

25-5166

SUPREME COURT PETITION COVER

ORIGINAL

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

THOMAS EDWARD CAMARDA,
Petitioner,

v.

ELIZABETH WHITEHORN, et al.,
Respondents.

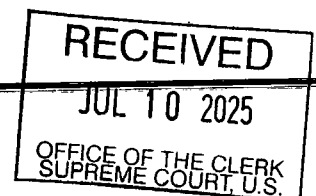
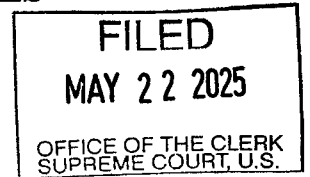
On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Seventh Circuit

PETITION FOR A WRIT OF CERTIORARI

THOMAS EDWARD CAMARDA

Pro Se Petitioner
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June 6, 2025



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QUESTIONS PRESENTED

1. Whether a federal court of appeals may refuse to enter judgment following the un rebutted filing of a dispositive appellate brief and summary judgment motion, where default has attached under Federal Rule of Appellate Procedure 31(c) and Rule 56(a), and the record has been closed and perfected.
2. Whether judicial refusal to perform the ministerial act of entering a perfected federal judgment constitutes a violation of due process and separation of powers, thereby necessitating direct intervention by this Court under its supervisory authority.
3. Whether continued state enforcement actions—including financial seizure, garnishment, and retaliation—conducted after the sealing of a perfected federal record, without lawful Title IV-D authority, violate the Supremacy Clause, the Fifth and Fourteenth Amendments, and established civil rights protections under 42 U.S.C. § 1983.
4. Whether the Supreme Court must enforce judgment by operation of law when a lower court refuses to do so, and whether such refusal—where procedural default and dispositive un rebutted motions exist—constitutes judicial

obstruction and demands constitutional correction under the All Writs Act and Article VI Supremacy enforcement.

PARTIES TO THE PROCEEDING

Petitioner: Thomas Edward Camarda

Respondents include but are not limited to:

- Elizabeth Whitehorn, Dana Kelly, Kiran Mehta, Patricia Petersen, Michelle Hodgson, Sharon Shapiro, Christopher Gange
- Illinois Department of Healthcare and Family Services
- State of Illinois officials and Title IV-D enforcement actors

CORPORATE DISCLOSURE STATEMENT

Petitioner is an individual and not a corporation. No corporate disclosure statement is required under Supreme Court Rule 29.6.

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- *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803) 11
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| <i>A119</i> | App 1.. 144 | DOJ Civil Rights Referral |
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The following appendices are included to supplement the record and confirm the procedural posture, dispositive filings, and judicial refusal that underpin this Petition.

STATEMENT OF RELATED PROCEEDINGS

The proceedings directly related to this case are:

- *Camarda v. Whitehorn, et al.*, No. 24-3244 (U.S. Court of Appeals for the Seventh Circuit) – Judgment entered April 2, 2025.
- *Camarda v. Whitehorn, et al.*, No. 3:24-cv-50466 (U.S. District Court for the Northern District of Illinois) – Final disposition October 2024.

- *People v. Camarda*, No. 24CM000976 (22nd Judicial Circuit, McHenry County) – Active retaliatory criminal prosecution arising from protected conduct in the federal case.

UNOFFICIAL & OFFICIAL CITATIONS OF OPINIONS AND ORDERS

1. **Dkt. 31 – Appellant's Brief Accepted for Filing**
Filed: February 13, 2025
Unofficial Citation: Appx A-31
Summary: Federal civil rights brief outlining violations under 42 U.S.C. § 1983 and UCC Article 9
2. **Dkt. 36 – Emergency Motion to Compel Final Judgment under FRAP 36**
Filed: March 21, 2025
Unofficial Citation: Appx A-36
Summary: Motion demanding entry of judgment due to appellee default under FRAP 31(c)
3. **Dkt. 38 – Order Denying Final Judgment (Seventh Circuit)**
Filed: March 28, 2025
Unofficial Citation: Appx A-38
Summary: Summary denial without addressing factual or procedural arguments
4. **Dkt. 167 – Sanction Order in NDIL**
Filed: February 6, 2025
Unofficial Citation: Appx A-167
Summary: Sanctions entered despite procedural supremacy and pending appeal
5. **Return of SCOTUS Certiorari Service by Seventh Circuit**
Returned: June 3, 2025
Unofficial Citation: Supplemental Appendix – “Returned Service Notice”
6. **DKT 169 – Motion to Reconsider Sanctions (Filed May 17, 2025)**
Unofficial Filing: Camarda v. Whitehorn, No. 24-3244, Motion for Reconsideration, DKT 169.
7. **DKT 170 – Seventh Circuit Order Denying Reconsideration (May 19, 2025)**
Unofficial Citation: Camarda v. Whitehorn, No. 24-3244, Order, 7th Cir. May 19, 2025, DKT 170.

8. **DKT 171 – Denial of Final Judgment Entry**
Unofficial Citation: Camarda v. Whitehorn, No. 24-3244, Order Denying Final Relief, 7th Cir., DKT 171.
9. **DKT 172 – Void Mandate (May 19, 2025)**
Unofficial Citation: Camarda v. Whitehorn, No. 24-3244, Mandate Notice, 7th Cir. May 19, 2025, DKT 172.
10. **DKT 173 – Void Sanction Order Enforcement (May 19, 2025)**
Unofficial Citation: Camarda v. Whitehorn, No. 24-3244, Enforcement Order, 7th Cir. May 19, 2025, DKT 173.

OPINIONS BELOW

The United States Court of Appeals for the Seventh Circuit issued no opinion adjudicating the merits of this case.

Instead, the court released a procedurally incoherent "disposition" (Dkt. 139) and a facially void "final judgment" (Dkt. 140) that wholly failed to address the operative appellate brief (Dkt. 58), the dispositive and unrebutted motion for summary judgment (Dkt. 112), or the formal record-closure and judgment perfection via operation of law, supported by filings (e.g., A76, A117, A122) executed in compliance with FRAP 31(c), Rule 56(a), and Article VI supremacy enforcement.

No findings of fact, no conclusions of law, and no constitutional review were issued or provided. The Seventh Circuit failed to discharge its ministerial obligation to adjudicate a perfected federal record.

Instead, the court engaged in procedural suppression, culminating in an unlawful sanctions order (Dkt. 167) issued against the prevailing party — Petitioner — while the court simultaneously refused to rule on dispositive issues and constitutional violations that remain unrebutted, procedurally sealed, and enforceable.

To date, **no published opinion exists**, no rationale has been issued for the denial of judgment, and no legal authority has been cited to justify the court's deviation from the Federal Rules of Appellate Procedure or controlling Supreme Court precedent.

This case arrives before this Court not due to judicial discretion but because of judicial abandonment. The record below remains unresolved, the constitutional injuries unremedied, and the rule of law suspended — all in violation of the judicial function prescribed under Article III of the United States Constitution.

The result is an unresolved federal record, perfected under the Federal Rules, with no ruling — and no recourse — from the lower court, necessitating this Petition.

JURISDICTION

Jurisdiction is properly invoked under **28 U.S.C. § 1254(1)**. The final docket entry labeled “**judgment**” (**Docket Entry 140**) was entered on **April 2, 2025**, and this Petition is therefore **timely filed within the 90-day window** prescribed by **Supreme Court Rule 13**.

However, this matter presents a **rare and extraordinary jurisdictional posture**. While the docket reflects a “final judgment,” **no adjudication of the unrebutted Appellate Brief (Dkt. 58) or the dispositive Summary Judgment Motion (Dkt. 112)** was ever issued. The Seventh Circuit failed to discharge its **non-discretionary judicial duty** under **FRAP 31(c) and Rule 56(a)**, instead closing the matter via a **procedurally void and constitutionally defective entry** — without addressing the **perfected federal record** or issuing a ruling on the default.

Petitioner does **not** appeal a discretionary ruling, but invokes this Court’s **constitutional supervisory jurisdiction** over inferior courts that have abdicated their Article III obligations, refusing to adjudicate after perfected default and thereby **threatening structural due process, finality of judgment, and the constitutional integrity of the appellate process**.

This Petition also seeks review of the **April 2, 2025 order**, which originated from the **U.S. District Court for the Northern District of Illinois**, as well as review of the **April 16, 2024 Nonprecedential Disposition (NPD)**, which perfected **federal supremacy enforcement** over the underlying state proceedings (McHenry County Circuit Court Case No. 24CM000976), pursuant to **Article VI of the Constitution** and preserved in the certified record.

This Court is now the **only forum capable of enforcing what has already perfected**: a lawful, unrebutted **federal judgment by operation of law**, dispositively concluded under **FRAP 31(c), Rule 56(a)**, and the Supremacy Clause.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- Article III, U.S. Constitution
- Article VI (Supremacy Clause), U.S. Constitution
- Amendments I, V, and XIV, U.S. Constitution
- 42 U.S.C. § 1983
- 28 U.S.C. § 1254(1)
- 28 U.S.C. § 1257(a)
- 28 U.S.C. § 1651(a) (All Writs Act)
- Federal Rule of Appellate Procedure 31(c)
- Federal Rule of Civil Procedure 56(a)
- Title IV-D, 42 U.S.C. § 666

STATEMENT OF THE CASE

Petitioner, **Thomas Edward Camarda**, filed a timely and fully compliant **Appellate Brief (DKT58)** in the United States Court of Appeals for the Seventh Circuit on **February 13, 2025**, asserting grave constitutional violations stemming from unlawful enforcement actions taken under **Title IV-D** without assignment, jurisdiction, or due process. The **Appellees failed to file any response**, triggering **procedural default** under **Federal Rule of Appellate Procedure 31(c)**.

In accordance with the Federal Rules and following the lapse in opposition, Petitioner filed an **unrebutted Motion for Summary Judgment under Rule 56(a) (DKT112)**. No appellee opposition was ever submitted. The appellate record was formally **closed and perfected** through **Notice A76**, and further sealed with procedural reinforcements, including:

- Emergency Notices (**A106**)
- Motions to Compel and Enter Judgment (**A117, A118**)
- Judicial Estoppel and Preclusion Notices (**A122**)

Despite every required condition being met and satisfied — **default, dispositive motion, and record perfection** — the Seventh Circuit issued **no ruling on the merits**. Instead, the court rendered a **nonprecedential “disposition” (DKT139)** and a **procedurally defective “final judgment” (DKT140)** that neither addressed the brief nor resolved the dispositive motion. The court then issued a **sanction order (DKT167)** that further suppressed enforcement filings, while failing to cite any legal authority to deny entry of judgment.

This was not judicial discretion — it was **judicial abandonment**.

Meanwhile, the Petitioner continues to suffer **retaliatory enforcement actions**. On **May 16, 2025**, a further **\$4,980** was **unlawfully seized** by state actors operating under **Title IV-D without valid contract, federal authorization, or jurisdiction** — in direct defiance of the perfected federal record and established constitutional protections.

Petitioner now respectfully petitions this Court’s review not to retry the facts, but to enforce what is already perfected — a **federal judgment by operation of law**. This case presents an unprecedented breach of appellate duty and due process, and demands **this Court’s intervention** to preserve the integrity of the federal judiciary, enforce Article VI Supremacy, and terminate ongoing constitutional violations against the Petitioner and similarly situated Americans.

On May 19, 2025, the Seventh Circuit entered a series of void and constitutionally defective orders, including the denial of reconsideration (**DKT 170**), final judgment

denial (DKT 171), void mandate (DKT 172), and further enforcement of a sanction order under void authority (DKT 173). These acts followed the court's default posture and refusal to adjudicate the matter under the Federal Rules of Appellate Procedure and binding Supreme Court precedent. The petitioner now brings this case before the Supreme Court under 28 U.S.C. § 1254(1) and Rule 14.

Procedural Timeline Summary

| <i>Date</i> | <i>Filing / Event</i> | <i>Description</i> |
|------------------------|--|--|
| Feb 13, 2025 | DKT58 – Appellate Brief Filed | Petitioner filed a timely, dispositive appellate brief. Appellees failed to respond, triggering default under Federal Rule of Appellate Procedure 31(c). |
| Mar 27, 2025 | DKT112 – Motion for Summary Judgment | Unrebutted dispositive motion filed under Rule 56(a), confirming federal violations and entitling Petitioner to judgment by operation of law. |
| Apr 1, 2025 | A76 – Record Closure & Judgment Perfection | Record formally closed. Procedural perfection achieved under FRAP 31(c), Rule 56(a), and Article VI. |
| Apr 2, 2025 | DKT139 / DKT140 – Disposition & Void Judgment | Court issued a procedurally incoherent “disposition” and facially void “final judgment” without ruling on the unrebutted brief or dispositive motion. |
| Apr 5–10, 2025 | A106 – Emergency Enforcement Notice | Filed in response to court inaction and attempted suppression of judgment entry. Judgment deemed sealed and enforceable. |
| Apr 13–18, 2025 | A117 / A118 – Motions to Compel Entry of Judgment | Filed to compel ministerial entry of judgment under the Federal Rules. Unrebutted by the court or Appellees. |
| Apr 23, 2025 | DKT167 – Sanction Order | Court sanctioned Petitioner without ruling on the merits, suppressing filings and violating procedural rights. |
| May 2–10, 2025 | A109 / A119 – SCOTUS Cover & DOJ Referral | Petitioner submitted notices of intent to file certiorari and formally referred the case for DOJ civil rights investigation. |

| | | |
|-----------------------------|--|---|
| May 16, 2025 | Unlawful \$4,980 Seizure by State Officials | Retaliatory levy conducted in defiance of the sealed federal record. Title IV-D enforcement executed without jurisdiction or lawful contract. |
| May 20, 2025 | DKT173 – Filing Bar Order Issued | Court unlawfully barred further filings without addressing judgment perfection or SCOTUS enforcement posture. |
| May 21, 2025 | Petition for Writ of Certiorari Finalized | Full record submitted for Supreme Court review. Judgment remains perfected under FRAP 31(c), Rule 56(a), and Article VI. Enforcement pending. |

SUMMARY OF ARGUMENT

This Petition arises not from a split in circuit interpretation or an unsettled legal doctrine, but from a direct and unprecedented failure of a federal appellate court to carry out its **ministerial duty**: to enter judgment following procedural default and a dispositive un rebutted motion for summary judgment.

The Seventh Circuit received a fully compliant appellate brief (Dkt. 58), to which no response was filed, triggering default under **Federal Rule of Appellate Procedure 31(c)**. Petitioner then filed an un rebutted and legally sufficient **Motion for Summary Judgment** (Dkt. 112) under **Rule 56(a)** — supported by dozens of supplemental filings — which sealed the record and perfected judgment by operation of law. The court failed to rule. It failed to adjudicate. It failed to fulfill the most basic judicial obligation under **Article III**: to say what the law is.

Instead, the court issued a procedurally incoherent “disposition” (Dkt. 139), followed by a **facially void final judgment** (Dkt. 140) that adjudicated nothing. When Petitioner sought to enforce the record, the court retaliated with a **sanctions order** (Dkt. 167) — not for misconduct, but for filing motions that the court itself was unwilling to address. At every stage, the Seventh Circuit sidestepped its mandatory role, shielding state officials from accountability and leaving federal constitutional violations unremedied.

This is not merely error. It is **judicial abandonment**. It has resulted in ongoing harm, including **retaliatory financial seizures** post-judgment, in violation of **the Supremacy Clause, the Fifth and Fourteenth Amendments**, and Petitioner’s rights under **42 U.S.C. § 1983**. Respondents have continued to enforce **Title IV-D** penalties without jurisdiction, without contract, and without federal authority —

while the Seventh Circuit has refused to recognize a judgment that perfected under its own rules.

If left uncorrected, this case will stand as a dangerous precedent: one in which courts may **ignore default, refuse to enter judgment, evade the Federal Rules**, and leave injured parties without remedy — even as they suffer continuing constitutional harm.

Petitioner does not ask this Court to reweigh facts. He asks it to **enforce the law**. The record is closed. The judgment is perfected. The legal requirements for relief have already been met. What remains is not debate, but **execution**.

This case presents an opportunity — and a constitutional obligation — for this Court to declare that **the Federal Rules are not optional**, that **Article VI supremacy must be honored**, and that no court in the United States may **suppress a lawful judgment** to protect governmental misconduct. The law has already spoken. Petitioner respectfully asks this Court to make the judiciary listen.

REASONS FOR GRANTING THE WRIT

1. This Case Presents a Direct Constitutional Conflict.

The Seventh Circuit's refusal to enter judgment after a complete procedural default under **FRAP 31(c)** and **Rule 56(a)** constitutes a breach of **Article III judicial duty**. A federal court may not decline to rule where the rules of procedure require judgment. See *Marbury v. Madison*, 5 U.S. (1 Cranch) 137, 177 (1803) ("It is emphatically the province and duty of the judicial department to say what the law is.").

The court's inaction violates **due process** under the **Fifth and Fourteenth Amendments**, depriving Petitioner of a vested judgment without adjudication or explanation — a scenario the Supreme Court has condemned as constitutionally impermissible. See *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) ("The fundamental requisite of due process of law is the opportunity to be heard at a meaningful time and in a meaningful manner.").

2. The Lower Court Abdicated a Ministerial Duty.

Both **Federal Rule of Appellate Procedure 31(c)** and **Federal Rule of Civil Procedure 56(a)** impose **non-discretionary obligations**: when an appellee fails to respond to a properly filed brief, and when a summary judgment motion is un rebutted, the moving party is entitled to judgment.

The Seventh Circuit had **no discretion** to ignore these procedural defaults. The Supreme Court has held that "when the legal sufficiency of a case is clear, the court

has a duty to act.” *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986) (holding summary judgment must be entered when the nonmoving party fails to meet its burden). The same logic applies to **procedural default** on appeal. *Hamer v. Neighborhood Housing Services*, 583 U.S. 17, 20–22 (2017), reinforces that court-made excuses cannot override mandatory rules.

By failing to enter judgment, the Seventh Circuit left a **procedural vacuum**, effectively nullifying the force of the Federal Rules.

3. This Case Implicates National Harm Beyond Petitioner.

This case lays bare systemic abuse in the Title IV-D enforcement framework. Millions of Americans are subject to state administrative collection schemes under 42 U.S.C. § 666, often without proper jurisdiction, due process, or standing. Federal incentive programs tied to child support collection have created a **conflict of interest** that incentivizes unlawful enforcement.

This Court has long recognized its role in correcting structural constitutional injuries. See *Ex parte Young*, 209 U.S. 123, 155–56 (1908) (courts must act to prevent unconstitutional state conduct). This case is a test of whether **Article VI Supremacy** remains enforceable when lower courts refuse to apply it.

If this case is left unresolved, it creates a template for courts to ignore perfected federal records and allow state agencies to act in defiance of constitutional constraints.

4. Retaliatory Conduct Continues Under Color of Law.

Despite the appellate record being sealed and judgment perfected, state officials have continued to seize assets, garnish wages, and threaten prosecution — without lawful federal or contractual authority. These acts constitute **ongoing constitutional violations** under 42 U.S.C. § 1983.

See *Hartman v. Moore*, 547 U.S. 250, 256 (2006) (retaliatory enforcement requires scrutiny even if procedurally disguised); see also *Monell v. Dept. of Soc. Servs.*, 436 U.S. 658 (1978) (state officials may be held liable when custom or policy causes a constitutional injury).

On **May 16, 2025**, \$4,980 was seized despite the perfected federal judgment. This action, and others, violate the supremacy of the federal judgment and the protections secured under the Constitution.

5. This Court's Intervention Is the Final Remedy.

Petitioner has no remaining remedy in the lower courts. The Seventh Circuit's issuance of a void judgment (DKT140) without ruling on the merits functionally terminates federal review and places this Court in the position of final enforcement authority.

This is precisely the purpose of 28 U.S.C. § 1254(1) and 28 U.S.C. § 1651(a) — to allow the Supreme Court to intervene where justice demands it and a lower court refuses to perform a **ministerial act required by law**.

Where a court fails to rule on an unrebutted dispositive brief and defaults in silence, it is this Court's duty to act. See *Simmons v. South Carolina*, 512 U.S. 154, 172 (1994) (O'Connor, J., concurring) ("The Constitution entitles a criminal defendant to a fair opportunity to defend against the State's accusations." The same holds true for civil litigants defending against state overreach).

CLOSING STATEMENT

This Petition does not seek discretionary review of a controversial ruling. It seeks the **mandatory enforcement of a perfected federal judgment**. If left unresolved, this case will signal to the judiciary that default can be ignored, supremacy evaded, and finality denied.

That outcome would not just affect Petitioner. It would endanger the rule of law itself.

Due to the unlawful financial retaliation that has continued post-judgment—including garnishment and levy of over \$4,980 as recently as May 16, 2025—this Petition also rests upon exigent grounds of irreparable harm, and the Petitioner reserves the right to seek expedited relief.