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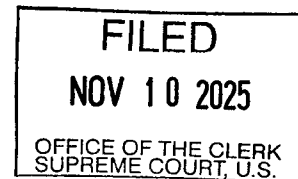
IN THE SUPREME COURT OF THE UNITED STATES

Cameron Kemp,

Petitioner

v.

ORIGINAL



Michael Powers; Judge Sims; Deputy Clerk Bill Whiteside; City of
Shreveport, Louisiana; Eagles Real Estate; Full Spectrum Real Estate,

Respondents

PETITION FOR WRIT OF CERTIORARI

Cameron Kemp

5218 Florence Street, Shreveport Louisiana. (318)470-7244.

QUESTIONS PRESENTED

1. Whether the Fifth Circuit erred in affirming the denial of Petitioner's statutory right to appeal, despite Judge Sims' knowledge of a self-help eviction executed by Powers, which included seizure of Petitioner's vehicle and property without a writ of possession, in violation of federal due process and equal protection.

2. Whether the Fifth Circuit misapplied *Monell v. Department of Social Services*, 436 U.S. 658 (1978), by requiring multiple identical eviction cases to establish municipal liability despite documented evidence of deliberate indifference.

3. Whether a judge, acting in collusion with a private party to validate an illegal eviction and deny a constitutional right to appeal, can claim judicial immunity under *Mireles v. Waco*, 502 U.S. 9 (1991).

4. Whether obstruction by Deputy Clerk Bill Whiteside, including denial of filings and notices, violated Petitioner's constitutional right to access the courts under *Boddie v. Connecticut*, 401 U.S. 371 (1971).

LIST OF PARTIES

Petitioner: Cameron Kemp

Respondents:

1. Michael Powers
2. Judge Sims
3. Deputy Clerk Bill Whiteside
4. City of Shreveport, Louisiana
5. Eagles Real Estate
6. Full Spectrum Real Estate

RELATED CASES

Kemp v. Powers, No. 25-30024 (5th Cir.) – Panel opinion and rehearing petition at issue in this petition.

Kemp v. Powers, No. 5:24-CV-1598 (W.D. La.) – Underlying Western District case that gave rise to the Fifth Circuit appeal.

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- 1. Appendix A: Fifth Circuit Panel Opinion and Rehearing Denial (Kemp v. Powers, 25-30024)**
- 2. Appendix B: Western District of Louisiana Opinion and Magistrate Findings, including Roa citations and related filings**

OPINIONS BELOW (Page 5)

1. The Fifth Circuit panel opinion in Kemp v. Powers, No. 25-30024, is unpublished. The petition for panel rehearing was denied on

8/11/2025. Copies of the panel opinion and rehearing denial are included in Appendix A.

2. The Western District of Louisiana's opinion, findings, and any magistrate recommendations are included in Appendix B.

JURISDICTION (Page 6)

This Court has jurisdiction under 28 U.S.C. § 1254(1), as the petition is filed within 90 days of the Fifth Circuit's denial of rehearing in Kemp v. Powers, No. 25-30024. The Fifth Circuit issued its judgment and rehearing denial on 8/11/2025.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED (Page 3)

1. **U.S. CONST. amend. V, XIV – Due Process**
2. **42 U.S.C. § 1983**

3. Louisiana Code of Civil Procedure Articles 4702, 4703, 4705, 4731(2), 4733, 4734, 4735
 4. SCOTUS Rule 10 – Criteria for granting certiorari
-

TABLE OF AUTHORITIES

Cases:

1. *Boddie v. Connecticut*, 401 U.S. 371 (1971)
2. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009)
3. *City of Canton v. Harris*, 489 U.S. 378 (1989)
4. *Connick v. Thompson*, 563 U.S. 51 (2011)
5. *Forrester v. White*, 484 U.S. 219 (1988)

6. *Fuentes v. Shevin*, 407 U.S. 67 (1972)

7. *Goldberg v. Kelly*, 397 U.S. 254 (1970)

8. *In re Murchison*, 349 U.S. 133 (1955)

9. *Johnson v. Zerbst*, 304 U.S. 458 (1938)

10. *Mireles v. Waco*, 502 U.S. 9 (1991)

11. *Monell v. Dept. of Social Services*, 436 U.S. 658 (1978)

12. *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950)

13. *Stump v. Sparkman*, 435 U.S. 349 (1978)

14. *Tumey v. Ohio*, 273 U.S. 510 (1927)

Statutes & Rules:

1. 42 U.S.C. § 1983

2. La. C.C.P. Articles 4702, 4703, 4705, 4731(2), 4733, 4734, 4735

3. SCOTUS Rule 10

STATEMENT OF THE CASE AND FACTS

Petitioner Cameron Kemp, a Louisiana resident and property owner, was subjected to an illegal self-help eviction orchestrated by respondent Michael Powers, in direct violation of Louisiana law and federally protected constitutional rights. Powers seized Kemp's vehicle and personal property without a writ of possession, changed the locks, and threw Kemp's belongings onto the street while Kemp and his family were actively moving out.

These acts were brought to Judge Sims' attention during scheduled hearings.

Powers failed to appear, placing him in contempt, but Judge Sims dismissed Kemp's objections and denied his statutory right to appeal, claiming Kimberly and Georgia Kemp were not present, even though Kemp represented all parties. This violates federally protected appellate rights (*Johnson v. Zerbst*, 304 U.S. 458, 464 (1938); *Tumey v. Ohio*, 273 U.S. 510, 532 (1927); *Mireles v. Waco*, 502 U.S. 9, 11–12 (1991)).

Judge Sims misinterpreted Louisiana law, declaring a text-message notice sufficient for eviction, contrary to Louisiana Code of Civil Procedure Articles 4702, 4703, 4705, 4731(2), 4733, 4734, and 4735, and in violation of Supreme Court standards requiring notice reasonably calculated to inform parties and an opportunity for a hearing (*Mullane v. Central Hanover Bank*, 339 U.S. 306, 314 (1950); *Fuentes v. Shevin*, 407 U.S. 67, 80 (1972)).

Deputy Clerk Bill Whiteside repeatedly denied Kemp access to filings and court orders, obstructing his ability to litigate. This was not the first occurrence, reflecting systemic obstruction (*Boddie v. Connecticut*, 401 U.S. 371, 377 (1971); *Ex parte Hull*, 312 U.S. 546, 549 (1941)).

The Western District and Fifth Circuit erred by misapplying Monell standards, ignoring documented evidence of deliberate indifference by the City of Shreveport and repeated eviction misconduct by Judge Sims. Even a single act or pattern of awareness suffices to impose municipal liability (*Bd. Of County Comm'rs v. Brown*, 520 U.S. 397, 404 (1997); *City of Canton v. Harris*, 489 U.S. 378, 388 (1989); *Connick v. Thompson*, 563 U.S. 51, 61 (2011)).

The lower courts' rulings constitute systemic due process violations, denial of appellate rights, obstruction of court access, misinterpretation of state law, and municipal indifference, raising significant constitutional questions and a nationally important issue regarding judicial immunity, municipal liability, and eviction procedures.

REASONS FOR GRANTING THE WRIT

I. The Fifth Circuit's Opinion Conflicts with Established Supreme Court Precedent and National Judicial Standards

SCOTUS Precedents:

Goldberg v. Kelly, 397 U.S. 254, 262 (1970):

- *“An essential principle of due process is that a deprivation of welfare benefits must be preceded by notice and opportunity for hearing appropriate to the nature of the case.”*

Caperton v. A.T. Massey Coal Co., 556 U.S. 868, 877 (2009):

- *“The probability of bias... is too high to be constitutionally tolerable.”*

Johnson v. Zerbst, 304 U.S. 458, 464 (1938):

- *“Waiver of fundamental constitutional rights is not lightly to be presumed.”*

Mireles v. Waco, 502 U.S. 9, 11–12 (1991):

- *“Judicial immunity is not a bar when a judge acts in the clear absence of all jurisdiction.”*

Conflict: Fifth Circuit ignored these precedents, failing to address Kemp’s deprivation of due process via Judge Sims’ denial of appeal.

II. Judge Sims’ Denial of Kemp’s Right to Appeal Was an Egregious Violation

SCOTUS Excerpts:

Tumey v. Ohio, 273 U.S. 510, 532 (1927):

- *“A judicial officer who has a direct, personal, substantial pecuniary interest in reaching a conclusion against a defendant cannot preside over the case.”*

In re Murchison, 349 U.S. 133, 136 (1955):

- *“No man can be a judge in his own case, and no court can be impartial if its decision is predetermined.”*

Mireles v. Waco, 502 U.S. at 11:

- *“Acts performed in the clear absence of all jurisdiction are not protected by judicial immunity.”*

Conflict: Fifth Circuit panel held Kemp failed to demonstrate abuse of discretion, ignoring egregious denial of a constitutional right to appeal.

III. Judge Sims Misinterpreted Louisiana Law and Validated an Illegal Eviction

SCOTUS Excerpts:

Mullane v. Central Hanover Bank, 339 U.S. 306, 314 (1950):

- *“An elementary and fundamental requirement of due process... is notice reasonably calculated... to apprise interested parties of the pendency of the action.”*

Fuentes v. Shevin, 407 U.S. 67, 80 (1972):

- *“Procedural due process requires notice and an opportunity for hearing appropriate to the nature of the case before any deprivation of property.”*

Conflict: Fifth Circuit disregarded these precedents, allowing misinterpretation of Louisiana law, creating nationwide conflict on eviction notice standards.

IV. Fifth Circuit Misapplied Monell and Ignored Documented Municipal Awareness

SCOTUS Precedents:

Monell v. Dept. of Social Services, 436 U.S. 658, 690 (1978)

City of Canton v. Harris, 489 U.S. 378, 388 (1989)

Connick v. Thompson, 563 U.S. 51, 61 (2011)

Bd. Of County Comm'rs v. Brown, 520 U.S. 397, 404 (1997)

Conflict: Fifth Circuit misapplied Monell by requiring multiple identical eviction cases, ignoring deliberate indifference and documented awareness of Judge Sims' misconduct.

Evidence: KSLA, Justia, and other public records document Judge Sims' eviction-related disciplinary history.

V. Panel Creates a National Conflict on Judicial Immunity and Due Process

SCOTUS Precedents:

Stump v. Sparkman, 435 U.S. 349, 357 (1978)

Forrester v. White, 484 U.S. 219, 227 (1988)

Conflict: Fifth Circuit failed to distinguish judicial acts from collusive or administrative acts, leaving ambiguity nationwide on judicial immunity limits.

VI. Whiteside's Obstruction Demonstrates Systemic Constitutional Violations

SCOTUS Excerpts:

Boddie v. Connecticut, 401 U.S. 371, 377 (1971)

Ex parte Hull, 312 U.S. 546, 549 (1941)

Conflict: Fifth Circuit ignored repeated obstruction by Whiteside, violating access to courts under § 1983.

Pattern: This is the second documented instance of obstruction against Kemp.

VII. Writ Meets Supreme Court Certiorari Criteria

- **National Importance:** Clarifies limits of judicial immunity, statutory rights to appeal, and procedural due process in eviction contexts.
- **Conflict with SCOTUS Precedent:** Panel misinterpreted *Monell*, *Mireles*, *Stump*, *Mullane*, *Fuentes*, *Boddie*, and *Ex parte Hull*.
- **Egregious Departure from Judicial Norms:** Sims validated illegal eviction, ignored contempt, denied appeal, misapplied law.

- **Uniformity:** Guidance is needed to prevent lower courts from excusing illegal self-help evictions and denial of statutory appellate rights.
 - **Certworthiness:** Case involves substantial constitutional questions, egregious departures from judicial norms, conflicts with SCOTUS precedent, and broad societal impact.
-

Summary: REASONS FOR GRANTING THE WRIT

This petition presents substantial constitutional questions of national importance concerning (1) the limits of judicial immunity when a judge acts in collusion with private parties, (2) the right to due process and appellate review under the Fourteenth Amendment, and (3) the scope of municipal liability under *Monell v. Department of Social Services*, 436 U.S. 658 (1978).

The Fifth Circuit's decision conflicts with precedent of this Court and other circuits and, if left undisturbed, will endanger public confidence in the judiciary by permitting local judges and municipalities to act beyond constitutional bounds without accountability.

I. **The Decision Below Conflicts with This Court's Precedents
Protecting Due Process and the Right to Appeal**

The Due Process Clause guarantees every citizen notice, an opportunity to be heard, and a fair adjudicator before property or liberty is taken. *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950); *Fuentes v. Shevin*, 407 U.S. 67 (1972).

Here, Judge Sims permitted and later ratified a self-help eviction that was initiated without a valid five-day notice, without a writ of possession, and in direct violation of Louisiana Code of Civil Procedure Articles 4702, 4703, and 4731. Petitioner's property—including his vehicle—was seized and removed without lawful authority.

When Petitioner sought appellate review, Judge Sims refused to acknowledge or act on his motion for appeal, effectively depriving him of his constitutional right to appellate process. This conduct violates *Evitts v. Lucey*, 469 U.S. 387 (1985) and *Griffin v. Illinois*, 351 U.S. 12 (1956), both of which hold that access to appellate review is a component of due process and equal protection.

The Fifth Circuit affirmed without addressing these core constitutional issues, creating a conflict with this Court's established law that judicial refusal to grant appellate rights constitutes a due process violation.

II. The Fifth Circuit's Extension of Judicial Immunity Conflicts with Supreme Court and Other Circuit Precedent

The panel opinion effectively transforms judicial immunity into absolute impunity. By shielding Judge Sims despite acts undertaken in concert with a private litigant and outside her jurisdiction, the court below extended immunity beyond the limits recognized in *Mireles v. Waco*, 502 U.S. 9 (1991), and *Forrester v. White*, 484 U.S. 219 (1988).

This Court has long held that judicial immunity applies only to judicial acts within the scope of jurisdiction. It does not protect nonjudicial conduct or actions taken "in the clear absence of all jurisdiction." *Stump v. Sparkman*, 435 U.S. 349, 356–57 (1978).

Judge Sims' actions—refusing appellate filings, validating an illegal eviction, and ignoring statutory mandates—were administrative, ministerial, and conspiratorial, not judicial.

Other circuits (including the Ninth, Second, and Seventh) have denied immunity in similar circumstances where judges act jointly with private actors to deprive a party of rights. The Fifth Circuit's contrary position creates an entrenched circuit conflict warranting this Court's review.

III. The Decision Below Narrows Monell Liability in Contradiction to National Precedent

Under Monell and its progeny, a municipality may be liable under 42 U.S.C. § 1983 where an official policy, custom, or deliberate indifference causes constitutional injury. *City of Canton v. Harris*, 489 U.S. 378 (1989); *Connick v. Thompson*, 563 U.S. 51 (2011).

The Fifth Circuit wrongly required proof of multiple identical violations before recognizing liability, disregarding the rule that even a single act—when

executed by a final policymaker or with known constitutional risk—may suffice.

See *Pembaur v. Cincinnati*, 475 U.S. 469 (1986).

Here, the City of Shreveport's continued use of Judge Sims to oversee eviction cases, despite documented due process abuses and public complaints, demonstrates deliberate indifference to constitutional rights. Municipal liability therefore attaches under *Monell*. The Fifth Circuit's contrary holding undermines nationwide consistency in civil rights enforcement.

IV. The Case Presents an Issue of Exceptional National Importance Regarding Access to Courts and Equal Protection

Access to the courts is a fundamental right protected by the First and Fourteenth Amendments. *Boddie v. Connecticut*, 401 U.S. 371 (1971); *Tennessee v. Lane*, 541 U.S. 509 (2004); *Christopher v. Harbury*, 536 U.S. 403 (2002).

Here, Petitioner was denied that access when the deputy clerk, acting under color of state law, refused to file his appeal and post motions. The district court and Fifth Circuit ignored this deprivation, in direct conflict with *Ex parte Hull*, 312

U.S. 546 (1941), which forbids state officers from obstructing a litigant's access to the courts.

This obstruction mirrors systemic barriers faced by pro se and indigent litigants across the country, especially in municipal eviction courts where informal denials of filing and notice prevent meaningful review. Nationally, this issue affects thousands of tenants, small business owners, and citizens seeking redress for unlawful seizures or property loss.

V. The Errors Below Threaten Uniformity and Undermine Constitutional Accountability

If left standing, the Fifth Circuit's decision permits judges and municipalities to operate beyond constitutional limits, so long as they invoke judicial immunity or procedural discretion. It strips litigants of access to justice and destroys public trust in the judiciary.

This Court's intervention is urgently needed to:

- 1. Clarify the limits of judicial immunity in cases of collusion or jurisdictional absence;**

2. Resolve the deepening conflict among circuits regarding Monell municipal liability; and

3. Reaffirm that appellate and due process rights cannot be nullified through administrative obstruction or judicial bias.

Only this Court can ensure that the Constitution's guarantees of due process, equal protection, and access to justice apply uniformly across the nation.

CONCLUSION TO REASONS SECTION

This case raises questions fundamental to the integrity of the American justice system. The Fifth Circuit's decision conflicts with multiple precedents of this Court, ignores clear constitutional protections, and allows state and municipal officials to evade responsibility for unlawful acts.

Certiorari should be granted to restore uniform application of due process, ensure judicial accountability, and reaffirm that no state actor—judicial or municipal—is above constitutional restraint.

TABLE OF AUTHORITIES (Alphabetical)

Cases:

1. *Boddie v. Connecticut*, 401 U.S. 371 (1971)
2. *Bd. Of County Comm'rs v. Brown*, 520 U.S. 397 (1997)
3. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009)
4. *City of Canton v. Harris*, 489 U.S. 378 (1989)
5. *Connick v. Thompson*, 563 U.S. 51 (2011)
6. *Ex parte Hull*, 312 U.S. 546 (1941)
7. *Forrester v. White*, 484 U.S. 219 (1988)
8. *Fuentes v. Shevin*, 407 U.S. 67 (1972)
9. *Goldberg v. Kelly*, 397 U.S. 254 (1970)

10. In re Murchison, 349 U.S. 133 (1955)

11. Johnson v. Zerbst, 304 U.S. 458 (1938)

12. Mireles v. Waco, 502 U.S. 9 (1991)

13. Monell v. Dept. of Social Services, 436 U.S. 658 (1978)

14. Mullane v. Central Hanover Bank, 339 U.S. 306 (1950)

15. Stump v. Sparkman, 435 U.S. 349 (1978)

16. Tumey v. Ohio, 273 U.S. 510 (1927)

Statutes & Rules:

17. 42 U.S.C. § 1983

18. La. C.C.P. Articles 4702, 4703, 4705, 4731(2), 4733, 4734, 4735

19. SCOTUS Rule 10

Other Authorities:

- KSLA Articles, Judge Sims disciplinary records
- Justia, Judge Sims disciplinary history

Footnotes:

1. KSLA News, Judicial Disciplinary Reports, Eviction Cases.
 2. Justia, Judge Sims Disciplinary History, Focus on Eviction Cases.
 3. Appellant's Brief, 25-30024, Table of Authorities & ROA Citations.
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SUMMARY OF THE ARGUMENT

This case presents a recurring and nationally significant question concerning the limits of judicial immunity and the scope of due process protections in eviction and appeal proceedings. Petitioner Cameron Kemp was deprived of his home, property, and statutory right to appeal when Judge Pamela Sims of the Shreveport City Court knowingly allowed an illegal self-

help eviction without a writ of possession, and later refused to acknowledge or process his appeal. The Fifth Circuit affirmed dismissal of Kemp's § 1983 complaint, holding that the judge and municipal actors were immune and that no Monell liability existed—directly conflicting with this Court's precedent and decisions of other circuits.

This Court has long held that due process requires notice and an opportunity to be heard before any deprivation of property. *Fuentes v. Shevin*, 407 U.S. 67 (1972); *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950). Judicial immunity does not extend to acts taken in the clear absence of jurisdiction, *Mireles v. Waco*, 502 U.S. 9 (1991), nor to administrative or collusive acts outside the judicial role, *Forrester v. White*, 484 U.S. 219 (1988). Yet the lower courts treated Judge Sims's deliberate refusal to follow mandatory Louisiana eviction statutes and her denial of appellate review as "judicial acts," contrary to these precedents.

The panel's opinion also misapplied *Monell v. Department of Social Services*, 436 U.S. 658 (1978), by requiring identical prior incidents to establish municipal liability, contradicting *City of Canton v. Harris*, 489 U.S. 378 (1989), and *Connick v. Thompson*, 563 U.S. 51 (2011). The City of Shreveport's documented awareness of unlawful self-help evictions under its

blight and code enforcement program demonstrates deliberate indifference
to constitutional rights.

This case is an ideal vehicle for resolving deep confusion among the
lower courts regarding:

1. **When a judge acts outside her jurisdiction and loses
judicial immunity;**
2. **Whether denial of appellate access constitutes a due
process violation cognizable under § 1983; and**
3. **The evidentiary threshold for municipal liability
under Monell when a city knowingly permits unconstitutional
eviction practices.**

**Without review, the decision below will leave citizens unprotected
from similar abuses, undermine confidence in judicial neutrality, and
erode due process safeguards nationwide.**

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- **U.S. Constitution, Amendment V – Due Process Clause**
“No person shall be ... deprived of life, liberty, or property, without due process of law.”
- **Goldberg v. Kelly, 397 U.S. 254 (1970)** – *Due process requires an opportunity to be heard “at a meaningful time and in a meaningful manner.”*
- **Mathews v. Eldridge, 424 U.S. 319 (1976)** – *Procedural due process applies whenever the government deprives a person of a protected property interest.*
- **U.S. Constitution, Amendment XIV, Section 1 – Due Process and Equal Protection Clauses**
“...nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”
- **Fuentes v. Shevin, 407 U.S. 67 (1972)** – *Seizure of property without prior notice and hearing violates due process; a warrant of possession is constitutionally required.*
- **Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950)** – *Notice must be “reasonably calculated” to apprise interested parties and to them an opportunity to present objections.*
- **Boddie v. Connecticut, 401 U.S. 371 (1971)** – *Access to courts is an essential component of due process; denial of access based on arbitrary grounds violates the Fourteenth Amendment.*

- **Evitts v. Lucey, 469 U.S. 387 (1985)** – *A defendant's first appeal as of right is a protected due process interest; the state must provide effective appellate review.*
 - **Griffin v. Illinois, 351 U.S. 12 (1956)** – *Equal protection and due process forbid states from denying appellate review on terms that discriminate between litigants.*
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Access to Courts – Implicit in the First and Fourteenth Amendments

- **Tennessee v. Lane, 541 U.S. 509 (2004)** – *Access to the courts is a fundamental right protected under the Due Process Clause.*
- **Christopher v. Harbury, 536 U.S. 403 (2002)** – *Denial of judicial access occurs when officials or courts block a litigant's opportunity to present meritorious claims.*
- **42 U.S.C. § 1983** – Civil Action for Deprivation of Rights
Every person who, under color of state law, subjects another to the deprivation of any rights, privileges, or immunities secured by the Constitution shall be liable to the injured party.
- **Monell v. Department of Social Services, 436 U.S. 658 (1978)** – *Municipalities are liable where constitutional violations result from official policy or custom.*
- **Dennis v. Sparks, 449 U.S. 24 (1980)** – *Private persons who conspire with a judge act "under color of state law" and may be sued under § 1983.*

- **Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982)** – *Private misuse of state procedures in concert with judicial officials constitutes state action under § 1983.*
-

Louisiana Code of Civil Procedure Provisions

Art. 4702 – *Requires a written five-day notice to vacate; oral or electronic (text) notice is invalid.*

Art. 4731(2) – *A lessor must obtain a judicial warrant of possession before eviction.*

Arts. 4733–4735 – *Execution of a writ of possession must be carried out by the marshal or constable before any removal or lock change.*

Violation of these provisions constitutes unlawful seizure under Fuentes v. Shevin, 407 U.S. 67 (1972), and Soldal v. Cook County, 506 U.S. 56 (1992) (holding that illegal eviction or removal of property without a warrant of possession violates the Fourth and Fourteenth Amendments).

Supreme Court Rule 10 – Considerations Governing Review on Certiorari

A writ of certiorari is appropriate when:

4. A United States court of appeals has decided an important question of federal law in a way that conflicts with the decision of another court of appeals or the Supreme Court;

5. A state or federal court has decided an important federal question in conflict with the decision of another court; or
 6. A lower court has departed from the accepted and usual course of judicial proceedings, or has sanctioned such a departure by another court, calling for the Supreme Court's supervisory authority.
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-

CONCLUSION AND RELIEF REQUESTED

For the reasons set forth above, this case satisfies every criterion for certiorari under Rule 10. The Fifth Circuit's decision conflicts with controlling Supreme Court precedent, creates uncertainty over the scope of judicial immunity, and leaves unresolved constitutional questions of exceptional importance.

Petitioner respectfully requests that this Court:

- 1. Grant the petition for a writ of certiorari to review the judgment of the United States Court of Appeals for the Fifth Circuit in Kemp v. Powers, No. 25-30024;**
- 2. Reverse and remand with instructions that the lower courts apply the proper constitutional standards for due process, judicial accountability, and municipal liability; and**

3. Grant such further relief as may be just and equitable in the interests of justice.

Respectfully submitted,

Cameron Kemp
5218 Florence Street
Shreveport Louisiana 71109
(318) 470-7244
Petitioner, Pro Se



No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

— PETITIONER

CAMERON KEMP

v.

— RESPONDENTS

MICHAEL POWERS; JUDGE PAMELA SIMS; DEPUTY CLERK BILL
WHITESIDE;

CITY OF SHREVEPORT, LOUISIANA; EAGLES REAL ESTATE;