No. 25-5639

IN THE SUPREME COURT OF THE UNITED STATES

FATHIREE UDDIN ALI, Petitioner,

v.

STEPHEN E. ADAMSON, Chaplain, et. al.

ON PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATE COURT OF APPEAL FOR THE SIXTH CIRCUIT

PETITIONER'S REPLY TO DEFENDANTS' BRIEF IN OPPOSITION
Pursuant to Supreme Court Rule 15(6)

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INTRODUCTION

Defendants' conclusory brief offers this Court nothing persuasive. It misrepresents the allegations in the complaint, ask this Court to believe that Ali never ask for a halal diet (amongst other farcial claims), turn after turn. It also urges this Court to construe Ali's complaint against him, and draw inferences that are both implausible and in Defendants' favor. On top of that, Defendants invitation to disregard fundamental precepts of civil procedure should be declined, importantly, that district court's sovereign immunity screening dismissal against prison officials for injunctive relief under RLUIPA

STATEMENT OF THE ISSUE

I. Under Sup. Ct. Rule 10, both district court and Sixth Circuit decisions that conflict with relevant decisions of this Court are sufficient reasons to grant certiorari or summarily relief on Mr. Ali's claims.

Both the district court and Sixth Circuit bring new standards and/or procedures that: 1) heightened screening under Fed.R.Civ.P Rule 8(a), 2) bar suits

against governments brought under RLUIPA for injunctive relief that substantially burdens a sincerely held religious belief; 3) draw inferences in Defendants' favor even though countervailing record evidence shows material disputes, and 4) process grounded under the Free Exercise Clause, that contravene precedents from this Court. For these reasons and those argued, certiorari should be granted.

STATEMENT OF THE CASE

A. Relevant Facts

The Muslim faith requires men like Ali to eat a halal diet, inclusive of properly prepared meat, dairy, eggs, fish, dates, and chicken. [Complaint, R.1, PgID.4; Ali Dec'n, R.53-2, PgID.313-315]. It is not enough for Ali to avoid haram foods to be in compliance with his religious tenets; the failure to consume foods that are specifically prescribed as part of a Muslim diet is itself haram. Ali Dec'n, R.53-2, PgId.314. Ali wrote Adamson for a halal diet. [R.33-7, PgID.196, Ali Dec'n, 53-2, PgID.315]. Adamson told Ali that he could not qualify for such an accommodation because he had not previously been approved for a vegan diet. Id. Adamson added that there were no meat-containing alternative diets offered to Muslims and would "never" be. Id. Adamson told Ali that he knew from sitting in administrative meetings that the MDOC would never approve a meat diet for Muslim prisoners and requesting an alternative religious menu would be a waste of time. Rather than properly process Ali's request for an accommodation to the deputy director, Adamson coaxed/thwart Ali into one for a vegan-meal. [Id. PgID.315]. Ali understood from this conversation both (1) that the appropriate path to receiving an alternative halal diet was to first be approved for the vegan diet and then to make a future request for accommodation and (2) that the prison ultimately would not approve a halal diet containing meat for him. Id. at PgID.315. Based on this guidance from Adamson, Ali agreed to take the vegan menu test. Id.

By relegating a Hobson's Choice, Ali was forced to modify his behavior so that he chose between adhering to his faith and ensuring a path to a halal diet.

Defendants assert that Leach denied Ali's application for the vegan meal based on over one hundred commissary purchased that conflicted with Ali's religious beliefs. [Def. Brief in Opposition, pg 28]. Even though Ali averred in his declaration and during a deposition that he never consumed any of the purchases or seasoning packets of the Ramen noodles for health and religious reasons [Ali's Dec'n R.53-2, PgID.315]]; both the district court [R.57, PgID.387] and Sixth Circuit rejected Ali's version of the facts. [Opinion at 12-14].

As a factual matter, the district court concluded that the parties simply "fundamental[ly] disagree[d] about what constituted a halal diet and that Defendants never understood Ali's request for a halal diet to be incompatible with a request for a vegan diet. Opinion, R.64, PgID.427-428. The court's resolve to this factual dispute concluded that Ali's definition of halal was an "idosyncratic view"[1] and that Ali had to conform to the MDOC's version; and that the evidence "establishe[d] that Ali submitted a request for the MDOC's definition of a halal diet--a diet that could also be vegan." Id at PgID.428. Thus the district court "disagree[d] with Ali's contention that Adamson converted the request for a halal diet to a vegan diet. Id. The court further concluded, based on its resolution of this factual dispute, that "Adamson did what Ali requested--he recommended approval for the universal religious diet that Ali initially sought" and therefore did not "in any way impede[] his religious accommodation request." [R.77, PgID.506].

That said, at no point did Defendants ever dispute Ali's claim that Adamson and Leach misdirected his halal request. Instead, the Sixth Circuit while ignoring

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fn. 1. Seemingly the court held Ali's strangeness not believable.

Mr. Ali's pled facts, favored the Defendants' version that Ali never requested an alternative diet, a finding which contravenes the summary judgment standard. See, Masson v New Yorker Magazine, Inc. 501 US 496, 520 (1991); Anderson v Liberty Lobby, Inc. 477 US 242, 255 (1986).

B. Procedural history

By a short and plain statement, Mr. Ali pled the MDOC as a party, on facts that it and Carson's meals oppose his religious tenets under RLUIPA, Free Exercise and Equal Protection Clauses, for declaratory and injunctive relief. [Complaint, R.1, pgID.10-12].

The district court, without an analysis of whether Mr. Ali could satisfy the RLUIPA standard, and governing authorization for any "appropriate relief against a government," fully relieved the MDOC of liability under sovereign immunity. See. Opinion, R.7, PgID.42; Order, R.8, PgID.44. The district court denied Mr. Ali's leave to amend his first complaint. The Sixth Circuit then upheld sovereign immunity decision even though there was no basis from which to (implicitly) conclude that the MDOC was not party to the injunctive relief claim under RLUIPA. Although the Sixth Circuit recognized that "Ali may sue the Department under RLUIPA for declaratory and injunctive relief, Sossamon v Texas, 560 F3d 316, 326-27 (5th Cir. 2009), aff'd, 563 US 277, (2011)," the panel hesitated to provide injunctive relief with an insurrection that Ali's "complaint fails to state a claim for relief against the agency because he did not identify a policy that violates RLUIPA." [Opinion at 10]. But for the district court and Sixth Circuit rulings dismissing Ali's injunctive relief claim it could not have reach the conclusion that Ali had failed to name a defendant with "the proper power to provide the relief sought." [District Court Opinion, R.64, PgID.432-433]. According to the panel, supposedly Ali can get halal meal by asking for it again. [Opinion at 10].

In any event, the courts' decisions and assessments of the facts--under rules governing the summary judgment process--is unreasonable--because: 1) inference was drawn to favor Defendants'; and, 2) it ignored Ali's allegations of Adamson's representation--that MDOC would "never' give him or any Muslims halal meat, which Adamson said he knew from being in "administrative meetings. [R.53-2, PgID.315]. To top that, the Sixth Circuit decision does not equate with similar facts and analysis it reached in Ackerman v Washington, 16 F4th 170 (6th Cir. 2021).

To end, the Department of Corrections as a whole certainly has the authority to approve a prisoner's participation in a meal program or grant a halal meal at any of its facilities, but the heightened pleading at screening failed to grant Ali that Article III venue and entitlement of relief.

ARGUMENT

A. This case demonstrates a plethora of fundamental errors that are irreconcilable with intervening Supreme Court precedent and procedural rules heightened through the Sixth Circuit's pleading rule, and improper drawn interferences to favor Defendants.

1. Sixth Circuit's "identify policy" requirement heightens procedural rules conflicts with Johnson v City of Shelby holding.

Defendants' brief tries to dispel the significance of the procedural posture wrecked by the district court's dismissal on claim for injunctive relief. A screening fundamental error at the case start--that granted the MDOC sovereign immunity--which precluded the principle for Ali's RLUIPA claims. While overlooking the liberal construction afforded a complianant's pro se statement and Fed.R.Civ.P 8(a)(2), written rules governing claim for relief, the Sixth Circuit ruling introduces a new procedural rule requirement that in order to "state a claim for relief against the agency" Ali is required to "identify a policy that violates RLUIPA." [Opinion at 10]. Neither rule eludes to such interpretation. But for Mr.

Ali's imperfect statement the Sixth Circuit was bound to reverse the district court's decision.

Plainly, the Sixth Circuit's heightened requirement breaks from the civil procedure language for a "short and plain statement." Fed.R.Civ.P 8(a)(2). What is more, it is irreconcilable with Johnson v City of Shelby, 574 US 10 (2014). In that case, under similar facts, this Court held that "they do not countenance dismissal of a complaint for imperfect statement of the legal theory supporting the claim assorted." 574 US at 11. In any event, the trust of Rule 8(a)(2), prevents a heightened pleading, in short, under the rule a complaint is sufficient with a "short and plain statement." It was error for the court to deny Ali claims.

2. Sixth Circuit's conclusion that Ali's claim are moot because he can reapply is illogical and conflicts with precedent from this Court. Ali should not be deprived of his right under Article III.

Defendants argue in their Brief in Opposition that Mr. Ali's claims are moot because he now resides at a[n] entirely different correctional facility. [BOP at 14.]. Defendants then assert that Mr. Ali is not entitled to relief because he "has been eligible to reapply since 2018, yet has not done so. Id. at 17. In that same manner, the Sixth Circuit decision denies relief on a conclusion that "Ali can reapply for the vegan diet today" and "[t]hat Ali has not re-applied for a vegan meal in seven years--despite this ready alternative to eating cross-contaminated food--undermines his request for relief from this court." [Opinion at 9]. These conclusions are not reconcilable.

Even assuming, that Ali could reapply while residing at an entirely different facility that posture favors Ali, since the controversy--that the MDOC does not provide halal meat to Muslim prisoners--is still live to date and governed by the same MDOC policy. The record evidence demonstrates a reasonable expectation that the wrong Mr. Ali suffers will be repeated. See. United States v W.T. Grant Co. 345 US 629 (1953); Ben-Levi v Brown, 577 US 1169 (2016).

Even still, neither the Defendants, nor the Sixth Circuit analysis is consistent with this Court's precedent. Again, since the MDOC policy and customs concerning religious meals have not changed, and remains the same to date, it is unreasonable for Mr. Ali to chase an unworkable process or be continuously burdened. According to the Defendants Landor's [v La. Dep't of Corr. & Public Safety, 145 S.Ct 2814 (2025), single violation was sufficient and distinguished from Ali. [Respondent's Brief in Opposition, at 1]. With that said, Mr. Ali need not waste time and resources slogging through renewed request for diet which Defendants said they will never provide for Muslims. [PgID.215]. According to the Sixth Circuit, there is no cause for action--Opinion at 11--and Ali should bail on his Article entitlement with hopefulness for the MDOC to change its practices.

Instead Ali raises an important burden on the religious exercise on him and other Muslims by challenging a blanket ban on halal meat despite the existence of a policy that nominally provide it. A claim like this one is precisely what RLUIPA is intended for. Indeed, this Court should find Mr. Ali well within his rights and choice to allow this case to run through complete litigation. See Grupo Dataflux v Atlas Global Group LP, 541 US 567 (2004).

3. The record plausibly demonstrates ample evidence that violates First Amendment principles and RLUIPA so that Ali's religious beliefs were substantial burden by Defendants denial of a halal diet.

According to Defendant and the Sixth Circuit conclusion, "Ali did not show a substantial burden on the exercise of a sincerely held religious belief. See Holt v Hobbs, 574 US 352, 361 (2015)." [BOP at 17]. Opinion 9-11.

At first, the district court failed to apply RLUIPA standard to Mr. Ali's complaint, which improperly granted sovereign immunity to Defendants' official capacity. Next, as Ali's opening brief argued, his religious practices were substantially burdened without sufficient justification when he was denied a diet

conforming to his religious requirements. Defendants contest this conclusion on a single ground: that Ali never communicated his wish for a religiously mandated mandated diet, one that contained meat, dairy, eggs, dates, to the MDOC. Defendant Adamson tells Ali that such accommodation will not ever be provided to the Muslims, even though he recognized Ali's sincerity to his beliefs. Despite Adamson's recommendation, Leach completely denies Ali access to a alternative diet and that of vegan diet. Even though there was a genuine dispute between prison officials concerning Ali's belief, the lower courts contend that Ali failed to show a genuine dispute on First Amendment or RLUIPA violation.

Granted, Mr. Ali comes pro se, and does not have the skillfulness of the opposing counsel, Attorney Generals office, experience or resources to legal authority. Thus, the truth is straightforward that each step of this judicial process have deprived him of its fairness, and equity to the principles of civil procedures and precedent of this Court. Based on the evidence: 1) Holt's, and Cutter v Wilkinson, 544 US 709, 721 (2005), broad protection for religious liberty favors Ali; 2) Adamson's's misdirection of Ali's request and conversion to a vegan meal request put substantial pressures on Ali to modify his behavior and violated his beliefs, contravenes Sherbert v Vener, 374 US 398, 404 (1963); Thomas v Review Bd. of Ind. Emp't Sec Div, 450 US 707, 717-18 (1981); 3) the lower courts favored Defendants version of the facts, even though Ali's proofs plausibly show that Defendants violated his Free Exercise rights and that those right were clearly established. See, Ashcroft v Iqbal, 556 US 662 (2009); Anderson v Creighton, 483 US 635, 640 (1987); Hope v Pelzer, 536 US 730, 739 (2002); Turner v Safley, 482 US 79, 89 (1987); 4) the threshold for all of Ali's pleadings were unlawfully heightened, unlike the plaintiffs in other Sixth Circuit decisions, Ackerman, 16 F4th 170 (6th Cir. 2021); Ewing v Finco, Nos. 20-1012, 20-1022, 2021 US App LEXIS

182 (6th Cir. Jan 5, 2021). See Anderson v Liberty Lobby, Inc. 477 US 242 (1986); Jones v Bock, 549 US 199, 212 (2007); and 5) the lower courts did not accept as true all of Mr. Ali's factual allegations in the complaint. See US v Gaubert, 499 US 315, 327 (1991); 7) Adamson misdirection of Ali's request for a halal diet contravenes Ross v Blake, 136 S.Ct 1850, 1859 (2016).

4. This case is on all fours with Landor concerning claims for damages against state officials in their individual capacity under RLUIPA, based on intervening Supreme Court precedent.

According to the Sixth Circuit, Ali can not pursue claims against a state official in their individual capacity for RLUIPA violations. [Opinion at 4-8.] Naturally, the Defendants agree.

Although, this Court's grant of certiorari in Landor, which bears similar facts/arguments as Mr. Ali, demonstrate the importance of this issue. Thus, Mr. Ali's case should be decided in the same manner as Landor.

CONCLUSION

Based on the foregoing reasons, this Court should reverse and remand the Sixth Court's decision, with appropriate relief so that Mr. Ali's claims can be determined by a jury.

Respectfully submitted,

FATHIREE ALI

DATED: January 16, 2026