

SUPREME COURT OF THE UNITED STATES

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Leroy A Garrett,  
Petitioner,  
vs.

PDV Holding  
Respondent.

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

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**PETITION FOR REHEARING**

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Dr. Leroy A. Garrett  
Pro Se Petitioner  
Venezuelan Petroleum Holocaust  
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Katy Texas 77494  
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Friend of the Court

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## **GROUNDS FOR REHEARING (Rule 44.2)**

### **1. Intervening Circumstance of Explosive Magnitude:**

The **Inter-American Commission on Human Rights (IACtHR)** has **advanced Petitioner's motion to admissibility review** (filed September 2025), igniting a **new international firestorm** over Venezuela's state-sponsored genocide against 23,000 PDVSA workers. This **unprecedented development**—unavailable at certiorari—**demands immediate SCOTUS intervention** to prevent the \$7.38 billion Citgo sale from **extinguishing victims' claims forever**.

### **2. Substantial Ground Not Previously Presented – The Death of Pro Se Justice:**

The **Third Circuit's year-long silence** on Petitioner's Motion to Stay (No. 0:25-cv-02519, filed September 5, 2025) is **not mere delay—it is a calculated burial**. Judge Stark's **stubborn efficiency** in *Crystallex* (No. 1:17-mc-00151) **denies recusal and QSF creation**; Judge Hall's **barriers** in No. 1:24-cv-00380 **block alter ego justice**; Judge Failla's **conspiracy-like scrutiny** in No. 1:19-cv-10023 **silences Petitioner's defense**. This **triangular strangulation** proves **no pro se litigant in Garrett's position can ever prevail—a systemic execution of equality** under Amendments V and XIV, **unaddressed in the original petition**.

## **CERTIFICATE (Rule 44.2)**

I certify that this petition is **limited to the intervening circumstances and substantial grounds stated above, is presented in good faith, and is not for delay**.

/s/ Leroy A. Garrett

November 1, 2025

## **CERTIFICATE OF COMPLIANCE**

I certify this petition contains **250 words**, complying with Rule 33.1(g)(iv).

/s/ Leroy A. Garrett

## **CERTIFICATE OF SERVICE**

I certify that on **November 1, 2025**, I served one copy on Respondent's counsel via first-class mail.

/s/ Leroy A. Garrett



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