

IN THE SUPREME COURT OF THE UNITED STATES

Case No. 25-6244

TASLEEMA YASIN,
Petitioner,

v.

VM MASTER ISSUER, LLC,
Respondent.

**SUPPLEMENTAL NOTICE OF NEW MATERIAL DEVELOPMENT
AND MOTION TO DISMISS WITH PREJUDICE**

INTRODUCTION

Petitioner Tasleema Yasin respectfully submits this Supplemental Notice pursuant to Supreme Court Rule 15.8 to inform this Court of critical material developments occurring after the filing of the Petition for Writ of Certiorari. Two significant developments are presented: (1) Respondent VM Master Issuer, LLC has sold the subject property, permanently divesting itself of any legal interest and confirming its lack of standing throughout these proceedings; and (2) Petitioner has formally demanded that Respondent's attorney of record, Elizabeth Cruikshank (Georgia Bar No. 215235), fulfill her mandatory professional obligations to withdraw, correct the false record she created, and move to dismiss the underlying action with prejudice — a demand made necessary by Attorney Cruikshank's documented fraud upon multiple courts.

Both developments are directly relevant to the questions presented in this Petition and are submitted for this Court's consideration before the April 17, 2026, conference.

EXHIBITS SUBMITTED WITH THIS NOTICE

The following exhibits are attached and incorporated herein by reference:

Exhibit A: Main Street Renewal Notice — VM Master Issuer sold property to ALTO Asset Company 6, LLC (April 2026)

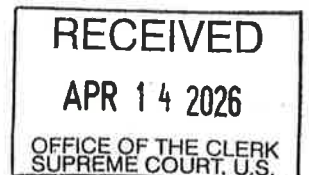


Exhibit B: Georgia Court of Appeals Filing — Motion to Dismiss with Prejudice, Case No. A25A1525

Exhibit C: Motion to Vacate Void Judgment and Dismiss with Prejudice — DeKalb Magistrate Court, Case No. 23D32729

Exhibit D: Formal Legal Demand Letter to Attorney Elizabeth Cruikshank (Georgia Bar No. 215235), dated April 9, 2026, demanding withdrawal, correction of false record, and motion to dismiss with prejudice

DEVELOPMENT ONE: RESPONDENT HAS SOLD THE PROPERTY

A. The Sale and Its Legal Significance

On or about April 2026, Petitioner received written notification from Main Street Renewal that Respondent VM Master Issuer, LLC sold and transferred the property located at 1868 Moore Creek Lane, Conley, Georgia 30288 to ALTO Asset Company 6, LLC. VM Master Issuer no longer holds any ownership, possessory, or financial interest in the subject property.

(See Exhibit A — Main Street Renewal Notice of Property Sale.)

This divestiture occurred while Respondent simultaneously contested this litigation through the DeKalb County Magistrate Court, the Georgia Court of Appeals, the Georgia Supreme Court, and now this Court — three years of litigation ultimately abandoned when Respondent elected to sell the property it claimed to be protecting.

Additionally, Petitioner's security deposit of ,470 was transferred to ALTO Asset Company 6, LLC — an entity with whom Petitioner has never had any contract — without Petitioner's knowledge or consent, constituting a further deprivation of Petitioner's property without due process of law.

B. Dismissal with Prejudice Is Required

The property sale, combined with Respondent's proven lack of any contract with Petitioner, requires dismissal with prejudice on four independent grounds:

Ground 1 — Permanent Lack of Standing: Respondent never had a contract with Petitioner. Petitioner's lease was with ARVM 5, LLC, recorded in DeKalb County Deed Book 31271, Page 333. This defect is incurable. Dismissal with prejudice prevents Respondent or its assignee ALTO Asset Company 6, LLC from relitigating the same baseless claims. *Nemo dat quod non habet.*

Ground 2 — Permanent Mootness: Respondent sold the property and has no remaining interest. Permanent mootness warrants dismissal with prejudice with full res judicata

effect, binding VM Master Issuer, ALTO Asset Company 6, LLC, Main Street Renewal, and all successors and assigns.

Ground 3 — Fraud Upon the Court: Respondent's attorney filed multiple false affidavits, fabricated a bankruptcy allegation, and obtained default judgment through an attorney with no standing. Courts may dismiss with prejudice as sanction for fraud upon the court. *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944).

Ground 4 — Res Judicata Protection: Dismissal with prejudice would bind not only VM Master Issuer but also ALTO Asset Company 6, LLC as its assignee and successor, permanently barring any future action based on the same purported lease relationship.

DEVELOPMENT TWO: FORMAL DEMAND TO ATTORNEY CRUIKSHANK

A. Why This Court Should Know About This Demand

Petitioner has sent a formal legal demand letter to Attorney Elizabeth Cruikshank, Georgia Bar No. 215235, counsel of record for Respondent, demanding that she: (1) immediately withdraw from representation; (2) correct the false record she created in multiple courts; and (3) file a motion to dismiss with prejudice in the DeKalb Magistrate Court.

(See Exhibit D — Formal Legal Demand Letter to Attorney Cruikshank, April 9, 2026.)

This Court should be aware of this demand because Attorney Cruikshank's documented conduct — filing false affidavits, fabricating a bankruptcy allegation, and prosecuting a case on behalf of a client with no contract with Petitioner — is part of the broader pattern of constitutional violations that are the subject of this Petition. Her continued failure to correct the record after being formally notified of her professional obligations would constitute an ongoing fraud upon this Court.

B. Attorney Cruikshank's Documented Violations

The demand letter submitted as Exhibit D documents the following violations of Attorney Cruikshank's mandatory professional duties:

Georgia Rule 3.3 — Candor Toward the Tribunal (Violated): Attorney Cruikshank filed multiple affidavits falsely stating that Respondent had received no money from Petitioner. Petitioner paid 7,410.00 and 22.30 into the court registry on January 19, 2024, as proven by court receipts. These false affidavits were the direct basis for multiple Applications for Writ of Possession.

Georgia Rule 8.4 — Misconduct (Violated): Attorney Cruikshank fabricated a bankruptcy allegation in a sworn affidavit, used her own firm's address as Plaintiff's

address to conceal its Delaware foreign status, and repeatedly misspelled Petitioner's trademarked name in official filings.

Georgia Rule 1.16 — Mandatory Withdrawal (Currently Violated): Rule 1.16(a)(1) requires withdrawal when continued representation will result in violation of the Rules of Professional Conduct. Attorney Cruikshank is required to withdraw now. Her failure to do so is an ongoing violation of her mandatory professional duties.

ABA Model Rule 3.3(b) — Duty to Correct (Currently Violated): When a lawyer has offered material evidence and later comes to know of its falsity, the lawyer shall take reasonable remedial measures including disclosure to the tribunal. Attorney Cruikshank has known for some time that her affidavits were false. Her failure to correct the record is an ongoing violation of her affirmative duty to this Court and to every court in which she has appeared in this matter.

C. Criminal Exposure Cited in the Demand Letter

The letter of the demand notifies Attorney Cruikshank of her criminal exposure under the following statutes, all of which are relevant to proceedings now before this Court:

18 U.S.C. § 1001: False statements in federal proceedings.

18 U.S.C. § 1621: Perjury in proceedings before or ancillary to federal courts.

18 U.S.C. § 1341: Mail fraud — using the mail to further a scheme to obtain a writ of possession through fraudulent affidavits.

18 U.S.C. § 1962 (RICO): Pattern of racketeering activity through sustained fraudulent filings over three years of litigation.

O.C.G.A. § 16-10-71: Georgia perjury — false sworn statements in official proceedings.

The demand gives Attorney Cruikshank 10 days to comply. Her response — or failure to respond will be submitted to this Court as further supplemental notice.

THE CONSTITUTIONAL QUESTIONS REMAIN OF NATIONAL IMPORTANCE

The sale of the property and the demand to Attorney Cruikshank do not moot the constitutional questions presented in this Petition. The question of whether states may deny appellate rights due to mandatory e-filing system malfunctions will continue to affect millions of litigants in Georgia and throughout the Eleventh Circuit. This case — with its clean factual record, exhausted remedies, and documented circuit split — remains the ideal vehicle for this Court's guidance.

If anything, these new developments strengthen the case for certiorari. They demonstrate that the constitutional violation Petitioner suffered at the appellate level was not an isolated procedural

error — it was the culmination of three years of proceedings infected by lack of standing, judicial bias, and attorney fraud. The denial of Petitioner's appellate rights was the final act in a pattern that this Court is uniquely positioned to address.

RELIEF REQUESTED

Petitioner respectfully requests that this Court:

1. Grant the Petition for Writ of Certiorari.
2. Take judicial notice of the sale of the subject property by Respondent VM Master Issuer, LLC, as evidenced by Exhibit A.
3. Take notice of the formal demand to Attorney Cruikshank, as evidenced by Exhibit D, and of Attorney Cruikshank's mandatory professional obligation to withdraw, correct the record, and move to dismiss with prejudice.
4. Order dismissal WITH PREJUDICE of Case No. 23D32729, permanently barring VM Master Issuer, LLC, ALTO Asset Company 6, LLC, Main Street Renewal LLC, and all their successors and assigns from bringing any future action against Petitioner arising from or related to the property or purported lease.
5. Order return of Petitioner's 7,470 security deposit.
6. Order return of all funds paid by Petitioner into the court registry; and
7. Grant such other and further relief as this Court deems just and appropriate.

Respectfully submitted,



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April 9, 2026