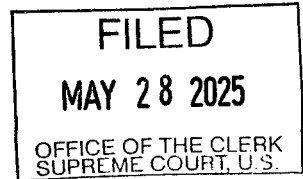


25 - 6358
No.



IN THE SUPREME COURT OF THE UNITED STATES

LARRY EDWARD WEBSTER JR,

___ PETITIONER

vs.

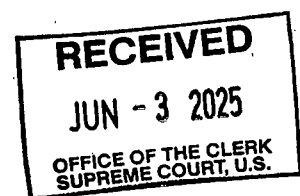
Dr. BALA DAVULURI,

___ RESPONDENT

ON PETITION FOR WRIT OF CERTIORARI
FROM THE UNITED STATES FIFTH COURT OF APPEALS
FOR THE FIFTH CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

S/A. LARRY EDWARD WEBSTER JR,
437 N. 60TH STREET
WACO, TEXAS 76710
larry.webster303@gmail.com



QUESTIONS PRESENTED

Under Article III of the Constitution, Federal courts can hear 'all cases, in law and equity, arising under this Constitution, [and] the laws of the United States. 'US Const, Art III, Sec 2. The Supreme Court has interpreted this clause broadly, finding that it allows federal courts to hear any case in which there is a federal ingredient. See, *Osborn v. Bank of the United States*, 22 U.S.C. 738 (1824). The Supreme Court has found that a 'suit arises under the law that creates the cause of action, see, *American Well Works v. Layne*, 241 U.S. 257 (1916), and therefore, only suits based on federal law, not state lawsuits, are most likely to create federal questions Jurisdiction, see, *Louisville & Nashville R. Co. v. Mottley*, Grable Test: Courts often use to determine federal questions jurisdiction is called the Grable Test, established in *Grable & Sons Metal Products, Inc. v. Darue Engineering & Manufacturing*. 1. Does the claim have 'federal questions jurisdiction under Article III Section 2 of the Constitution? 2. Does the claim meet the requirements for 28 USC 1331 Federal question jurisdiction? See, *Grable & Sons Metal Products v. Darue Engineering & Manufacturing*:

The questions presented are:

- (A). Whether a individual receiving Medicaid under Title XIX of the Social security Act (the Act, P.L. 89-97) can sue a physician for violating, the False Claims Act, bind Federal Courts Jurisdiction? And if so, Whether, the limitation on medical malpractice damages in Tex. Rev. Civ. Stat. Ann. Art. 4590i. 11.02 and 11.03(Vernon Supp.196) is consistent with the Texas Constitution, and if so, whether it applies to limit the liability of each defendant rather than the recovery of each Claimant?
- (B). Whether, punitive damages can be levied 4 separate times based on Dr. Bala Davuluri, providing four diagnosis in areas he does not treat nor focus on under Title XIX of the Social security Act(the Act, P.L. 89-97)?
- C). Whether the First Amendment Limits on intentional Limits on intentional infliction of emotional distress, (IIED) Liability, which certain intentional actions may meet the prima facie case for an (IIED), (Particularly as related to the outrageous conduct components)?
- (D). Whether the First Amendment Limits on intentional Limits on intentional infliction of emotional distress, (IIED) Liability, which certain intentional actions may meet the 'prima facie case', for an (IIED), (Particularly as related to the 'outrageous conduct components)?

(I).

E). Whether Sec. 108.0085. binds the duties of the Attorney General, to the Petitioners case because the Petitioner was receiving Medicaid under XIX of the Social security Act (the Act, P.L. 89-97)?

(F). Whether DR. Bala Davuluri, Violated HIPPA Law Rights? And the False Claims Act?

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(II).

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TABLE OF AUTHORITIES:

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(III).

IN THE SUPREME COURT OF THE UNITED STATES

No.

LARRY EDWARD WEBSTER JR, _____ PETITIONER

vs.

Dr. BALA DAVULURI, _____ RESPONDENT

ON PETITION FOR WRIT OF CERTIORARI
FROM THE FIFTH CIRCUIT COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

Larry Edward Webster Jr, respectfully Petition for a Writ of Certiorari
to Review the Judgment of the United States Court of Appeals for the FIFTH
Circuit Court of Appeals in this Case.

OPINIONS BELOW:

The opinion of the FIFTH Circuit Court of Appeals granting motion to leave to file
petition out of time was granted on April 22, 2025. The Order denying
Petitioner's motion for Rehearing was on April 22, 2025. The earlier opinion of the
Western District of Texas, dismissal for Lack of Jurisdiction was on July 29, 2024.
and March 12, 2025.

JURISDICTION:

The Judgment of the FIFTH Circuit Court of Appeals decided April 22, 2025.
Provides the U.S. Supreme Courts jurisdiction to hear cases from the Court of
Appeals under Article III, Section 2, Clause 2 of the Constitution, which grants the
Supreme Court appellate Jurisdiction. Marbur v. Madison (1803).

STATUTORY PROVISIONS INVOLVED:

28 U.S.C. 1331 Jurisdiction, 61 Vanderbilt Law Re3view 1667 (2008).

42 U.S. Code 1983 Civil action for deprivation of rights.

(1).

STATEMENT:

The Appellant Larry E Webster Jr, was referred to Dr. Bala Davuluri, M.D. Neurologist, who has worked for over 20 years in his field of study, on or about January 5, 2024. The Petitioners (ATP) Dr. Grant, put in a Neurological referral and Dr. Bala Davuluri, after assessing the claim file set an appointment on 1-11-2024. for. 1. Foreign Accent Syndrome. 2. Dysarthria. 3. Somatic Symptom Disorder. 4. Conversion disorder. 4 Rare Neurological Disorders for which Dr. Bala Davuluri, stated the Petitioner did not have a neurological diagnosis, in areas he doe's not treat nor focus on under Title XIX of The Social Security Act(the Act, P.L. 89-97). and the Petitioner filed a summons and Comlaint. Stating: Simple Negligence, Misdiagnosis, Medical Malpraxctice, and requested relief in the amount of \$300,000.000. and \$200,000.000. per each diagnosis and under 28 U.S.C. 1331 Presented Questions for the Court of Appeals to answer granting the District court Jurisdiction and the district court and the fifth circuit court of appeals erred failed to answer the questions presented? (A). Whether, a individual under Title XIX of the Social security Act (the Act, P.L. 89-97) can sue a physician for violating, the False Claims Act, bind Federal Courts Jurisdiction? And if so, (B). Whether, the limitation on medical malpractice damages in Tex. Rev. Civ. Stat. Ann. Art. 4590i. 11.02 and 11.03(Vernon Supp.196) is consistent with the Texas Constitution, and if so, whether it applies to limit the liability of each defendant rather than the recovery of each Claimant? Question? (C). Whether, punitive damages can be levied 4 separate times based on Dr. Bala Davuluri, providing four diagnosis in areas he does not treat nor focus on under Title XIX of the Social security Act(the Act, P.L. 89-97)?

(2).

This court should grant review to decide. (D). Whether the First Amendment Limits on intentional infliction of emotional distress, (IIED) Liability, which certain intentional actions may meet the 'prima facie case', for an (IIED), (Particularly as related to the 'outrageous conduct components)? (E). This court should grant review to decide Whether, Sec. 108.0085. binds the duties of the Attorney General, to the Petitioners case because the Petitioner was receiving Medicaid under XIX of the Social security Act(the Act, P.L. 89-97)? The Texas Health and Safety Code binds the Attorney General shall provide the Texas Department of Health Services (DSHS) with advice and legal assistance needed to implement the provisions of Chapter 108.0085's scope: This section within the Health and Safety Code outlines the Attorney Generals role in supporting the DSHS's efforts in collecting and managing health care data. His obligation is to furnish the DSHS with legal advice and provide assistance necessary for carrying out the duties outlined in chapter 108. The Texas Attorney General defends the state in civil lawsuits, enforces laws, and protects Texans from fraud and abuse. They also serve as legal opinions, and enforce open government laws. The Attorney General litigates cases in which the state is a party, including defending against lawsuits and pursuing claims against others.

A. Background.

Title 42. "Section 1983, of the United States Code is a procedural vehicle by which one whose federal statutory or constitutional rights were violated can bring an action against state 'actors' who commit these violations 'under color of law'. The statute was rarely used until 1961, when the Supreme Court ruled that private

(3).

litigants are to be permitted a federal, court remedy as a first resort rather than having to first bring suit in state court. See, *Monroe v. Pope*, 365 U.S. 167 (1971). The Petitioner was seen on 1-11-2024. by Dr. Bala Davuluri, MD has studied medicine for over 20 years received the Petitioner's medical file and assessed he didn't have 1. Foreign Accent Syndrome. 2. Dysarthria. 3. Somatic Symptom Disorder. 4. Conversion disorder. which Dr. Bala Davuluri, does not treat nor focus on, and the Petitioner contacted 'Traditional Medicaid', under federal and stated indigent program under Title XIX of the Social Security Act (the Act, P.L. 89-97). and informed them in regards to Dr. Bala Davuluri's acts, and Traditional Medicaid informed me that they were not going to get involved but I must payback the services received through Traditional Medicaid. And the Petitioner filed a Summons and Complaint in the Western district of Texas, on May 28, 2024. citing. Simple Negligence, Misdiagnosis, Medical Malpractice, and sought \$300,000.00. and \$200,000.00 per each of the 4 diagnosis, and on June 9, 2024. The Petitioner 'Amended' his summons and complaint citing. Simple Negligence, Misdiagnosis, Medical Malpractice, and sought \$300,000.00. and \$200,000.00 per diagnosis, while presenting 7 Federal Questions Pursuant to U.S.C. 28 1331. Texas. Constitution. Art. V, 3-c, to coincide with the claim of Medical Malpractice by asking? Whether, an individual under Title XIX of the Social Security Act (the Act, P.L. 89-97) can sue a physician for violating, the False Claims Act, bind Federal Courts Jurisdiction? And if so, Whether, the limitation on medical malpractice damages in Tex. Rev. Civ. Stat. Ann. Art. 4590i. 11.02 and 11.03 (Vernon Supp.196) is consistent with the Texas Constitution, and the district court & fifth circuit court of appeals committed harmful error failed to address the fact that

(4).

the Petitioner presented 7 Questions of significant importance in regards to Constitutional violations, HIPPA violations, and the False Claims Act. And the questions presented raises several substantial question of federal law. That does not require a minimum amount of controversy and the Western District of Texas, erred dismissing the Petitioners case on June 20, 2024. Stating the district court lacked jurisdiction and the Petitioner filed an objection to the ALJ recommendation June 25, 2024. requesting the facts to the Petitioners Questions presented and the Merits of the Petioners claim under Tex. R. Civ. P. 296. And the district court violated that right to a fair and partial hearing and the district court erroneous Final Judgment was on July 29, 2024. and the Petitioner, on August 1, 2024. Filed a Notice of Appeal to the district and this case should be reversed and granted relief the Petitioner sought in damages based on the outrageous conduct.

B. Procedural History.

The Petitioner's (ATP) Dr. Grant, plced a referral to Baylor Scott & White-Hillcrest, and on 1-11-2024. Dr. Bala Davuluri, perused the the Petitioners medical file and rstated the Petitioner did not have. 1. Foreign Accent Syndrome. 2. Dysarthria. 3. Somatic symptom disorder. 4. Conversion Disorder. For which Dr. Bala Dalvuluri, does not treat nor focus on and violated the Petitioners HIPPA Law Rights and violated the False Claims act. And the Petitioner filed a summons and complaint in the Western District of Texas, on 5-29-2024. stating the Claim of Simple Negligence, Misdiagnosis, Medical Malpractice and requested relief in the amount of \$3000,000.00. and \$200,000.00 per each diagnosis. And amended the summons and complaint on June 9, 2025. presenting several significant frederal questions under Tex. Const. Art. V, 3-c. The federal Courts have jurisdiction to

(5).

answer questions in regards to federal damages for \$500,000,000. and the case was dismissed June 20, 2024. and Petitioner Appealed to the fifth circuit court of Appeals that dismissed the case in error April 22, 2025. and the case should be reversed and remanded and granted the relief sought and attorney fee's.

REASONS FOR GRANTING CERTIORARI

The questions presented in this case are of critical importance to the Petitioners Merits of his claim, and is a matter of significant public importance or national significance. This case will help many others Citizens who are receiving Medicare or Medicaid under Title XIX of the Social security Act(the Act, P.L. 89-97). and their Constitutional rights are violated become more aware of 28 U.S.C.A. 1331. The Rule that grants federal courts jurisdiction to hear cases depending on Federal Law, arising under the Constitution, Laws, or Treaties and Petitioners right to relief depends necessarily on substantial questions of federal law, and the reverse or remand is proper under the Supreme Courts decision in. Merrell Dow Pharm. Inc. v. Thompson 478 U.S. 804, 106 S. Ct. 3229, 92 L.Ed.2d 650 (1986).

(A). to decide Whether, a individual under Title XIX of the Social security Act (the Act, P.L. 89-97) can sue a physician for violating, the False Claims Act, bind Federal Courts Jurisdiction? And if so, (B). Whether, the limitation on medical malpractice damages in Tex. Rev. Civ. Stat. Ann. Art. 4590i. 11.02 and 11.03(Vernon Supp.196) is consistent with the Texas Constitution, and if so, to decide (D). Whether it applies to limit the liability of each defendant rather than the recovery of each Claimant? The Petitioner receives Federal and State Medicaid under Title XIX of the Social security Act(the Act, P.L. 89-97). in which the Petitioner was seen by Dr.Bala, works for Baylor Scott & White that works under Title XIX

(6).

of the Social security Act, knew he did not treat nor focus on the 4 rare neurological disorders stating he does not have and violated the Petitioners HIPPA Law Rights, which states that a physician providing a diagnosis, outside their specialty, is considered PHI and is protected under HIPPA and the False Claims Act, which Dr. Bala Davuluri, violated my constitutional rights, by reviewing my medical file, knowing he does not treat nor focus on 1. foreign accent syndrome. 2. dysarthria. 3. Somatic symptom disorder. 4. Conversion disorder. The Petitioner phoned Jennifer Allen, and explained that Dr. Bala, minimized my neurological disorders. My cervical, and lumbar spine finding and she stated the medical report will be amended but never changed the report and stated Baylor Scott & White-Hillcrest would stand by Dr. Bala Davuluri, decision. Suing a physician under Title XIX (Medicaid) of the Social security Act can involve claims related to overcharging, fraud, or substandard care. It's important that we understand that Title XIX primary focuses on ensuring accurate reporting and preventing fraud. This includes reporting false or misleading information, billing for services not provided, and other deceptive practices. Federal Tort Claims Act (FTCA): The FCTA allows individuals to sue the United States for injuries caused by the negligence or wrongful acts of its employees, including medical professionals working for the government. 42 U.S. Code 1983 Civil action for deprivation of rights. Every person under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution shall be liable to the party injured in a action at law suit in

(7).

equity, or other proper proceeding for rederess, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. Baylor Scott & White-Hillcrest contracts services through the department of Health, who hires physicians with credentials that states their field of study and Baylor Scott & White-Hillcrest works under Title XIX of the Social Security Act (the Act, P.L. 89-97). shall be liable for the outrageous acts of Dr. Bala Davuluri, and Jennifer Allen, for conspiring to provide the Petitioner a diagnosis in areas Dr. Bala Davuluri, does not treat nor focus on and seeked relief stating the claim of Simple negligence, Misdiagnosis, and Medical malpractice, and seeked \$300,000.00. and \$200,000.00. for each diagnosis, while presenting a federal question under Tex. Const. Art. V, 3-c. The federal Courts have jurisdiction to answer questions: (B). Whether the limitation on medical malpractice damages in Tex. Rev. Civ. Stat. Ann. Art. 4590i. 11.02 and 11.03 (Vernon Supp. 196) is consistent with Texas Constitution and if so whether it applies to limit the liability of each defendant rather than the recovery of each Plaintiff? Petitioner states this Act, limits the amount of civil liability in health care liability claims, including medical malpractice. Initially, the limit was \$250,000 per individual health care provider, with a total limit of \$500,000 if multiple institutions were involved the Supreme Court in 1988 ruled that these sections were unconstitutional when applied to common law medical malpractice actions (health care liability claims), meaning the damage limitations do not apply to all cases and the finding that these sections are unconstitutional means that the damages limitations outlined in 11.02 and 11.03 do not apply to all medical

(8).

malpractice claims and the Petitioner sought damages in the amount of \$500,000,000.00. This can have a significant impact on the amount of damages that can be awarded in a medical malpractice case. Petitioner states 1. foreign accent syndrome. 2. dysarthria. 3. Somatic symptom disorder. 4. Conversion disorder. Which is outside of Dr. Bala Davuluri, scope of practice causing more harm, because now the Petitioners diagnosis is being challenged by a physician that minimized or failed to document neurological orders which Dr. Bala's, simple negligent acts lead me into anxiety and depression because I now have to receive a second opinion to prove that Dr. Bala, violated HIPPA Laws and the False claimws act an in order to prevail I had to see another physician in which on 5-20-2024. Dr. Bala Davuluri, Supervisor of Neurlogy John McIntoss cancelled the follow up visit with Dr. Bala, stating the Baylor Scott & White-Hillcrest does not have a neurologist that treats for my condition, and also on 5-20-2024. Petitioners (ATP) Dr. Grant stated she highly recommend permanent total disability assesing a higher level of care, specifically for his neurological disorders and mentions Dr. Martin Solomon, Dr. Susan Frensley, and Dr. Brunn, all documented foreign accent syndrome, and Dr Frensley and Dr. Brunn, documented somatic symptom disorder, conversion disorder, dysarthria, and foreign accent syndrome and the case should be reversed.

(C). This Court should grant review to decide, Whether, punative damages can be levied 4 separate times based on Dr. Bala Davuluri, providing four diagnosis in areas he does not treat nor focus on under Title XIX of the Social security Act(the Act, P.L. 89-97)?

(9).

1. foreign accent syndrome. 2. dysarthria. 3. Somatic symptom disorder. 4. Conversion disorder. Which is outside of Dr. Bala Davuluri, scope of practice causing more harm, and the Petitioner seeked \$300,000.00. and requested damages for \$500,000,000.00. At least thirteen states other than Texas have enacted damage limitation provisions into their medical malpractice statues. Each statue has different characteristics, and the state courts have divided on the constitutionality of the various caps. See, e.g. Smith v. Department of Insurance, 507 So.2d 1080, 1087-89 (Fla.1987) (\$450,000 limit on noneconomic damages violated open courts provision of Florida Constitution); Wright v. Central Du Page Hospital Ass'n, 63 Ill.2d 313, 347 N.E.2d 736, 743 (1976) (\$500,000 cap constituted special law in violation of Illinois Constitution; [1] Carson v. Maurer, 120 N.H. 925, 424 A.2d 825, 836-38 (1980) (\$250,000 limit on noneconomic damages violated equal protection guaranteed by New Hampshire Constitution); Arneson v. Olson, 270 N.W.2d 125, 135-136 (N.D. 1978). and the case should be reversed.

(D). This court should grant review to decide Whether, the First Amendment Limits on intentional Limits on intentional infliction of emotional distress, (IIED) Liability, which certain intentional actions may meet the 'prima facie case', for an (IIED), (Particularly as related to the 'outrageous conduct components)?

The Petitioner states that Dr. Bala Davuluri, writing false, and misleading medical findings in rare neurological disorders. 1. foreign accent syndrome. 2. dysarthria. 3. Somatic symptom disorder. 4. Conversion disorder, for which he does not treat nor focus on and his supervisor John McIntosh, cancelled the follow up visit with Dr. Bala, stating Baylor Scott & White-hillcrest does not have a neurologist that

(10).

treat for my rare condition on 5-20-2024. and on 5-20-2024. Petitioners (ATP) Dr. Grant, documented I spoke with Mr. Webster, and I recommended Permanent total disability assessing a higher level of care, specifically for his neurological disorders and documented Dr. Martin Solomon, and Dr. Susan Frensley, and Dr. Brunn, all documented foreign accent syndrome, and Dr. Frensley, and Dr. Brunn, documented. Somatic symptom disorder, conversion disorder, foreign accent syndrome, and dysarthria. Which going through the process of finding out Dr. Bala, provided diagnosis in areas he does not treat nor focus on causing me to have more stress, anxiety, and depression because I was well aware that Dr. Bala, medical assessment was false and misleading and would take me far off my course of trying to receive medical treatment for those rare neurological disorders and the Petitioner sought damages in regards to the emotional trauma I have endured having to file a case and hope that a physician would contradict Dr. Bala Davuluris, medical finding and having his supervisor John McIntosh and Dr. Grant, contradicted Dr. Bala Davuluris, medical findings and the Petitioner seeks Damages in the amount of \$500,000,000.00. which the Petitioners right to redress, we first note that the litigant has two criteria to satisfy. The first. Is he must show that the Petitioner has a cognizable common law cause of action that is being restricted. The Second, the Petitioner must show that the restriction is unreasonable or arbitrary when balanced against the purpose and basis of the statute. Texas courts have long recognized that victims of medical negligence have a well defined common law cause of action to sue for injuries negligently inflicted upon them. This much is undisputed. Under Sax, then, the remaining inquiry is whether the restriction on the Petitioners right to recovery is unreasonable or

(11).

right of recovery is unreasonable or arbitrary when balanced against the purpose and basis of the statute which the Supreme Court held that the restriction is unreasonable and arbitrary and that article 4590i, sections 11.02 and 11.03, unconstitutionally limits the Petitioners right of access to the courts for a remedy by due course of Law. Tex. Const. Art. 1, 13. We note that there is no provision in the federal constitutions open courts guarantee. Indeed, that guarantee is embodied in Magna Carta and has been a part of our constitutional law since our republic. The Supreme Court first concern with the statute is that the legislature has failed to provide the Petitioner any adequate substitute to obtain redress for the Petitioners injuries. Texas constitution article I, section 13, guarantees meaningful access to the courts whether or not liability rates are high. As to the legislatures stated purpose to assure that awards are rationally related to actual damages, section 1.02(b)(2), we simply note that this is a power properly attached to the judicial and not the legislative branch of government. Tex. Const. Art. II, 1. In any event, we hold it is unreasonable and arbitrary for the legislature to conclude that arbitrary damages caps, applicable to all claimants no matter how seriously injured, will help assure a rational relationship between actual damages and amounts awarded.

(E). This court should grant review to decide Whether, Sec. 108.0085.

binds the duties of the Attorney General, to the Petitioners case because the Petitioner was receiving Medicaid under XIX of the Social security Act (the Act, P.L. 89-97)?

The Petitioner states. Section 552.108(a)(1) of the Government Code allows governmental bodies to withhold information, like law enforcement records

(12).

related to pending investigations, without seeking a ruling from the Attorney General's Office if certain conditions are met. These conditions are outlined in the 108 Previous Determination Guide. SEC. 13. Subject to the powers and duties of the Attorney General shall be the chief law officer of the State. It shall be the laws of the State are uniformly and adequate enforced. The Attorney General shall have direct Supervision over every district attorney and sheriff and over such other law enforcement officers as may be designated by Law. The Petitioner states the Attorney General should be involved do to Dr. Bala Davuluri, and Jeniffer Allen, working under Title XIX of the Social security Act(the Act, P.L. 89-97). for the Baylor scott & White-Hillcrest medical facility that conspired to provide 4 misdiagnosis in areas Dr. Bala, does not treat nor focus on a and requested payment and Jennifer Allen also conspired to shield Dr. Bala, devilish deed and should be liable and criminal charges filed for not only providing 4 misdiagnosis committing malpractice, but for requesting payment for 4 rare conditions in which he does not treat nor focus on and the case should add the Attorney General and reversed the case. (F). This Court should grant Review to decide, Whether Dr. Bala Davuluri, violated the Petitioners HIPPA Law Rights? And the False Claims Act? Hipa and Private Rights: primary focuses on protecting the privacy and security of Protected Health Information (PHI). Individuals can file complaints with the Department of Health and Human Sevices (HHS) for HIPPA violations, but they don't have a direct legal path. The Petitioner states Dr. Bala, was well aware he does not treat nor focus on 1. dysarthria. 2. somatic symptom disorder. 3. conversion disorder. 4. foreign accent syndrome and provided diagnosis ouside his field of study obtaining sensitive medical information about

(13).

traumatic brain and spine and nerve injury information and chose to minimize neurological disorders and failed to use the Petitioners complete medical file violating HIPPA Laws, and the False Claims Act, which is a Federal law that holds individuals and companies liable for defrauding the government. It allows citizens to sue on behalf of the Government which the Petitioner contacted his Insurance provider 'Traditional Medicaid', to inform them about Dr. Bala Davuluri, and Jeniffer Allen, conspiring to provide false and misleading medical evidence which both parties work for Baylor Scott & White, that contracts through the Department of Health and Human Services providing medical care for Texas residence under the False claims Act, and my Insurance provider at that time 'Traditional Medicaid' stated they would not get involved and all I had to due was payback Traditional Medicaid back on the medical services I received under my Traditional medicaid plan and the False claims Acts primarily addresses situations Where false and fraudulent claims are knowingly submitted to the government for payment which Dr. Bala Davuluri, and Jeniffer Allen, of Baylor Scott & White-Hillcrest, both defrauded the Government by submitting false medical information documenting there is no foreign accent syndrome, there is no dysarthria, there is no conversion disorder, and there is no somatic symptom disorder which is a false diagnosis that could lead to the Petitioner not receiving the proper medical attention and for these reasons Dr. Bala Davuluri, and Jennifer Allen of Baylor Scott & White-Hillcrest, who contracts medical services under Title XIX of the Social security Act, can be held liable for the false claims act and for theses many reasons listed from (A-F), The Petitioner Respectfully request that my Certiorari to review should be Granted. S/A Larry Edward Webster Jr, 5-14-25.

(14).

CONCLUSION

The Petition For Writ of Certiorari should be granted to address issues of National Significance or Wide Impact on individuals or society that may have to seek justice under Tex. Const. Art. V. 3-c presented question of grave importance to the court and the case should be reversed and the relief sought and damages should be granted and attorney fees.

S/A LARRY EDWARD WEBSTER JR, 5-16-2025.