

No. 25-6272

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IN THE SUPREME COURT OF THE UNITED STATES

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*James Taylor,*

*Petitioner,*

v.

*Freedom Mortgage Corporation, McCalla Raymer Leibert Pierce, LLC,*

*Respondents.*

On Petition for A Writ of Certiorari  
to the United States Court of Appeals  
for the Eleventh Circuit

No. 24-12771-AA

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**PETITIONER'S PETITION FOR REHEARING**

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James Taylor

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*Pro se*

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Petitioner James Taylor respectfully petitions the Court for rehearing of the Court’s order denying James Taylor’s Petition for a Writ of Certiorari on February 23, 2026.

## GROUNDS FOR REHEARING

*Berg v. McCalla Raymer Leibert Pierce, LLC*, No. 19 C 5113 (N.D. Ill. Oct 30, 2019) and *Stewart v. JP Morgan Chase Bank, N.A., et. al.*, 1:18-cv-07584 (N.D. Ill. Nov. 15, 2018) supports the Supreme Court's interpretation of law and precedent from *Heintz v. Jenkins*, 514 U.S. 291, 115 S.Ct. 1489, 131 L.Ed.2d 395 (1995) apply to McCalla Raymer Leibert Pierce, LLC. Evidence from *McCalla Raymer Leibert Pierce, LLC* supports that the Court of Appeals for the Eleventh Circuit erred in formulating or applying a rule of law by erroneously applying the Court's interpretation of law and precedent from *Obduskey v. McCarthy & Holthus LLP*, 139 S.Ct. 1029, 203 L.Ed.2d 390 (2019) to 24-12771.

The defendants failed to provide a reply brief, appendix and failed to respond to the petition with the original promissory note for 2007 and 2016 prior to refinancing July 1, 2020, supporting that the Court's interpretation of law and precedent regarding *Carpenter v. Longan*, 83 U.S. 271, 275 (1872) apply to 24-12771.

The intervening circumstances of a substantial or controlling effect include the Opinion of the Court of Appeals for the Eleventh Circuit erring in formulating or applying a rule of law because the

Opinion of the United States Court of Appeals for the Eleventh Circuit lacked constraint when it failed to apply the Supreme Court's interpretation of law to the facts of 24-12771 and neglected its obligation to follow the precedent set by the Supreme Court of the United States by rendering decisions irreconcilable with *Carpenter v. Longan*, 83 U.S. 271, 275 (1872), *Heintz v. Jenkins*, 514 U.S. 291, 294, 115 S.Ct. 1489, 131 L.Ed.2d 395 (1995) and *Obduskey v. McCarthy & Holthus LLP*, 139 S.Ct. 1029, 203 L.Ed.2d 390 (2019). The Eleventh Circuit's opinion constitutes a reversible error by failing to apply controlling Supreme Court interpretation of law and precedent to the facts of 24-12771. This failure to adhere to the hierarchy of legal authority violates Canons 1 and 2 of the Code of Conduct for United States Judges and the Georgia Code of Judicial Conduct, 18 U.S.C. § 241 and 18 U.S.C. § 242, resulting in an oppressive disregard for my right to an honest, fair, impartial, diligent and competent appeal.

## CONCLUSION

For the foregoing reasons, and those stated in the Petition for a Writ of Certiorari, the Court should grant rehearing and grant the Petition and review the judgment of 24-12771.

March 4, 2026

Respectfully submitted,

James L. Taylor

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### **CERTIFICATE OF PRO SE**

Pursuant to Rule 44.2, I, James L. Taylor, Pro se Petitioner, hereby certify that the Petition for Rehearing is restricted to the grounds specified in Rule 44.2. I further certify that the Petition for Rehearing is presented in good faith and not for delay.

March 4, 2026

/s/ James L. Taylor

James L. Taylor

A handwritten signature in cursive script that reads "James L. Taylor". The signature is written in dark ink and is positioned below the printed name of the signatory.

No. 25-6272

IN THE  
SUPREME COURT OF THE UNITED STATES  
JAMES TAYLOR – PETITIONER

VS.

FREEDOM MORTGAGE CORPORATION, ET AL. – RESPONDENTS

**PROOF OF SERVICE**

I, James Taylor, do swear or declare that on this date, March 4, 2026, as required by Supreme Court Rule 29 I have served THE PETITION FOR REHEARING on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid for delivery within 3 calendar days.

The names and addresses of those served are as follows:

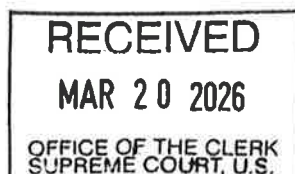
McCalla Raymer Leibert Pierce, LLC

1544 Old Alabama Road

Roswell, Georgia, 30076

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

Executed on March 4, 2026.



*James L. Taylor*