

25-5314

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

THEODORE JUSTICE,

Petitioner,

v.

**MCANGUS GOUDELOCK & COURIE, LLC; LUKE DALTON; SKYLAR J.
GALLAGHER; NORTH CAROLINA BAR ASSOCIATION; AMANDA E. STEVENSON,**
Respondents.

**ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT
OF APPEALS FOR THE FOURTH CIRCUIT**

SUPPLEMENTAL BRIEF PURSUANT TO SUPREME COURT RULE 15.8

Theodore Justice
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Petitioner Pro Se

RECEIVED

AUG 14 2025¹

OFFICE OF THE CLERK

**TO THE HONORABLE CHIEF JUSTICE AND THE ASSOCIATE JUSTICES OF THE
SUPREME COURT OF THE UNITED STATES:**

Petitioner Theodore Justice, proceeding pro se, respectfully submits this supplemental brief pursuant to Supreme Court Rule 15.8 to bring to the Court's attention the mandate issued by the United States Court of Appeals for the Fourth Circuit on August 4, 2025, subsequent to the filing of the Petition for a Writ of Certiorari on July 29, 2025.

I. SUPPLEMENTATION UNDER RULE 15.8

1. Supreme Court Rule 15.8 permits any party to file a supplemental brief while a petition for a writ of certiorari is pending to address new cases, legislation, or other intervening matters not available at the time of the party's last filing.
2. The Fourth Circuit's mandate, issued on August 4, 2025, constitutes such an intervening matter, as it was not available when Petitioner filed the petition and completes the procedural record for this Court's review.

II. PROCEDURAL BACKGROUND

3. On June 20, 2025, the Fourth Circuit affirmed the dismissal of Petitioner's 42 U.S.C. §§ 1983 and 1985(2) claims in an unpublished per curiam opinion, relying on procedural limitations under Fourth Circuit Rule 34(b) despite undisputed evidence of constitutional violations, including a sworn admission of notice failure under *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950), and a jurisdictionally defective gatekeeper order. *Justice v. McAngus Goudelock & Courie, LLC*, No. 25-1241 (4th Cir. June 20, 2025).
4. The Fourth Circuit denied rehearing and rehearing en banc on July 21, 2025, and issued its mandate on August 4, 2025, finalizing the judgment. See Exhibit A (Fourth Circuit Mandate). This mandate was not available for inclusion in the petition's appendix under Supreme Court Rule 14.1(i)(iv) at the time of filing.

5. Petitioner's petition was timely filed within 90 days of the Fourth Circuit's denial of rehearing, pursuant to Supreme Court Rule 13.3, which provides that the time to file a petition runs from the date of the judgment or order sought to be reviewed, not the mandate's issuance.

III. COMPLETION OF THE RECORD

6. The attached mandate (Exhibit A) completes the procedural requirements under Supreme Court Rule 14.1(i) by providing the final disposition of the Fourth Circuit proceedings.
7. It does not alter the substantive arguments presented in the petition, which address critical constitutional questions regarding procedural barriers to § 1983 and § 1985(2) claims, access to courts, First Amendment rights, and equal protection violations.

IV. NO CHANGE IN CERT-WORTHINESS

8. The issuance of the mandate does not affect the cert-worthiness of the Questions Presented, which remain of exceptional national importance.
9. The petition identifies a clear circuit split, including an internal contradiction within the Fourth Circuit between *Jenkins v. Woodard*, 109 F.4th 242 (4th Cir. 2024) (requiring accommodation for pro se § 1983 claims), and the dismissal of Petitioner's claims under Rule 34(b), as well as a conflict with the Sixth Circuit's requirement for substantive constitutional review in *Club Italia Soccer & Sports Org., Inc. v. Charter Twp. of Shelby*, 470 F.3d 286 (6th Cir. 2006).
10. The questions involve:
 - a. Whether federal courts may dismiss § 1983 claims despite admitted due process violations (*Axon Enter., Inc. v. FTC*, 598 U.S. 175 (2023));

- b. Whether jurisdictionally defective state court orders violate due process (*Bell v. Burson*, 402 U.S. 535 (1971));
- c. Whether procedural barriers to court access violate constitutional rights (*Boddie v. Connecticut*, 401 U.S. 371 (1971); *Tennessee v. Lane*, 541 U.S. 509 (2004));
- d. Whether coordinated conduct establishes a § 1985(2) conspiracy (*Christopher v. Harbury*, 536 U.S. 403 (2002));
- e. Whether gatekeeper orders requiring attorney representation violate the First Amendment right to petition government (*McDonald v. Smith*, 472 U.S. 479 (1985); *BE&K Constr. Co. v. NLRB*, 536 U.S. 516 (2002));
- f. Whether wealth-based restrictions on court access violate the Equal Protection Clause (*M.L.B. v. S.L.J.*, 519 U.S. 102 (1996); *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432 (1985)).

11. These issues affect pro se and indigent litigants nationwide, requiring resolution to ensure consistent enforcement of federal civil rights protections.

V. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

- a. Accept this supplemental brief and the attached mandate (Exhibit A) as part of the complete record for consideration of the Petition for a Writ of Certiorari;
- b. Consider the petition with the complete procedural record now before the Court; and
- c. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

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Date: August 5, 2025

- b. Whether jurisdictionally defective state court orders violate due process (*Bell v. Burson*, 402 U.S. 535 (1971));
- c. Whether procedural barriers to court access violate constitutional rights (*Boddie v. Connecticut*, 401 U.S. 371 (1971); *Tennessee v. Lane*, 541 U.S. 509 (2004));
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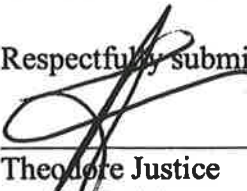
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Respectfully submitted,



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EXHIBIT A

FILED: August 4, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 25-1241
(5:24-cv-00392-D-BM)

THEODORE JUSTICE

Plaintiff - Appellant

v.

MCANGUS GOUDELOCK & COURIE LLC; LUKE DALTON; SKYLAR J.
GALLAGHER; NORTH CAROLINA BAR ASSOCIATION; AMANDA E.
STEVENSON

Defendants - Appellees

M A N D A T E

The judgment of this court, entered June 20, 2025, takes effect today.

This constitutes the formal mandate of this court issued pursuant to Rule
41(a) of the Federal Rules of Appellate Procedure.

/s/Nwamaka Anowi, Clerk