

No. **25-7254**

IN THE SUPREME COURT OF THE UNITED STATES

ORIGINAL

Susan Lloyd,

Petitioner

V

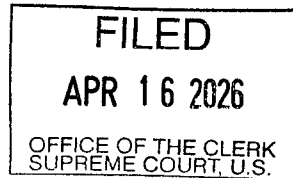
Lancaster County Housing Authority

Respondents

ON PETITION FOR A WRIT OF CERTIORARI TO UNITED STATES

3rd CIRCUIT APPEALS COURT

PETITION FOR WRIT OF CERTIORARI



Susan lloyd

/s/ susan lloyd

55 stanley ave

Landisville pa 17538

QUESTION PRESENTED

1. Is Lancaster County Housing (or any other governmental agency) immune when they keep money that is lawfully yours

LIST OF PARTIES

PETITIONER

Susan Lloyd

RESPONDENTS

Lancaster County Housing Authority

Manbel Devco

Manbel Devco I

Avery Colella

Fowler Hirtzel McNulty and Spaulding

Greenspaces Landscape Construction

Manbel Devco III

Benjamin Novak

Caroline Schenck

*Gretna
Landscaping and
Lawn Care*

RELATED CASES

Susan Lloyd v Manbel Devco , Eastern District of Pennsylvania,
23-2261

Susan lloyd v Manbel Devco 3rd Circuit Court of Appeals 25-2457

TABLE OF CONTENTS

OPINIONS BELOW

JURISDICTION

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

STATEMENT OF THE CASE

REASONS FOR GRANTING THE WRIT

CONCLUSION

1
1
2
2
1
8

INTERESTED PARTIES

The only interested parties are Susan Lloyd and Lancaster County Housing AUTHORITY. All other parties settled with Lloyd prior to 3rd circuit appeal

Susan lloyd

/s/ susan lloyd

55 stanley ave

Landisville pa 17538

INDEX TO APPENDICES

APPENDIX A	3rd circuit Court of Appeals orders	9-17
APPENDIX B	Denial petition of rehearing	18-19
APPENDIX C	March 4 2025 Eastern District of PA	20-58
APPENDIX D	July 24 2025 Eastern District of PA	59
	Appendix E - (HAB Rule)	

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

Armstrong v Manzo 380 US 545 (1965)	6
CityNet v Gianato US 4th CIRCUIT COURT OF APPEALS 18-1575	4
Fuman V Davis 371 US 178, 182, 83 S Ct 227, 230 (1962)	5
Id. at 780, 819 P.2d 370	4
John Doe v. Puget Sound Blood Ctr., 117 Wash.2d 772, 780, 819 P.2d 370 (1991)	4
Lewis v Casey, 518 US 343 (1996), the US supreme court	4
Marks V shell oil co 830 F 2d 68, 69 (6th Cir 1987)	5
Mullane v cent Hanover Bank and Trust co 339 US 306, 313 (1950)	7
Peralta v Heights Medical Center 485 US 80 (1988)	6
re Murchison, 349 US 133, 136, 75 S Ct 623, 99 L Ed 942 (1955) see	4
US v James Daniel Good Real Property, 510 US 43 53 114 S Ct 492, 126 L Ed 2d 490 (1993)	
Schever v Rhodes 416 US 232, 236 (1974)	5
US V Boch Oldsmobile Inc 909 F 2d 657, 661 (1st circ 1990)	6

STATUTES

28 USC 1367

Fed Civ R 15(a)(2)

PA constitution, § 11. Courts to be open; suits against the Commonwealth.

5
5
3

IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI
OPINIONS BELOW

1. Petitioner prays that a writ of certiorari issues to review the judgments below.

2. The opinion of the 3rd CIRCUIT COURT OF APPEALS appears at Appendixes A. They are dated March 23 2026. *filed March 30 2026*

3. Lloyd filed a petition for rehearing that was denied on April 15 2026. Appendix B.

4. The opinions of the Eastern District of Pennsylvania appears at Appendixes C-D.

5. They are March 4 2025 dismissing Lancaster Housing Defendants. *EXHIBIT C*

6. Order dated July 29 2025 dismissed the rest of the Defendants *EXHIBIT D*

JURISDICTION

7. The date on which the 3rd circuit court of appeals decided case was March 23 2026. Appendix A. *Entered March 30, 2026*

8. Lloyd filed timely rehearing that was denied April 15 2026.

Appendix B *Entered April 15 2026*

9. The jurisdiction of this court is invoked under 28 USC
1254.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

10. PA constitution, § 11. Courts to be open; suits against
the Commonwealth.

11. 1st Amendment right of access to the courts

12. 14th Amendment Due Process right

STATEMENT OF THE CASE

15. This case was originally filed in Eastern District of
Pennsylvania on June 12 2023.

16. Orders were made dismissing case on March 4 2025 and July 29
2025.

17. Lloyd appealed dismissal of Lancaster County Housing
Defendants on July 29 2025 to 3rd Circuit court of appeals
assigned case 25-2457.

18. The 3rd circuit affirmed on March 30 2026

19. Lloyd filed for petition of rehearing on March 30 2026

20. Lloyds rehearing was denied on April 15 2026

21. Lloyd is now filing this writ of certiorari

22. The facts of this case are not disputed

23. Lloyd applied for ERAP (Emergency Rental assistance program) during covid which Lancaster County Housing does not dispute

24. Lloyd was approved for at least 12 months of rent which Lancaster County Housing does not dispute

25. Under ERAP, if the landlord does not accept the ERAP money, then it must be paid to Lloyd. Lancaster County housing does not dispute this

26. Manbel Devco, Lloyds landlord, would not accept the money. Lancaster County Housing does not dispute this

27. However, to date, Lancaster County Housing refused to pay Lloyd any of the money they owe her.

28. Lancaster County Housing only defense is immunity and they never dispute that they owe Lloyd money

29. They just refuse to give it to Lloyd

30. Lancaster County Housing Authority is not immune under any theory

31. Under PA constitution, **§ 11. Courts to be open; suits against the Commonwealth.**

All courts shall be open; and every man for an injury done him in his lands, goods, person or reputation shall have remedy by due course of law, and right and justice administered without sale, denial or delay. Suits may be brought against the Commonwealth in such manner, in such courts and in such cases as the Legislature may by law direct.

32. Under 1st amendment, Lloyd also had a right to access the courts to remedy an injury she received

33. Lloyds case was even dismissed without a hearing. In re Murchison, 349 US 133, 136, 75Sct 623, 99 LEd 942 (1955) see US v James Daniel Good Real Property, 510 US 43 53 114 S Ct 492,126 L Ed 2d 490 (1993) (due process requires a hearing)

34. The people have a right of access to courts; indeed, it is "the bedrock foundation upon which rest all the people's rights and obligations." John Doe v. Puget Sound Blood Ctr., 117 Wash.2d 772, 780, 819 P.2d 370 (1991).

35. It is the duty of the courts to administer justice by protecting the legal rights and enforcing the legal obligations of the people. Id. at 780, 819 P.2d 370

36. In Lewis v Casey, 518 US 343 (1996), the US supreme court ruled that actual injury allows access to the court

37. Lloyd suffered actual injury of loss of her money that is lawfully hers

38. Lancaster county housing committed fraud by not paying Lloyd her ERAP funds and therefore is not immune as in CityNet v Gianato US 4th CIRC COURT OF APPEALS 18-1575

39. While courts have recognized the public interest in affording public officers immunity from suit to protect their ability to exercise independent discretion in carrying out their official duties, it surely does not serve the public interest to

extend immunity protection to public officials who defraud the government," U.S. Circuit Judge Paul V. Niemeyer, a Ronald Reagan appointee, wrote in the 13-page opinion. "Thus, while immunity should protect discretion, it must not shield fraud."

40. Lloyds case was even dismissed without allowing Lloyd to amend. Fed Civ R 15(a)(2) states a court shall give free leave to amend.

Fuman V Davis 371 US 178, 182, 83 S Ct 227, 230 (1962).

41. Amendments are given to ensure complaints are decided on the merits. Marks V shell oil co 830 F 2d 68, 69 (6th Circ 1987).

42. For motion to dismiss, the issue is not whether Lloyd can prevail, but whether she has the right to offer evidence.

Schever v Rhodes 416 US 232, 236 (1974).

43. Judge Leeson also stated that Lloyds ERAP claims are state claims so he should have dismissed them without prejudice so Lloyd could file them in state court

44. However, at the time, Lloyds ERAP claims were tied into Manbel Devco claims so since Manbel Devco claims were not dismissed, then neither should have Lancaster county Housing as Leeson had supplemental jurisdiction under 28 USC 1367.

45. Lloyd claims that Manbel Devco settled with Lloyd but Lloyd did not receive her rent back.

46. Lloyd had other claims against Manbel Devco such as discrimination, retaliation, etc

5

47. So Lloyd was not made whole by Manbel Devco settlement
48. Lancaster County Housing took Lloyds money and then
unjustly enriched themselves and kept Lloyds money so therefore
are not immune.

49. Failure to provide a party with an opportunity to be heard
violates due process and renders judgment void. Peralta v
Heights Medical Center 485 US 80 (1988)

50. When a judgment is entered without due process, it is void
for lack of jurisdiction. Armstrong v Manzo 380 US 545 (1965)

51. Lloyd was not allowed any due process in this matter and was
denied discovery and a hearing in violation of Lloyds 14th
amendment rights

52. Lloyd did not spend one minute in court for this matter

53. Lloyd filed documents and boom, case dismissed

54. Same thing happened with Lloyds appeal

55. Lloyd asked for oral argument and it was denied

56. Judgment was entered in this matter in violation of Lloyds
due process rights and is therefore void

57. A void judgment is not entitled to the respect accorded to
a valid adjudication. It is not entitled to enforcement and has
no res judicata effect. US V Boch Oldsmobile Inc 909 F 2d 657,
661 (1st circ 1990)

58. This dismissal violated Lloyds right to a fair hearing.
Parties whose rights are to affected are entitled to oral

argument. Mullane v Cent Hanover Bank and Trust Co 339 US 306, 313 (1950).

59. This case began over 3 years ago and Lloyd has not spent one minute in court

60. The case shall be remanded back so Lloyd can amend, do discovery and have a fair hearing on this matter.

REASONS FOR GRANTING THE PETITION

61. The US Supreme Court needs to hear this case as government agencies should not be immune when they take your money that is lawfully yours

62. Lancaster County Housing does not deny that under ERAP, they owe Lloyd money

63. They just refuse to pay Lloyd

64. This case was also dismissed in violation of Lloyds due process rights and 1st amendment right of access to the courts along with violations of Pennsylvania constitution.

65. Lloyd did not spend one minute in any courtroom in this matter and was even denied oral argument despite repeatedly asking for it.

CONCLUSION

66. This writ of certiorari should be granted as Lloyds due process and right to be heard and right to access the courts was

violated. The underlying courts also went against precedented cases to dismiss Lloyds case.

67. Also, Lloyd has a right to sue the government to get money that is lawfully hers.

CONCLUSION

68. The petition for a writ of certiorari should be granted.

Susan Lloyd

/s/Susan Lloyd

55 stanley ave

landisville pa 17538

Domino7575@yahoo.com

2133219999

8