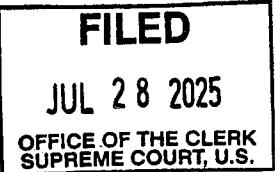


ORIGINAL

No. _____

25-5456

IN THE



SUPREME COURT OF THE UNITED STATES

Elbert Gaynor — PETITIONER
(Your Name)

vs.

Extended Stay America — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Howard County Circuit Court
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Elbert Gaynor
(Your Name)

Address TBA
(Address)

(City, State, Zip Code)

202-300-3874
(Phone Number)

QUESTION(S) PRESENTED

1. Whether a state court of last resort erred in affirming a lower court decision to dismiss petitioners' appeals overlooking deprivation of petitioners 14th Amendment equal protection and procedural due process rights of providing notice, opportunity to be heard, and right to appointed counsel before dismissing petitioner's appeals?
2. Whether a state court of last resort erred in affirming a lower state court order to dismiss petitions case because of mootness overlooking Article 3 exceptions to mootness of case being capable of repetition yet evading review and collateral consequences.
3. Whether a state court of last resort erred in affirming a lower court decision overlooking deprivation of petitioners 14th Amendment equal protection and procedural due process rights in due notification ,sufficient service of process which was supposed to inform petitioner of his right to appointed counsel in eviction proceedings?

LIST OF PARTIES

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

RELATED CASES

Extended Stay America v. Elbert Gaynor, D-101-LT-23-005825, Howard County District Court Judgment entered August 11, 2023

Extended Stay America v. Elbert Gaynor, D-101-LT-23-011336, Howard County District Court Judgment entered January 11, 2024

Extended Stay America v. Elbert Gaynor, C-13-CV-23-000701, Howard County Circuit Court Judgments entered 11/28/23, 3/6/24 6/4/24, 6/27/24

Extended Stay America v. Elbert Gaynor, C-13-CV-24-000122, Howard County Circuit Court Judgments entered 3/11/24

Extended Stay America v. Elbert Gaynor, ACM-REG-0505-2024 Appellate Court of Maryland case transferred to Supreme Court of Maryland

Extended Stay America v. Elbert Gaynor, ACM-REG-0804-2024 Appellate Court of Maryland case transferred to Supreme Court of Maryland

Extended Stay America v. Elbert Gaynor, ACM-REG-1380-2024 Appellate Court of Maryland cases transferred to Supreme Court of Maryland

Extended Stay America v. Elbert Gaynor, ACM-REG-1917-2024 Appellate Court of Maryland cases transferred to Supreme Court of Maryland

Extended Stay America v. Elbert Gaynor, The Supreme Court of Maryland SCM-PET-0138-2024 Judgement entered 9/25/24

Extended Stay America v. Elbert Gaynor, The Supreme Court of Maryland SCM-PET-0180-2024 Judgement entered 9/25/24

Extended Stay America v. Elbert Gaynor, The Supreme Court of Maryland SCM-PET-0280-2024 Judgement entered 3/21/25

Extended Stay America v. Elbert Gaynor, The Supreme Court of Maryland SCM-PET-0416-2024 Judgement entered 4/28/25

United States Supreme Court docket number TBA

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TABLE OF AUTHORITIES CITED

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"CONSUMERS'RESEARCH, Supreme Court 2025 - Google Scholar." PAGE NUMBERS 41,42

"IN RE JORDON B., 7 NW 2d 894 - Neb: Supreme Court 2024 - Google Scholar." PAGE NUMBERS 8,9

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"2024 Maryland Statutes :: Real Property :: Title 8 - Landlord and Tenant :: Subtitle 9 - Access to Legal Representation in Eviction Cases :: Section 8-905 - Informational Pamphlet Developed – Copies Served with Process by Sheriff or Constable." Justia Law, 2024

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OTHER
MARYLAND RULE 2-341(b) AMENDMENT OF OTHER PAPERS "Maryland Code and Court Rules." Westlaw.com, 2025,

Attorney , General of Maryland . REPORT of the ACCESS to COUNSEL in EVICTIONS TASK FORCE. 2024.

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix C to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the The Supreme Court of Maryland court appears at Appendix C to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

1.

JURISDICTION

[] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

[] No petition for rehearing was timely filed in my case.

[] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

[] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. 24 A 1113 and 1114.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

Petitions for cases 0138 and 0180 from the Supreme Court of Maryland were combined under this court's jurisdiction and invoked under Rule 12.4.

[x] For cases from **state courts**:

The date on which the highest state court decided my case was 9/25/24.
A copy of that decision appears at Appendix C.

[X] A timely petition for rehearing was thereafter denied on the following date: 2/26/25, and a copy of the order denying rehearing appears at Appendix D.

[X] An extension of time to file the petition for a writ of certiorari was granted to and including MAY 23, 2025 (date) on JULY 26, 2025 (date) in Application No. 24 A 1113 and 1114.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

RECEIVED

AUG 25 2025

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

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“2024 Maryland Statutes :: Real Property :: Title 8 - Landlord and Tenant :: Subtitle 9 - Access to Legal Representation in Eviction
Cases :: Section 8-905 - Informational Pamphlet Developed – Copies Served with Process by Sheriff or ConstableJustia Law,
2024

MARYLAND RULE 8-203(b) Notice. Before the lower court strikes a notice of appeal

Maryland Code and Court Rules”. Westlaw.com, 2025,

MARYLAND RULE 2-341(b) AMENDMENT OF OTHER PAPERS“Maryland Code and Court Rules”. Westlaw.com, 2025,

STATEMENT OF THE CASE

Howard County District Court (D-101-LT-23-005825)

- On 8/11/23 federal questions raised during trial federal right to federal benefit 15 U.S.C. 9058 (a)(c).
- On 2/1/24 federal question raised before motion denied to obtain transcript cited Griffin v Illinois 35 U.S. (1956).
- On 8/11/23 federal question raised during trial 14 Amendment equal protection clause right to appointed counsel eviction proceedings.

Howard County District Court (D-101-LT-23-011336)

- On 1/11/24 federal question raised during trial 14th Amendment procedural due process insufficient process referenced in record transcript of this case on 3/8/24 page 19 paragraph 16.
- On 1/11/24 federal questions raised during trial 14th Amendment equal protection clause right to appointed counsel in eviction proceedings referenced in the record transcript of this case on 3/8/24 page 26 paragraph 24 page 27 paragraph 12 petitioner (pro se) states correction should have been stated under Maryland statute Real Property 8-902. Crossed referenced with page 34 paragraph 1-5 and 35 paragraph 22-25.
- On 1/11/24 federal question raised during trial Article 3 supremacy clause referenced in the record transcript of this case on 3/8/24 page 43 paragraph 9-17
- On 1/11/24 federal question raised during trial this court's jurisdiction Article 111 S2.C.5 to review state court decisions referenced in the record transcript of this case on 3/8/24 page 52 paragraph 10-13

Howard County Circuit Court (C-13-CV-23-000701)

- On 10/10/23 federal questions were raised of 14 Amendment procedural due process petitioner receiving insufficient service of process and referenced in the record of petitioners memorandum page 6.
- On 2/12/24 federal questions were raised and referenced in the record on motion stating Article III and 14th Amendment as grounds and authorities why appeal should not be dismissed motion was noted to be considered for upcoming hearing.
- On 2/12/24 federal questions were raised and referenced in the record in the attachment file titled "Opposition to Dismiss Appeal" where federal questions are raised on pages 1-4 addressing Article III exceptions to mootness, collateral consequences. 14 Amendment procedural due process insufficient process and equal protection to appointed counsel in eviction proceedings.
- On 3/6/24 federal questions raised during hearing of petitioner stating he would be affected by collateral consequences from the courts judgement referenced in the record transcript of this case entered on 7/25/24 on page 9 paragraph 10.

Howard County Circuit Court (C-13-CV-24-000122)

On 7/26/24 transcript of the District Court case (D-101-LT-23-011336) entered into the record containing following:

- On 1/11/24 federal question raised during trial 14th Amendment procedural due process insufficient process referenced in record transcript of this case on 3/8/24 page 19 paragraph 16.
- On 1/11/24 federal question raised during trial Article 3 supremacy clause referenced in the record transcript of this case on 3/8/24 page 43 paragraph 9-17

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- On 1/11/24 federal questions raised during trial 14th Amendment equal protection clause right to appointed counsel in eviction proceedings referenced in the record transcript of this case on 3/8/24 page 26 paragraph 24 page 27 paragraph 12 petitioner (pro se) states correction should have been stated under Maryland statute Real Property 8-902. Crossed referenced with page 34 paragraph 1-5 and 35 paragraph 22-25.
- On 1/11/24 federal question raised during trial this court's jurisdiction Article 111 S2.C.5 to review state court decisions referenced in the record transcript of this case on 3/8/24 page 52 paragraph 10-13

The Supreme Court of Maryland (SCM-PET-0138-2024)

On 7/17/24 federal question raised of deprivation of 14th Amendment procedural due process rights in insufficient service of process equal protection of right to appointed counsel in eviction proceedings and federal benefits 15 U.S.C. 905 section(a)(b) petitioner requested to amend petition which would have included more federal questions motion denied on 9/25/24.

The Supreme Court of Maryland (SCM-PET-0180-2024)

The petitioner requested to amend the petition which would have included more federal questions, motion denied on 9/25/24.

Petitioner has found the decisions of the Supreme Court of Maryland on important federal questions and important questions of federal law involving the 14th Amendment and Article III in conflict with the decisions of another state court of last resort, the United States Court of Appeals and relevant decisions of this court. Petitioner's record also raises the important federal questions and important questions of federal law during his proceedings.

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REASONS FOR GRANTING PETITION

The Supreme Court of Maryland has decided an important federal question in a way that conflicts with the Supreme Court Nebraska.

Petitioner's record shows an order from the Supreme Court of Maryland on 4/28/25 for Petition No 138 stating that its decision to deny petitioner's petition was related to an appeal dismissal of the Circuit Court order dismissing the appeal. The Supreme Court of Maryland overlooked that the lower court decision deprived petitioner of his 14th Amendment right to procedural due process of notice before dismissing his appeal and is in conflict with the Supreme Court of Nebraska's decision on the 14th Amendment procedural due process regarding notice. In the case In Re Jordan State of Nebraska v Leah B No S-23-618 B 7 NW 2d 894 (6/28/2024) Upon looking at the record, relevant state statutes, and rules the Supreme Court of Nebraska found that Leah was deprived of her 14th Amendment procedural due process right of notice before issuing a termination order of Leah parental rights. Petitioner's record shows an order on 6/27/24 from the Circuit Court striking appeal over a filing fee not paid. The order also shows a fee waiver denied on 6/4/24 which subsequently led to denial in the appellate court on 6/9/24. The Supreme Court of Maryland overlooked petitioner's record showing a fee waiver granted on 9/11/23 and a final waiver of costs granted on 2/21/24. Under 14th Amendment petitioner (1) had a protected fundamental interest to have his fees waived for the purpose of an appeal over petitioner's housing (2) Petitioner was deprived of that fundamental interest when his fee waiver was denied despite his eligibility stated within state rules. The 14th Amendment 14.S1.8.12.3 interpretation by this court stated when a dispute of a fundamental matter such a marriage shows a state terminated an avenue by denying fees to be waived then it denied due process by imposing the fee that kept the individual from accessing the avenue.

Boddie v Connecticut, 401 U.S. 371 (1971), M.L.B. v S.L.J. 519 U.S.102 (1996) Griffin v Illinois, 351.U.S. 12 (1956). The 14th amendment section 1.5.3. Interpretation by this court states a protected property interest is one defined by existing state law or rules that specify claims of entitlement to those benefits Bd. of Regents v Roth, 408 U.S. 564,569-71,577 (1972). The Maryland court rules 1-325 section (B) which apply to the circuit courts state appeal states a court must consider relevant factors in rendering a decision to deny granting a fee waiver and state the basis for the denial which is not shown on the order. Petitioner argues the relevant factors within the record shows prior fee waivers granted. Rule 1-325 section (i) states that a court must verify if the individual's income qualifies under Maryland Legal Services. Petitioner record shows no income change that disqualifies him from the guidelines set forth under Maryland Legal Services. The Supreme Court of Maryland also overlooked that the Circuit Court did not provide notice prior under Rule 8-203(b) before striking the petitioner's appeal. Under the 14th Amendment petitioner (1) had a protected fundamental interest of having a right to an appeal of an adverse decision affecting petitioner's housing. (2) Petitioners were deprived of that interest when his appeal was dismissed over a filing fee that was not paid when petitioner was eligible to have his fees waived furthermore petitioner was not provided notice under statutory requirements before striking the appeal. The 14th Amendment 14.S1.8.12.3 interpretation by this court stated when a dispute of a fundamental matter such a marriage shows a state terminated an avenue by denying fees to be waived then it denied due process by imposing the fee that kept the individual from accessing the avenue. Boddie v Connecticut, 401 U.S. 371 (1971), M.L.B. v S.L.J. 519 U.S.102 (1996) Griffin v Illinois, 351.U.S. 12 (1956).

The 14th amendment section 1.5.3. Interpretation by this court states a protected property interest is one defined by existing state law or rules that specify claims of entitlement to those benefits Bd. of Regents v Roth, 408 U.S. 564,569-71,577 (1972). Petitioner had a right to be provided notice before striking his appeal under the state statute 8-203(b) which states before an appeal can be dismissed notice has to be provided; it also states the clerk must serve notice providing 15 days to show good cause why the notice of appeal should not be stricken. The Supreme Court of Maryland overlooked Petitioner's record with Circuit Court case C-13-C-24-000122 on 6/26/24 which provides an example of proper notice under 8-203(b). The Supreme Court of Maryland also overlooked petitioner record SCM-PET-0138-2024 showing an attempt to send a check on 7/18/24 to pay for the filing fee. Petitioner (pro se) did not know that he qualified to have his fees waived at that time. Cases SCM-PET-0416-2024 and SCM-PET-0280-2024 are orders denying petitions showing attempts to pay the filing fee. The Supreme Court of Maryland's order to affirm the lower court decision for the case SCM-PET-0180-2024 before this court as (application No.24 A 1114) now merged in this petition under Rule 12.4 is related to the Circuit Court's case C-13-CV-24-000122 order dismissing the appeal as untimely. Out of abundance of caution for transparency before this court petitioner did not appeal the orders from the Circuit Court 11/28/23, 6/4/24 and 6/27/24, due to a lack of legal knowledge. The Supreme Court of Maryland overlooked petitioner was deprived of his 14th Amendment equal protection and procedural due process right of appointed counsel in eviction proceedings which played a substantial factor in petitioners not appealing the orders and untimely appeals. More specifically procedural due process requires parties whose rights are affected at minimum representation by counsel when it is required by constitution or statute In Re Jordan State of Nebraska v Leah B No S-23-618 (at 590) The Supreme Court of Nebraska B 7 NW 2d 894 (6/28/2024).

This court stated a party may claim excusable neglect only if the failure to timely perform was done to circumstances beyond its reasonable control. "Pioneer Investment Services Co. V. Brunswick Associates Ltd. Partnership, 507 U.S. 380 (1993)." Justia Law, 2025.

The 14th amendment section 1.5.3. Interpretation by this court states a protected property interest is one defined by existing state law or rules that specify claims of entitlement to those benefits Bd. of Regents v Roth, 408 U.S. 564,569-71,577 (1972). Maryland law states that a covered individual shall have access to counsel in eviction proceedings. "2022 Maryland Statutes :: Real Property :: Title 8 - Landlord and Tenant :: Subtitle 9 - Access to Legal Representation in Eviction Cases :: Section 8-902 - Access by Covered Individual to Legal Representation." *Justia Law, 2022.*

The Supreme Court of Maryland has decided an important federal question in a way that conflicts with the Decision of another United States Court of Appeals.

The Supreme Court of Maryland decision to affirm the Circuit Court's decision to dismiss petitioner's appeals overlooking a deprivation of petitioner's 14th amendment procedural due process rights of notice and opportunity to be heard in meaningful time and manner is in conflict with the decision of United States Circuit Court of Appeals for the 3rd Circuit. In the case "Montemuro v. JIM THORPE AREA SCHOOL DIST., 99 F. 4th 639 - Court of Appeals The 3rd Circuit reversed the lower court's decision because Montemuro, a school board president, was not provided notice before terminating his position. The 3rd Circuit decision examined the Pennsylvania constitution, relevant state statutes, rules, and the State Supreme Court's interpretation of notice before deprivation and found that Montemuro was not providing due process of law. The 3rd Circuit stated that its decision was a complicated analysis because based on Pennsylvania's constitution Montemuro termination was lawful;

It was only when the 3rd Circuit observed and acknowledged the Supreme Court of Pennsylvania's Constitution and interpretation of the statutory guidelines requiring notice and hearing before termination could such an act be constitutional. The Supreme Court of Maryland overlooked the statutory guidelines in Rule 8-203 in affirming the Circuit Court's striking of petitioner's appeal. Rule 8-203 requires that notice be given to the parties before an appeal is stricken by the Circuit Court County Commissioners of Carroll County v. Carroll Craft Retail, Inc., 862 A. 2d 404 - Md: Court of Appeals 2004. The 14th amendment section 1.5.3. Interpretation by this court states a protected property interest is one defined by existing state law or rules that specify claims of entitlement to those benefits Bd. of Regents v Roth, 408 U.S. 564,569-71,577 (1972). Petitioner argues the existing state law or rules that specify petitioner's claims of entitlement are Rule 8-203(b) and the state statute Real Property That state a covered individual shall have access to counsel in eviction proceedings. "2022 Maryland Statutes :: Real Property :: Title 8 - Landlord and Tenant :: Subtitle 9 - Access to Legal Representation in Eviction Cases :: Section 8-902 - Access by Covered Individual to Legal Representation." *Justia Law*, 2022. The legislature intentionally retained the word "shall," noting that tenants "shall have access to counsel Attorney . General of Maryland . REPORT of the ACCESS to COUNSEL in EVICTIONS TASK FORCE. 2024.

The Supreme Court of Maryland has decided an important question of federal law that has not been but should be settled by this court and also decided an important federal question in a way that conflicts with relevant decisions of this court.

The Supreme Court of Maryland has decided an important question of federal law that has not been but should be settled by this court because of a growing trend of states enacting new laws to protect tenants rights from unlawful evictions.

The Supreme Court of Maryland has decided an important question of federal law that has not been but should be settled by this court because of a growing trend of states enacting new laws to protect tenants rights from unlawful evictions. This court could establish a holding that the 14th Amendment guarantees equal protection and procedural due process to citizens of a state who are eligible to be appointed counsel in eviction proceedings. The petitioner was wrongfully evicted because he did not have legal knowledge of eviction proceedings. In the case “Trump v. JGG, 145 S. Ct. 1003 - Supreme Court 2025 - Google Scholar.” This court acknowledged that arguments presented by both parties could not be reached without pointing out the negligence of the United States government to not provide due process of notice and an opportunity to be heard to Venezuelans nationals who were entitled to due process but were deprived of their right to notice before removal proceedings. Petitioner’s record shows on 9/3/24 a motion to amend his petition was filed on 9/25/24 the motion was denied. The 14th amendment section 1.5.3. Interpretation by this court states a protected property interest is one defined by existing state law or rules that specify claims of entitlement to those benefits Bd. of Regents v Roth, 408 U.S. 564, 569-71, 577 (1972). Maryland Rule 2-342 allows for amendments only by leave of the court.

The Supreme Court of Maryland has decided an important federal question in a way that conflicts with the decisions of another state court of last resort.

The Supreme Court decision to affirm the lower court’s decision involves petitioner’s case being dismissed over mootness overlooking Article III exceptions to mootness of petitioner’s case being capable of repetition yet evading review and collateral consequences. The Supreme Court of Minnesota decision conflicts with the Supreme Court of Maryland.

In the case of “State v. Oberton, 10 NW 2d 64 - Minn: Supreme Court 2024 - Google Scholar.”

The Supreme Court Minnesota’s decision stated Oberton satisfied the requirements of collateral consequences and his appeal was not moot by both parties agreeing that Oberton would be subjected to adverse legal consequences in the future from a prior judgment which satisfied a real and substantial disability. The Supreme Court of Maryland overlooked that the petitioner case and appeal was not moot due to collateral consequences because the respondents don’t deny they were seeking a warrant or restitution that was canceled which would have led to the petitioner being evicted. Respondents testimony within the transcript states they obtained a 2nd judgment which has led to adverse legal consequences in the future of the petitioner being evicted. Article III section 2.C1.8.7 of the United States Constitution states the exception to mootness is a case showing its capable of repetition yet evading review based on meeting requirements of (1) A challenged action being too short to be fully litigated or (2) A showing that the individual facing the action would be subject to the same action in the future.

Petitioner's record shows two cases showing he has been subject to the same action in the future.

The Supreme Court of Maryland has decided an important federal question in a way that conflicts with the decision of another United States Court of Appeals.

The 4th Circuit's decision on exceptions to mootness conflicts with the Supreme Court of Maryland decision. In the case ASSOCIATED ENERGY GROUP, LLC v. United States, 131 F. 4th 1312 (2025) the 4th Circuit's decision to acknowledge exception to mootness was predicated on both parties agreeing the United States government action would subject AEG to the same action in the future satisfying the capability of repetition yet evading review requirement.

The Supreme Court of Maryland overlooked the lower courts record transcript showing despite respondents claiming of mootness their acknowledgement of obtaining a second judgement and that the cancelled eviction would be initiated in the second case is evidenced in the record by refiling a warrant of restitution in the future thus conceding and satisfying the capability of repetition yet evading review requirement.

The Supreme Court of Maryland 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 Supreme Court decision to affirm the lower court's decision that petitioner's case was moot overlooked Article III exceptions to mootness of petitioner's case being capable of repetition yet evading review and collateral consequences that has not been but should be settled by this court because of the national importance and public interest due to the growing trend of states enacting laws that mandate appointed counsel in eviction proceedings. Future cases affecting citizens of a state deprived of equal protection and procedural due process of appointed counsel in eviction proceedings in the lower courts have a higher probability of becoming moot. This court could create a new holding that certain actions stemming from deprivation of procedural due process in obtaining appointed counsel satisfy exceptions to mootness creating uniformity among the state lower courts and state courts of last resort who have already enacted the laws and newer states who will adopt appointed counsel in eviction proceedings legislation allowing this court to manage its docket more efficiently. In the case "CONSUMERS' RESEARCH v FCC, Supreme Court 2025 - Google Scholar." This court decision was predicated using factors The Supreme Court of Minnesota and the 4th Circuit used to show the parties involved understood that the recurring action would be capable of repetition yet evading review.

The court also stated that a contributor factor was that the litigation initiated would be too short for judicial review. The Supreme Court of Maryland decision overlooked an important federal question of Article III exception to mootness section 2.C1.8.7 that conflicts with relevant decisions of this court in the case “CONSUMERS’RESEARCH v FCC, Supreme Court 2025 - Google Scholar.” A contributing factor in the petitioner case is the initiated litigation brought forth by respondents would be too short for judicial review and despite respondents claiming mootness, two cases showing the same legal issues resulting in adverse legal consequences upon petitioner in the future would be capable of repetition yet evading review and collateral consequences and is evidenced in the record by petitioner being wrongfully evicted in the second case.

Petition Is Extremely Important and of National Public Importance

Petitioner ‘s petition is extremely important because it highlights deprivations of the 14th Amendment equal protection and procedural due process rights to a fundamental interest such as housing. Petitioner’s record presents compelling reasons for showing the Important federal question being raised at every level of his proceedings for this court to exercise its discretionary jurisdiction. Petitioner has also satisfied Rule 10(b)(c) showing a conflict between courts on the federal question. Petitioner petition is of national and public importance not just for the petitioner but others similarly situated due to the growing trend of states enacting laws that mandate appointed counsel in eviction proceedings creating uniformity among the state lower courts and state courts of last resort who have already enacted the laws and the newer states who will adopt appointed counsel in eviction proceedings legislation allowing this court to manage its docket more efficiently. This court could create a new holding that protects citizens of a state’s 14th amendment equal protection rights and procedural due process rights in obtaining appointed counsel in eviction proceedings.

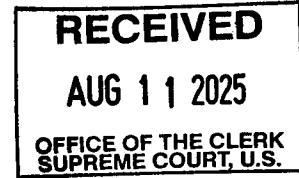
CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Elbert Gaynor

Date: July 26 2025



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