

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-6244 / No. S25C1160

TASLEEMA YASIN,
Petitioner,

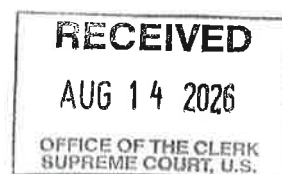
v.

VM MASTER ISSUER, LLC,
Respondent.

**PETITION FOR REHEARING
PURSUANT TO SUPREME COURT RULE 44**

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Pro Se Petitioner



CERTIFICATION OF GOOD FAITH

I, Tasleema Yasin, hereby certify that this Petition for Rehearing is presented in good faith and not for delay. The constitutional questions presented are genuine, urgent, and involve a recurring issue of national importance affecting millions of litigants who depend on mandatory electronic filing systems. This petition raises controlling points of law overlooked by the April 20, 2026 denial and presents new material facts — including post-denial substitution of a related entity as plaintiff and issuance of a Writ of Possession — that constitute intervening circumstances within the meaning of Supreme Court Rule 44.

I declare under penalty of perjury under the laws of the United States of America that the foregoing certification is true and correct.



Date: 6/24/26

Tasleema Yasin

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QUESTIONS PRESENTED FOR REHEARING

I. Whether Due Process permits a State to require exclusive use of a mandatory electronic filing system while providing no constitutionally adequate remedy when that system prevents timely filing through no fault of the litigant.

II. Whether the denial of certiorari should be reconsidered in light of an entrenched and acknowledged conflict among five circuits on whether states may deny appellate rights through mandatory e-filing system failures — a question of nationwide importance affecting millions of litigants.

III. Whether Equal Protection permits a state to deny appellate rights to a litigant whose mandatory State e-filing system failed through no fault of her own, while granting full appellate rights to an identically situated litigant whose system functioned correctly.

IV. Whether intervening circumstances since the original petition — including a related-entity transfer at the identical corporate address during active Supreme Court proceedings, substitution of that entity as plaintiff, and issuance of a Writ of Possession — constitute grounds for rehearing under Supreme Court Rule 44.

V. Whether a void judgment obtained through five documented acts of fraud upon the court — including false sworn statements directly contradicted by the court's own payment records — can constitutionally support eviction proceedings when the underlying court lacked subject matter jurisdiction, the presiding judge acknowledged bias and refused to recuse, and the default was obtained by an attorney with no authority.

INTRODUCTION

Petitioner Tasleema Yasin petitions for rehearing of this Court's April 20, 2026 order denying certiorari. Rehearing is proper on two independent grounds. First, this case presents an unresolved constitutional question of nationwide importance — whether due process permits a state to mandate exclusive use of an electronic filing system while providing no remedy when that system fails — on which five federal circuits are openly and irreconcilably divided. Second, critical intervening circumstances have arisen since the original petition was filed: a related-entity property transfer during active Supreme Court proceedings, substitution of the transferee as plaintiff, and issuance of a Writ of Possession directing Petitioner's immediate eviction.

The procedural constitutional question is this: when a state mandates that litigants use an electronic filing system as the exclusive means of court access, and that system fails through no fault of the litigant, what constitutional remedy exists? Georgia answers: none. Five other circuits answer: due process requires relief. That conflict has never been resolved by this Court. It affects every litigant in every state that uses mandatory e-filing — and that number grows every year. This Court is uniquely positioned to resolve this conflict and provide guidance on an issue of recurring national importance.

The substantive constitutional question is equally urgent: can an eviction stand when it is based on a judgment obtained without a contract, by a court whose judge acknowledged bias and refused to recuse, through five documented false sworn affidavits, and by an attorney who was never a party to the case? Not one court has answered this question on the merits in two and a half years of litigation.

Under *Windsor v. McVeigh*, 93 U.S. 274 (1876), it is this Court's duty to exhaust all its power to enforce the application of one who has exhausted all available remedies. Under *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803), every right must have a remedy. Petitioner has rights. She has exhausted every available remedy at fifteen separate forums. This Court is the last.

I. REHEARING IS PROPER UNDER SUPREME COURT RULE 44

Supreme Court Rule 44.2 provides that rehearing will be granted when the petition presents intervening circumstances of a substantial or controlling effect, or other substantial grounds not previously presented. Both independent grounds are satisfied here.

A. Intervening Circumstances of Substantial and Controlling Effect

The following material developments — none of which existed when the original petition was filed — constitute intervening circumstances of substantial and controlling effect:

April 3, 2026 — Alter Ego Transfer During Active Supreme Court Proceedings: VM Master Issuer, LLC transferred its entire Georgia property portfolio to ALTO Asset Company 6, LLC — an entity at the identical address: 401 Congress Avenue, 33rd Floor, Austin, TX 78701. Same building. Same floor. Same suite. Both Delaware limited liability companies. This transfer — recorded fourteen days before the April 17, 2026 Supreme Court conference — is a strategic maneuver to continue void proceedings under a new corporate name.

May 13, 2026 — Writ of Possession Issued While Rehearing Was Pending: The lower court substituted ALTO as plaintiff and issued a Writ of Possession directing Petitioner's immediate eviction — on the same day this Court received the original Petition for Rehearing. Respondent's counsel obtained these orders without disclosing to the lower court that the Petition for Rehearing was pending with a May 15, 2026 deadline, in deliberate violation of Georgia Rule of Professional Conduct 3.3(a)(1).

May 18, 2026 — State Court Appeal — Automatic Stay in Effect: Petitioner filed a Petition for Review in the State Court of DeKalb County, Case No. 26A03730, triggering an automatic stay of the Writ of Possession under O.C.G.A. § 44-7-56. Both the State Court appeal and this Court's rehearing proceedings are now active simultaneously.

B. Substantial Grounds Not Previously Presented

The constitutional consequences of the alter ego transfer — specifically that the same enterprise operating under a new corporate name inherited all of VM Master Issuer's legal defects, including the five documented acts of fraud upon the court and the void judgment — constitute substantial grounds not fully presented in the original petition because the transfer had not yet occurred. The deed contains no lease assignment language; under *nemo dat quod non habet*, ALTO inherited no rights against Petitioner that VM Master Issuer never possessed.

II. THIS CASE PRESENTS A QUESTION OF NATIONWIDE CONSTITUTIONAL IMPORTANCE

The Supreme Court's certiorari jurisdiction is most appropriately exercised when a case presents a recurring constitutional question of broad national significance. This case presents exactly that question.

A. Mandatory E-Filing Systems Are Now Universal and Their Failures Are Inevitable

Every federal court and nearly every state court now mandates electronic filing as the exclusive means by which litigants must submit appellate documents. Georgia's eFileGA system is the exclusive means of appellate filing — there is no paper alternative. When Georgia's mandatory system misclassified Petitioner's timely January 2, 2025 filing, she lost her appellate rights with no mechanism for relief — regardless of her diligence, regardless of the system's fault, regardless of the constitutional deprivation. She did everything the law required. The government's system failed. She bore the entire consequence.

Technical failures in mandatory e-filing systems are not anomalies — they are mathematically inevitable at scale. Every day across every jurisdiction using mandatory e-filing, litigants risk losing constitutional rights not through their own error but through government-created failures. The constitutional consequences of those failures remain unresolved. Courts are divided. Litigants are unprotected. This Court's guidance is urgently needed.

B. The Question Will Recur Nationwide Without This Court's Resolution

The question this case presents — whether Due Process permits a State to mandate exclusive use of a filing system while providing no remedy when it fails — will recur in every jurisdiction that uses mandatory e-filing. Without this Court's resolution of the five-circuit split, the answer to that question depends entirely on the accident of geography. A litigant in Georgia permanently loses appellate rights when the government's system fails. An identically situated litigant in California gets relief. The Constitution cannot mean different things on different sides of a state border.

III. AN ENTRENCHED FIVE-CIRCUIT CONFLICT SATISFIES SUPREME COURT RULE 10(a)

Supreme Court Rule 10(a) identifies as a ground for certiorari a decision in conflict with another circuit on an important federal question. Five circuits are directly divided on whether relief is available when a government-created procedural barrier prevents timely filing through no fault of the litigant:

Circuit	Case	Standard	Relief?
Fifth	United States v. Duran, 934 F.3d 407 (2019)	Government error excused filing	YES
Sixth	Shuler v. Garrett, 715 F.3d 185 (2013)	System barrier excused	YES
Ninth	Kastner v. Comm'r, 4 F.4th 1208 (2021)	System error excused	YES
Tenth	United States v. Mitchell, 518 F.3d 740 (2008)	Clerk error excused	YES
Eleventh	Sanders v. United States, 113 F.3d 184 (1997)	No excuse — no relief ever	NO

Five circuits recognize the constitutional right to relief. One does not. The Eleventh Circuit — governing Georgia — applies the most restrictive standard in the nation: no relief, ever, regardless of who caused the procedural barrier or the constitutional magnitude of the deprivation. While the cases in those circuits arise in varying procedural contexts — court clerk error, e-filing system barriers, and mandatory system failures — they share a single unifying principle: the government cannot deprive a litigant of access to courts through its own error and then refuse any remedy. The Eleventh Circuit rejects that principle entirely. That conflict requires this Court's resolution.

This conflict is not theoretical — it determined the outcome of Petitioner's case. Georgia's Court of Appeals dismissed her timely appeal as untimely based solely on a malfunction in the State's mandatory e-filing system. Her January 2, 2025 filing was timely. The State's system nonetheless rejected it. In five other circuits, that dismissal would never have stood.

IV. CONTROLLING CONSTITUTIONAL PRECEDENTS COMPEL REVERSAL

A. Due Process — Logan, Boddie, Armstrong, Mullane, and Fuentes

A litigant cannot lose a protected claim because of a government-created procedural failure. *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982). *Logan* is directly controlling: Petitioner's appellate rights were extinguished not by her own failure but by a malfunction in the State's own mandatory filing system. She did everything the law required. Under *Logan*, she cannot bear the constitutional consequence of the government's failure.

The government cannot close the courthouse doors when it is the exclusive avenue for vindicating rights. *Boddie v. Connecticut*, 401 U.S. 371 (1971). Georgia's mandatory e-filing system is the only avenue for appellate filing. When that system failed, it closed the courthouse to Petitioner with no key to reopen it.

The opportunity to be heard must be granted at a meaningful time and in a meaningful manner. *Armstrong v. Manzo*, 380 U.S. 545 (1965). Petitioner's opportunity to be heard on appeal was denied not by any action of her own but by the State's mandatory system failure and the State's refusal to provide any remedy.

Due process requires procedures reasonably calculated to provide meaningful participation in judicial proceedings. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950). A mandatory filing system that provides no remedy when it fails is not reasonably calculated to protect litigants' rights — it is a constitutional trap.

Significant property interests — including one's home — cannot be taken without constitutionally adequate procedures. *Fuentes v. Shevin*, 407 U.S. 67 (1972). The eviction proceedings against Petitioner lack constitutionally adequate procedures at every stage: no valid contract, a biased judge who refused to recuse, an unauthorized default, five false affidavits, and denial of appellate rights through a government system failure with no remedy.

B. Equal Protection — Griffin and M.L.B.

States may not arbitrarily deny appellate access based on circumstances beyond a litigant's control. *Griffin v. Illinois*, 351 U.S. 12 (1956). Two identically situated Georgia tenants file appeals on the same day. One whose government's system processes the filing without error retains full appellate rights. One whose government's system malfunctions through no fault of her own loses all appellate rights permanently. This arbitrary outcome turns on a random technological failure of a government system, not on any action or omission of the litigant. Under *Griffin*, this arbitrary deprivation is unconstitutional.

States may not arbitrarily deny appellate review where important rights are at stake. *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996). There is no right more important than the right to remain in one's home. The denial of appellate review through a government system failure — with no mechanism for relief regardless of the litigant's diligence — violates *M.L.B.* directly.

C. Access to Courts — *Evitts* and *Mathews*

Appellate rights once granted must be implemented consistent with due process. *Evitts v. Lucey*, 469 U.S. 387 (1985). Georgia granted Petitioner discretionary appellate review on December 23, 2024, then extinguished it through a malfunction in its own mandatory filing system with no alternative and no remedy. No court addressed *Evitts*. The denial of certiorari left it unaddressed.

The *Mathews v. Eldridge*, 424 U.S. 319 (1976), balancing test weighs overwhelmingly in Petitioner's favor: her fundamental interest in her home is enormous; the risk of erroneous deprivation through a mandatory system with no safeguards is extreme; the State's burden of maintaining a backup filing procedure is minimal. No court applied *Mathews*. Applied correctly, it compels relief.

D. Fraud Upon the Court — *Hazel-Atlas* and *Chambers*

Fraud upon the court may be addressed at any stage and is never moot. *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944). Attorney Elizabeth Cruikshank filed five separate sworn affidavits falsely stating Petitioner made no registry payments — directly contradicted by official court receipts showing **\$7,410.00 and \$222.30 paid January 19, 2024**. She fabricated a bankruptcy allegation. Attorney J. Mike Williams obtained the default judgment with no standing. Under *Hazel-Atlas*, this Court has jurisdiction to address this fraud at any time.

This Court reaffirmed in *Chambers v. NASCO, Inc.*, 501 U.S. 32 (1991), the inherent power of courts to address fraud and abuse of the judicial process. The documented fraud in this case goes to the heart of the integrity of every proceeding below.

E. Property Rights and Void Judgment

Once a protected property interest exists, due process protections attach and cannot be removed without constitutionally adequate process. *Board of Regents v. Roth*, 408 U.S. 564 (1972); *Cleveland Board of Education v. Loudermill*, 470 U.S. 532 (1985). Petitioner's leasehold interest is a protected property interest subjected to deprivation proceedings without a valid contract, without an impartial tribunal, and without constitutionally adequate procedures at any stage.

A judgment entered without jurisdiction is void ab initio and has no legal force. *Pennoyer v. Neff*, 95 U.S. 714 (1877). The default judgment of January 22, 2024 is void on five grounds: (1) no contract — no subject matter jurisdiction; (2) VM

Master Issuer never proved Georgia authority; (3) Judge Kleinrock acknowledged bias and refused to recuse in violation of O.C.G.A. § 15-1-8, *Tumey v. Ohio*, 273 U.S. 510 (1927), and *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009); (4) Attorney Williams obtained the default with no standing; and (5) five documented false sworn affidavits constitute fraud upon the court. A court cannot condemn property where the owner was not allowed to appear and make answer. *Windsor v. McVeigh*, 93 U.S. 274 (1876).

V. THIS CASE IS NOT MOOT

- 1. Ongoing Financial Injuries:** The void judgment remains on record; \$7,410.00 and \$222.30 in registry payments have not been returned; the \$2,470.00 security deposit transferred to ALTO without consent has not been returned.
- 2. Ongoing Constitutional Violations:** ALTO Asset Company 6, LLC — an entity with no contract with Petitioner — actively pursues eviction under a void judgment while Petitioner's State Court appeal and this rehearing petition are simultaneously pending.
- 3. Capable of Repetition Yet Evading Review:** The e-filing constitutional question is 'capable of repetition yet evading review.' *Southern Pacific Terminal Co. v. ICC*, 219 U.S. 498 (1911). Individual cases are resolved before full appellate review can occur, making this Court's guidance the only protection available to millions of litigants who face this question every day in mandatory e-filing jurisdictions.

VI. RELIEF REQUESTED

Petitioner respectfully requests that this Court:

- 1. GRANT REHEARING** under Supreme Court Rule 44 on the grounds that intervening circumstances of substantial and controlling effect have arisen since the original petition and that multiple controlling points of law were overlooked;
- 2. GRANT CERTIORARI** and set this case for full briefing and oral argument on the five constitutional questions presented;

3. VACATE the judgment of the Georgia Court of Appeals and remand for proceedings consistent with this Court's opinion;

4. ALTERNATIVELY, SUMMARILY REVERSE the Georgia Court of Appeals' dismissal as a direct violation of *Logan v. Zimmerman Brush Co.*, *Boddie v. Connecticut*, *Armstrong v. Manzo*, *Evitts v. Lucey*, *Mathews v. Eldridge*, *Griffin v. Illinois*, *M.L.B. v. S.L.J.*, *Windsor v. McVeigh*, and *Pennoyer v. Neff*; and

5. GRANT all other relief this Court deems just and constitutionally required.

CONCLUSION

This case is not only about Tasleema Yasin. It is about every litigant in every state who depends on a mandatory government filing system to access the courts — and who has no remedy when that system fails through no fault of their own. It is about whether the Constitution permits a state to close the courthouse door through a technological failure it created, mandated, and refuses to remedy. Five circuits recognize the constitutional right to relief. One does not. That conflict costs litigants their constitutional rights every day it goes unresolved.

Petitioner has documented five acts of fraud upon the court, a void judgment on five independent grounds, a biased judge who acknowledged her bias and refused to recuse, an unauthorized default judgment, and an alter ego transfer of assets designed to continue void proceedings under a new corporate name — all while concealing from the lower court that this Court's rehearing proceedings were active. Not one court has addressed any of these claims on the merits. Fifteen forums. Zero substantive engagement.

Under *Windsor v. McVeigh*, it is this Court's duty to exhaust all its power to enforce the application of one who has exhausted all available remedies. Under *Marbury v. Madison*, every right must have a remedy. Petitioner has rights. She has no remedy except this Court.

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June 24, 2026

CERTIFICATE OF SERVICE

I, Tasleema Yasin, hereby certify that on June 24, 2026, I served a true and correct copy of the foregoing Petition for Rehearing upon all parties of record via certified mail, return receipt requested:

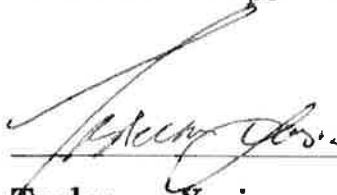
Attorney Elizabeth Cruikshank, Georgia Bar No. 215235

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Georgia 30328

Attorney J. Mike Williams, Georgia Bar No. 765209

2970 Clairmont Rd, Suite 220, Atlanta, Georgia 30329

I declare under penalty of perjury that the foregoing is true and correct.



Tasleema Yasin

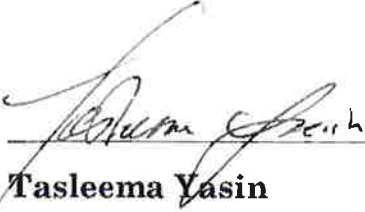
Pro Se Petitioner

Date: 6/24/26

CERTIFICATE OF WORD COUNT

I, Tasleema Yasin, hereby certify pursuant to Supreme Court Rules 29 and 33.1(h) that the foregoing Petition for Rehearing contains **2,653 words**, excluding the cover page, questions presented, certifications, certificate of service, and this certificate of word count. This word count does not exceed the 3,900-word limit established by Supreme Court Rule 33.1(h).

I declare under penalty of perjury that the foregoing is true and correct.



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