25-5307

No._____

IN THE

SUPREME COURT OF THE UNITED STATES

In Re Sara Murray
Petitioner(s),

On Petition for a Writ of Mandamus to the
United States District Court for the Western District of Washington,
United States District Court for the Northern District of California,
the United States Court of Appeals for the Ninth Circuit, et Al.,

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PETITION FOR WRIT OF MANDAMUS

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Pro Se Petitioner

I. QUESTIONS PRESENTED

I. Judicial Integrity & Structural Recusal

1. **Structural Conflict of Interest**

   Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately cease adjudicating cases in which their own courts, judicial officers, or staff are named as parties or have been credibly accused of constitutional, statutory, or treaty violations, without disqualification—in violation of the Due Process Clause and mandatory disqualification rules under 28 U.S.C. §§ 455(a), 144.

2. **Disqualification Mandate for Conflicted Judges**

   Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to disqualify all judges and court officials currently acting as defendants, respondents, or implicated parties in cases involving the same Petitioner, pursuant to 28 U.S.C. §§ 455(a) and 144, and the Due Process Clause of the Fourteenth Amendment.

3. **Referral to DOJ / Civil Rights Division / Inspector General**

Whether this Court should refer the documented pattern of judicial misconduct, systemic ADA and Rehabilitation Act violations, and deliberate indifference to serious harm—constituting deprivations of rights under color of law and conspiracy to interfere with federally protected rights—for criminal and civil rights review by the U.S. Department of Justice, the Office of the Inspector General, and the Departmental Bureau of Investigation, pursuant to 28 U.S.C. § 530B, 28 U.S.C. § 535, and the Executive's enforcement duties under Article II of the Constitution, and in light of potential violations of 18 U.S.C. §§ 241 and 242.

II. Disability Rights & Procedural Access

4. **Procedural Manipulation Against Disabled Litigants**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately cease the use of procedural manipulation, delay, and denial—including, but not limited to, failure to rule on emergency or accommodation motions, imposition of arbitrary procedural limits, and refusal to docket complaints or service requests—as a mechanism to obstruct access to justice for disabled litigants, in violation of the Fourteenth and Fifth Amendments, the

Americans with Disabilities Act (42 U.S.C. § 12132), and Section 504 of the Rehabilitation Act (29 U.S.C. § 794).

5. **Uniform ADA Compliance in Courts**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, state courts under Ninth Circuit appellate review, and federal judicial conduct commissions to immediately and uniformly comply with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act by conducting individualized interactive processes with qualified ADA experts, providing effective accommodations tailored to each litigant's disability, and refraining from issuing adverse rulings or imposing procedural barriers until lawful accommodations are provided, pursuant to the ADA (42 U.S.C. § 12132), the Rehabilitation Act (29 U.S.C. § 794), and the Fourteenth Amendment's Due Process Clause, and Articles 14 and 26 of the International Covenant on Civil and Political Rights (ICCPR).

6. **Restore Access to Service and Filing**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and their clerks and administrative arms to restore and guarantee access to complaint service, summons issuance, and docketing of

filings for Petitioners whose access has been blocked by Gender and ADA discrimination, court officials' obstruction, or unreasonable systemic delays, under the ADA (42 U.S.C. § 12132), the Rehabilitation Act (29 U.S.C. § 794), and the Due Process Clause of the Fourteenth Amendment.

7. **Liability for ADA and Rehabilitation Act Violations**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately recognize that judicial and governmental actors who engage in discrimination under the ADA and Rehabilitation Act may be held liable under 42 U.S.C. § 1983 when their actions foreseeably result in disability-related harm and due process violations, pursuant to 42 U.S.C. §§ 1983, 12132; 29 U.S.C. § 794 (Rehab Act); Fourteenth Amendment.

III. Gender-Based Violence & Child Protection

8. **End Forced Mother-Child Separation**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately

end Petitioners' forced mother-child separation where the separation was imposed without due process and without providing ADA accommodations to a disabled parent litigant, in violation of the Eighth and Fourteenth Amendments.

9. **Emergency Protective Relief for Minor Petitioners**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately issue emergency protective relief—including, but not limited to, a temporary restraining order or equivalent order—to extract minor Petitioners G.E.M. and C.M.M. from the custody of their abusive father, whose abuse was confirmed in an accredited forensic interview, and to end judicial complicity in ongoing gender-based violence and state-created danger, in violation of the Eighth and Fourteenth Amendments and federal anti-discrimination law.

10. **Parental Representation for Indigent Survivors**

Whether a writ of mandamus should issue requiring the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to allow indigent parental survivors of gender-violence, domestic violence, and/or coercive

control, with ADA disabilities, to represent their minor children under Federal Rule of Civil Procedure 17(c)(2), for the limited purpose of initiating federal claims and securing appointment of counsel for their children, where state court proceedings have violated the children's constitutional, statutory, and treaty rights, pursuant to the Fourteenth Amendment's Due Process and Equal Protection Clauses, the ADA (42 U.S.C. § 12132), the Rehabilitation Act (29 U.S.C. § 794), the Convention Against Torture (8 C.F.R. § 208.18), and the ICCPR (Articles 7 and 26)

11. **Recognize Judicial Rulings Perpetuating Abuse as Violations**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately declare that judicial rulings which perpetuate domestic violence, coercive control, and child endangerment violate both constitutional and treaty protections under the First, Eighth, and Fourteenth Amendments; CAT (8 C.F.R. § 208.18); and ICCPR (Articles 7 and 26).

12. **Implement Screening for Coercive Control in Custody Cases**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its

jurisdiction, and state courts under its appellate supervision to promptly adopt public awareness campaigns and mandatory early screening protocols in all custody-related proceedings to detect Cluster B-pattern domestic violence and coercive control—including psychopathy, narcissistic abuse, and sadism—using qualified experts, and to implement protections consistent with VAWA Kayden's Law, pursuant to the First, Eighth, and Fourteenth Amendments; the ADA (42 U.S.C. § 12132); the Rehabilitation Act (29 U.S.C. § 794); the Convention Against Torture (8 C.F.R. § 208.18); the ICCPR (Articles 7 and 26); and to prevent foreseeable violations of 42 U.S.C. § 1983, the Racketeer Influenced and Corrupt Organizations Act (RICO), and other constitutional, treaty, and federal rights in family court.

IV. Constitutional & Treaty Violations

13. Cease Participation in Psychological Torture

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately cease participating in, enabling, or acquiescing to acts or omissions by courts that constitute psychological torture under 8 C.F.R. § 208.18, as incorporated from the Convention Against Torture (CAT).

14. **Declare Procedural Barriers as Cruel Treatment**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately declare that procedural barriers imposed on disabled litigants that knowingly exacerbate medical harm constitute cruel, inhuman, or degrading treatment under 8 C.F.R. § 208.18, Article 7 of the ICCPR, and violate the Eighth and Fourteenth Amendments.

15. **Recognize Denial of Legal Representation as Deliberate Indifference**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately recognize that denying court-appointed legal representation as an ADA accommodation for survivors of gender-violence, domestic violence, and/or coercive control—particularly those with brain and nervous system disabilities—constitutes deliberate indifference to serious medical harm and violates survivors' rights under the Eighth Amendment, the Americans with Disabilities Act (42 U.S.C. § 12132), Section 504 of the Rehabilitation Act (29 U.S.C. § 794), 8 C.F.R. § 208.18 (CAT), and Articles 7 and 26 of the

International Covenant on Civil and Political Rights (ICCPR).

16. **Affirmative Duty to Prevent Rights Violations**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately recognize their affirmative duty to prevent Eighth Amendment and treaty-based violations where domestic courts perpetuate cruel, inhuman, or degrading treatment—and to cease using defamatory, unproven, gender-biased, or stigma-based labels to discredit survivors and evade accountability for systemic rights violations, under Eighth and Fourteenth Amendments; 42 U.S.C. § 12132; 29 U.S.C. § 794; 8 C.F.R. § 208.18; ICCPR; CAT.

V. Remedial Measures & Emergency Relief

17. **Identify and Investigate Shielding of Appellees**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately identify the judicial and government actors who unlawfully shielded the

appellees in Ninth Circuit Appeal No. 25-1016, declare void ab initio all orders issued in King County Superior Court Case No. 17-3-06463-1 SEA—each of which six of the appellees procedurally admitted to have obtained through violations of the Racketeer Influenced and Corrupt Organizations Act (RICO), 42 U.S.C. § 1983, the Americans with Disabilities Act, and the Rehabilitation Act—and void all adverse WA State Supreme Court and federal rulings that obstructed adjudication of those violations, and to initiate disciplinary and criminal referrals, pursuant to 28 U.S.C. §§ 351–354 and § 455; 18 U.S.C. §§ 241 and 242 where judicial or government actors conspired to deprive federally protected rights or acted under color of law to do so; and the waiver doctrine.

18. **Issue TROs Where Defenses Are Waived**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to issue temporary restraining orders or preliminary injunctions where opposing parties have waived and abandoned their federal defenses, and the Petitioners present evidence of imminent harm and ongoing constitutional violations, under the Eighth and Fourteenth Amendments, the ADA (42 U.S.C. § 12132), the Rehabilitation Act (29 U.S.C. § 794), and Rule 65 of the

Federal Rules of Civil Procedure.

19. **Halt Retaliation Against Petitioners**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to immediately halt retaliation against Petitioners Sara Murray, G.E.M., and C.M.M.—including public defamation, constructive denial of access to the courts and law enforcement, forced mother-child separation, and refusal to adjudicate claims or permit trial by jury—in violation of the First Amendment, the Americans with Disabilities Act (42 U.S.C. § 12132), and Section 504 of the Rehabilitation Act (29 U.S.C. § 794).

20. **Order Limited Remand for Enforcement of Procedurally Admitted Claims**

Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit to order a limited remand in Appeal No. 25-1016 as to all appellees who waived and abandoned federal defenses, thereby procedurally admitting liability on all claims asserted in the preliminary brief and incorporated Sixth Amended Complaint filed in *Murray v. King County Superior Court et al.*, No. 2:24-cv-00239-JNW (W.D. Wash.)—so that discovery and factual findings may proceed solely on

damages and enforcement of rights already deemed admitted under waiver doctrine and binding federal procedural rules.

VI. Next Friend Representation and Pro Bono Counsel for Unrepresented Minors

21. Whether a writ of mandamus should issue directing the United States Court of Appeals for the Ninth Circuit, the U.S. District Courts within its jurisdiction, and state courts under its appellate supervision to recognize that minor children abducted and held through conduct constituting federal civil rights and RICO violations are entitled to meaningful federal protection—through next friend representation by their surviving parent under Federal Rule of Civil Procedure 17(c)(2) where no competent, non-abusive adult exists to protect their interests—and to require appointment of pro bono counsel under Rule 17(c)(2) where the parent is herself disabled by the same violations that placed the children in danger, in order to enforce the children's rights under the Fourteenth Amendment, the ADA (42 U.S.C. § 12132), the Rehabilitation Act (29 U.S.C. § 794), and treaty protections including 8 C.F.R. § 208.18 (CAT) and Articles 7 and 26 of the ICCPR.

II. LIST OF PARTIES

All parties **do not** appear in the caption of the case on the cover page. A list of the parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

i. Petitioner

Sara Murray is a mother with documented ADA-covered disabilities who has been systematically denied accommodations, access to justice, and due process protections by federal and state judicial institutions, including the U.S. District Court for the Western District of Washington, the U.S. District Court for the Northern District of California, the Ninth Circuit Court of Appeals, the Washington State Supreme Court, and the King County Superior Court. She brings this petition in her individual capacity as the only named party.

Petitioner has sustained grave constitutional, statutory, and treaty-based injuries from coordinated judicial obstruction and retaliation. These injuries include prolonged separation from her two minor children as a result of coercive judicial misconduct and systemic exclusion from protective relief. In **Appeal No. 25-1016**, six appellees waived and abandoned all federal defenses to a decade of coercive control, child abuse, civil RICO activity, and 42 U.S.C. § 1983 violations—including conduct meeting the definition of torture under 8 C.F.R. § 208.18. The resulting family separation and state-created danger have directly exacerbated Petitioner's disabilities and are the basis for multiple federal causes of action. Although

Petitioner is the sole named party in this action, the rights and safety of her minor children remain central to the ongoing irreparable harm and unlawful judicial exclusion that give rise to this petition.

iii. Respondents

This petition names federal courts, judges, and agencies subject to this Court's direct supervisory power, as well as state judicial actors and courts whose unconstitutional conduct is shielded by federal actors. Jurisdiction is detailed in Section VIII pursuant to 28 U.S.C. § 1651(a), Rule 10(a), Rule 10(c), and Rule 20(1).

Group 1: *Murray v. King County Superior Court et al.*, Case No. 2:24-cv-00239-JNW (W.D. Wash.)

King County Superior Court, in its official capacity.

The following Respondents acted in their official and administrative capacities, committing or facilitating constitutional, treaty, and statutory violations within the meaning of Rule 10(c) jurisdiction.

- **Judges and Commissioners:** Judges Janet Helson, David Whedbee, Sean O'Donnell, Jonathan Lack, Jason Holloway, Matthew Segal, Aimee Sutton, and Monica Carey; Commissioners Henry Judson, Richard Furman, Paul Eagle, and Jessica Martin.
- **Court Officials & ADA Officers:** Dr. Melanie English (Parenting Evaluator); Ronda Bliey (ADA Coordinator); Leena Ackerman, Salina Hill,

and Jodi Johnson (KCSC Court Clerks).

- **Court-Appointed GALs & Parenting Evaluators:** Stacie Naczelnik and Bailey Walton (Sound Family Law); Sound Family Law (GAL firm financially benefiting from fraudulent proceedings).
- **Court-Appointed Parenting Supervisor:** Indaba (Parenting services provider engaging in ADA discrimination); Alan Schneider (Parenting supervisor engaged in discriminatory conduct and creation of defamatory records).
- **Washington State Bar Association (WSBA):** In its quasi-judicial capacity, complicit in obstructing disability rights enforcement, and M. Craig Bay in his official capacity.
- **Washington Commission on Judicial Conduct:** For deliberate failure to address ADA violations and judicial misconduct complaints.
- **Washington State Attorney General's Office:** Assistant Attorneys General Michael Collins (DCYF Division, identified falsified state evidence and refused to correct the record), Mary Li (Child Welfare Division), and Patricia Prosser (Civil Rights Division).

Group 2: *Murray v. Supreme Court of Washington et al.*, Case No. 3:25-cv-05074-DGE (W.D. Wash.)

Washington Supreme Court, in its official capacity.

- **Washington Supreme Court Justices:** Chief Justice Steven C. González, Associate Chief Justice Charles W. Johnson, Justice Susan Owens (replaced by Justice Madsen for this proceeding), Justice Sheryl Gordon McCloud, Justice Raquel Montoya-Lewis, and Justice Barbara A. Madsen (who sat for Justice Owens in this matter). These justices are named under Rule 10(c) for perpetuating unresolved and conflicting constitutional violations.
- **Washington Supreme Court Administrative Staff:** Becky Woodrow, Senior Office Administrative Assistant, Washington State Supreme Court, for her role in processing filings and ADA notices on behalf of the Court during administrative obstruction.

Group 3: Murray v. Ninth Circuit Court of Appeals (Appeal Nos. 25-1016, 25-2090, 25-3506, 25-3183)

United States Court of Appeals for the Ninth Circuit, in its official capacity.

Ninth Circuit Judges and Officials (Article III judges and administration):

- *Hon. Jamal Whitehead* (Appeal No. 25-1016 – central actor in ADA and due process violations)
- *Hon. Barry G. Silverman* (Appeals 25-1016, 25-2090, 25-3506 – issued multiple conflicted rulings undermining jurisdiction and procedural waiver)
- *Hon. Richard C. Tallman* (Appeal No. 25-2090 – signed onto unexplained "frivolous" dismissal)

- *Hon. Patrick J. Bumatay* (Appeal No. 25-2090 – signed onto unexplained "frivolous" dismissal)
- *Hon. Kenneth K. Lee* (Appeals 25-1016, 25-3506 – signed jurisdictional dismissals without analysis)
- *Hon. Lawrence VanDyke* (Appeals 25-1016, 25-3506 – signed jurisdictional dismissals without analysis)

"These judges are named under Rule 10(c) due to active rulings issued while this petition was pending, in conflict with the judicial interests at stake in this action."

Group 4: *Murray v. Whitehead et al.*, Case No. 2:25-cv-00312-SAB (W.D. Wash.) (Now on Appeal No. 25-2090)

United States District Court for the Western District of Washington, in its official capacity.

Judges and officials named as defendants: Chief Judge Hon. David G. Estudillo; Hon. Jamal Whitehead (named defendant in civil rights case 2:25-cv-00312-SAB); Hon. Lauren King; Hon. Theresa L. Fricke (Magistrate Judge); Hon. Stanley A. Bastian

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Group 5: *Murray v. Murguia et al.*, Case No. 4:2025cv01364-WHO (N.D. Cal.) (Now on Appeal, Appeal No. TBD)

United States Court of Appeals for the Ninth Circuit, in its official capacity.

United States District Court for the Northern District of California, in its official capacity.

- Hon. Mary H. Murguia (Ninth Circuit Chief Judge and Chair of the Judicial Conduct Council)
- Ninth Circuit Judicial Council (in its administrative capacity)
- Hon. Kandis A. Westmore (U.S. Magistrate Judge, N.D. Cal.)
- Hon. William H. Orrick
- Susan Y. Soong (Circuit Executive, Ninth Circuit Court of Appeals), named due to her administrative responsibility for intake and procedural routing of judicial conduct filings.

Group 6: *Murray v. U.S. Attorney's Office*, Case No. 2:25-cv-00259-LK (W.D. Wash.)

U.S. Attorney's Office for the Western District of Washington, in its official capacity.

- U.S. Attorney Tessa Gorman (official capacity), for obstructing Petitioner's ADA-protected access to a criminal investigation and retaliating against Plaintiff following ADA accommodation requests.
- U.S. Attorney Susan Kas (official capacity), complicit in the denial of ADA

accommodations and refusal to provide access to federal investigative processes, thereby perpetuating the harm caused by RICO-related violations.

Group 7: Murray v. DOJ et al., Case No. 6:25-cv-00924-MC (D. Or.)

United States District Court for the District of Oregon, in its official capacity.

District Judge: *Hon. Michael J. McShane*, named under Rule 10(c) for issuing retaliatory and incompatible rulings in Case No. 6:25-cv-00924-MC while this petition was pending, despite directly conflicting judicial outcomes against the same respondent class in separate District of Oregon actions.

III . RELATED CASES

The following proceedings are directly related to the case in this Court within the meaning of Rule 14.1(b)(iii). A full summary of each matter, including the constitutional, statutory, and treaty-based violations implicated, is provided in **Appendix L** (beginning at page 206a), incorporated herein by reference:

- *Murray v. Murray*, No. 17-3-06463-1 SEA (King County Superior Court)
- *In re Sara Murray*, No. 1029250 (Washington Supreme Court)
- *Murray et al. v. King County Superior Court et al.*, No. 2:24-cv-00239-JNW (W.D. Wash.) (9th Circ.Constructive Denial Appeal No. 25-1016)
- *Murray v. Whitehead et al.*, No. 2:25-cv-00312-SAB (E.D. Wash.) (9th Circ Appeal No. 25-2090)
- *Murray v. Washington Supreme Court*, No. 3:25-cv-05074-DGE (W.D. Wash.) (9th Circ. Constructive Denial Appeal No. 25-3506)
- *Murray v. Murguia et al.*, No. 4:25-cv-01364-WHO (N.D. Cal.) (9th Circ. Appeal No. 25-3183)
- *Murray v. U.S. Attorney's Office et al.*, No. 2:25-cv-00259-LK (W.D. Wash.) (9th Circ.Appeal No. 25-2378)
- *Murray v. DOJ et al., 6:25-cv-00924-MC (D. Or.) (appeal forthcoming)*
- *Murray v. Washington State Department of Social and Health Services (DSHS) et Al., 6:25-cv-01053-AA*

IV. TABLE OF CONTENTS

VI. TABLE OF AUTHORITIES

Cases

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IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF MANDAMUS

Petitioner respectfully prays that a writ of mandamus issue.

VII. OPINIONS BELOW

The following opinions of the United States Courts of Appeals for the Ninth Circuit are unpublished:

1. ***Murray v. Whitehead et al., Appeal No. 25-2090 (9th Cir.):***

Dkt 26 Opinion and Order, 7/16/2025, appears at Appendix 219a to the petition.

2. ***Murray v. Ninth Circuit et al., Appeal No. 25-1016 (9th Cir.):***

Dkt 47 Order, 7/18/2025, appears at Appendix 220a to the petition.

3. ***Murray v. DOJ et al., Appeal No. 25-3506 (9th Cir.):***

Dkt 10 Order, 7/21/2025, appears at Appendix 222a to the petition.

4. ***Murray v. Ninth Circuit, et Al.*, Appeal No. 25-3183 (9th Cir.):**

Dkt 7 Order, 7/25/2025, appears at Appendix 235a to the petition.

The following opinions of the United States District Courts are unpublished:

1. *Murray v. King County Court et al.* 2:24-cv-00239-JNW (W.D. Wash.):

Doc 5 Order, 12/27/2023, appears at Appendix **22a** to the petition.

Doc 7 Order, 1/6/2024, appears at Appendix **29a** to the petition.

Doc 12 Order - Appoint Counsel, 2/5/2024, appears at Appendix **38a** to the petition.

Doc 13 Order: Pro Bono Counsel, 2/6/2024, appears at Appendix **42a** to the petition.

Doc 16 Order: Change Venue, 2/16/2024, appears at Appendix **45a** to the petition.

Doc 23 Order to Show Cause, 4/1/2024, appears at Appendix **46a** to the petition.

Doc 26 Order: IFP, 4/8/2024, appears at Appendix **48a** to the petition.

Doc 29 Order: Attorney, 4/30/2024, appears at Appendix **50a** to the petition.

Doc 34 Order: Appoint Counsel, 8/13/2024, appears at Appendix **53a** to the petition.

Doc 38 Order Referring Motion, 9/11/2024, appears at Appendix **64a** to the petition

Doc 39 Min. Order, 9/12/2024, appears at Appendix **77a** to the petition.

Doc 40 Order denying disqual., 9/18/2024, appears at Appendix **78a** to the petition.

Doc 41 Order, 12/27/ 2024, appears at Appendix **81a** to the petition.

Doc 43 Order: Reconsideration, 1/17/2025, appears at Appendix **85a** to the petition.

Doc 54 Order - Motion to Stay, 3/10/2025, appears at Appendix **91a** to the petition.

Doc 56 Order Motion to Vacate, 3/11/2025, appears at Appendix **95a** to the petition.

Doc 58 Order Motion to Vacate, 3/12/2025, appears at Appendix **96a** to the petition.

Doc 61 Order - Motion to Vacate 3/26/2025, appears at Appendix **97a** to the petition

Doc 63 Order: Misc Relief, 4/18/2025, appears at Appendix **98a** to the petition.

Doc 65 Minute Order, 5/5/2025, appears at Appendix **99a** to the petition.

2. ***Murray v. Whitehead et al.* 2:25-cv-00312-SAB (W.D. Wash.):**

Doc 6 Order to Show Cause, 2/25/2025, appears at Appendix **104a** to the petition.

Doc 11 Order on IFP, 3/18/2025, appears at Appendix **106a** to the petition.

Doc 15 Order: For Leave, 3/27/2025, appears at Appendix **108a** to the petition.

3. ***Murray v. Murguia et al.* 3:25-cv-01364-WHO (N.D. Cal.):**

Doc 10 Order, 3/12/2025, appears at Appendix **117a** to the petition.

Doc 17 Order, 5/9/2025, appears at Appendix **121a** to the petition.

Doc 18 Judgment, 5/9/2025, appears at Appendix **124a** to the petition.

4. ***Murray v. WA Supreme Court et al.* 3:25-cv-05074-DGE (W.D. Wash.):**

Doc 5 Order to Show Cause, 3/7/2025, appears at Appendix **128a** to the petition.

Doc 8 Order Referring Motion, 4/18/2025, appears at Appendix **136a** to the petition

Doc 11 Order Referring Motion, 5/6/2025, appears at Appendix **141a** to the petition

5. ***Murray v. U.S. Attorney's Office et al.* 2:25-cv-00259-LK (W.D. Wash.):**

Doc 5 Order on TRO, 2/5/2025, appears at Appendix **148a** to the petition.

Doc 7 Order on IFP, 2/18/2025, appears at Appendix **150a** to the petition.

Doc 12 Order Appoint Counsel, 3/11/2025, appears at Appendix **151a** to the petition

Doc 14 Order Referring Motion 3/18/2025, appears at Appendix **162a** to the petition

Doc 17 Order Referring Motion 3/31/2025, appears at Appendix **166a** to the petition

Doc 19 Order, 4/8/2025, appears at Appendix **172a** to the petition.

Doc 20 Order: Reconsideration, 4/8/2025, appears at Appendix **179a** to the petition.

Doc 21 Judgment, 4/9/2025, appears at Appendix **184a** to the petition.

6. ***Murray v. DOJ et al., 6:25-cv-00924-MC (D. Or.):***

Dkt 9 Opinion and Order, 7/19/2025, appears at Appendix 223a to the petition.

Dkt 10 Judgment, 7/19/2025, appears at Appendix 234a to the petition.

For cases from state courts: The opinion of the highest state court to review the merits, the Washington Supreme Court, appears at Appendix **188a** to the petition

and is unpublished. *In re Sara Murray*, Washington Supreme Court, No. 1029250, July 2024: Order denying IFP and ADA Accommodations based on cost, without interactive ADA process, in violation of *Olmstead v. L.C.*, 527 U.S. 581 (1999), and *Duvall v. Kitsap County*, 260 F.3d 1124 (9th Cir. 2001).

The opinion of the King County Superior Court appears at Appendix **190a** to the petition and is unpublished. *Murray v. Murray*, King County Superior Court, No. 17-3-06463-1 SEA, January 25, 2023: Order denying ADA accommodations after the court instructed Petitioner not to submit medical evidence, then failed to comply with *Duvall*, *Olmstead* or the ADA. The court obstructed, retaliated, falsely claimed accommodations were provided, and engaged in years-long ADA discrimination.

VIII. JURISDICTION

For cases from federal courts: The following federal cases were constructively denied, dismissed, or remain without impartial adjudication in the U.S. District Courts, nor the United States Court of Appeals for the Ninth Circuit:

- *Murray et al. v. King County Superior Court et al.*, No. 2:24-cv-00239-JNW (W.D. Wash.) Constructive denial appeal filed 01/2025 Ninth Circuit No25-1016
- *Murray v. Whitehead et al.*, No. 2:25-cv-00312-SAB (E.D. Wash.) – Dismissed March 27, 2025; Ninth Circuit Appeal No. 25-2090.
- *Murray v. Washington Supreme Court*, No. 3:25-cv-05074-DGE (W.D. Wash.) – Petitioner's IFP was constructively denied, then denied after Petitioner filed constructive denial appeal; an admin order contradicted the denial afterward.

- *Murray v. Murguia et al.*, No. 4:25-cv-01364-WHO (N.D. Cal.) – Dismissed May 9, 2025; appeal 25-3183.
- *Murray v. U.S. Attorney's Office et al.*, No. 2:25-cv-00259-LK (W.D. Wash.) – Dismissed April 9, 2025; Ninth Circuit Appeal No. 25-2378.

Petitioner has not filed any document titled a "petition for rehearing" in any federal court proceeding. Throughout proceedings, Petitioner was denied ADA accommodations, appointed counsel, and intelligible access to judicial procedures, in violation of the Constitution, treaties and federal statutes. Orders were issued without reaching the merits or addressing controlling law. Petitioner's disabilities and exposure to unconstitutional proceedings—violating the Eighth Amendment and 8 C.F.R. § 208.18—further prevented access to appellate relief. Petitioner invokes this Court's jurisdiction under 28 U.S.C. § 1254(1) and 28 U.S.C. § 1651(a).

For cases from state courts: The highest state court to rule on Petitioner's claims was the Washington Supreme Court in *In re Sara Murray*, No. 1029250 – Denied in July 2024. No rehearing was filed. Petitioner was denied ADA accommodations and appointment of counsel necessary to understand or access the process for pursuing such relief. The underlying matter (*Murray v. Murray*, No. 17-3-06463-1 SEA) remains stayed under unlawful and retaliatory conditions imposed in 2022-2024. Petitioner has not had access to a lawful, impartial state forum for over 8 years. Petitioner invokes this Court's jurisdiction under 28 U.S.C. § 1257(a) and 28 U.S.C. § 1651(a). In further support of jurisdiction under the All Writs Act and this Court's

supervisory authority, Petitioner states as follows:

This Court has jurisdiction under 28 U.S.C. § 1651(a) (All Writs Act), authorizing extraordinary relief to protect constitutional rights where no other adequate remedy exists. Jurisdiction is further proper under 28 U.S.C. § 1254(1), granting appellate and supervisory authority over United States courts of appeals that fail to comply with binding constitutional and statutory mandates.Pursuant to Supreme Court Rule 10(a): jurisdiction is proper where a United States Court of Appeals has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's supervisory power. Under Rule 10(c): jurisdiction is warranted because state courts and a United States Court of Appeals have decided an important question of federal law that has not been, but should be, settled by this Court, or has decided an important federal question in a way that conflicts with relevant decisions of this Court. Under Rule 20(1): issuance of an extraordinary writ under the All Writs Act is proper because this petition will aid in the Court's appellate jurisdiction, involves exceptional circumstances, and there is no other adequate relief available.

IX. RELEVANT CONSTITUTIONAL & STATUTORY PROVISIONS INVOLVED

In accordance with Rule 14.1(e)(v), the relevant constitutional provisions cited in this Petition are incorporated by reference and reproduced in full in **Appendix K** *(starting at page 198a).* These include: U.S. Const. art. II, § 3; U.S. Const. art. VI, cl. 2 (Supremacy Clause); U.S. Const. amends. I, V, VIII, XIV; 28 U.S.C. § 1651(a) (All

Writs Act); 28 U.S.C. §§ 144, 351(a), 455(a), 530B, 535; 9 U.S.C. § 794 (Section 504 of the Rehabilitation Act); 42 U.S.C. §§ 1983, 1985(2), 1985(3), 12132 (Title II of the ADA), 12203 (ADA); 18 U.S.C. §§ 113, 241, 242, 1962 (RICO), 1964(c) (RICO Private Right of Action); Fed. R. Civ. P. 17(c)(2), 65(b)(1); 8 C.F.R. § 208.18 (CAT definition of torture); Convention Against Torture (CAT)) Articles 2, 16; International Covenant on Civil and Political Rights (ICCPR) Arts 7, 26

X. STATEMENT OF THE CASE

This petition arises from an unremedied and now procedurally admitted pattern of constitutional, treaty, and federal statutory violations ("Respondent Violations") perpetrated against Petitioner and her children—through systemic obstruction, retaliation, and unlawful confinement. The record establishes that: (i) at least six appellees in Ninth Circuit Appeal No. 25-1016 have procedurally admitted to ongoing RICO, ADA, and § 1983 violations; (ii) the RICO enterprise uses custody of Petitioner's minor children to extort Petitioner and maintain control of her business; (iii) the enterprise relies on pre-existing state-created danger in family court as a RICO vehicle; (iv) Respondents were notified of abuse, coercive control, and conspiracy yet shielded these crimes; (v) federal and state officials have long known state-created family court danger predictably results in ADA disability and retaliation; (vi) Respondents operate a closed loop of constitutional obstruction that entraps Petitioner and her children; (vii) the ADA discrimination escalated into First, Eighth, and Fourteenth Amendment violations and treaty breaches; (viii)

each Respondent took affirmative steps to sustain this unlawful loop; (ix) the courts below have so far departed from lawful proceedings that no remedy remains; and (x) this Court has a non-discretionary duty to intervene. At the time of filing, Petitioner and her children remain unlawfully and forcibly separated—approaching three years—despite the absence of any lawful no-contact order.

Subsequent Procedural Developments and Structural Conflict Escalation

While this petition has been pending, a pattern of procedural suppression has emerged across multiple appellate and district court matters—further confirming the structural necessity of mandamus relief. In July 2025, three separate Ninth Circuit panels issued summary dismissals in Appeal Nos. 25-1016, 25-2090, and 25-3506, 25-3183 (Dkt 47, Dkt 26, Dkt 10, Dkt 7, respectively). Each panel consisted exclusively of Article III judges affiliated with the Ninth Circuit—an entity named as respondent in this action and implicated in the underlying procedural violations. No jurist with lived or legal experience in maternal disability, gender-based violence, or family court abuse participated in adjudicating these matters. These rulings dismissed petitioner's claims as "frivolous" or "jurisdictionally improper" without engaging the controlling procedural record. Notably, none of the orders acknowledged the operative waiver and abandonment entered on the Ninth Circuit docket in 25-1016—despite its direct jurisdictional implications. The rulings instead relied on brief citations to case law without application, offering no reasoning, findings, or factual analysis. This approach—employing technical labels to avoid

record review—functions not as adjudication, but as defamation and procedural foreclosure. Concurrently, Chief Judge Michael J. McShane (District of Oregon) issued rulings—Dkt 9 and Dkt 10 in Case No. 6:25-cv-00924-MC— dismissing petitioner's claims under similar pretexts. The orders misstate petitioner's legal claims, ignore jurisdictional and statutory grounds, and repeat language from the Ninth Circuit dismissals—indicating institutional alignment, not independent review.These post-filing rulings represent more than legal disagreement. They constitute a closed-loop pattern of judicial self-protection: a structurally conflicted court issuing rapid dismissals of claims implicating its own conduct, while declining to address binding procedural events or statutory violations. The coordination in timing, language, and judicial identity—combined with the total absence of adjudicatory reasoning—suggests a collective effort to suppress constitutional exposure rather than resolve claims on the merits. This pattern leaves Petitioner without access to any neutral federal forum and places her and her children in continued harm without remedy. Mandamus is therefore not only appropriate—it is necessary to preserve the Constitution's guarantee of access, accountability, and equal protection under law.

Preservation of Waiver and Extraordinary Grounds for Mandamus

Petitioner affirms that the procedural waiver and abandonment filed into the record by Appellees in Appeal No. 25-1016 remains unreversed, unopposed, and unadjudicated. The Ninth Circuit's Dkt 47 dismissal order did not address the

waiver, nor did it vacate, reverse, or nullify its legal effect. Instead, the court issued a jurisdictional dismissal devoid of analysis—despite the procedural admission's dispositive impact. Petitioner expressly reserves the right to enforce the waiver in all present and future proceedings. A procedural admission does not dissolve through unrelated orders that fail to confront it. Mandamus remains the only remedy capable of protecting the constitutional and statutory rights now foreclosed by a judiciary in structural conflict. The Ninth Circuit has repeatedly refused to evaluate petitioner's claims under controlling law, instead issuing unreasoned denials that reference *Mersho* or *Bauman* without application. Petitioner asserts that the record satisfies all five *Bauman* factors: (1) **No other adequate means** exist to obtain relief. Petitioner has exhausted ordinary appeals, which were dismissed through conflicted and procedurally invalid orders. (2) **The issue is novel and critical**: the judiciary has not addressed how a petitioner may compel adjudication where procedural admissions are ignored by conflicted judges. (3) **The district court's actions were clearly erroneous**, including failure to engage required ADA processes, due process obstruction, and refusal to consider jurisdictional waivers. (4) **The pattern is systemic and repetitive**: multiple district and appellate courts have adopted identical evasion patterns—indicating institutional entrenchment. (5) **The issue is of profound public importance**: the case implicates the constitutional rights of parents disabled by gender violence and state-created family court danger, the structural accountability of federal courts,

and the enforceability of federal civil rights laws.

The recent rulings cited in **Appendix N** reveal an escalation—not resolution—of harm. Procedural doors have been closed by judges with institutional self-interest, often in short rulings devoid of legal reasoning. These dismissals are not neutral; they are institutional containment maneuvers—timed to preempt this Court's oversight and designed to conceal, rather than correct, structural violations. Where Article III courts have failed in their duty to apply law without prejudice or self-protection, mandamus relief is warranted and constitutionally imperative.

i. 25-1016 Appellees Procedurally Admitted RICO, ADA, & § 1983 Violations

In Ninth Circuit Appeal No. 25-1016, at least six appellees—including the two lead RICO conspirators—waived all federal defenses to every count in the operative Sixth Amended Complaint. Admissions include RICO violations involving enterprise conduct to seize Petitioner's business, suppress litigation, and expand coercive control; ADA and § 12203 violations based on the infliction and exploitation of disability, denial of accommodations, and obstruction of court access; and a § 1983 conspiracy with state and federal actors to violate Petitioner's First, Eighth, and Fourteenth Amendment rights under color of law. Appellees further waived defenses to treaty-based and regulatory claims, including violations of 8 C.F.R. § 208.18 (CAT) and Articles 7 and 26 of the ICCPR. The Ninth Circuit docket confirms these waivers (Doc. Nos. 19, 36)【App. 2a】, which constitute procedural admissions to every category of harm now before this Court. These are ongoing

violations inflicted on Petitioner—causing permanent neurological harm, severe psychological trauma, catastrophic loss of livelihood, and unlawful, indefinite mother-child separation in direct violation of constitutionally protected family integrity– a principle this Court has reaffirmed for a century: *See Pierce v. Society of Sisters* 268 U.S. 510 (1925); *Troxel v. Granville*, 530 U.S. 57 (2000); *Meyer v. Nebraska*, 262 U.S. 390 (1923); *Wisconsin v. Yoder*, 406 U.S. 205 (1972); *Moore v. City of East Cleveland*, 431 U.S. 494 (1977). The procedural admission now entered into the appellate record confirms the factual basis for the violations raised herein. Among the most urgent and ongoing violations: King County Superior Court, acting under color of state law, continues to enforce procedurally void custody orders that indefinitely detain Petitioner's children without due process. The detaining party—a procedurally admitted RICO conspirator—inflicts psychological harm consistent with coercive control and abuse, substantiated by forensic interview and uncontested pleadings. The children are, in effect, civil detainees—separated from their primary caregiver without court protection, counsel, or judicial review. Federal courts have long held that even brief, unauthorized removal of children from parental custody violates the Fourteenth Amendment. *See* Duchesne v. Sugarman, 566 F.2d 817, 825 (2d Cir. 1977). The Supreme Court has similarly held that individuals held in state custody have substantive due process rights to safety, freedom from unreasonable restraints, and adequate care. *See* Youngberg v. Romeo, 457 U.S. 307, 315–16 (1982). That principle applies not only to institutional custody,

but to all forms of state-imposed control. Critically, even in contexts far removed from family law, federal courts have intervened where individuals were detained outside lawful process through government outsourcing. *See* Salahi v. Bush, No. 1:05-cv-00569-UNA (D.D.C.) (upholding habeas rights and due process protections for individuals held in non-traditional, indefinite U.S. custody abroad). The logic holds: **custody without law is unconstitutional—regardless of form.**

Here, the state has not merely failed to act. It has outsourced unlawful custodial control of Petitioner's children to a known abuser—functionally placing her children in non-consensual, indefinite, extrajudicial detention through a procedurally admitted RICO actor. The result is the psychological and legal imprisonment of both mother and children. That confinement is not metaphorical—it is physiological, relational, and constitutional. The Ninth Circuit has held that the unlawful removal of children from their parents without a valid court order or exigent circumstances violates the constitutional rights of both the parents and the children. *See* Wallis v. Spencer, 202 F.3d 1126, 1137 (9th Cir. 1999). Similarly, the use of excessive force by state actors resulting in the loss of familial companionship constitutes a violation of substantive due process. *See* Smith v. City of Fontana, 818 F.2d 1411, 1418–19 (9th Cir. 1987). These liberty interests—especially the right to family integrity and protection from state-inflicted confinement—are not novel; they are among the fundamental rights "deeply rooted in this Nation's history and tradition" and "implicit in the concept of ordered liberty." *See* Washington v. Glucksberg, 521 U.S.

702, 721 (1997).

ii. The RICO Enterprise Uses Custody of Petitioners' Children to Extort Petitioner and Maintain Control of Her Business—Profiting Millions

The admitted facts in the Sixth Amended Complaint establish the existence of an active and ongoing RICO enterprise whose purpose was to seize control of Petitioner's child custody, intellectual property and revenue streams by destroying her economic, legal, and medical capacity to resist. The enterprise weaponized the judicial system to extract control of Petitioner's children and commercial assets—using psychological abuse, custody threats, and litigation coercion to disable her ability to function, communicate, or defend herself. Petitioner was the sole founder of a successful commercial venture. The RICO enterprise's lead actors seized control of that venture through fraud, extortion, and coercive litigation—then diverted its value to themselves while isolating and discrediting Petitioner. Using custody of her children as leverage, they issued repeated threats that she would lose her children, her company, her income and reputation if she exposed or resisted their actions. When she persisted in seeking redress, the enterprise carried out those threats: severing mother-child contact, defaming her in court records, and obstructing her legal standing. The perpetrators inflict psychological, reputational, and financial harm using real-time judicial power to expand control over Petitioner's business and public identity– and the children are used as instruments of extortion. The resulting financial damage exceeded millions of dollars. The

enterprise reinvested RICO gains into new predicate acts designed to silence Petitioner permanently and prevent her from regaining control of what's been taken. Appellees who procedurally admitted to these acts in Ninth Circuit Appeal No. 25-1016 have confirmed, through waiver, that these events occurred, that they are ongoing, and that their enterprise used child custody interference, defamation, ADA retaliation, and court process fraud as central RICO mechanisms. This petition seeks urgent relief because the enterprise is not historical—it continues to profit from its control of Petitioner and her children, while inflicting ongoing harm.

iii. Family Court State-Created Danger is the RICO Scheme's Vehicle

The RICO enterprise exploited entrenched systemic failures in King County Superior Family Court—failures so persistent that court-published documents describe state-created danger dating back two decades. These structural dangers predated the RICO conduct and created fertile ground for its expansion: Petitioner encountered a total absence of screening for Cluster B-pattern abuse or coercive control (domestic abuse by perpetrators with behavior patterns consistent with Antisocial Personality Disorder– colloquially "sociopathy", "psychopathy"-- and Narcissistic Personality Disorder), despite known risks of serious harm. No public awareness mechanisms existed. Evaluators, GALs, and parenting supervisors lacked expertise in Cluster B-pattern DV or child trauma. Forensic procedures were absent or violated national standards and state law under RCW 26.44: accredited evaluations were excluded; interviews were unwitnessed and unrecorded. Law

enforcement and courts disbelieved DV reports while penalizing Petitioner for making them. ADA-defamed victims were systematically discredited, including through manufactured evidence by DCYF—flagged by the Washington Attorney General but never removed. Twelve state judges across Petitioner's case history were incited, manipulated, or conspired with, into constitutional, treaty and federal violations, per now-admitted facts in Appeal No. 25-1016. Three Appellees—all attorneys—admitted aiding the central RICO actor by exploiting these conditions. The family court's systemic failures created a legal landscape where judicial power was weaponized to shield and provide a mantle of power to racketeering abusers, silence survivors, enable RICO enterprise expansion– violating 42 U.S.C. § 1983.

iv. Respondents Were Notified of Constitutional, Treaty and Federal Violations—Now Admitted by Appellees—And Chose to Shield the Crimes

Petitioner—disabled under the ADA after surviving a decade of coercive abuse—repeatedly notified Respondents of the ongoing violations. She submitted accredited forensic and medical evidence, including a confirmed child abuse interview and formal diagnosis of severe PTSD. Despite the known cognitive barriers and lack of legal representation, she did everything within her capacity to report the violations, seek court protection, and stop the harm. Respondents responded not with protection, but with punishment. They refused to provide ADA accommodations, compelled her to act as lead counsel against her perpetrators—including attorneys and state actors—and then penalized her for the very

disabilities caused by the violations at issue. The "opinions below" are not neutral adjudications; they are retaliatory acts and procedural entrapment under color of law—violating the ADA, Rehabilitation Act, and 42 U.S.C. § 1983, and constituting cruel and unusual punishment under the Eighth Amendment and 8 C.F.R. § 208.18. Respondents also shielded: (1) appellees who procedurally admitted to civil rights and RICO violations now pending in Ninth Circuit Appeal 25-1016; (2) federal defendants facing related claims currently on appeal; and (3) Other government actors who engaged in unconstitutional conduct. These decisions prolonged harm, denied remedy, and reinforced an unlawful structure no court below dismantled.

v. This State-Created Danger Foreseeably Results in ADA Disability, IFP Status, and Judicial Discrimination and Retaliation Against Women

Federal and state authorities—including those that fund Respondents— have long known that exposure to family court state-created danger (unlawful and dangerous handling of abuse, coercive control, and forced child separation) foreseeably results in maternal and child ADA disabilities, financial collapse, and systemic retaliation. VAWA-funded research, federal IPV tools, and trauma science studies consistently link litigation abuse and court complicity directly to PTSD and financial hardship–both markers of ADA disability. King County, where this case originated, developed a VAWA-funded IPVIA tool requiring courts to identify survivors and abuse red flags: (1) PTSD diagnosis; (2) income and child custody loss; (3) the abuser's concurrent gain of financial or legal power and control. To address the state-created

danger, Congress passed VAWA Kayden's Law, requiring courts to consult qualified psychological professionals when evaluating safety, credibility, and capacity in cases involving coercive control and abuse—specifically to protect women and children from dangerous rights violations and gender/ADA discrimination by courts and judges. California and Washington passed similar laws: Piqui's Law and HB 1901 respectively. In 2024, the U.S. allocated over $690 million[1] in VAWA funds to states to address this danger. Both Washington and California accepted those funds. Yet Respondents ignored these safety protocols entirely. Here, Respondents actively suppressed accredited forensic and medical evidence—including confirmed child abuse disclosures and PTSD diagnostics. They imposed defamatory pseudo-diagnoses by non-medical professionals, forced public ADA disability disclosure in court, denied legal representation, and penalized Petitioner for petitioning for government redress. This case is not an outlier; it exemplifies a well-documented national pattern in which the judicial branch violates constitutional, treaty, and statutory rights of mothers and children working to escape abuse and coercive control. The violations perpetuate—and can directly cause—foreseeable ADA disabilities. Research shows: up to 86% of women who survive a single incident of DV or coercive control—including emotional, physical,

[1] Office of Public Affairs, U.S. Department of Justice. "Justice Department Announces More Than $690 Million in Violence Against Women Act Funding." Department of Justice, 12 Sept. 2024, www.justice.gov/opa/pr/justice-department-announces-more-690-million-violence-against-women-act-funding.

sexual or financial abuse (RICO applies)—develop PTSD-related brain injuries[2] within 1 to 30 days of a single event. When courts force ongoing exposure to abuse, the resulting injuries compound[3], leading to severe disabilities that implicate the ADA. Here, Respondents, acting under color of law, are providing perpetrators with a mantle of power in violation of 42 U.S.C. § 1983, subjecting Petitioner and her children to repeated disabling conditions over 8 years. Many Respondents did not merely acquiesce to the long-term torture of Petitioner—they actively participated in the violations, directly compounding the harm. Their conduct sustains a closed-loop constitutional obstruction: the state created the danger, perpetuates the abuse, and forecloses all legal remedy.[4] This systemic disregard constitutes deliberate indifference to serious harm, as well as willful blindness to ongoing constitutional, statutory, and treaty violations. Respondents' conduct violated the Eighth and Fourteenth Amendments, the ADA, the Rehabilitation Act, and protections under the Convention Against Torture (8 C.F.R. § 208.18) and ICCPR.

vi. Respondents' ADA Discrimination Escalated into I, VIII, XIV Amendment, CAT, ICCPR, CFR 208.18, 18 U.S.C. § 113 Violations

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[2] Woods SJ, Hall RJ, Campbell JC, Angott DM. "Physical health and posttraumatic stress disorder symptoms in women experiencing intimate partner violence." J Midwifery Womens Health. 2008;53(6):538–546

[3] Wineman NM, Woods SJ, Zupancic M. "Intimate partner violence as a predictor of post-traumatic stress disorder symptom severity in women." Presented at: Sigma Theta Tau International's 15th International Nursing Research Congress; July 22–24; Dublin, Ireland. 2004.

[4] "A Gendered Trap: When Mothers Allege Child Abuse by Fathers, the Mothers Often Lose Custody, Study Shows." The Washington Post, 29 July 2019, www.washingtonpost.com/local/social-issues/a-gendered-trap-when-mothers-allege-child-abuse-by-fathers-the-mothers-often-lose-custody-study-shows/2019/07/28/8f811220-af1d-11e9-bc5c-e73b603e7f38_story.html.

Petitioner's permanent ADA-qualifying disability—resulting from the sustained coercive control, institutional violence, and systemic rights violations—is documented throughout this petition with verified medical evidence (**Appendix M** page 213a) and binding legal authority. These neurological injuries are progressive and have been foreseeably worsened by Respondents' continued denial of accommodations, obstruction of access, and coercion into futile ADA processes. Such conduct constitutes deliberate indifference under the Eighth Amendment and acquiescence to torture under 8 C.F.R. § 208.18. Her treating physicians formally notified the courts of the medical necessity of legal representation to prevent further harm. Yet, no Respondent court appointed counsel through Rule 17(c)(2) or triggered emergency referral protocols under the ADA. Although the U.S. Court for the District of Oregon did briefly appoint pro bono counsel, the accommodation ended when the District of Western Washington took the case; although Judge Whitehead of the Western District of Washington initially reversed his own denial after Petitioner cited *Davey v. Pierce County*, No. 3:22-cv-05312-RJB, 2023 WL 2691584 (W.D. Wash. Mar. 29, 2023) to show sex-based ADA disparities—the accommodations were never implemented and, subsequently, re-denied. After Petitioner filed a judicial conduct complaint against Judge Whitehead for ADA discrimination and retaliation, he escalated retaliation, issued adverse rulings, erected procedural barriers, and excluded the forensic child abuse confirmation report from the record. This conduct—carried out despite medical evidence and

procedural admissions—violates long standing precedent. See *Holstein v. City of Chicago*, 803 F. Supp. 205, 210 (N.D. Ill. 1992), aff'd, 29 F.3d 1145 (7th Cir. 1994) (a judge may be liable under § 1983 for conduct in clear absence of jurisdiction); *Galloway v. Superior Court*, 816 F. Supp. 2d 1214, 1222–23 (C.D. Cal. 2011). Federal courts have likewise held that officials who manipulate proceedings, suppress exculpatory evidence, or retaliate against protected activity are not entitled to immunity. See *Green v. Thomas*, 3:23-CV-126-CWR-ASH, at 22–27 (S.D. Miss. Mar. 3, 2025). Petitioner was forced to litigate against perpetrators and sitting judges—without a JD, income, or accommodations—while suffering compounding neurological injury. Her children remain isolated with the procedurally admitted RICO perpetrator and child abuser, and displayed visible trauma and medical deterioration. No court intervened to protect them or enforce federal rights, despite obvious need and legal duty. Instead, Respondents continue to inflict direct cruelty that satisfies the constitutional cruel and unusual punishment standard (Eighth Amendment), retaliation and obstruction of petitioning rights (First Amendment), and disability-based exclusion under the ADA and Rehab Act; it also meets the definition of torture under ICCPR, CAT, and 8 C.F.R. § 208.18—binding domestic law. See Rose v. Himely, 8 U.S. (4 Cranch) 241, 276 (1808); U.S. Const. art. VI, cl. 2. In 2025, after district Respondents were notified of this petition, those Respondents denied any ADA or Rehabilitation Act obligation—a legally untenable position. This Court in Lane v. Peña, 518 U.S. 187, 192 (1996), held that federally conducted

programs are bound by Rehabilitation Act nondiscrimination mandates. Respondents' position contradicts *Lane* and, if allowed to stand, effectively strips access to courts from all Americans with disabilities—denying them a forum to assert constitutional, treaty and statutory protections. Respondents' conduct constitutes unconstitutional retaliation and entrapment, inflicting torturous harm under color of judicial authority. See *Browning v. Placke*, 698 S.W.2d 362, 365 (Mo. Ct. App. 1985), foreclosing access to constitutional rights, denying equal protection, and eviscerating due process.

vii. Respondents Operate a Closed Unconstitutional Loop That Ratifies Constitutional, Treaty, & Federal Violations– and Entraps Petitioner

Respondents have maintained a self-reinforcing structure of obstruction that deprives Petitioner of remedy by forcing her to seek rights relief from the very actors enabling or conducting the harm. Instead of neutral adjudication, Petitioner is trapped in a closed unconstitutional loop where the disabilities caused by abuse and rights violations are used against them to deny relief. This loop has no lawful exit. Petitioner is denied appointed counsel even when medically required, denied relief for lacking counsel, and punished for pro se filings. Respondents demand procedural compliance while simultaneously denying the ADA accommodations necessary for Petitioner to meet those standards. This conduct is not passive error; it is a deliberate system in which entrapment is the operating condition. Under *Farmer v. Brennan*, 511 U.S. 825 (1994), such conduct meets the definition of

deliberate indifference to risk of harm—sustained across multiple courts and years. Respondents have also nullified key federal and state policy reforms—including VAWA, Kayden's Law, Washington HB 1901, and California's Piqui's Law—enacted to protect women and children from precisely the types of coercive control, retaliation, and court-enabled abuse now at issue. Respondents obstructed access to ADA remedies, rendering Petitioner's efforts futile; litigated against her from the bench; ignored forensic medical evidence; colluded with unqualified or financially conflicted appointees; misused the UCCJEA to block mother-child contact for nearly three years; retaliated against Petitioner for protected speech; and mocked and defamed her ADA-recognized disabilities in open court. These acts violate the First, Eighth, and Fourteenth Amendments, the ADA, the Rehabilitation Act, and enforceable treaty obligations—and undermine the federal mandates and hundreds of millions of dollars in federal investment deployed to prevent this harm. Despite six appellees in Appeal No. 25-1016 waiving all federal defenses to RICO, ADA, § 1983, and related claims, Respondents continued to retaliate, defame, obstruct, and issue rulings as if those claims were contested—refusing to apply waiver doctrine, enforce default, or issue TROs. This constitutes ratification of admitted constitutional and statutory violations. Rather than apply the law, Respondents defamed Petitioner, denying her credibility and accommodations, and substituting stigma for fact. These acts are unconstitutional, retaliatory, and independently unlawful under federal disability law and the Eighth and Fourteenth

Amendments. Federal courts further entrenched the danger by constructively denying and blocking emergency relief, refusing to appoint counsel, and denying accommodations— despite forensic medical records and procedural admissions confirming the need. Petitioner and her children remain in danger— while the facts are clear—because Respondents refuse to obey controlling law and precedent.

viii. Respondents Took Affirmative Steps[5] to Sustain the Closed Constitutional Loop, Obstructed Relief—This Petition Lists a Fraction[6]

Below are a representative selection of acts and omissions by Respondent groups that, together, perpetuate the closed constitutional loop:

Group 1: *Murray v. King County Superior Court et al.*, 2:24-cv-00239-JNW (W.D. Wash.) : Respondents violated the First, Eighth, and Fourteenth Amendments by retaliating against protected speech, obstructing due process, creating a state-created danger, and showing deliberate indifference to documented ADA-related harm. They further violated the ADA and Rehab Act by denying accommodations, blocking access, and retaliating for ADA assertions. These acts are actionable under § 1983 and § 12203. Treaty violations include cruel, degrading treatment and unequal protection under CAT and ICCPR. CFR violations include

[5] The phrase "affirmative steps" as used in this section includes deliberate omissions where Respondents had a legal duty to act and knowingly refused—such as failing to accommodate known disabilities, refusing to investigate child abuse, or deliberately obstructing court access. Under binding precedent, including Farmer v. Brennan, 511 U.S. 825 (1994), such omissions constitute constitutional and statutory violations.

[6] Plaintiff suffers from severe PTSD-related brain injuries, which are dangerously aggravated by re-exposure to trauma. She has requested ADA accommodations and appointment of counsel to safely petition for redress. Forcing her to litigate these events without protections risks serious harm, constitutes cruel and unusual punishment. Examples here are illustrative, not exhaustive.

acquiescence to torture under 8 C.F.R. § 208.18 and failure to intervene in known discrimination under 28 C.F.R. § 35.130. Six defendant-appellees in Ninth Circuit Appeal No. 25-1016 waived and abandoned all federal defenses to claims of RICO and § 1983 conspiracy involving these Respondents, establishing procedural admissions to the pattern of misconduct documented here.Federal actors, including Group 4, further enabled these violations by shielding state misconduct and denying ADA relief.

Group 2: *Murray v. Supreme Court of Washington et al.*, No. 3:25-cv-05074-DGE (W.D. Wash.)-- *WA State Supreme Court No. 102925-0:* Respondents violated the First, Eighth, and Fourteenth Amendments by suppressing Petitioner's speech, obstructing due process, sanctioning unlawful mother-child separation, and ignoring ADA rights—thereby creating a state-created danger and perpetuating psychological harm. They refused to engage in the interactive process mandated by *Duvall v. Kitsap County*, 260 F.3d 1124 (9th Cir. 2001), instead imposing procedural obstacles that foreseeably worsened Petitioner's disabilities. These acts constitute ADA and Rehabilitation Act violations, are actionable under 42 U.S.C. § 1983 and § 12203, and cannot be excused by fiscal constraints. Washington courts have long recognized that federal law is binding on state courts and cannot be disregarded on procedural or institutional grounds. See *Edelstein v. Foley*, 6 Wn.2d 444, 107 P.2d 901, 906 (1940) (affirming that state courts are bound by the Supremacy Clause and must apply controlling federal law in disability-related proceedings).Treaty

violations include acquiescence to psychological torture under CAT and discriminatory denial of equal protection under ICCPR Articles 7 and 26, as well as failure to intervene in known harm under 8 C.F.R. § 208.18. Multiple appellees who waived federal defenses in Appeal No. 25-1016 conspired with or were shielded by these Respondents, rendering the violations procedurally admitted. Federal actors in Group 4 further entrenched this misconduct by obstructing enforcement of ADA and constitutional protections.

Group 3: Murray v. Ninth Circuit Court of Appeals, No. 25-1016 (9th Cir.) Respondents violated the First, Eighth, and Fourteenth Amendments by retaliating against protected ADA activity, denying accommodations in appellate proceedings, and imposing rigid deadlines without regard for Petitioner's disability—thus creating a barrier to justice and perpetuating harm. Their refusal to process ADA filings, in violation of *Duvall v. Kitsap County*, and escalation of retaliation after protected activity, violated the ADA (42 U.S.C. § 12132), Section 504 (29 U.S.C. § 794), and 42 U.S.C. § 12203. These acts inflicted ongoing neurological harm and constitute cruel and unusual punishment, disability-based exclusion, and deliberate indifference. Treaty violations include acquiescence to psychological torture under CAT and denial of equal protection under ICCPR, as well as willful blindness to ongoing harm, breaching 8 C.F.R. § 208.18. Respondents unlawfully ignored procedural admissions to these violations, entered by six appellees in 25-1016.

Group 4: *Murray v. Whitehead et al.*, No. 2:25-cv-00312-SAB (E.D. Wash.):

Respondents violated the First, Eighth, and Fourteenth Amendments by retaliating against Petitioner for asserting ADA rights, filing judicial conduct complaints, and petitioning this Court for relief. Judges issued rulings in their own defense while named as parties, in direct violation of 28 U.S.C. § 455(a) and (b), which mandates disqualification where impartiality may reasonably be questioned or where the judge has personal knowledge of disputed facts. As this Court has held, even the **appearance** of deep-seated bias—arising from conduct within the case—requires recusal. See *Liteky v. United States*, 510 U.S. 540, 555–56 (1994). These acts escalated into procedural retaliation, including defamatory rulings entered without hearings or evidentiary basis—used to discredit Petitioner, suppress the record, and justify unconstitutional orders. Petitioner was forced to litigate through inaccessible proceedings, despite ADA disability and medical documentation requiring appointment of counsel—causing prolonged neurological harm and unlawful mother-child separation, in violation of the Eighth and Fourteenth Amendments and the First Amendment right to petition. These harms were magnified by systemic and unreasonable judicial delays, which obstructed the exercise of statutory and constitutional rights and independently support mandamus relief under the rule-of-reason standard articulated in *Telecommunications Research & Action Center v. FCC (TRAC)*, 750 F.2d 70, 80 (D.C. Cir. 1984).

The Western District of Washington has repeatedly affirmed enforceability of ADA mandates—including appointment of counsel in *Davey v. Pierce County*—and

long-term structural oversight in *Disability Rights Washington v. Washington State Department of Corrections* No. 2:23-cv-01553 (W.D. Wash. Oct. 17, 2023). Yet when Petitioner requested identical relief, the same court denied accommodations and escalated procedural obstruction. This disparity reflects not legal principle but institutional bias, violating Title II of the ADA, § 504 of the Rehabilitation Act, and clearly established constitutional protections. The refusal to disqualify conflicted judges or implement mandated accommodations amid procedural collapse constitutes deliberate indifference under *Farmer v. Brennan*, 511 U.S. 825 (1994). Respondents further violated 42 U.S.C. § 12132, § 794, and § 12203 by refusing to engage in the interactive process, denying accommodations, and retaliating for protected ADA activity. Treaty violations include cruel, inhuman, and degrading treatment under CAT, ICCPR Articles 7 and 26, and psychological torture under 8 C.F.R. § 208.18. Their refusal to intervene, despite clear evidence of abuse and disability, constitutes willful acquiescence. The merit of Petitioner's claims is confirmed by the procedural waiver of all federal defenses by at least six Appellees in Ninth Circuit Appeal No. 25-1016—including RICO, ADA, and § 1983 claims—which Respondents acted to shield. Such rulings are void as a matter of law: a court acts without jurisdiction when it violates due process, disqualification statutes, or ADA mandates. See *Pennoyer v. Neff*, 95 U.S. 714, 733 (1878) ("The judgment of a court without jurisdiction is a nullity."). This principle applies to adverse or retaliatory rulings entered by disqualified judges or without

ADA-mandated process—not to lawful procedural defaults. See *Rook v. Rook*, 353 S.E.2d 756, 758 (Va. Ct. App. 1987) (void judgments may be collaterally attacked at any time; procedural defaults are not subject to vacatur).

Group 5: *Murray v. Murguia, et al.*, No. 4:2025cv01364-KAW (N.D. Cal.): Respondents violated the First, Eighth, and Fourteenth Amendments by retaliating against Petitioner for protected ADA-related speech and filings, obstructing due process, and showing deliberate indifference to worsening neurological harm caused by systemic disability discrimination. Respondents suppressed judicial accountability by denying accommodations in judicial misconduct proceedings and refusing to process Petitioner's complaints against federal judges—despite clear medical documentation and a pending lawsuit. These actions reflect cruel and unusual punishment, denial of equal protection, and deliberate retaliation for First Amendment-protected activity. Respondents further violated Title II of the ADA (42 U.S.C. § 12132), Section 504 of the Rehabilitation Act (29 U.S.C. § 794), and 42 U.S.C. § 12203 by refusing the interactive process and obstructing Petitioner's right to report judicial misconduct. The Ninth Circuit Judicial Conduct and Disability Council, including Circuit Executive Susan Y. Soong, closed Petitioner's complaint without addressing ADA assertions or initiating the required procedural review. These omissions enabled systemic retaliation and disability-based exclusion in violation of federal civil rights statutes and court obligations.

Treaty violations include cruel, degrading treatment and denial of equal protection

under the CAT and ICCPR Articles 7 and 26. By acquiescing to coercive legal conditions and psychological harm, Respondents violated 8 C.F.R. § 208.18 and rendered the judicial misconduct system an instrument of further abuse.

Group 6: Murray v. U.S. Attorney's Office, No. 2:25-cv-00259-LK (W.D. Wash.): Respondents violated the First and Fifth Amendments by retaliating against Petitioner for asserting ADA rights and denying equal protection based on gender and disability. Despite receiving credible evidence of criminal RICO conduct, ADA conspiracy, and constitutional violations—later procedurally admitted by at least six appellees in Ninth Circuit Appeal No. 25-1016—they refused to investigate, process, or respond to Petitioner's complaint. This refusal constituted obstruction of justice under 18 U.S.C. §§ 1510 and 1512 and left Petitioner and her children exposed to ongoing harm. It also violated Title II of the ADA (42 U.S.C. § 12132), Section 504 of the Rehabilitation Act (29 U.S.C. § 794), and 42 U.S.C. § 12203, by denying accommodations and ceasing communication after protected activity. These omissions foreseeably inflicted serious emotional and neurological harm. Treaty and regulatory violations include cruel, degrading treatment and unequal protection under CAT and ICCPR Articles 7 and 26, and acquiescence to psychological torture under 8 C.F.R. § 208.18 through willful inaction in the face of imminent danger and already-admitted federal crimes.

ix. The Courts Below Have So Far Departed From Lawful Proceedings That No Impartial Forum or Remedy Exists

Every court Petitioner has turned to—state, district, and appellate—has either ruled in favor of procedurally admitted RICO defendants, procedurally obstructed through constitutional, treaty and/or federal violations, or refused to act. Appellees' admissions are on record, yet the courts below have continued to treat the case as if contested, denied accommodations, refused appointment of counsel, and left Petitioner's children in known danger. As a result, all three are trapped in a closed constitutional loop with no neutral forum and no lawful path to remedy.

x. This Court Has a Non-Discretionary Duty to Break the Loop, Protect Petitioner and her children, and Issue the Writ

This petition falls squarely within the jurisdictional scope of the All Writs Act, 28 U.S.C. § 1651, Supreme Court Rule 20, and Rule 10(a) and (c). The courts below have not only departed from lawful procedure—they have refused to enforce waiver doctrine, denied accommodations after liability was admitted, and permitted ongoing rights violations against children and a disabled parent. The case raises nationally significant questions of first impression concerning judicial retaliation, ADA enforcement, and federal responsibility to prevent constitutional, treaty, and statutory harm. Without this Court's intervention, all three remain unlawfully severed, endangered, and with no functioning remedy under law. It is, as this Court has long held, *"emphatically the province and duty of the judicial department to say what the law is." Marbury v. Madison*, 5 U.S. (1 Cranch) 137, 177 (1803).

XI. REASONS FOR GRANTING THE WRIT

i. Immediate Intervention Is Required to Halt Irreparable Harm

Petitioner and her children remain in imminent, life-threatening danger due to sustained violations of the First, Eighth, and Fourteenth Amendments; Title II of the ADA; Section 504 of the Rehabilitation Act; and Articles 7 and 26 of the ICCPR and CAT, incorporated via 8 C.F.R. § 208.18. Petitioner suffers from ADA-recognized neurological disabilities, repeatedly worsened by judicial obstruction, forced self-representation, and retaliatory denial of accommodation—resulting in severe pain, neurological deterioration, and medical crises. Her children remain in the unlawful custody of a procedurally admitted RICO actor and known abuser, within a documented state-created danger involving coercive control, physical violence, and suppressed child sexual abuse reports. With full knowledge of these risks, government actors have blocked every protection pathway: refusing ADA accommodations, denying counsel, and suppressing access to court. These actions have imposed unlawful mother-child separation, psychological torture, and silencing of protected speech. Irreparable harm continues: Petitioner faces escalating neurological injury; her children remain at risk; and lower courts normalize unconstitutional and torturous conditions for disabled survivors. Federal officials cannot delay where clearly established law prohibits such risk. See *Hope v. Pelzer*, 536 U.S. 730, 738 (2002) (qualified immunity unavailable where officials are plainly on notice, and delay constitutes deliberate indifference). Petitioner has no adequate

remedy below. Relief has been repeatedly denied or obstructed across all forums. The extraordinary and system-wide nature of these violations demands issuance of the writ.

ii. Systemic Violations Undermine Legitimacy & Constitutional Supremacy

The courts below have not merely erred—they have shown escalating defiance of both Petitioner's rights and this Court's constitutional authority. Judges and officers across jurisdictions have disregarded binding precedent, including *Olmstead v. L.C.*, 527 U.S. 581 (1999); *Troxel v. Granville*; and *Pierce v. Society of Sisters*, while refusing to enforce federal statutes and treaties. Yet as this Court held in *Cohens v. Virginia*, 19 U.S. (6 Wheat.) 264, 404 (1821), "it must take jurisdiction if it should"—particularly where state actors nullify federally protected rights. By denying required accommodations, ignoring disqualifications, and evading protective duties, judicial actors have usurped legislative and executive functions—nullifying civil rights mandates and eroding this Court's role as final arbiter. In so doing, they have assumed powers they do not possess, transforming courts into lawless zones beyond Article III limits, contrary to *United States v. Hudson & Goodwin*, 11 U.S. (7 Cranch) 32, 34 (1812) ("federal courts possess no jurisdiction absent constitutional or statutory grant"). This "lawless zone" is not theoretical. Systemic judicial misconduct requiring federal intervention has occurred before. During Operation Greylord, over 90 individuals—including judges, prosecutors, and court personnel—were indicted for racketeering, bribery, and

conspiracy to deprive litigants of due process in Cook County, Illinois. See *United States v. Reynolds*, 821 F.2d 427 (7th Cir. 1987); *Olson*, 610 F. Supp. 1450 (N.D. Ill. 1985); *Murphy*, 768 F.2d 1518 (7th Cir. 1985); *Maloney*, 71 F.3d 645 (7th Cir. 1995). The judiciary did not hesitate then. Here, the record includes procedural admissions by attorneys—one identified as a principal RICO conspirator—his law firm, and their legal assistant, all waiving and abandoning federal defenses in Appeal No. 25-1016. These admissions implicate a broader civil conspiracy under 42 U.S.C. § 1983 involving attorneys, court officers, and public officials who were notified of the unlawful conduct and failed to intervene, retaliated, or shielded perpetrators—thereby ratifying the misconduct under color of law. This writ is not only justified—it is institutionally imperative. Silence in the face of systemic retaliation, rights nullification, and structural insubordination will signal that Supreme Court precedent and federal law may be defied with impunity. Intervention is necessary to preserve judicial legitimacy and the survival of equal protection under law.

iii. Extraordinary Relief Serves the Public Interest

The public has a compelling interest in courts upholding the Constitution, enforcing civil rights statutes without discrimination, and protecting—rather than punishing—disabled mothers and children seeking legal redress. This case exposes a pattern of state-enabled coercion and judicial retaliation which, if left unchecked, endangers all litigants. Public trust in the judiciary depends on this Court's defense

of equal protection, access to justice, and its constitutional authority.

iv. Constitutional, Treaty and Federal Violations

This Petition arises from ongoing violations of the First, Eighth, and Fourteenth Amendments; the Americans with Disabilities Act; the Rehabilitation Act; 8 C.F.R. § 208.18; 18 U.S.C. §§ 241, 242, and 113; and binding treaty obligations under the International Covenant on Civil and Political Rights (ICCPR) and the Convention Against Torture (CAT). These violations also implicate the state-created danger doctrine, judicial disqualification statutes, and the Supremacy Clause—all detailed in the "Relevant Constitutional, Treaty, and Statutory Provisions" section. Their application here is supported by binding precedent and unreversed procedural admissions. The retaliatory, exclusionary, and custodial patterns documented in the record constitute both structural and substantive violations of federal and constitutional law—and warrant this Court's extraordinary intervention.

v. Supreme Court Rules Violations

Rule 10(a): This Court's intervention is warranted because "a United States Court of Appeals has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's supervisory power." The Ninth Circuit refused to remedy ADA violations and ongoing judicial obstruction within its jurisdiction, instead upholding procedural barriers that deny disabled litigants meaningful access to justice. This constitutes a departure from standard constitutional practice requiring

supervisory correction. See *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982); *Duvall v. Kitsap County*, 260 F.3d 1124 (9th Cir. 2001). **Rule 10(c):** Review is further warranted where "a state court or a United States court of appeals has decided an important question of federal law that has not been, but should be, settled by this Court, or has decided an important federal question in a way that conflicts with relevant decisions of this Court." The Ninth Circuit and the Washington Supreme Court have disregarded controlling precedent on the ADA, Rehabilitation Act, and constitutional rights of disabled parents—creating direct conflict with *Tennessee v. Lane*, 541 U.S. 509 (2004); *Olmstead v. L.C.*, 527 U.S. 581 (1999); and *PGA Tour, Inc. v. Martin*, 532 U.S. 661 (2001). **Rule 20(1):** "The issuance of an extraordinary writ authorized by 28 U.S.C. § 1651(a) is not a matter of right, but of discretion sparingly exercised. To justify the granting of any such writ, the petitioner must show that the writ will be in aid of the Court's appellate jurisdiction, that exceptional circumstances warrant the exercise of the Court's discretionary powers, and that adequate relief cannot be obtained in any other form or from any other court." These exceptional circumstances are met here: No lower court has provided meaningful relief. Judicial obstruction has produced sustained constitutional, statutory, and treaty violations, including coerced family separation, psychological torture, and irreparable harm. Courts uniformly refused to conduct ADA-required interactive process, resulting in no civil rights for disabled litigants.

vi. Violations of FRCPs and Structural Safeguards

Federal courts failed to apply procedural protections to disabled litigants and unrepresented minors. Petitioner brought claims on behalf of her children under Rule 17(c)(2), which requires the court to "issue another appropriate order" to safeguard minors. Yet both children—despite known disabilities and exposure to state-created danger—were removed as parties in violation of Rule 55(b). See *Wallis v. Spencer*, 202 F.3d 1126 (9th Cir. 2000).No Respondent moved to appoint counsel for the children or for Petitioner, who also requested counsel as an ADA and Eighth Amendment accommodation to prevent further neurological harm. Courts then issued adverse rulings while accommodation motions were pending—violating Rules 55(b) and 60(b)(6), which bar default and require vacatur when orders are entered under unconstitutional or discriminatory conditions. See *Tennessee v. Lane*, 541 U.S. 509 (2004); *Farmer v. Brennan*, 511 U.S. 825 (1994).

vii. Supporting Precedent and Structural Mandamus Authority

This petition incorporates all controlling and persuasive authorities cited in the Table of Authorities (pp. 29–35), including but not limited to: precedent on judicial disqualification, ADA and Rehab Act obligations under *Duvall* and *Olmstead*, Eighth and Fourteenth Amendment protections against state-created danger and psychological harm, and structural voidness where judgments are issued amid fraud, exclusion, or procedural futility-- including grounds warranting relief under Rule 60(b)(6). See *Kennedy v. City of Ridgefield*, 439 F.3d 1055 (9th Cir. 2006). These authorities confirm that mandamus is both lawful and necessary.

XII. Structural Conflict and Civil Constitutional Emergency

This case does not arise from ordinary procedural missteps or individual judicial error. It arises from a system-wide conflict of interest and coordinated institutional refusal. Petitioner—a disabled mother and civil rights advocate—has been denied access to any neutral adjudicator in matters implicating federal ADA, RICO, and constitutional claims. Each court with jurisdiction has either evaded review, misrepresented facts, or relied on its own institutional position to justify dismissal. While this petition has been pending, a coordinated pattern of retaliatory dismissals has emerged. Most recently, Judge McShane of the District of Oregon issued Dkt 9 and Dkt 10 in 6:25-cv-00924-MC, adopting legally contradictory reasoning that mirrors 9thCircuit actions in Dkt 47 (25-1016), Dkt 26 (25-2090), Dkt 7 (25-3183). These rulings misstate petitioner's legal arguments, disregard jurisdictional doctrine, and erase appeal access through "frivolity" defamation— while ignoring the controlling procedural waiver on record. The judicial actors issuing these rulings—Judges Silverman, Lee, VanDyke, Tallman, Bumatay—are all affiliated with institutions directly implicated by the petitioner's claims. All are male. None have medical degrees, background or apparent training in ADA enforcement, gender-violence, or the rights of disabled mothers in family court state-created danger contexts. These rulings do not reflect impartial adjudication. They reflect a closed-loop of institutional self-protection. Petitioner is not challenging a single outcome. She is challenging a structural impossibility: a legal framework in which

every available gatekeeper is functionally conflicted, and no path to relief is open. This is not judicial review—it is systemic foreclosure.The result is the indefinite entrapment of a disabled mother and her children in ongoing constitutional harm, without remedy, access, or acknowledgment. Such harm— deliberately maintained through legal machinery—is civil constitutional torture. This petition is last-resort invocation of this Court's supervisory authority. Without intervention, a proven record of waiver, ADA obstruction, and retaliatory judicial behavior will be buried by the very courts it indicts. This Court's intervention is required to preserve Petitioner's civil rights and the legitimacy of the judiciary's constitutional function.

XIII. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court(1) Grant the Petition for Writ of Mandamus, (2) Answer each Question Presented in the affirmative; and (3) Issue corresponding extraordinary relief consistent with each affirmative answer. These actions are legally required to halt constitutional, statutory, and treaty violations; prevent irreparable harm, and restore the rule of law—including enforcement of this Court's binding precedent, which lower courts have disregarded in violation of Article III, 28 U.S.C. § 1651(a), and treaties enforceable through the Supremacy Clause.

Respectfully submitted,

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