

25-6508

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

ORIGINAL

FILED

DEC 10 2025

OFFICE OF THE CLERK
SUPREME COURT, U.S.

Angeliina L. Lawson

— PETITIONER

(Your Name)

VS.

ERIC W. GODDERZ, District Judge for
the Fourth Judicial District of Kansas,
and TAYLOR WINE, Chief Judge,

— RESPONDENT(S)

ON PETITION FOR A WRIT OF Prohibition TO

Kansas Supreme Court

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

Corrected PETITION FOR WRIT OF PROHIBITION

Angeliina L. Lawson

(Your Name)

1914 5th Avenue

(Address)

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(City, State, Zip Code)

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(Phone Number)

QUESTION(S) PRESENTED

1. Whether the Supreme Court should exercise its supervisory power under Rule 20 and the All Writs Act to restrain a state judge who continues to act without venue or subject matter jurisdiction and after removal to federal court, in defiance of 28 U.S.C. § 1446(d) and the Fourteenth Amendment.
2. Whether the Court should direct Kansas courts to restore Petitioners parental rights and enforce federal due-process and ADA protections where the state judiciary has refused to act and dismissed Petitioners writ of prohibition for lack of jurisdiction, leaving no forum for relief.

Petitioner timely filed the prior version of this writ on October 31, 2025; this corrected version is submitted solely to conform with the procedural requirements identified by the Clerk and does not alter the substance or timeliness of the original filing.

LIST OF PARTIES

- ☒ All parties appear in the caption of the case on the cover page.
- ☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

Kansas Supreme Court No. 129285 Lawson v. Godderz (Writ of Prohibition dismissed Sept. 30 2025)
U.S. D. Kan. Nos. 5:25-cv-04045, 6:25-cv-01179, 2:25-cv-02199
U.S. C.A. 10th Cir. No. 25-3097

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TABLE OF AUTHORITIES CITED AND REFERENCES

CASES	PAGE NUMBER
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Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009)	judicial bias and recusal, 8, 49
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In re Murchison, 349 U.S. 133 (1955)	justice must satisfy the appearance of justice, 7, 48
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Norton v. Shelby County, 118 U.S. 425 (1886)	unconstitutional acts are void ab initio, 11, 26
Santosky v. Kramer, 455 U.S. 745 (1982)	clear and convincing standard for termination, 7, 53
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Troxel v. Granville, 530 U.S. 57 (2000)	parental decision-making liberty, 7, 53
Winter v. Natural Resources Defense Council, 555 U.S. 7 (2008)	irreparable harm and balance of equities, 17
Blackstone's Commentaries on the Laws of England (1765 1769)	Defines fundamental common-law rights of parent and child
Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803)	Establishes judicial duty to remedy violations of law
Ex parte United States, 287 U.S. 241 (1932)	All Writs Act supervisory power over lower courts
Ex parte Peru, 318 U.S. 578 (1943)	Mandamus in aid of appellate jurisdiction
United States v. United Mine Workers, 330 U.S. 258 (1947)	Enforcement of court authority through injunctions
ADA AND JUDICIAL-BIAS CASES	
PGA Tour, Inc. v. Martin, 532 U.S. 661 (2001)	individualized ADA accommodations; Title III equal-access principle 57
United States v. Georgia, 546 U.S. 151 (2006)	Title II abrogates state immunity when conduct also violates the Constitution 58
ADA v. Santa Clara County Superior Court, DOJ Settlement No. 204-11-90 (1990)	state-court duty to provide auxiliary aids and ADA coordinators 59
United States v. Louisiana Supreme Court, DOJ Settlement Agreement (2014)	ADA enforcement directly against a state supreme court 60
Currier v. Taos County Magistrate Court, No. 15-2077 (10th Cir. Aug. 31 2015)	Tenth Circuit reading of § 1443(1) and ADA removal limits 61
Judge Perspective on ADA § 1443(1) (Unpub. 10th Cir. Concurrence 2024)	recognizes ADA Title II as modern equal-civil-rights law 62
State v. Logan, 236 Kan. 79 (1984)	appearance of judicial bias warrants recusal under Canons 2 & 3 63
Garrison v. City of Ottawa, No. 22-1004 (U.S. Mar. 13 2023)	SCOTUS remand ordering reassignment for Judge Godderzs bias against pro se litigant 64

STATUTES AND RULES

FEDERAL STATUTES: 18 U.S.C. § 1503 Obstruction of justice
 18 U.S.C. § 1512 Witness tampering and intimidation
 18 U.S.C. § 1519 Destruction or alteration of records
 18 U.S.C. § 1962 RICO Racketeer Influenced and Corrupt Organizations Act
 28 U.S.C. § 1257 Supreme Court jurisdiction over state judgments
 28 U.S.C. § 1443 Civil-rights removal statute
 28 U.S.C. § 1446(d) Automatic divestiture of state jurisdiction upon removal
 28 U.S.C. § 1651(a) All Writs Act
 28 U.S.C. § 1915(a)(1) In forma pauperis standards
 42 U.S.C. § 1983 Civil action for deprivation of constitutional rights
 42 U.S.C. § 12132 ADA Title II public entity nondiscrimination
 42 U.S.C. § 12203 ADA retaliation and interference
 42 U.S.C. § 12205 Attorneys fees and remedies under ADA

Supreme Court Rules:

Rule 20 Extraordinary writs
 Rule 22 Applications to individual Justices (emergency)
 Rule 33.2 Format for IFP petitions
 Rule 39 In forma pauperis procedure
 Rule 29 Filing and service
 Rule 14 Form and content of petitions
 Rule 8 Stay or injunction pending appeal (analogous authority)

Maxims Of Law / Common Law Principles:

Justice delayed is justice denied Common-law maxim; Blackstones Commentaries
 No man shall be judge in his own cause. Nemo iudex in causa sua foundational
 common-law rule of impartiality
 Equity will not suffer a wrong without a remedy. Maxim of equity (ubi jus, ibi
 remedium)
 Fraud vitiates everything it touches. Common-law principle cited in Hazel-Atlas
 Where there is a right, there is a remedy. Ubi jus ibi remedium

BLACK'S LAW DICTIONARY DEFINITIONS (11th ed.)

Fraud upon the court - A scheme to interfere with the judicial machinery itself so
 that the impartial function of the court is directly corrupted.
 Color of law- The pretense or appearance of legal authority when none actually
 exists.
 Void ab initio-Invalid from the beginning; a legal nullity.
 Constructive termination- A de facto or indirect termination accomplished by
 actions that make performance or relationship impossible.
 Extrinsic fraud-Fraud that prevents a party from having a fair opportunity to present
 a case or defense.

COMMON LAW AND EQUITABLE DOCTRINES

Clean hands - A court of equity will not aid one who has acted unconscionably.
 Inherent judicial bias renders judgment void - Derived from English common law and
 reaffirmed in Caperton.
 Public office is a public trust - Common-law principle underlying Canon 1.
 The law will not allow a wrong without a remedy - Core equitable doctrine applied in
 Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803).

CONSTITUTIONAL PROVISIONS;

U.S. Const. art. III Judicial power and federal jurisdiction
 U.S. Const. art. VI (Supremacy Clause) Federal law supreme over
 state actions
 U.S. Const. amend. I Petition for redress; retaliation protection
 U.S. Const. amend. V Due process and takings clauses
 U.S. Const. amend. IX Retained fundamental rights
 U.S. Const. amend. X Reserved powers; limits on state abuse of
 authority
 U.S. Const. amend. XIV Due process and equal protection guarantees
 Kansas Const. Bill of Rights § 1 Inalienable natural rights (life, liberty,
 happiness)
 Kansas Const. Bill of Rights § 18 Remedy by due course of law; justice
 without delay

STATE STATUTES (KANSAS):

K.S.A. 21-5409 Interference with parental custody
 K.S.A. 21-5601 Child endangerment
 K.S.A. 23-3203 Best-interests-of-the-child standard
 K.S.A. 23-3401(b)(2) 21-day evidentiary hearing requirement for ex
 parte orders

Judicial Conduct Canons:

Canon 1 Uphold integrity and independence of the judiciary
 Canon 2 Avoid impropriety and appearance of impropriety
 Canon 3 Perform duties fairly and impartially
 Canon 3(D) Disqualification and recusal for bias or conflict of interest

IN THE
SUPREME COURT OF THE UNITED STATES

Corrected PETITION FOR WRIT OF PROHIBITION

Petitioner respectfully prays that a writ of prohibition issue to review the judgment below.

OPINIONS BELOW

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix ^A_____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was 09/30/2025.
A copy of that decision appears at Appendix A.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

The Kansas Supreme Court entered its order dismissing Petitioner's Writ of Prohibition on September 30 2025; a copy appears at Appendix A.

No petition for rehearing was available or filed.

☒ Jurisdiction is invoked under 28 U.S.C. § 1651(a) and Supreme Court Rule 20, as the petition seeks an extraordinary writ in aid of this Court's appellate jurisdiction and no adequate relief can be obtained elsewhere

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. Art. III; Amends. I, V, IX, X, XIV;
Kansas Bill of Rights §§ 1 & 18;
28 U.S.C. § 1651(a);
42 U.S.C. §§ 1983, 12132, 12203;
18 U.S.C. §§ 1503, 1512, 1519, 1962.

STATEMENT OF THE CASE

September 19, 2024 Jurisdictionally Void Removal of Child

Petitioners minor child was removed under an ex parte "emergency" order entered without notice, hearing, evidence, or subject-matter jurisdiction. The court lacked venue under K.S.A. 23-2703, and the case had not been lawfully initiated. No DCF investigation, police report, or criminal allegation existed. Judge Eric W. Godderz refused to allow Petitioner to review the Guardian ad Litem's initiating e-mail, testify, present exhibits, or cross-examine witnesses. No evidentiary record was created, and the proceeding occurred entirely off-record and outside lawful judicial process.

September 24, 2024 Void Order Memorializing Unlawful Action

Five days later, opposing counsel presented a proposed order memorializing the removal, which was signed and docketed on a Saturday when the courthouse was closed. No hearing had occurred, no evidence was presented, and no trial or adjudication has occurred to this day. This document constitutes a void order entered without jurisdiction, and violates both state and federal due process standards.

October 2024 - February 2025 Continued Jurisdictional Abuse and ADA Retaliation

Despite uncontested attorney stipulations that venue was improper, Judge Godderz refused to schedule or rule on motions to transfer under K.S.A. 60-609. All parties acknowledged that neither parent resided in Anderson County. The judge's refusal to act rendered all subsequent proceedings unlawful. Simultaneously, court clerks altered and suppressed docket entries constituting fraud upon the court. Petitioner's self-representation rights were stripped: a withdrawn attorney was used to block all filings, including fraud pleadings and victim impact declarations. Chief Judge Taylor Wine ignored six months of formal ADA accommodation requests. Hearings were conducted without captioning, access support, or transcript availability despite clear notice that Petitioner is ADA-qualified under 42 U.S.C. §12132.

March - August 2025: Federal Removal and Multi-Forum Obstruction

Petitioner filed a federal removal under 28 U.S.C. §1443(1) and initiated habeas corpus, civil rights (42 U.S.C. §1983), and RICO actions (18 U.S.C. §1962) in the District of Kansas. In each case, no summons issued and no discovery was allowed. All were dismissed pre-merits, with repeated denials of Article III adjudication. All terminated pre-briefing and without evidentiary hearing. Witnesses were intimidated. GAL subpoenas were ignored. Motions were docket-suppressed. Across state and federal dockets, the same pattern of constructive judicial paralysis denied access to a lawful tribunal.

September 30, 2025: Exhaustion of State Remedies and Ongoing Harm

The Kansas Supreme Court dismissed Petitioner's Writ of Prohibition for lack of jurisdiction, despite unrebutted jurisdictional defects and ongoing constitutional harm. No state court has ever addressed the merits of Petitioner's claims, and federal courts have dismissed all filings prior to discovery. Petitioner remains under void custody orders entered post-removal, in a venue without legal authority, while ADA retaliation and parental separation continue without review. No lawful tribunal has yet heard the case. Only this Court's Writ of Prohibition can now halt further unlawful judicial action.

REASONS FOR GRANTING THE PETITION

Extraordinary Circumstances and Irreparable Harm: The Kansas Supreme Court's dismissal of Petitioner's Writ of Prohibition for lack of jurisdiction has closed all available state remedies. As a result, Petitioner remains subject to void orders issued by a judge lacking both venue and subject-matter jurisdiction. The continuing denial of parental association and ADA access constitutes irreparable injury, including the total deprivation of access to her minor child without hearing, evidence, or adjudication. These circumstances meet the threshold for extraordinary relief under Rule 20(a)(2).

In Aid of Appellate Jurisdiction: Petitioner's federal removal and civil rights cases, including 5:25-cv-04045 and Tenth Circuit Appeal No. 25-3097, remain pending. The Kansas judiciary's active defiance of 28 U.S.C. § 1446(d) through post-removal hearings, orders, threats of de facto parental termination of rights for seeking federal protection of rights and contempt threats directly obstructs this Court's future appellate jurisdiction, should it be exercised on the merits. Intervention now is essential to preserve that jurisdiction.

Systemic Judicial Breakdown: Evidence across related dockets reveals a coordinated pattern of forum suppression, ADA retaliation, docket tampering, witness obstruction, and procedural sabotage. These acts spanning multiple jurisdictions and actors form a predicate pattern consistent with civil RICO enterprise behavior under *H.J. Inc. v. Northwestern Bell Tel. Co.*, 492 U.S. 229 (1989). Traditional remedies have proven ineffective. No hearing has occurred in any court of competent jurisdiction. A Writ of Prohibition is the only mechanism capable of halting this systemic breakdown.

Institutional Failure and Public Importance This case presents urgent questions of constitutional structure and public trust: whether a litigant with disabilities can be silenced through venue fraud, retaliatory court orders, and judicial manipulation of ADA rights. The record reflects judicial conduct that, if left unreviewed, threatens the integrity of domestic court systems across the country.

Although this Court did not reach the merits in *Garrison v. Ottawa*, No. 22-1004, that case resulted in reassignment due to the same presiding judge's demonstrated bias. The recurrence of identical misconduct by Judge Eric Godderz and with the enabling authority of Chief Judge Taylor Wine shows that no internal oversight has occurred. Instead, a judicial structure has developed that entraps pro se and disabled litigants within a closed venue controlled by a disqualified judge, with no available appellate relief.

The Supreme Court has repeatedly affirmed that state courts are subject to the requirements of the Americans with Disabilities Act (ADA). In *Tennessee v. Lane*, 541 U.S. 509 (2004), the Court held that Title II guarantees access to the courts for individuals with disabilities. In *PGA Tour, Inc. v. Martin*, 532 U.S. 661 (2001), the Court confirmed that public accommodations must be adjusted to prevent exclusion. Department of Justice enforcement actions against the Santa Clara County Superior Court and the Louisiana Supreme Court further establish that judicial systems themselves are public entities under Title II and must adopt accommodations, training programs, and access reforms.

Despite these mandates, Judges Eric W. Godderz and Taylor Wine have acted in open defiance of ADA requirements. Court clerks blocked filings, refused to issue CART captioning access, suppressed transcripts, and imposed inaccessible in-person hearings all while Petitioner's ADA grievances were either ignored or actively sabotaged. Petitioner was excluded from proceedings without aid, transcript, or access, in violation of Lane and the Supremacy Clause.

The Kansas Supreme Court's dismissal of Petitioner's Writ of Prohibition for lack of jurisdiction despite the underlying ADA violations has left no remaining forum for redress. This satisfies the extraordinary circumstances standard under Rule 20(a)(2), warranting this Court's intervention to prohibit continued judicial obstruction and ADA retaliation.

Separately, the case involves structural judicial bias rising to the level of constitutional violation. In *State v. Logan*, 236 Kan. 79 (1984), the Kansas Supreme Court held that even the appearance of impropriety requires recusal to preserve public confidence. In *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), this Court ruled that where the probability of actual bias is constitutionally intolerable

CONCLUSION

WHEREFORE, Petitioner respectfully prays that this Court issue a Writ of Prohibition:

Prohibiting Judge Eric W. Godderz and Chief Judge Taylor Wine from taking any further action in Case No. 2020-DM-131, including enforcement of any orders entered without lawful venue or jurisdiction;

Declaring that all orders in the absence of lawful subject-matter jurisdiction or venue, are void ab initio;

Prohibiting further ADA retaliation, denial of access, or coercive proceedings conducted without accommodations, pending adjudication before a court of competent jurisdiction;

Directing that the matter be transferred to a lawful venue, consistent with Kansas statutes governing jurisdiction and residence;

Referring the record to appropriate federal authorities for review of potential judicial misconduct.

Petitioner requests such further relief as may be necessary to protect this Court's future appellate jurisdiction and to prevent continued irreparable harm.

Respectfully submitted,

Angeliina L. Lawson

Date: 12/10/2025