh a Petitioner’s right to defend his intellectual property without being silenced by a procedural lag. This geographic and technological isolation

transforms the right to be heard into a hollow formality, violating the core tenets of the *Fifth Amendment*.

Beyond geographic and procedural blockades, a stark technological divide undermines the integrity of the adversarial process. While bar-admitted counsel uses high-cost legal databases and proprietary analytics, *pro se* litigants are increasingly sanctioned for utilizing generative AI—a tool that, despite its potential for “hallucinations,” remains the only resource uniquely positioned to bridge the massive resource gap between an individual inventor and a corporate defense team. In the modern era, intellectual property rights must not be forfeited solely for a lack of formal bar credentials. This Court’s intervention is required to ensure that the transition to an AI-driven legal landscape does not create a “knowledge monopoly” for institutional defendants. Without such protection, the “meaningful opportunity to be heard” is reduced to a hollow formality for those lacking the financial means to compete with the high-velocity technological infrastructure of the traditional bar.

RELIEF SOUGHT

Petitioner seeks the same fundamental relief requested in his Petition for Rehearing En Banc, CAFC ECF No. 25: a vacatur of the procedural blockades that have silenced his multidisciplinary defense, venue transfer, and an order restoring parity in filing access to prevent further structural harm to his intellectual property rights.

CONCLUSION

This Court should grant certiorari.

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