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SUPREME COURT OF THE UNITED STATES

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MICAH LAMB, J23663 — PETITIONER
(Your Name)

VS.
FLORIDA DEPARTMENT OF CORRECTIONS
SECRETARY RICKY D. DIXON AND
RESPONDENTS — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

(11th) ELEVENTH CIRCUIT COURT OF APPEALS, ATLANTA, GEORGIA
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

MICAH LAMB, J23663
(Your Name)

FRANKLIN CORRECTIONAL INSTITUTION
(Address) 1760 HIGHWAY 67 NORTH
CARABELLE, FLORIDA
323 22
(City, State, Zip Code)

N/A
(Phone Number)

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QUESTION #1

GROUND #4, SEE APPENDIX 12A

"ALL PETITIONERS' TIMELY PLEADINGS' PLEADS THE 'ACTUAL INNOCENCE' EXCEPTION" OF: "IT IS MORE LIKELY THAN NOT," TO HAVE THE MERITS DETERMINATION OF FLORIDA LEGISLATURES' "NEWLY INTERVENING CHANGE OF LAW ON "CARRYING A CONCEAL FIREARM WITH NO NEED OF A LICENSE, NOW; AND LACK OF A ARREST WARRANT AND PROBABLE CAUSE, UNDER F.R.C.P. 60(b)(1,2,3,4,5), 15(c)(2)?"

QUESTION #2

GROUND #17, SEE APPENDIX 12A

"ALL PETITIONERS' TIMELY PLEADINGS' PLEADS THE 'ACTUAL INNOCENCE' EXCEPTION" OF: "IT IS MORE LIKELY THAN NOT," TO HAVE A MERITS DETERMINATION OF FLORIDA LEGISLATURES' "NEWLY INTERVENING CHANGE OF LAW ON THE "CARRYING CONCEAL FIREARM WITH NO NEED OF A LICENSE, NOW, CONSOLIDATED TOGETHER BY THE (11TH) CIRCUIT COURT OF APPEALS, OF JSO POLICE ILLEGAL SEIZURE OF CHEVY LUMINA WITHOUT PROBABLE CAUSE OR SEARCH WARRANT, UNDER F.R.C.P. 60(b)(1,2,3,4,5), 15(c)(2)?"

LIST OF PARTIES

A list of all parties to the proceeding in the court whose judgment is the subject of this petition is provided below. If a party is a corporation with a stock ticker symbol, that symbol is also included.

WIFCAH UAMS DOC 523663;
ATTORNEY GENERAL'S OFFICE, ATTORNEY JAMES WILKMEIR;
SECRETARY, FLORIDA DEPARTMENT OF CORRECTIONS RICKY
D. DIXON.

RELATED CASES

N/A

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APPENDIX "AA": 11TH CIRCUIT COURT OF APPEALS, DENIAL ORDER, OCTOBER 29TH, 2025, ON PETITIONER'S TIMELY FILED, "EXPANDED COA BRIEF," UNDER F.R.C.P. 60(b)(1,2,3,4,6), 15(c)(2);

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3, 5, 10, 13, 18, 20

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari 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 "B" 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 "A" 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 _____ 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 OCTOBER 29th, 2025.

☐ 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: DECEMBER 10th, 2025, and a copy of the order denying rehearing appears at Appendix "B".

☒ 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 _____.
A copy of that decision appears at Appendix _____.

☐ 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).

"CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED"

(A). THE (4TH) CIRCUIT COURT OF APPEALS DENIAL ORDER (GRANTED IN PART) DATED DECEMBER 18TH, 2025, RECEIVED AT LEGAL MAIL JANUARY 14TH, 2026, AT LEGAL MAIL, CITED TO OUTDATED FEDERAL LAW CASES, PURSUANT TO PETITIONER'S MOTION FOR REHEARING, ON FEDERAL COURTS AND GOVERNMENT ATTORNEYS' LATE DISCLOSURE OF EXCULPATORY EVIDENCE IS, FRAUD ON THE HABEAS COURT, A LIVE CONSPIRACY TO COVERUP THE MERITS, DIRECTED TO EN BANK COURT TO INCLUDE U.S. DISTRICT (FEDERAL JUDGE TJOFAT) CITING, BILAL V. DRIVER, 251 F.3d 1346, 1349 (11th Cir. 2004); HUBBARD V. CAMPBELL, 379 F.3d 1245, 1247 (11th Cir. 2004) IS A MISAPPROPRIATION OF THE FEDERAL LAW, CONTRARY TO THIS COURT'S CONTROLLING AUTHORITY, UNDER F.R.C.P. 60(b)(1, 2, 3, 4, 6), 15(C)(2), SEE, BUCK V. DAVIS, 137 S.Ct. 759 (2017); STRICKLAND V. WASHINGTON, 104 S.Ct. 2052 (1984); BLOM, LEXIS 2193 (2025); FONEROT, 402 F.SUP.3d 1110 (10th Cir. 2019); KYLE V. WHITLEY, 115 S.Ct. 1555 (1995); U.S. V. CHANG, LEXIS 145517 AT 31 (9th Cir. 2025); (B). OF 4TH, 5TH, 6TH, 7TH, 8TH, AND 14TH U.S. CONSTITUTIONAL AMED., VIOLATIONS HIGHLIGHTED BY "NEWLY INTRODUCING CHANGE OF FLORIDA LEGISLATURE'S HOUSE BILL 5430 EFFECTIVE DATE JULY 1ST, 2024 (REPEALING) OLD, CARRYING CONCEAL FIREARM WITHOUT A LICENSE (WAS NOT YET FINAL), THRU "STEADY TRIAL WAIVER FORM" OF 9 YEARS AND 4 MONTHS, TO WHEREAS A LICENSE IS NOT NEEDED, RESULTED IN (RELITIGATION) THAT EXPOSED THE OMITTED FACTS OF (C). DEFECTIVE ARREST OF PETITIONER BEING A SUSPECT IN (2) TWO ARMED ROBBERIES WHEN INCLUDED ARREST REPORT IS DEVOID OF (UNEXPLAINED SOURCES) OF HOW PETITIONER BECAME A SUSPECT FOR: ECOU BANK ARMED ROBBERY OF (DECEMBER 07, 2001) AND BANK OF AMERICA ARMED ROBBERY (SEPTEMBER 17TH, 2001), BE FRUITS OF THE "CARRYING CONCEAL FIREARM WITHOUT A LICENSE" ON (DECEMBER 21ST, 2000) AT 4:45 PM, IS A "ILLEGAL ARREST", SEE, U.S. IMBRO, 402 F.2d 197, 199 (5th Cir. 1973) CERT. DENIED 94 S.Ct. 371 (1973); TRIAL COUNSEL FAILURE TO FILE A "MOTION TO DISMISS", (C). JACKSONVILLE, PRICE ILLEGAL SEIZURE OF PETITIONER'S CHEVY LUMINA OFF AVANTS MRS. WYOMIA HOLLIS (120 CAHOON) ROAD (CURTILAGE) ON (DECEMBER 21ST, 2000) AT 1:30 PM, BY REPRESENTED BY, RESPONDENTS, IN (FRAUDULENTLY CONCEAL / SUPPRESSED SEARCH WARRANTS AND AFFIDAVITS DATED (DECEMBER 22d, AND 27TH, 2000) AS CHEVY LUMINA BEING AT, (8100 NEVADA STREET) A VACANT LOT, SEE, U.S. V. SIMMONS, 944 F.SUP. 1396, 1398-1410 (7th Cir. 1996); COLLINS V. VIRGINIA, 138 S.Ct. 1653 (2018) IS A LIE, AND IS A "JUDICIAL ADMISSION" BINDING ON ALL (APPEALS) SEE, STARBUCKS V. R.J. REYNOLDS, 349 F.SUP. 3d 1223, 1233 (M.D. Fla. 2018) TRIAL COUNSEL FAILURE TO FILE A "MOTION TO DISMISS" REQUIRES ALL (9) NINE S.Ct. JUDGES JUDICIAL INTERVENTION OF GRANTING: DISCHARGE OF PETITIONER, AND RETURN CHEVY LUMINA.

" STATEMENT OF THE CASE "

PETITIONER ACCUSED OF BEING A SUSPECT IN (2) TWO ECCE ARMED ROBBERY OF DECEMBER 9TH, 2001, AND BANK OF AMERICA SEPTEMBER 17TH, 2001 SEE, LAMB V. JONES, 133 S.Ct. 1318 (2013) AND OATHS WITH THE PROSECUTOR LIVE CONSPIRACY OF RESPONDENTS' (FRAUDULENT CONCEALMENT) OF: (A). "SPEEDY TRIAL WAIVER FORM" RESULTING IN POLICE JACKSONVILLE, FLORIDA, ON (UNEXPLAINED SOURCES¹) OF PROBABLE CAUSE ON (DECEMBER 21ST, 2001) AT (1:30 P.M.) WENT ON PETITIONER'S AUNT MRS. WYOMIA HOWIS, 120 CATHOON ROAD, (2) TWO STORY HOUSE (CURTILAGE) AND ILLEGALLY SEIZED PETITIONER'S CHEVY LUMINA WITHOUT A SEARCH WARRANT AND PROBABLE CAUSE, THEN, AT 4:19 P.M. JSO POLICE CONTACTED PETITIONER THRU SURVEILLANCE. INTELLIGENCE OFFICERS AT THE (1ST STOP) AT 2124 CLIFTON AND SHERRINGTON STREET AT PETITIONER'S MOTHER'S HOUSE, AND SNATCHED ALLEGED EYEWITNESS BETTY MOOREY OUT THE JEEP ON (9) OUTSTANDING CHECK WARRANTS SEE, U.S. V. MORIN, 665 F.2d 765, 769 (5th Cir. 1982); (A). THEN, PETITIONER WAS FREE TO LEAVE, AT (4:45 P.M.) ANOTHER JSO POLICE (STOPPED) PETITIONER AGAIN AT THE TEXACO GAS STATION, BY OFFICER COLLIER (GOSH) WHO DEVESTATED PETITIONER THEN PULLED UP BEHIND PETITIONER'S JEEP, ORDERED PETITIONER TO EXIT THE JEEP AND WALK BACK TO HIS PATROL CAR, OFFICER COLLIER ASKED ME WHAT DO I HAVE IN THE VEHICLE HE SHOULD KNOW ABOUT, I TOLD HIM THAT I HAVE TWO (2) HANDGUNS, A GLOCK .357 AND .380 T&W, OFFICER COLLIER SAID HE DIDN'T WANT THE FIREARMS, HE WANTED THE (1) KID OF COCAINE, I SAID I DON'T HAVE ANY COCAINE, AND (5) FIVE PAIR CLOTHES, DETECTIVES RAN UP FROM BEHIND ME, DETECTIVE CARNY (HIS) SLAMMED A CONSENT FORM ON COLLIER'S POLICE HOOD AND COMPELLED PETITIONER TO SIGN IT. CARNY DISCOVERED MY .380 UNDER THE (BACK REAR PASSENGER SEAT) AND HAD OFFICER COLLIER ARREST ME FOR CARRYING A CONCEAL FIREARM WITHOUT A LICENSE, THAT (REFUSED) THRU NEW INTERVENING HOUSE BILL 513 EFFECTIVE JULY 1ST, 2023; (B). RESPONDENTS WERE COURT ORDERED, BY THE 1ST DCA ON CASE NO: 1007-1594, JULY 17TH, 2007 TO PUT JSO / RESPONDENTS' (DECEMBER 22d, 2001, SEARCH WARRANT AND AFFIDAVIT FOR) PETITIONER'S CHEVY LUMINA BACK IN THE APPROPRIATE RECORD, ALLOWED ALL COURTS TO (TURN THE BULLSHIT) TO AN PETITIONER'S EXCULPATORY EVIDENCE, TOOK ON THE FORMS OF "PLAIN ERROR, AND FRAUD ON THE COURT, SEE, FOLEY V. ALBAUGH, 402 F.SUP.3d 1110, 1149 (10th Cir. 2019) CERT. DENIED 142 S.Ct. 2722 (2022).

(FNU) "MAKES TRIAL COUNSEL DAVID MAKORFF BE INEFFECTIVE FOR FAILURE TO FILE ON BOTH GROUNDS, SEE APPENDIX 121A, 417, SEE U.S. V. GORMAN, 859 F.3d 706, 714 (9th Cir. 2017) (Citing WONG SUN V. U.S., 83 S.Ct. 401 (1963))".

QUESTION #1

REASONS FOR GRANTING PETITION

GROUND #4, SEE APPENDIX 121A

"ALL PETITIONER'S TIMELY READINGS' PLEADS THE 'ACTUAL INNOCENCE EXCEPTION' OF: 'IT IS MORE LIKELY THAN NOT' TO HAVE A MERITS' DETERMINATION OF FLORIDA LEGISLATURES' 'NEWLY INTERVENING CHANGE OF LAW ON THE 'CARRYING A CONCEAL FIREARM WITH NO NEED OF A LICENSE, NOW, AND LACK OF A ARREST WARRANT AND PROBABLE CAUSE UNDER F.R.C.P. 60(b)(1,2,3,4,6), 15(c)(2)?"

(1)(A). PETITIONER PREJUDICED BY FEDERAL COURTS' AND RESPONDENTS' ABUSE OF DISCRETION, AND LACK OF UNDERSTANDING OF FEDERAL LAW, HARMONY FROM THE FIRE OF THE RECORD OF CLEAR BRAINESS' ADJUDICATIONS' OF CORRUPTION OF THE TRIAL SEEKING FUNCTION OF THE TRIAL PROCESS, MISCARRIAGE OF JUSTICE, 'ACTUAL INNOCENCE EXCEPTION', 'FAKE AND MOCKERY OF JUSTICE', 'DUE TO FEDERAL COURTS' KNOWINGLY USING FAKE MISINFORMATION TO MAKE INVOLUNTARY, PETITIONER TO FILE THIS GROUND IN A § 2244 FEDERAL HABEAS PETITION FOR PERMISSION FOR AUTHORIZATION TO PROCEED ON A (2d) OR SUCCESSIVE HABEAS CORPUS, CAUSED FRAUD ON THE HABEAS COURTS, BY SENIOR U.S. DISTRICT JUDGE TIMOTHY J. CORRINGAN'S FEBRUARY 5TH, 2025, DENIAL ORDER FOLLOWED BY THE (11TH) CIRCUIT OCTOBER 20TH, 2025 DENIAL ORDER, SEE, APPENDIX "A, AA, ", PETITIONER FILED A TIMELY MOTION FOR REHEARING TO INCLUDE, OUR OLDEST FEDERAL JUDGE TJOFAT ON (EN BANC) NOVEMBER 10TH, 2025, (WAS GRANTED) BY THE 11TH CIRCUIT COURT OF APPEALS DECEMBER 18TH, 2025, SEE, APPENDIX "B" COURT ORDER (OMITTED) FROM THE COURTS' DISCUSSION OF ESSENTIAL FACTS, TO CONDUCT A PROPER WEIGHING AND EVALUATION OF ALL THE 4TH, 6TH, AND 14TH U.S. AMENDMENT VIOLATIONS, CAUSED A FURTHER ONE PROCESS VIOLATION, SEE, U.S. V. GILSON CO. 68 S.Ct. 525, 542, (1948), BENSON V. CITY OF LINCOLN, 343 F.R.D. 515, 607 (8 Cir, 2023), LIA V. JUNIOUS, 871 F.3d 679-694 (9 Cir, 2015), WHEN FLORIDA LEGISLATURES' NEWLY INTERVENING CHANGE OF LEGISLATION HOUSE BILL 543, EFFECTIVE DATE, JULY 1ST, 2023, ON 'CARRYING A CONCEAL FIREARM WITH NO NEED OF A LICENSE, NOW, (WAS NOT YET FINAL) FROM (2003-2012) OF 9 YEARS AND (4) FOUR MONTHS, SEE, JOHNSON V. CAIN, 68 F.Supp.3d 513, 515 (LA, 2014) WAS PRESERVED UNDER PETITIONER'S, 'SPEEDY TRIAL WAIVER FORM', BINDING AS A 'JUDICIAL ADMISSION' BY RESPONDENTS, SEE, STARBUCK V. R.J. REYNOLDS, 349 F.Supp.3d 1223, 1233 (M.D. FLA. 2018) PROVED INEFFECTIVE, WERE IT TOOK 23 YEARS TO COME TRUE, MADE TRIAL COUNSEL DAVID MAKORFF, ESQ., FOR FAILURE TO FILE A MOTION TO DISMISS, IN CONJUNCTION WITH HIS 'SPEEDY TRIAL WAIVER FORM', MADE IT INVOLUNTARY AND UNKNOWING, BY RESPONDENTS' FRAUD ON THE HABEAS COURTS, OF IT RESOLVES DISREGARD OF THEIR DISCLOSURE DUTIES OF THIS FORM, SEE, APPENDIX "B"

SEE MARTIN V. BENSON, 815 F.SUPP.2d 1086, 1095 (Minn. 2011) ("SUMMARY DISMISSAL WAS NOT WARRANTED, IS NOT A (2d) OR SUCCESSIVE PETITION"); SMITH V. YEAGER, 89 S.Ct. 277 (1968) ("INTERVENING CHANGE OF LAW GOVERNING RIGHT OF A HABEAS CORPUS HEARING WARRANTS (RELITIGATING) OF CLAIM IN EARLIER PROCEEDING"); BUCK V. DAVIS, 137 S.Ct. 759 (2017); BYNOE V. BACH, 966 F.3d 972, 979-986 (9th Cir. 2020); U.S. V. LOSCHIAVO, 531 F.2d 659, 661-664, 666 (2d Cir. 1976); ROBSON V. U.S., 526 F.2d 1145, 1147-1148 (1st Cir. 1975); DELAWARE REPUBLICAN STATE COMMITTEE V. RED FERN, 97 S.Ct. 42 (1976) ("ON WRIT OF HABEAS CORPUS JUDGMENT VACATED OF 3d CIRCUIT AND CASE REMANDED TO THE COURT OF APPEAL FOR FURTHER CONSIDERATION [IN LIGHT OF INTERVENING LEGISLATION]"); CAREY V. ECHEVERRIA, 97 S.Ct. 44 (1976) (same); DAVIS V. U.S., 94 S.Ct. 2298 (1974); GARLAND V. OX, 472 F.2d 875, 877 (4th Cir. 1973) CERT. DENIED 94 S.Ct. 877 (1973) ("AN INTERVENING CHANGE OF LAW IS SUFFICIENT JUSTIFICATION FOR FAILING TO RAISE A CLAIM EVEN IF THE POINT OCCURRED IN A PRIOR HABEAS HEARING. IF PURELY LEGAL QUESTIONS ARE INVOLVED, THE AFFIDANT MAY BE ENTITLED TO A NEW HEARING UPON SHOWING AN INTERVENING CHANGE IN THE LAW (OR SOME OTHER JUSTIFICATION OF HAVING FAILED TO RAISE A CRUCIAL POINT OR ARGUMENT IN THE PRIOR APPLICATION)"; HOWARD V. U.S., 374 F.3d 1068, 1073-1080 (11th Cir. 2004) (NEW RULE); U.S. V. BENWERNER, 785 F.3d 958, 962-963 (9th Cir. 2015) (NEW RIGHT); MORRIS V. SCHOONFIELD, 90 S.Ct. 2232 (1970) (CRIMINAL); KUENZEL V. ALLEN, 488 F.3d 1341 (11th Cir. 2007) ("HOWEVER, THE COURT GRANTED PETITION ON INTERVENING, PACE, 125 S.Ct. 1807 (2005) DECISION, HOWEVER HE ARGUED THAT HE SATISFIED THE EXCEPTIONS TO PROCEDURAL BARRIERS HE MAINLY CONTENDS HE HAD MADE SUFFICIENT SHOWING OF (ACTUAL INNOCENCE) TO EXCUSE HIS PROCEDURAL DEFAULT. THE APPELLATE COURT DECLINED TO REOPEN THE QUESTION OF (ACTUAL INNOCENCE) FOR THE 1ST TIME ON APPEAL.

(FN 2) "FLORIDA LEGISLATURES' HOUSE BILL WAS EFFECTIVE JULY 18, 2023, PETITIONER, TIMELY FILED HIS F.R.C.P. 60(b)(1,2,3,4,6), 15(c)(2), ON JUNE 21ST, 2024, AND THE U.S. DISTRICT COURT, SENIOR JUDGE TIMOTHY J. CORRIGAN, FAILED TO RULE ON THE (TIMELINESS FACTOR) OF THE MOTION, A CRUCIAL ASPECT OVERLOOKED ON PETITIONER'S 'ACTUAL INNOCENCE EXCEPTIONS' TO EXCUSE ALL PROCEDURAL BARRIERS, SEE WOOTEN V. CAULEY, 677 F.3d 303, 307-308 (6th Cir. 2012)".

THE DISTRICT COURT CERTIFICATE OF APPEALABILITY DID NOT REFER TO HIS CLAIM OF (ACTUAL INNOCENCE) AND THE DISTRICT COURT DID NOT DISCUSS OR SQUARELY RULE ON THAT CLAIM!!

KUENZEL V. CAMPBELL, 85 FED APPX 726 (11 CIR. 2003) (SAME); LOPEZ V. ARAN, 844 F.2d 996 (FNG) (13 CIR. 1988); BURGER V. SCOTT, 317 F.3d 1133, 1144 (10 CIR. 2003); KEITH V. SECY OF FLORIDA, 377 F.3d 1317, 1337 (11 CIR. 2004); BUCKLON V. SECY FLA, 606 F.3d 490, 493 (11 CIR. 2015) ("FINALLY, RULE 60(b)(c)(i) REQUIRES THAT BUCKLON FILE HIS MOTION WITHIN A REASONABLE TIME, BUCKLON WAITED (18) EIGHTEEN MONTHS AFTER, CUNNINGHAM V. STATE, 131 SO.3d 793 (FLA. 2d DCA 2012) WAS ISSUED TO FILE THE RULE 60(b)(6) MOTION. THIS AMOUNT OF TIME IS REASONABLE HERE!!) COMPARE; GIENN V. SECY DEPT. OF CORR, LEWIS 14402, AT 4 (11 CIR. 2024) ("HERE REASONABLE JURORS WOULD NOT DEBATE THE DETERMINATION THAT GIENN'S RULE 60(b)(6) MOTION WAS NOT FILED WITHIN A REASONABLE TIME AS IT WAS FILED 5 YEARS AFTER THE COURT DENIED A COA ON HIS ORIGINAL § 2254 PETITION, AND (4) FOUR YEARS AFTER, MENDEZ, (FLA. 3d DCA 2019) WAS ISSUED, SEE, F.R. CIV. P. 60(b)(6)(i), FURTHER, BECAUSE GIENN FAILED TO PRESENT NEW EVIDENCE, HE FAILED TO MAKE A CONVINCING SHOWING OF ACTUAL INNOCENCE THAT COULD EXCUSE THE (UNTIMELINESS) OF HIS MOTION, SEE, McQUIGGIN V. PERKINS, 569 U.S. 383, 399 (2013) ("STATING THAT TO MAKE A CREDIBLE SHOWING OF (ACTUAL INNOCENCE) TO EXCUSE AN UNTIMELY FILING A PETITIONER MUST SHOW THAT: 'IT IS MORE LIKELY THAN NOT THAT NO REASONABLE JUROR WOULD HAVE CONVICTED HIM IN LIGHT OF THE NEW EVIDENCE'"); OSBORNE V. HOMESIDE LENDING, INC., 379 F.3d 271, 283-285 (11 CIR. 2004) ("COURT GRANTED, MOTIONS UNDER 60(b) MUST BE MADE WITHIN A REASONABLE TIME UNLESS GOOD CAUSE CAN BE SHOWN FOR THE DELAY"); SECY OF LAB, MINE SAFETY AND HEALTH V. WESTFALL, 69 F.4TH 902, AT 7 (D.C. CIR. 2023) ("REMAND UNDER 60(b)"); CLARK V. STEPHENS, 627 F.3d 305, 309 (FV3) ("SEE, APPENDIX A, U.S. DISTRICT COURT'S FEBRUARY 5TH, 2025, DENIAL ORDER, AND APPENDIX A, 11TH CIRCUIT COURT OF APPEALS OCTOBER 29TH, 2025 DENIAL ORDER, COMPARE JULIE V. DUCK WORK, 861 F.2d 1349, 1351 (7 CIR. 1988) ("CHANGE OF LAW AFTER (1ST) FIRST PETITION JUSTICES (RELITIGATION) OF SAME CLAIM"); JOHNSON V. CANN, 685 SUP. 3d 593, 615 (LA. 2014) ("NEW RULE, OUT-OF-TIME-APPEAL").

(F122) (11 Cir. 2015); U.S. V. PASHA, 797 F.3d 1122, 1133-1141 (D.C. Cir. 2015) ("COURT GRANTED RELIEF WHEN IT FOUND, IN A CRIMINAL TRIAL INVOLVING A DEFENSE ATTORNEY AND LEGAL INVESTIGATORS WHO (FABRICATED EVIDENCE) AND (SUBORNED PERJURY) DURING A CRIMINAL IN WHICH THEY REPRESENTED ANOTHER INDIVIDUAL"); HOLLAND V. FLORIDA, 130 S.Ct. 2549, 2562 (2010); ARON V. U.S., 291 F.3d 708, 712 (11 Cir. 2002); JONES V. U.S., 153 F.3d 1305 (11 Cir. 1998) ("GRANTED ON ACTUAL INNOCENCE EXCEPTION"); U.S. V. APKER, 714 F.3d 934 (8 Cir. 1999) (SAME); IN RE M.T.G. INC., 366 B.R. 730, 753-754 (6 Cir. 2007) Aff'd 400 B.R. 558 (Mich. 2009) ("ATTORNEY COMMITTED (FRAUD ON THE COURT) IN RECKLESS DISREGARD FOR THE TRUTH AND RECKLESS DISREGARD OF THEIR DISCLOSURE DUTIES"); FATE V. CITI MORTGAGE, LEXIS 4591 (11 Cir. 2009) ("DISMISSAL INAPPROPRIATE"); MASON V. ACHLER, LEXIS 517 (6 Cir. 2023) ("FRAUD ON THE COURT BY ATTORNEY MICHAEL TINDALL"); ASPEN AM. IND. CO. V. TADAL LLC, 508 F.SUP.3d 1179, at 7-10, (11 Cir. 2020); (SAME); COMARE F.R.C.P. 41(b) SEE, FRITZ V. HONDA CO., 818 F.2d 924 (D.C. Cir. 1987) ("ATTORNEY AOTED IN BAD FAITH MULTIPLIED THE (PROCEEDINGS) VEXATIONISLY AND HARASSING, AN ABUSED THE PROCESS OF THE COURT UNREASONABLY"); THE ATTACHED, POLICE REPORT, IS (VOID) OF EVIDENCE TESTIMONY?

II. CLEAR ERRONEOUS ADJUDICATION, OCCURRED SEE APPENDIX 12A, GROUND # 4/17, INTERTWINES! BOTH GROUNDS PROVES NO DE NOVO REVIEW OCCURRED, AND THE 11TH CIRCUIT USUAL ORDER IS CONTRARY TO LAW WHEN IT FAILS TO APPLY OR MISAPPLIES RELEVANT STATUS CASE LAWS OR RULES OF PROCEDURES HAS SERIOUSLY PREJUDICED PETITIONER, SEE, GRINDER V. GANON, 73 F.3d 793, 795 (8 Cir. 1995) ("PRISONER HAD SHOWN THAT A DE NOVO REVIEW WAS NOT PERFORMED AND NO EVIDENCE EXISTED TO DEMONSTRATE THAT THERE WAS DE NOVO, THE CASE SHOULD BE REMANDED TO THE DISTRICT COURT"); EASLEY V. CROMARTIE, 121 S.Ct. 1452, 532 U.S. 234, 242 (2001); BENSON V. CITY OF LINCOLN, 343 F.R.D. 595, 607 (NEB. 2023); IN RE BRADLEY, 960 F.2d

502,507 (11 Cir. 1992); U.S. V. LOTHRIE, 324 F.3d 599, 600
(8 Cir. 2003); J. COVILL MFG. V. FITZPATRICK, 215 F.2d 567
571 (2d Cir. 1954); HOLMES V. OR., 184 F.3d 536, 549
(6 Cir. 1999) ("FINDINGS CLEAR ERROR, WHERE FACTUAL
FINDINGS WAS (INFECTED) BY AFFILIATED MISAPPLICATIONS
OF GOVERNING LAW"); U.S. V. U.S. GYPSUM CO., 333 U.S. 364,
395, 68 S.Ct. 525, 542 (1948); U.S. V. STREETER, 70 F.3d
1314, 1320-1323 (D.C. Cir. 1995) ("WHEN DOCUMENTS
OR OBJECTIVE EVIDENCE CONTRADICT THE WITNESS
STORY, ANDERSON V. CITY BESSEMER CITY, 470 U.S. 565, 575,
105 S.Ct. 1504 (1985) AN APPELLATE COURT IS FREER TO
OVERTURN A FINDING OF FACT THAN IF THE COURT IS
FACED SOME WITH A CONFLICTING WITNESSES CREDIBILITY
ID. 1317-1318, CITING, JACKSON V. U.S., 353 F.2d 862, 866
(D.C. Cir. 1965) ("THE COURT FOUND SERIOUS INCONSISTENCIES
IN THE OFFICERS' TESTIMONY AND THE LIKELIHOOD OF HIS
STORY (FN 4-15)"); BROWN V. WARDEN, LEXIS 23210, AT 5-6,
(11 Cir. 2015) ("BY FEDERAL JUDGE JILL PRYOR, MR. BROWN, DID NOT
PRESENT NEW EVIDENCE IN HIS [3d] THIRD, 60(b) MOTION] NOR DID
HE SHOW THAT AN INTERVENING CHANGE IN THE LAW DEMANDS A
DIFFERENT RESULT. HE ALSO FAILED TO DEMONSTRATE THAT THIS
OVERTHROW DECISION IS (CLEARLY ERRONEOUS), CITING,
THOMAS V. U.S., 573 F.3d 1300, 1303-1304 (11 Cir. 2009) ("THE
COURT HED BECAUSE WE FIND THAT THE LAW OF THE CASE
DOCTRINE DOES NOT BAR REVIEW HERE [AS TO EACH CLAIM
SPECIFIED IN THE COA, WE ASSUME THAT IT COULD APPLY IN
SUCH A SCENARIO] ID. 1305 WE REVERSE THE DISTRICT
COURT'S DENIAL OF RELIEF UNDER § 2255 BASED ON THE
APPLICATION OF THE LAW OF THE CASE DOCTRINE WITH RESPECT
TO BOTH THE INTERPRETIVE ASSISTANCE OF COUNSEL ISSUE
AND INVALID STATE COURT CONVICTION ISSUE. THE CASE IS
REMANDED TO THE DISTRICT COURT FOR FURTHER PROCEEDINGS
CONSISTENT WITH THIS OPINION") COMARE, LATIMER V. ROARING, 601 F.3d
1224, 1237 (11 Cir. 2010) ("A COURT MAY DETERMINE THAT AN AFFIDAVIT
IS A SHAM WHEN IT CONTRADICT PREVIOUS DEPOSITION TESTIMONY

AND THE PARTY SUBMITTED THE AFFIDAVIT DOES NOT GIVE ANY VALID EXPLANATION FOR THE CONTRADICTION¹¹); VAN J. JENKINS AND ASSOCIATE V. U.S. INDUSTRIES INC., 736 F.2d 656 (11th Cir. 1984) (THE COURT

AFFIRMED THE GRANT OF SUMMARY JUDGMENT TO DEFENDANT SEVER BECAUSE THERE WERE (MATERIAL INCONSISTENCIES) BETWEEN PLAINTIFF BYER DEPOSITION TESTIMONY AND AFFIDAVIT IN OPPOSITION

TO THE MOTION FOR SUMMARY JUDGMENT. THUS THE DISTRICT COURT (PROPERLY) AWARDED SUMMARY JUDGMENT TO DEFENDANT¹¹); WRIGHT FOOT BEER CO. O.R. PEPPER, 414 F.2d 887, 891 (5th Cir. 1969); (THAT THERE

WERE APPARENT (MATERIAL INCONSISTENCIES)¹¹); ALLEN V. STEPHEN, 42 F.4th 223, 250, 254 (4th Cir. 2022) (GRANTED JAC)¹¹; U.S. V. IBARRA, LEXIS 246, AT 2, (11th Cir. 2024); WHITTON V. SECY DEPT OF CORR, LEXIS 23643, AT (11th Cir. 2023);

U.S. V. SMITH, LEXIS 3809, AT 3 (11th Cir. 2024); LINDHART V. U.S., 585 F.2d 361, 365 (5th Cir. 1978); HOWARD V. LEWIS, 905 F.2d 1318, 1325 (9th Cir. 1990);

* (PRIOR PETITION WAS NOT ON THE MERITS AND THEREFORE, DID NOT PRECLUDE * A SUCCESSIVE HABEAS PETITION¹¹); OCON V. U.S., LEXIS 60365, AT 17 (5th Cir. 2022) (SAME); BUCK V. DAVIS, 137 S.Ct. 759 (2017), BY THE WAY REQUIRES, AM

(9) NINE S.Ct. JUSTICES' (RECONSIDERATION) ON ALL THE TOTALITY - OF CIRCUMSTANCES, WHEN PETITIONER HAS CITED DIRECT CONTROLLING PRECEDENT,

REMOVING ALL CONFLICT, AND DISCREDITING BOTH FEDERAL COURT ORDERS, SEE, APPENDIX 12A, A, B, DECEMBER 18TH, 2025, AND LITIGATED

SOPHISTICATED (4TH AND 11TH) U.S. CONSTITUTIONAL LAWS, BEING CONFUSED, MISAPPLIED BY BOTH FEDERAL COURTS THAT'S CAUSED A JUDICIAL

TRAVESTY, FOR A PROPER MERITS DETERMINATION, THAT IS SELF-EFFICIENT, AND PLAIN, THAT PETITIONER'S (ILLEGAL ARREST, GROUND #4) VS. PETITIONER

(ILLEGAL SEIZURE OF THE CHELY LUMINA WITHOUT A SEARCH WARRANT AND AFFIDAVIT) ARE MERITORIOUS, SEE, U.S. V. GRAVES, 409 F.2d 789, 792 (11th Cir. 2011) (BECAUSE SUCH A MAIN ERROR ARGUMENT WOULD HAVE CONSTITUTED

A SOUND MERITORIOUS ARGUMENT BASED ON DIRECTLY CONTROLLING PRECEDENT¹¹ REQUIRES THIS COURT TO ISSUE A (SHOW-CAUSE-ORDER) ON RESPONDENTS,

SEE, AS FOLLOWS:

III. "NO DUE PROCESS"

(FN4) (SEE, STRYKER V. CITY OF HOMELAND, 978 F.3d 769, 773 (11th Cir. 2020) (REVERSING GRANT OF SUMMARY JUDGMENT WHERE PARTIES TESTIFIED TO COMPETING VERSIONS)¹¹).

MADE TRIAL COUNSEL DAVID MAKORFF, ESQ. (COUNSEL OF THE RECORD) (THE SON) TO BE INEFFECTIVE ASSISTANTS OF COUNSEL WHEN PETITIONER WAS "DISARMED" PRIOR TO THE ARREST OF CARRYING A CONCEAL FIREARM WITHOUT A LICENSE, WAS
5 (REPEALED) BY NEW HOUSE BILL 543 AS INTERVENING CHANGES OF LAW, INDUCED THRU (FALSE MISREPRESENTATION) BY BOTH ATTORNEYS, SEE STRICKLAND V. WASHINGTON, 104 S.Ct. 2052 (1994); ROSENWALD V. U.S., 898 F.2d 585 (7th Cir. 1990); NICOL V. STATE, 892 S.O.2d 1169 (Tenn. 5th Oct 2005); BRIDGES V. U.S., 991 F.3d 793, 803-804 (7th Cir. 2021); COOK V. U.S., 461 F.2d 530, 532 (5th Cir. 1981); SIMS V. LIVESAY, 970 F.2d 1575, 1580-1581 (FNI) (6th Cir. 1992); RICHARD V. ANTHONY, 374 F.3d 46, 56 (2d Cir. 2006); WILLIAM V. TURAN, 87 F.3d 1201, 1211 (FNI) (11th Cir. 1991) "DISTINGUISHING AN EVIDENTIARY HEARING TO PRESENT (NEW EVIDENCE) TO SUPPORT PRIMARY CLAIM"; DELPRETE V. THOMPSON, 10 F.Supp.3d 907 (EIL 2014); FRANCIS V. SPRAGGINS, 720 F.2d 1190, 1193 (FNI) (11th Cir. 1993) "THIS IS NOT TO SAY THAT A GENERAL ALLEGATION OF INEFFECTIVE ASSISTANCE OR A SPECIFIC ALLEGATION OF INEFFECTIVE ASSISTANCE [WHOLLY UNRELATED TO THE GROUND ON WHICH THE CLAIM ULTIMATELY DEPENDS WILL IMMUNIZE A PETITIONER FROM A FINDING OF PROCEDURAL DEFAULT. BUT WHERE THE PETITIONER CALLS THE STATE COURT ATTENTION TO INEFFECTIVE PROBLEMS AND THE COURT EXAMINES THIS CRITICAL ASPECT OF COUNSEL REPRESENTATION AS IN THIS CASE THE PETITIONER MAY (RELITIGATE) THE CONSTITUTIONAL CLAIM IN FEDERAL COURT]"; WOOLFORD V. U.S., 772 F.Supp.2d 664, 684-685 (VA 2010); HARDIN V. WAINWRIGHT, 578 F.2d 589, 591 (5th Cir. 1998) "GRANTED ZAC, HAD (RECONSIDERATION), ... THERE WAS HERE THAT AN APPELLANT FAILURE TO OBJECT TO A MAGISTRATE REPORT BARS THE PARTY FROM ATTACKING ON APPEAL FACTUAL FINDINGS IN THE REPORT ACCEPTED OR

(FNI) "U.S. V. ROBINSON, 690 F.2d 869 (11th Cir. 1982) "SUBSEQUENT (CONSENT) RESULTS IN ILLEGAL"; U.S. V. JEREZ, 108 F.3d 684, 693 (7th Cir. 1997); U.S. V. BERRYMAN, 717 F.2d 651, 663, 659-660 (1st Cir. 1983) CERT. DENIED 104 S.Ct. 1594 (1984); U.S. V. POPE, 561 F.2d 663, 668 (FNI) (6th Cir. 1977); U.S. V. NEWSOME, 492 F.2d 1166, 1168 (FNI) (2d Cir. 1974) "REPEALED, LINGERING STATUTE, BUT FOR NARCOTICS VIOLATION" 11.

ADOPTED BY THE DISTRICT COURT (EXCEPT UPON GROUNDS OF
PLAIN ERROR MANIFEST INJUSTICE); VEAL V. ESTELLE, 708 F.2d
954, 960 (5 Cir. 1983) ("GENERAL INFERRED ASSISTANCE CLAIM
IN FEDERAL COURTS, THE PETITIONER (UNDERSCORED) ADDITIONAL
TRIAL ERRORS, NOTING THAT ALL OF THESE ERRORS SUPPORT THE
SAME (CONSTITUTIONAL CLAIM) URGED BEFORE THE SAME COURT,
AND ALL WERE READILY DISCOVERABLE FROM THE REVIEW OF THE
THE (ENTIRE RECORD) WHICH THE COURT WAS OBLIGATED TO
CARRY THE COURT CONCLUDED THAT FOR EXHAUSTION PURPOSES
THE ADDITIONAL GROUNDS FOR THE GENERAL CLAIMS HAD
EVEN BEEN FAIRLY PRESENTED TO THE STATE COURT").
NETTLES V. WAINWRIGHT, 678 F.2d 589, 591 (5 Cir. 1981) (SAME);
GADY V. U.S., 376 F.2d 993, 995 (FN2) (5 Cir. 1967); HEINERY V.
MOORE, LEXIS 18107, AT 6, (FN3) (6 Cir. 2024) ("REQUESTING
TO EXPAND THE RECORD TO INCLUDE EVIDENCE OF INNOCENCE
COA GRANTED III").

IT'S NOTED TO THIS COURT, PETITIONER LITIGATION IN THE
LOWER COURT, THRU, APPENDIX 129A, THAT RESPONDENTS HAD
FRAUDULENTLY CONCEALED, THE LEXIS NEXUS LAW LIBRARY
TO (MARCH 2016), THIS CASE WAS MOVING FROM STATE TO
FEDERAL, IN (2003-2013), SEE APPENDIX 121A, SO GRUATABLES
• TOWING APPLIES ALSO TO ANY LATE-FILED APPLICATIONS
CASE LAW, WOULD MAKE THESE PROCEEDINGS FAIR.

(FNG) ("STATE TRIAL JUDGE PETER DEARING ALSO COAUTHORED THE
"SPEEDY TRIAL WAIVER FORM" UNDER THE MIS-ADVICE OF 9 YEARS
AND 4TH MONTHS, SEE U.S. V. HAKIM, 30 F.4TH 1310 (11 Cir. 2022)").

IV. "MERITORIOUS DEFENSE ARGUMENTS"

JURISTS OF THIS COURT COULD FURTHER DEBATE AND SAY THAT UNDER THE TOTALITY-OF-CIRCUMSTANCES-OF-~~THE~~ FACTS THAT PETITIONERS "EXPANDED COA" ALSO THE "ADAM INNOCENCE EXCEPTION" TO HAVE BOTH FEDERAL COURTS MAKE A DENOVA MERITS DETERMINATION, ON ITS FACE OF THE RECORD, DEMONSTRATES COUNSEL DAVID MARK REASER WAS IN RECKLESS ASSISTANCE OF COUNSEL FOR HIS FAILURE TO FILE A "MOTION TO DISMISS" WHEN JACKSONVILLE, FLORIDA SHERIFFS POLICE, VIOLATED THE 4TH AND 14TH U.S. CONSTITUTIONAL AMENDMENTS (2) TWO - FIVE ON DECEMBER 21ST, 2001, AT THE (1ST) STOP, AT 4:19 P.M., AT PETITIONERS MORTGAGE HOUSE AT 2124 CLIFTON STREET, JSD POLICE, SNATCHED (ALSO) EVIDENCED BETTY MCQUEEN out of PETITIONERS RED, 1985 JEEP CHEROKEE, THE (2d) STOP, AT 4:45 P.M. BY OFFICE CUMER (6064) WERE POLICE RELIED ON HASTORY, SUSPECTED ARREST WARRANT OR SEARCH WARRANT, TURNED OUT TO BE (NONEXISTENT, OR VOID) SEARCH WARRANT AND AFFIDAVIT ON PETITIONERS CHEVY LUMINA, UNDER INDIRECT OR INCOMPLETE INFORMATION, OR ERRONEOUS RADIO-60W ALERT INFORMATION TO THEM BY JSD AGENT CONCERNING A CHEVY LUMINA FOUND IN A VACANT LOT, WAS A LIE, DID NOT ESTABLISH PROBABLE CAUSE, WHEN RESPONDENTS ARE AT FAULT IN PERMITTING THE RECORD TO REMAIN UNCORRECTED, BY EXTENDING THEIR (TRAFFIC STOP) BEYOND THE TIME REASONABLY REQUIRED TO COMPLETE ITS (MISSION) OF PETITIONER MICHA LAMB #023663 BEING A SUSPECT IN (2) TWO ARMED ("THE ATTACHED POLICE REPORT IS VOID OF EVIDENCE TESTIMONY") ARE NOT "B"

(F17) ("SEE RODRIGUEZ V. U.S., 135 S.Ct. 1609, 1614-1616 (2015); U.S. V. DEHOYOS, 652 F.3d 240, 249 (2d Cir. 2021) ("ILLEGAL SEIZURE OF (FIREARM) WITHOUT PROBABLE CAUSE"); U.S. V. MACIAS, 658 F.3d 599, 517 (8th Cir. 2011); U.S. V. MCKINNEY, 980 F.3d 485, 495 (11th Cir. 2020); U.S. V. VALDEZ, 40 F.4th 339 (F12) (11th Cir. 2022); JONES V. STATE, 185031346348 (FLA 4TH DCA 2016); U.S. V. CHANTHA SOLAT, 342 F.3d 1271, 1271 (11th Cir. 2003); UNDERHILL V. STATE, 197 So.3d 90, 91 (FLA 4TH DCA 2015); FLORIDA V. RIVER, 460 U.S. 491, 500, 103 S.Ct. 1319 (1983); BAXTER V. ROBERTS, 54 F.4th 1241 (11th Cir. 2022); DELAWARE V. PROUSE, 99 S.Ct. 1311 (1979); U.S. V. CAMPBELL, 26 F.4th 860, 860 (11th Cir. 2022); U.S. V. URINE, 109 F.3d 646, 652 (7th Cir. 2013); U.S. V. STATE, 257 So.3d 1011, 1014-1015 (FLA 4TH DCA 2018); WILLIAM V. STATE, 910 So.2d 368, 371 (FLA 5th DCA 2005); BROWN V. ILLINOIS, 95 S.Ct. 2254 (1975); AMES V. STATE, 739 So.2d 699 (FLA 1ST DCA 1999)"); U.S. V. SMITH, 799 F.2d 704, 708 (11th Cir. 1986) ("8010 BIONT MARCH")

ROBBERIES THAT OCCURRED ON SEPTEMBER 17TH, 2001, AND DECEMBER 07, 2001, OF (UNEXPLAINED SOURCE) OF PROBABLE CAUSE FOR (STOPPING) PETITIONER MICHAEL LAMB, J23663, IS THE (1ST) FIRST ARREST, THAT IS INVALID. VS. THE (2d) SECOND INVALID ARREST FOR "CARRYING A CONCEALED FIREARM," DISCOVERED UNDER THE BACK REAR PASSENGER FRONT SEAT, WHEN PETITIONER HAD BEEN FOUND THE .380 THRU FIREARM, BY SIGNING THE CONSENT FORM, WAS ALSO INVOLUNTARY, COERCED, AND UNKNOWING, IS A (ILLEGAL ARREST), IN FACE OF THE RECORD EVIDENCE, SEE, U.S.V. COX, 475 F.2d 837, 841 (9th Cir. 1973) "THE ARREST WAS INVALID BECAUSE AN INDEPENDENT REASON FOR ARREST ALREADY EXISTED THAT EVIDENCE OF A (DIFFERENT CRIME) DISCOVERED ON THE PREMISES WAS ADMISSIBLE, WAS REJECTED BECAUSE THE TAINT OF THE (PRIMARY) ILLEGALITY WAS NOT PURGED"; MARTIN V. STATE, 424 SO.2d 994, 995 (FLA.2d OCT 1983) "... THE POLICE COULD NOT USE A [VOID OR NONEXISTENT WARRANT] AS THE BASIS FOR A LAWFUL ARREST, AND THE ILLEGALITY OF THE ARREST COULD NOT BE REMOVED SIMPLY BECAUSE THE STOPPING OFFICER RELIED ON ERRONEOUS INFORMATION GIVEN TO HIM BY A FELLOW OFFICER"; WALKER V. STATE, 606 SO.2d 1220, 1221 (FLA.2d OCT 1992) "THE ARREST IN QUESTION WAS INVALID WHERE THE OFFICER RELIED ON (ERRONEOUS RADIO INFORMATION FROM A FELLOW OFFICER)"; DEAN V. STATE, 466 SO.2d 1216 (FLA.4TH OCT 1985) "A MORE DIFFICULT QUESTION IS THE EFFECT OF [SUPPOSED WARRANT]. THERE WAS NO REAL EVIDENCE OF A WARRANT, OTHER THAN THE OFFICER'S TELLING ARRESTEE THAT THE POLICE RECORDS SHOWED AN OUTSTANDING WARRANT. AS SAID IN MARTIN V. STATE, 424 SO.2d 994, 995 (FLA.2d OCT 1983), AN OTHERWISE ILLEGAL ARREST CANNOT BE INSULATED FROM CHALLENGE BY THE FACT THE EXECUTING OFFICER RELIED ON ERRONEOUS RADIO INFORMATION DISPATCHED BY A FELLOW OFFICER OR EMPLOYEE, Citing, WHITELEY V. WARDEN, 91 SCT. 1031, N. [34] (1971)"; ALBO V. STATE, 477 SO.2d 1071, 1074 (FLA.3d OCT 1985) "Citing, U.S.V. HENSLEY, 105 SCT. 675 (1985), IF THE FIFTH OR SIXTH HAS BEEN ISSUED IN ABSENCE OF A REASONABLE SUSPICION, THEN A [STOP] IN OBJECTIVE RELIANCE UPON IT VIOLATES THE FOURTH AMENDMENT"; STATE V. WHITE, 660 SO.2d 664, 667-669 (FLA.1995)

("WHERE SHERIFFS ARREST OF DEFENDANT WAS PREMISED ON POLICE
 COMPUTER ERROR, AND TRUE FACTS WERE (WITHIN COLLECTIVE
 KNOWLEDGE OF SHERIFFS OFFICE)"; U.S. V. JIMISON, 482 F.2d 197, 199
 (5th Cir. 1973) CERT. DENIED 94 S.Ct. 371 (1973) ("VARIED THE DISTRICT
 COURTS JUDGMENT OF CONVICTION AND REMANDED FOR CONSISTENT
 PROCEEDING, IF THE SEARCH OF A CONTAINER IN DEFENDANT'S CAR
 WAS INVALID WHERE THE GOVERNMENT [DID NOT ATTEMPT TO EXPLAIN
 THE SOURCE OF THE INFORMATION THAT LED TO THE [STOP] OF
 DEFENDANT'S CAR"); MORESON V. STATE 431 S.O.2d 315, 316 (Fla.3d
 DCA 1983); GRAHAM V. STATE 714 S.O.2d 1142 (Fla.1st DCA 1998) ("DISCHARGE PRISONER"); PRICE V. STATE, 120 S.O.3d 198 (Fla.5th DCA
 2013); ARMATAGE V. STATE, 954 S.O.2d 669, 670-671 (Fla.1st DCA
 2007); LOGAN V. CARO, 525 F.2d 937 (5th Cir. 1976); U.S. V. WILSON,
 569 F.2d 392, 397 (5th Cir. 1978); BECK V. OHIO, 85 S.Ct. 223, 228 (1969);
U.S. V. DAPOLITO, 713 F.3d 141, 148 (1st Cir. 2013); U.S. V. ROBINSON,
 536 F.2d 1298, 1300 (9th Cir. 1976) ("STATE OFFICER WHO (STOPPED)
 DEFENDANT'S CAR AND SEARCHED IT HAD NO KNOWLEDGE OF THE
 CRIME ALLEGEDLY COMMITTED BY DEFENDANT BUT WAS MERELY
 RESPONDING TO ANOTHER AGENCY'S RADIO DISPATCH, THE OFFICER
 HAD NO FOUNDED SUSPICION TO [STOP] DEFENDANT'S CAR. THE
 SUBSEQUENT SEARCH WAS INVALID AND THE EVIDENCE OBTAINED
 THEREFROM WAS INADMISSIBLE"); U.S. V. MCCLEROY, 584 F.2d 746
 (5th Cir. 1978) ("THERE WAS NOTHING IN THE RECORD AS TO INFORMANT
 IDENTITY, AND RELIABILITY. THIS INFORMANT'S TIP WAS INSUFFICIENT
 TO CREATE A REASONABLE SUSPICION OF CRIMINALITY");
U.S. V. ANDREWS, 600 F.2d 563 (6th Cir. 1979) CERT. DENIED 100 S.Ct.
 166 (1979); U.S. V. SANTA-MANRIQUEZ, 603 F.2d 575, 578 (5th Cir. 1979);
U.S. V. TOIBERT, 692 F.2d 1044, 1045 (6th Cir. 1982) CERT. DENIED 104 S.Ct.
 337 (1983); FLETCHER V. WAINWRIGHT, 399 F.2d 62, 64-65 (5th Cir.
 1968); U.S. V. FOSTER, 566 F.Supp. 1403, 1412 (D.C. Cir. 1983) ("COURT
 GRANTED MOTION, WHEN FAILURE OF TRIAL COUNSEL TO MAKE A TIMELY
 'MOTION TO SUPPRESS' THE EVIDENCE THAT DENIED RIGHT TO EFFECTIVE
 ASSISTANCE OF COUNSEL AS GUARANTEED BY THE U.S. CONSTITUTION,
 OF A (SAVED-OFF SHOTGUN) WAS FRUIT OF THAT (ILLEGAL
 DETENTION) WHICH SHOULD HAVE BEEN SUPPRESSED, CITE:

U.S.V. BECK, 602 F.2d 729, 730

(5 CIR. 1978) SENIOR

LIVING FEDERAL JUDGE TJOFLAT, REVERSED CONVICTION OF ILLEGAL STOPA; JURIST WOULD FINALLY DEBATE AND SAY THAT TRIAL COUNSEL DAVID MAKOKFA ESQ., WAS INEFFECTIVE, AND PETITIONERS GROUND SHOULD BE GRANTED, DUE TO RESPONDENTS KNOWINGLY USED FALSE TESTIMONY AND EVIDENCE, INVOLVED, NOT JUST PROSECUTORIAL MISCONDUCT, BUT MORE IMPORTANTLY THE CORRUPTION OF THE TRUTH SEEKING FUNCTION OF TRIAL PROCESS BY RESPONDENTS PURPOSEFULLY WITHHOLDING THE EXCOURATORY AND IMPENDING EVIDENCE OF THEIR MISCONDUCT IN THIS CASE IN TAKING AFFIRMATIVE ACTION AFTER, MIRIANDS JURY TRIAL (TO CONSIDER) THE: "SPEEDY TRIAL WAIVER FORM" OF APRIL 11TH, 2003, SHOWING THAT IT WAS (INVOLUNTARY AND UNKNOWING) WHEN ATTORNEY LESTER MAKOKFA (THE FATHER) PROMISED PETITIONER THAT THE FLORIDA LEGISLATORS WOULD CHANGE THE LAW ON "CARRYING A CONCEAL FIREARM WITHOUT THE NEED OF A LICENSE", WITHIN THE 9 YEARS AND 4 MONTHS, WAS (MIS ADVICE), WHEN IT TOOK LEGISLATURES 23 YEARS, REQUIRES JURISTS TO (WITHDRAW) THE "SPEEDY TRIAL WAIVER FORM" AND ALLOW PETITIONER TO PROCEED WITH A JURY TRIAL (OR) GRANT PETITIONERS "MOTION TO DISMISS" ALL CHARGES, DUE TO THE (2) TWO LOWER FEDERAL COURTS FAILED TO CONDUCT A (FULL DE NOVO REVIEW) OF THIS GROUND, SEE, BENSON, 343 F.R.D. 595, 607 (NEB. 2023), EXPLAINING WHY BOTH FEDERAL COURTS' DENIAL ORDERS ARE (INCOMPLETE) SEE APPENDIX 12A #4, APPENDIX A, #8 DATED FEBRUARY 5TH, 2025, OCTOBER 29TH, 2025, AND DECEMBER 18TH, 2025 (PREVENTED) UNFAIRLY, ALL FEDERAL COURTS FROM PROPERLY HANDLING AND ADJUDICATING PETITIONERS PLEADINGS, VIOLATED (CLEARLY. ERRONEOUS. STANDARD) IN LIGHT OF THESE CIRCUMSTANCES, IT IS APPROPRIATE TO TREAT THIS "NEW INTERVENING CHANGE OF LEGISLATURE HOUSE BILL 543" EFFECTIVE JULY 1ST, 2023 AS A SUPPLEMENT UNDER F.R.C.P. 60 (b) (1, 2, 3, 4, 6), IS (C) (2) REQUIRES JURISTS TO (RETIRE. BACK) TO PETITIONERS TIMELY FILED § 2254 IN (2009-2012) AND (EQUITABLE TOLL) THIS TIMELY PETITION FOR A MERITS DETERMINATION, TO GRANT PETITIONER EXPANDED COAL, FOR RECONSIDERATION;

TO HOW OTHERWISE WOULD BE TO ALLOW THE GOVERNMENT
(RESPONDENTS) TO PROFIT FROM ITS OWN EGREGIOUS
CONDUCT, PETITIONER SHOULD NOT BE FORCED TO BEAR
THE BURDEN OF SECTION § 2244, WHICH IS MEANT TO PROTECT
AGAINST THE (PRISONER HIMSELF WITHHOLDING) SUCH INFORMATION
OR INTENTIONALLY PROLONGING THE LITIGATION. FURTHER
(FRAUD UPON THE COURT) CALLS INTO QUESTION THE VERY
LEGITIMACY OF A JUDGMENT, AND THAT A JUDGMENT MAY
HAVE BEEN REACHED WITH THE ASSISTANCE OF A PROSECUTOR
WHO MAY NOT HAVE HAD THE INTENTION OF FINDING THE
TRUE PERSTRATOR. SUCH A JUDGMENT IS INHERENTLY
UNRELIABLE, WHEN PETITIONER'S IGNORANCE OF THE
LIMITATIONS PERIOD WARRANTS GRANTING PETITIONER'S "MOTION
TO REOPEN", SEE SOLOP-GONZALES V. INS, 272 F.3d
1176, 1188-1196 (9 Cir. 2000); FONET V. ALBAUGH, 402 F.
SUPP.3d 110, 1149-1156, 1239 (10 Cir. 2019) ("COURT GRANTED
DUE TO THE FUTILITY OF EXHAUSTION FED. R. CIV. P. 60
(b), 15 (d) (c) AND 60 (d), AFF'D, FONET V. CROW, 4 F.3d
982, AT 67-171, 184-229, 315-318 (10 Cir. 2021) CERT. DENIED
142 S.Ct. 2722 (2022); WHEN PETITIONER PLED THE "ACTUAL
INNOCENCE EXCEPTIONS" STANDARD IS MET, JURISTS OF THE
UNITED STATES SUPREME COURT COULD DISAGREE WITH BOTH
LOWER FEDERAL COURTS' RESOLUTION OF THE U.S. CONSTITUTIONAL
CLAIMS, OR JURISTS COULD CONCLUDE THE ISSUES PRESENTED ARE
ADEQUATE TO DESERVE ENCOURAGEMENT TO PROCEED FURTHER
BUCK V. DAVIS, 137 S.Ct. 759 (2017), JURISTS ALSO WOULD FIND IT
DEBATABLE WHETHER THIS PETITION STATES A VALID CLAIM
OF THE DENIAL OF A CONSTITUTIONAL RIGHT AND WHETHER
THE LOWER FEDERAL COURTS WERE CORRECT IN ITS PROCEDURAL
HANDLING AND RULING, SEE SIATER V. U.S. STEEL, 871 F.3d
1174, 1176, 1181 (11 Cir. 2018) ("NON-DISCLOSURE CAUSED A MOCKERY
OF JUSTICE"); DEMANTJUK V. PETROVSKY, 10 F.3d 338, 348
(6 Cir. 1993) CERT. DENIED 106 S.Ct. 1198 (1993) ("COURT GRANTED
60 (b) WHEN RESPONDENTS DECEIVED COURT"); BURDEN
V. ZANT, 114 S.Ct. 654 (1994); BROWN V. MATHER, 335 F.Supp.
2d 1-5 (D.C. Cir. 2004) ("GRANTED 60 (b) (4) citing:

NATIONAL CTR. FOR MFG. SERVICES' V. DOD, 199 F.3d 507, 514 (D.C. Cir. 2000) ("GRANTED, MOTION ON CLEAR ERROR OF LAW") IS A 14TH AND 14TH U.S. CONSTITUTIONAL VIOLATIONS' ALONG WITH ASSISTANT ATTORNEY GENERAL CHARLES' MCCOYS' # 333646 INTENTIONAL AND DELIBERATE COVERUP, AND CONSPIRACY TO ILLEGALLY CONCEAL THE ("SPEEDY TRIAL WAIVER FORM") THAT REMOVES A FACTUAL ISSUE FROM DISPUTE IN A LITIGATION AND BINDS PARTIES ON (TRIAL AND APPEAL) SEE STARBUCKS V. R.J. REYNOLDS, 349 F.SUPP.3d 1223 (M.D. Fla. 2018) CAUSED A "MANIFEST INJUSTICE", VESTED APPELLATE COURTS WITH THE POWER TO (RECONSIDER) AND CORRECT RULINGS THAT HAVE BECOME "LAW OF THE CASE" SEE STRAZZULLA V. HENDRICK, 177 So.2d 1, 4-5 (Fla. 1965) CITING, JOHNSON V. CADILLAC MOTOR CO., 261 F. 878, 885 (2d Cir. 1919); SCHAFERAN V. MT. VERON-WOODBERY, 70 F.2d 963, (3d Cir. 1934); BERGER V. U.S., 55 S.Ct. 629 (1935); U.S.V. BERNALLOBES, 989 F.2d 331, 334 (9th Cir. 1993), BERRYMAN V. PORTS, LEXIS, 42836, At 5 (Mich. 2025) ("... STATE CREATED A TRAVESTY WHEN IT CONSPIRED TO CONCEAL FACTS"), U.S.V. ALPINE, 984 F.2d 1047, 1049 (9th Cir. 1993) CERT. DENIED 114 S.Ct. 60 (1993) ("F.R.C.P. 60 (b) GRANTED TO AVERT A MANIFEST JUSTICE") WHEN PETITIONER'S "CARRYING CONCEAL FIREARM WITHOUT A LICENSE" (WAS NOT FINAL) STAYED PENDING FROM (2003 - 2012) SEE, APPENDIX 121A, § 2254, GROUND 4/17 PROVIDES JURISDICTION OF THIS COURT TO RENDER PETITIONER RELIEF OF DISCHARGE FROM FLORIDA PRISONS, SEE PUMPHREY V. K.W. THOMPSON TOOL CO., 62 F.3d 1128, 1133 (9th Cir. 1995) CERT. DENIED 116 S.Ct. 1242 (1996) ("NONDISCLOSURE OF VIDEO TAP OF GUN MISFIRING"); CUSBY V. JONES, 960 F.2d 925, 935 (11th Cir. 1992); CHRISTEN V. ROEPER, 135 S.Ct. 891 (2015) FOX NOT V. ALBAUGH, 402 F.SUPP.3d 1110, 1149-1153, 1239 (10th Cir. 2019) CERT. DENIED 142 S.Ct. 2722 (2022); CAIN, 68 F.SUPP.3d 593, 615 (La. 2014) ("APPLIED RETROACTIVELY TO ALL CASES STATE AND FEDERAL, PENDING ON DIRECT REVIEW OR (NOT YET FINAL)"; BLOM BANK SAL. V. HONICKMAN, LEXIS, 2193, N. [5-7] (2025).

QUESTION #2
REASONS FOR GRANTING PETITION
GROUND #17, SEE APPENDIX 121A

"ALL PETITIONERS' TIMELY REMOVALS' AHEADS THE "ACTUAL INNOCENCE EXCEPTION" OF:
"IT IS MORE LIKELY THAN NOT" TO HAVE A MERITS' DETERMINATION OF FLORIDA
LEGISLATURES' "NEWLY INTERVENING CHANGE OF THE LAW ON THE "CARRYING CONCEAL
FIREARM WITH NO NEED OF A LICENSE, NOW, CONSOLIDATED TOGETHER BY THE (11TH)
CIRCUIT COURT OF APPEALS, OF USO POLICE ILLEGAL SEIZURE OF CHEVY LUMINA
WITHOUT PROBABLE CAUSE OR SEARCH WARRANT, UNDER F.R.C.P. 60 (b) (1,2,3,4,6)
15 (c)(2)?

(2)(A). PETITIONER PREJUDICED BY FEDERAL COURTS' AND RESPONDENTS' MISAPPROPRIATIONS
OF LAW AND PROCEDURES'; ABUSE OF DISCRETION ON ITS FACE OF THE RECORD OF CLEAR
ERRONEOUS ADJUDICATIONS' OF: CORRUPTION OF THE TRUTH SEEKING FUNCTION OF JUDICIAL
PROCESS, THE COURTS' AND RESPONDENTS' WILLFUL "FRAUD ON THE HABEAS CORPUS COURTS, IN
RECKLESS DISREGARD FOR THE TRUTH AND RECKLESS DISREGARD OF THEIR (DISCLOSURE
DUTIES). (8). USO POLICE OMITTED ITS DECEMBER 22ND, AND 27TH 2001, SEARCH
WARRANT AND AFFIDAVIT AND ETC., FROM AN OJAS' AND PETITIONER. (C). PETITIONER'S
(POST-CONVICTION 3.850), ON FAC FOR FAILURE TO FILE A "MOTION TO DISMISS" WHEN
JACKSONVILLE, FLORIDA POLICE HAD A YAGUE POLICE BOLO ON DECEMBER 07, 2001
ARMED ROBBERY SUSPECTS' VEHICLES HAVING: (E). TINTED WINDOWS, (E). RACING
FINN ON TRUNK, DID NOT MATCH PETITIONER'S CHEVY LUMINA, CAUSED POLICE TO
ILLEGALLY SEIZE PETITIONER'S CHEVY OFF 120 CANYON ROAD PETITIONER'S AUNT
MRS. WYOMIA HOLLIS CURTAGE, WITHOUT PROBABLE CAUSE AND SEARCH WARRANT ON
DECEMBER 21ST, 2001, AT 1:30 P.M.; (D). PETITIONER'S 3.850 POST-CONVICTION MOTION
WAS TAKEN OUT OF CHRONOLOGICAL ORDER SEQUENCES, BY CLERK OF COURT JIM FULLER,
AT RESPONDENTS' DIRECTION, TO CONFUSE REVIEWING COURTS' FROM INVOLVING JUDICIAL
INTERVENTION TO CORRECT THE HEREIN CITED "MANIFEST INJUSTICES", SEE APPENDIX 150A,
174A, 175A DATED ARE ON LAW AND SURVEYING FROST'S BRIEF, MARCH 19TH, 2005,
CITED IN BOTH CERTIFICATE OF SERVICES, BUT PAGE NUMBERS STAMPED WRONG; (E).
THE (11TH) CIRCUIT COURT OF APPEALS (2012) DENIAL ORDER, SEE APPENDIX 121, 4/7, IS
A UNFOUNDED, AND WEIRD FORM OF ADJUDICATION THAT IS PATENTLY ERRONEOUS
OF BOTH GROUNDS JOINED TOGETHER OF "CARRYING CONCEAL FIREARM WITHOUT A
LICENSE, OF A .380 THOMPSON HANDGUN, DISCOVERED UNDER THE FRONT PASSENGER
SEAT, AT THE REAR FLOOR-BOARD, VS. THE ILLEGAL SEIZURE OF THE CHEVY LUMINA;
(F). FEDERAL COURTS' TURNING THE BLIND-EYES, AND KNOWINGLY USING FALSE
EVIDENCE, TESTIMONY, AND MISINFORMATION, TO MAKE PETITIONER FILE THIS GROUND:

" MERITORIOUS DEFENSE ARGUMENTS "

UNDER § 2254, IS FOUND TO BE A LIE, SEE, (11TH) CIRCUIT COURT OF APPEALS
DECEMBER 18TH, 2025 COURT ORDER, APPENDIX "B", SEE HOWARD V. LEWIS, 905 F.2d
1318, 1325 (9th Cir. 1990) CAUSED (FRAUD ON ALL HABEAS REVIEWING COURTS) BY
RESPONDENTS' (OMITTING): EXCULPATORY EVIDENCE OF BOTH DECEMBER 22d, AND 27TH,
2001 SEARCH WARRANTS AND AFFIDAVITS, WERE CIRCUMVENTED, CONTRARY TO FLORIDA STATUTE 933.05 (2001)
TO RETURN WITHIN (10) TEN DAYS, BACK TO THE COURTHOUSE WAS NOT FOLLOWED, SEE, SAMUELS AFFIDAVIT,
"SEE APPENDIX 175A, IS THE PRODUCT OF (FRAUDULENT CONCEALMENT) SEE, STATE V. FEATHERSTONE,
246 So.2d 597, 599 (Fla. 3d Dkt 1971) (CITING, HENRIK V. STATE, 53 OKL. CR. 22, 3, P.2d 24, 212 (1931);
FOREST V. CRIVEN, 464 F.2d 1293, 1294 (FN) (9th Cir. 1972) (ABSENCE OF ALLEGEDLY INVALID SEARCH WARRANT
D); (G). STATE POLICE, POLS, DATED JANUARY 9TH, AND 18TH, 2001, POLICE REPORT, WAS (OMITTED)
EXCULPATORY EVIDENCE SHOWING PETITIONER'S CHEVY LUMINA (TIRE TREAD PATTERNS) DID NOT
MATCH THOSE IN POLICE SEARCH WARRANT AND AFFIDAVIT, OF THE OTHER SUSPECTS' CHEVY LUMINA
(TIRE CAST MOLDS) SHOWS PETITIONER WAS NOT AT ANY ARMED ROBBERIES OF LOCAL BANK /
CREDIT UNION ON DECEMBER 07TH, 2001, OR ATTEMPTED MURDER OF JSD POLICE OFFICER ERIC
SIMMONS, COMPARE, TERRY V. NAVAL, 764 So.2d 612 (Fla. 3d Dkt 1999); (II). WHEN
ALSO THE POLICE BOLO ALERT, (DID NOT), MATCH PETITIONER'S CHEVY LUMINA HAVING A: LICENSE
RACK ON THE TRUNK; NO TINTED WINDOWS, AND A REGISTRATION TAG WAS ATTACHED TO THE
VEHICLE VS. SUSPECTS' CHEVY LUMINA HAS A RACING FINN ON THE TRUNK, TINTED WINDOWS
ON THE CHEVY LUMINA, AND NO REGISTRATION TAG ATTACHED; CAUSED PETITIONER EXTREME
PREJUDICE OF 4TH, AND 14TH U.S. CONSTITUTIONAL AMENDMENT VIOLATIONS, AT THE DIRECTION
OF § 2254 ASSISTANT ATTORNEY GENERAL CHARLES MCCOY #333646 WILLFUL,
TREACHEROUS, DELIBERATE (COVERUP) AND CONSPIRACY TO ILLEGALLY CONCEAL RESPONDENTS' (II
JUDICIAL ADMISSIONS) THAT ELABORATES IT CASE TO (MATERIAL CONTRADICTIONS) THAT BINDING
ON ALL PARTIES IN (2003 JURY TRIAL, AND OTHER AREAS) SHOWN IN STATE COURT ORDER DATED
JULY 11TH, 2007, WHICH RESPONDENTS HAVE OBEYED, SEE, STARBUCKS V. R.J. REYNOLDS, 349
F.3d 1223, 1233 (11th Cir. 2004) CAUSED A "MANIFEST INJUSTICE", VESTS THIS COURT WITH
POWER TO (RECONSIDER) AND CORRECT RULINGS THAT HAVE BECOME "LAW OF THE CASE DOCTRINE",
SEE, STRAZZULLA V. HENRICK, 177 So.2d 14-5 (Fla. 1965) (CITING, JOHNSON V. CADILLAC MOTOR
CO., 261 F. 818, 985 (2d Cir. 1979); SCHAFERMAN V. MTT. VERNON-WOODBERRY, 70 F.2d 963,
(3d Cir. 1934); BERGER V. U.S., 55 S.Ct. 629 (1935); U.S. V. GARNALOBES, 989 F.2d 331, 334 (9th Cir.
1993); BERRYMAN V. PORTIS, LEXIS 42836 AT 5 (MICH. 2025) "... STATE CREATED A
(JUDICIAL TRAVESTY) WHEN IT (CONSPIRED) TO (CONCEAL) FACTS"; U.S. V. ALAINE, 984 F.2d
1047, 1049 (9th Cir. 1993) CERT. DENIED 114 S.Ct. 60 (1993) (F.R.C.P. 60(b) GRANTED TO
AVERT A MANIFEST JUSTICE, SEE, APPENDIX 150A,

I.

SEE MARTIN V. BENSON, 815 F.2d 1086, 1095 (11th Cir. 2016) ("Summary Dismissal was not warranted, is not a (2d) or successive petition"); SMITH V. VENER, 89 S.Ct. 271 (1969) ("INTERVENING CHANGE OF LAW GOVERNING RIGHT OF HABEAS CORPUS HEARING WARRANTS (RELITIGATING) OF CLAIM IN EARLIER PROCEEDING"); SMITH V. DUCKWORTH, 864 F.2d 1348, 1351 (7th Cir. 1988) CERT. DENIED 110 S.Ct. 93 (1999) ("CHANGE OF LAW AFTER (1ST) PETITION JUDGES (RELITIGATION) OF SAME CLAIM"); BUCK V. DAVIS, 137 S.Ct. 759 (2017); BYNOE V. BACH, 965 F.3d 972, 979-986 (9th Cir. 2020); U.S. V. LOSCHIATO, 531 F.2d 659, 661-664, 666 (2d Cir. 1976); ROBSON V. U.S., 526 F.2d 1145, 1147-1148 (1st Cir. 1975); DELAWARE REPUBLICAN STATE COMMITTEE V. REDFEARN, 97 S.Ct. 42 (1976) ("ON WRIT OF HABEAS CORPUS JUDGMENT VACATED OF 3d CIRCUIT AND CASE REMANDED TO THE COURT OF APPEALS FOR FURTHER CONSIDERATION [IN LIGHT OF INTERVENING LEGISLATION]"); CAREY V. SCHLESINGER, 97 S.Ct. 44 (1976); DAVIS V. U.S., 94 S.Ct. 2298 (1974); GARLAND V. COX, 472 F.2d 875, 877 (4th Cir. 1973) CERT. DENIED 94 S.Ct. 877 (1973); HOWARD V. U.S., 374 F.3d 1068, 1073-1080 (11th Cir. 2004) ("NEW RULE"); U.S. V. BENNERMAN, 785 F.2d 958, 962-963 (9th Cir. 2009) ("NEW RIGHT"); MORRIS V. SCHOOFIELD, 90 S.Ct. 2232 (1970) ("CRIMINAL"); JUDGES OF THIS COURT WOULD DEBATE AND SAY PETITIONER IS AWARDED A "MERIT DETERMINATION," OF THIS GROUND, THAT'S (NOT YET FINAL) WHEN THE (11th) CIRCUIT COURT OF APPEALS ILLEGALLY INTERFERED, GROUND 14/17 SEE, APPENDIX 12A, TOGETHER, THE "CARRYING CONCEAL FIREARM WITHOUT A LICENSE (NOW REPEALED) THEN HUNG BILL 543, EFFECTIVE JULY 1ST, 2023) UNDER THE "ACTUAL FAVORABLE EXCEPTION" SEE, JOHNSON V. GAIN, 68 F.3d 593, 615 (1st Cir. 2014); KUENZEL V. AULIN, 488 F.3d 1341 (11th Cir. 2007); JONES V. U.S., 153 F.3d 1305 (11th Cir. 1998); U.S. V. AAKER, 174 F.3d 934 (8th Cir. 1999); U.S. V. RASHA, 797 F.3d 1122, 1133-1141 (D.C. Cir. 2015); HOLLAND V. FLORIDA, 130 S.Ct. 2549, 2562 (2010); ARON V. U.S., 291 F.3d 708, 712 (11th Cir. 2002) JUDGES WOULD FURTHER DEBATE THAT RESPONDENTS' CONSPIRACY TO DEFRAUD, AND "FRAUD ON THE HABEAS COURT," EXTENDED THEIR (FRAUDULENT CONCEALMENT) TO THE HIGHEST DEGREE OF SECRECY, WHEN BOTH SEARCH WARRANTS AND AFFIDAVITS WERE (OMITTED) FROM ALL COURTS' INSPECTION, SEE IN REM T.G. INC., 366 B.R. 730, 753-754 (6th Cir. 2007) AFF'D 400 B.R. 558 (MICH.

"NO DUE PROCESS"

(MICH. 2009) "ATTORNEY COMMITTED FRAUD ON THE COURT IN RECKLESS DISREGARD FOR THE TRUTH AND RECKLESS DISREGARD OF THEIR DISCLOSURE DUTIES"; THEY V. CITI MORTGAGE, LEXIS 4591, (11 CIR. 2009) "DISMISSAL INAPPROPRIATE"; MASON V. PICTLER, LEXIS 517, (6 CIR. 2023) "FRAUD ON THE COURT BY ATTORNEY MICHAEL TINDALL"; ASTEN AM.

IND. CO. V. TADJAL LLC., 508 F.SUPP.3d 1179, AT T-10, (11 CIR. 2020) (SAME); COMPARE F.R.C.P. 41 (b) SEE FRITZ V. HONDACO, 818 F.2d 924, (D.C. CIR. 1987) "ATTORNEY ACTED IN BAD FAITH AND MULTIPLIED THE PROCEEDINGS VEXATIONOUSLY AND HARASSING, AND ABUSED THE PROCESS OF THE COURT UNREASONABLY"; SEE APPENDIX 1764; 135A

II. CLEAR ERRONEOUS ADJUDICATION OCCURRED, SEE APPENDIX 121A, GROUND # 4/17, INTERTWINES BOTH GROUNDS PROVES NO DE-NOVO REVIEW OCCURRED AND THE 11TH CIRCUIT DENIAL ORDERS IS CONTRARY TO LAW WHEN IT FAILS TO APPLY OR MIS-APPLIES RELEVANT STATUTE, CASE LAWS, OR RULES OF PROCEDURES HAS SERIOUSLY PREJUDICED PETITIONER SEE GRINDER V. GANNON, 73 F.3d 793, 795 (8 CIR. 1995) "PRISONER HAD SHOWN THAT A (DE-NOVO-REVIEW) WAS NOT PERFORMED AND NO EVIDENCE EXISTED TO DEMONSTRATE THAT THERE WAS DE-NOVO, THE CASE SHOULD BE REMANDED TO THE DISTRICT COURT"; EASLEY V. CROMARTIE, 125 CT. 1452, 532 U.S. 234, 242 (2001); BENSON V. CITY OF LINCOLN, 343 F.R.D. 595, 607 (NEB. 2023); IN RE BRADLEY, 960 F.2d 502, 507 (11 CIR. 1992); US. V. LOTHIDGE, 324 F.3d 599, 600 (8 CIR. 2003); SCOVILL MFG. CO. V. FITZPATRICK, 215 F.2d 567, 571 (2d CIR. 1954); HOLMES V. CIR., 184 F.3d 536, 549 (6 CIR. 1999) "FINDINGS CLEAR ERROR WHOSE FACTUAL FINDINGS WAS (INFECTED) BY AFFILIATED (MISAPPLICATIONS) OF GOVERNING LAW"; U.S. V. U.S. GYPSUM CO., 333 U.S. 364, 395, 68 SET. 525, 542 (1948); U.S. V. STREETER, 70 F.3d 1314, 1320-1323 (D.C. CIR. 1995) "WHEN DOCUMENTS OR OBJECTIVE EVIDENCE... CONTRADICT THE WITNESS STORY, ANDERSON V. CITY BESSEMER CITY, 470 U.S. 565, 575, 105 SET. 1504 (1985) AN APPELLATE COURT IS FREER TO OVERTURN A FINDING

OF FACT THAN IF THE COURT IS FACED SOLELY WITH
A CONFLICTING WITNESSES CREDIBILITY ID. 1317-1318 CITING,
JACKSON V. U.S., 353 F.2d 862, 866 (6th Cir. 1965) "THE
COURT FOUND SERIOUS INCONSISTENCIES IN THE OFFICERS'
TESTIMONY AND THE LIKELIHOOD OF HIS STORY (FN. 4-15)"
BROWN V. WARDEN, LEXIS 23210, AT 5-6, (11th Cir. 2015) "BY FEDERAL
JUDGE JILL PRYOR, MR. BROWN DID NOT PRESENT NEW EVIDENCE IN
HIS [3d, 310d, 60 (b) MOTION], NOR DID HE SHOW THAT AN
INTERVENING CHANGE IN THE LAW DICTIONATES A DIFFERENT RESULT.
HE ALSO FAILED TO DEMONSTRATE THAT THIS COURT'S PRIOR
DECISION IS (CLEARLY ERRONEOUS), CITING, THOMAS V. U.S., 573 F.2d
1300, 1303-1304 (11th Cir. 2009) "THE COURT, HELD BECAUSE WE FIND
THAT THE LAW OF THE CASE DOCTRINE DOES NOT BAR REVIEW HERE
[AS TO EACH CLAIM SPECIFIED IN THE COA, WE ASSUME THAT
IT COULD APPLY IN SUCH A SCENARIO] ID. 1305. . . . WE REVERSE
THE DISTRICT COURT'S DENIAL OF RELIEF UNDER § 2255 BASED ON
THE APPLICATION OF THE LAW OF THE CASE DOCTRINE WITH RESPECT
TO BOTH THE INEFFECTIVE ASSISTANCE OF COUNSEL ISSUE AND
INVALID STATE COURT CONVICTION ISSUE. THE CASE IS REMANDED
TO THE DISTRICT COURT FOR FURTHER PROCEEDINGS' CONSISTENT
WITH THIS OPINION" COMPARE, LATIMER V. ROARING, 601 F.3d 1224,
1237 (11th Cir. 2010) "A COURT MAY DETERMINE THAT AN AFFIDAVIT
IS A SHAM WHEN IT CONTRADICT PREVIOUS DEPOSITION
TESTIMONY AND THE PARTY SUBMITTED THE AFFIDAVIT DOES NOT
GIVE ANY VALID EXPLANATION FOR THE CONTRADICTION" VAN J. JENKINS AND ASSOCIATE V. U.S. INDUSTRIES
INC., 736 F.2d 656, (11th Cir. 1984) "THE COURT AFFIRMED
THE GRANT OF SUMMARY JUDGMENT TO DEFENDANT SEIER
BECAUSE THERE WERE (MATERIAL INCONSISTENCIES)
BETWEEN PLAINTIFF BYERS' DEPOSITION TESTIMONY AND
AFFIDAVIT IN OPPOSITION TO THE MOTION FOR SUMMARY
JUDGMENT TO DEFENDANT" WRIGHT ROOT BEER CO. OR.
PEPPER, 414 F.2d 887, 891 (5th Cir. 1969) "THAT THERE WERE
APPARENT (MATERIAL INCONSISTENCIES); ALLEN V. STEPHEN,
42 F.4th 223, 250, 254 (4th Cir. 2022) "GRANTED IAC" REQUIRES
JURISTS TO INVOKE: "IT IS MORE LIKELY THAN NOT," UNDER:

BY GRANTING THE INSTANT "EXPANDED COAL" TO AVERT THE HEREIN INDUSTRIES, SEE
U.S.V. ZEBARA, LEXIS 246, AT 2 (11 CIR. 2024); WHITTON
V. SECY DEPT. OF CORR. LEXIS 23643 AT 2 (11 CIR.
2023); U.S.V. SMITH, 3809 AT 3 (11 CIR. 2024); LINDHART
V. U.S. 585 F.2d 361, 365 (ENB) (8 CIR. 1978); HOWARD
V. LEWIS, 905 F.2d 1318, 1325 (9 CIR. 1990) ("PRIOR PETITION
WAS NOT ON THE MERITS AND THEREFORE DID NOT
PRECLUDE A SUCCESSIVE HABEAS PETITION"); O'CONN
V. U.S. LEXIS 60365, AT 17 (5 CIR. 2022) (SAME);
BUCK V. DAVIS, 137 S.Ct. 759 (2017); AND FOR THE JURISTS
TO "EQUITABLE TOLL" PETITIONERS, F.R.E.P. 60 (b) (1, 2, 3, 4, 5
(c) (2), SEE, HOLLAND V. FLORIDA, 130 S.Ct. 2549, 2562
(2010); BROWN V. SECY DOC, 750 F.2d 915, 927-928
(11 CIR. 2018); HUNTER V. FERRELL, 587 F.3d 1304, 1308
(11 CIR. 2009); GREEN V. DOC, 877 F.3d 1244, 1247-1248
(11 CIR. 2017); WYZYKOWSKI V. DOC, 226 F.3d 1213, 1216 (11
CIR. 2000) IS MANIFESTED AS TRUE, LEAVES ALL FEDERAL
COURTS, S.CT. AND JURISTS, WITH A FIRM CONVICTION
THAT, LAMB V. JONES, 133 S.Ct. 1318 (2013) IS (DEAD-WRONG)
THAT RECORD EVIDENCE ATTACHED PROVED RESPONDENTS HAVE
ACTED WITH INTENTIONAL DECEPTION, FROM POST-CONVICTION 3,850,
FILED IN STATE TRIAL COURT, THEN THE 1ST DCA, CASE #
NUMBER: 1007-1594, IS MANIFESTED THAT RESPONDENTS
RESPONDENTS DISREGARD OF THEIR DISCLOSURE DUTIES, AND TRUTH,
(WILL NOT) TRANSMIT THE DEFENSIVE SEARCH WARRANTS AND
AFFIDAVITS, DATED, DECEMBER 22d, 2001, AND DECEMBER 27th,
2001, RESULTED TO, FRAUD ON ALL FEDERAL HABEAS CORPUS
COURTS, SEE, IN RE MTCG, 366 B.R. 730, 753-754 (6 CIR.
2007) AFF'd 400 B.R. 558 (MICH. 2009) ("ATTORNEYS COMMITTED
FRAUD ON THE COURT IN RECKLESS DISREGARD FOR THE TRUTH
AND RECKLESS DISREGARD OF THEIR DISCLOSURE DUTIES");
MASON V. RICHTER, LEXIS 517 (6 CIR. 2023) ("FRAUD ON
THE COURT BY ATTORNEY MICHAEL E. TINDALL"); ARE
RESPONDENTS' EFFORTS TO PROTECT A "JUDICIAL CLEARLY
ERRONEOUS," U.S. 4TH AND 14TH U.S. CONSTITUTIONAL
AMENDMENT VIOLATIONS, CAUSED BY JACKSONVILLE, FLA.,
(POLICE, ILLEGAL SEIZURE OF PETITIONER'S CHEVY LUMINA)
WAS MANIFESTED AT JURY TRIAL PAGE 426, AS TO THE TRUTH:

SEE APPENDIX 174A, 175A, 176A: IN CONJUNCTION WITH MORE U.S. CONSTITUTIONAL VIOLATIONS OF FLORIDA STATUTE 933.05 (2001), THRU A (CORRUPT) DETECTIVE KOIVISTO (636) HAS ADVANCED HIMSELF ILLEGALLY IN WANTING TO KILL BLACK U.S. PRESIDENT OBAMA, SEE APPENDIX 135A, IS A PAVEN PATTERN. AND PRACTICE OF POLICE MISCONDUCT, THAT CREATED A "JUDICIAL TRAP" THAT RESULTED IN LACK OF PROBABLE CAUSE, AND LACK OF A SEARCH WARRANT AND AFFIDAVIT, ON DECEMBER 21ST, 2001, IS CLEAR AND EVIDENT THAT RESPONDENTS ATTACHED (ENCLOSED SEARCH WARRANTS AND AFFIDAVITS HAVE THE (WRONG ADDRESS OF): 8100 NEVADA STREET VS. THE (CORRECT ADDRESS OF): 120 CANYON ROAD PETITIONER'S AUNT MRS. WYOMIT HOLLIS (2) TWO STORY HOUSE, AND HER SWORN AFFIDAVIT SEE APPENDIX 174A: GIVING PETITIONER CONSENT TO PARK HIS CHEVY LUTHERA AND COMMERCIAL FREIGHTLINER SEMI, EQUATES TO A (4TH AND 14TH) U.S.A. CONSTITUTIONAL VIOLATIONS, SEE U.S. V. KENNEY, 164 F.SUP. 841, 893 (D.C. CIR. 1958) ("GRANTED MOTION WHEN POLICE USED INCORRECT STREET ADDRESS"); KENNINGHAM V. U.S., 287 F.2d 126, 128 (D.C. CIR. 1960); U.S. V. SIMMONS, 944 F.SUP. 1395, 1398-1410 (Cir. 1996) ("THE COURT RULED THAT (1) BECAUSE THE OFFICERS' PROVIDED INFORMATION THAT SHOULD HAVE KNOWN WAS (WRONG), AND THAT WAS CRITICAL TO DETERMINING THE SCOPE OF THE SEARCH WARRANT, THE WARRANTS AND SEARCH (WERE INVALID)"); U.S. V. WILLIAMSON, 1 F.3d 1134 (10 CIR. 1993); U.S. V. PALMER, 505 F.SUP. 812, 820 (11TH CIR. 1981) ("CITING, WONG-SUN V. U.S., 371 U.S. 471 (1963); COLLINS V. VIRGINIA, 138 S.Ct. 1563 (2018); U.S. V. BRADSHAW, 490 F.2d 1097, 1101 (4TH CIR. 1974); CERT. DENIED 955. CT. 173 (1974) ("LEGAL SEIZURE OF TRUCK"); U.S. V. COLLINS, 830 F.2d 145 (9 CIR. 1987); U.S. V. WASHINGTON, 573 F.3d 279 (6 CIR. 2009); OSORIO V. STATE, 244 So.3d 1115, 1121 (FLA. 4TH DCA 2018); U.S. V. SCHRODER, 129 F.3d 439, 442, 443 (8 CIR. 1997); INTEROCEAN SHIPPING COMPANY V. NATIONAL SHIPPING AND TRADING, 462 F.2d 673, 676 (2d CIR. 1972) ("MOREOVER, WHILE APPELLANTS MIGHT BE FAULTED FOR NOT PRESENTING THEIR ARGUMENTS TO THE DISTRICT COURT IN A MORE COHERENT FASHION [AFFIDAVITS AND EXHIBITS ATTACHED TO THE PETITION AND ANSWER DID TEND TO SUBSTANTIATE APPELLANTS' DENIAL OF THE EXISTENCE OF CONTRACTUAL RELATIONS]"; JURISTS WOULD FINALLY, DEBATE AND SAY THAT TRIAL COUNSEL DAVID MAKORFA ESQ. WAS INEFFECTIVE AND PETITIONER'S GROUND #17, SEE APPENDIX 121A SHOULD BE GRANTED ON THE "MOTION TO DISMISS" WHEN POLICE RESPONDENTS USED KNOWINGLY FALSE TESTIMONY AND EVIDENCE CITED ABOVE TO PRODUCE PETITIONER'S CONVICTION, SEE HARDIN V. WAINWRIGHT, 678 F.2d 589, 591 (5 CIR. 1981) ("THE GRANTED")

INVOLVES! NOT JUST PROSECUTORIAL MISCONDUCT, BUT MORE
IMPORTANTLY THE CORRUPTION OF THE TRUTH SEEKING FUNCTION
OF TRIAL PROCESS, BY RESPONDENTS' (PURPOSEFULLY WITHHOLDING
THE EXCUPATORY AND IMPROVING EVIDENCE) OF THEIR MISCONDUCT
IN THIS CASE IN TAKING AFFIRMATIVE ACTION, AFTER MR. LAMBS, JURY
TRIAL (TO CONCEAL) THE: " DECEMBER 22d, AND 27th, 2001 SEARCH
WARRANTS AND AFFIDAVITS, AND THE 1ST DCA JULY 14th, 2007 COURT
ORDER, SHOWING CRITICAL EVIDENCE SHOWING POLICE HAD NO PROBABLE
CAUSE TO SEIZE CHEVY LUMINA, WAS (OMITTED) FROM THE LOWER
COURTS' (DE NOVO REVIEW), SEE, BENSON, 343 F.R.D. 595, 607 (NEB. 2023)
EXPLAINS WHY BOTH FEDERAL COURTS' DENIAL ORDERS ARE INCOMPLETE
SEE, APPENDIX 121A, #17, APPENDIX "A, B", DATED, FEBRUARY 5th, 2025
OCTOBER 29th, 2025, AND DECEMBER 18th, 2025, PREVENTED ALL
FEDERAL COURTS FROM PROPERLY HANDLING AND ADJUDICATING PETITIO-
NERS' READINGS, VIOLATES (CLEARLY ERRONEOUS STANDARD) IN LIGHT OF THESE
CIRCUMSTANCES, IT IS APPROPRIATE TO TREAT THIS NEW INTERVENING
CHANGE OF LEGISLATURE HOUSE BILL 543 EFFECTIVE JULY 1ST, 2023
AS A SUPPLEMENT UNDER F.R.C.P. 60(b)(1,2,3,4,5), 15(c)(2),
REQUIRES JURISTS TO RELATE BACK TO PETITIONER'S TIMELY
FILED \$2254 IN (2009-2012) AND EQUITABLE TOLL, THIS TIMELY
PETITION FOR A MERITS DETERMINATION, TO HOLD OTHERWISE WOULD
BE TO ALLOW THE GOVERNMENT/RESPONDENTS TO PROFIT FROM ITS OWN
EGREGIOUS CONDUCT, PETITIONER SHOULD NOT BE FORCED TO BEAR
THE BURDEN OF SECTION \$2244, WHICH IS MEANT TO PROTECT
AGAINST THE PRISONER HIMSELF (WITHHOLDING) SUCH INFORMATION
OR INTENTIONALLY PROLONGING THE LITIGATION. FURTHER (FRAUD
UPON THE COURT) CAUS INTO QUESTION THE VERY LEGITIMACY
OF A JUDGMENT, AND THAT A JUDGMENT MAY HAVE BEEN
REACHED WITH THE ASSISTANCE OF A PROSECUTOR WHO MAY
NOT HAVE HAD THE INTENTION OF FINDING THE TRUE
PERPETRATOR. SUCH A JUDGMENT IS INHERENTLY UNRELIABLE
(SEE, FONTENOT V. ALBAUGH, 402 F.SUPP.3d 1110, 1149-1156, 1239
(10 CIR. 2019) "COURT GRANTED, DUE TO THE FUTILE OF EXHAUST-
ION, FED. R. CIV. P. 60(b), 15(d)(c), AND 60(d) AND 60(d)"
AFFID FONTENOT V. CROW, 4 F.3d 982, AT 67-174, 184-228, 315-
318 (10 CIR. 2021) CERT. DENIED 142 S.Ct. 2722 (2022)
SOCOP - GONZALEZ V. INS, 272 F.3d 1176, 1188-1196 (9 CIR. 2000);
26.

WHEN PETITIONER FIED THE "ACTUAL INNOCENCE EXCEPTION" STANDARD, IS MET, JURISTS OF THE UNITED STATES SUPREME COURT COULD DISAGREE WITH BOTH LOWER FEDERAL COURTS' RESOLUTION OF THE U.S. CONSTITUTIONAL CLAIMS, OR JURISTS COULD CONCLUDE THE ISSUES PRESENTED ARE ADEQUATE TO DESERVE ENCOURAGE TO PROCEED FURTHER, SEE BUCKY.

DAVIS, 137 OCT. 759 (2017) JURISTS ALSO, WOULD FIND IT DEBATABLE WHETHER THIS PETITION STATES A VALID CLAIM OF THE DENIAL OF A CONSTITUTIONAL AND WHETHER THE LOWER FEDERAL COURTS WERE CORRECT IN ITS PROCEDURAL HANDLING AND RULING ON RESPONDENTS'

OF: THE INVALID SEARCH WARRANTS AND AFFIDAVITS DATED DECEMBER 22, AND 27TH, 2001, SEE, SO COP-GONZALEZ V. INS., 272 F.3d 1176, 1188-1196 (9 CIR. 2000) (THE (24) CIRCUIT RECENTLY CONCLUDED THAT THE TIME PERIOD FOR FILING (MOTIONS TO REOPEN) IS AMENDABLE TO EQUITABLE TOLLING

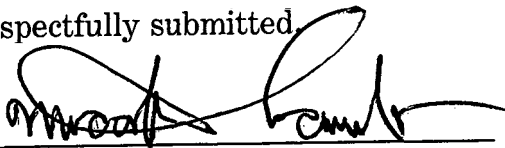
SEE, LAVORSKI V. U.S. INS., 232 F.3d 124, 130 (2d CIR. 2000), 10.134: "EQUITABLE TOLLING OF A STATUTE OF LIMITATION IS PERMITTED UNTIL THE FRAUD OR CONCEALMENT IS, OR SHOULD HAVE BEEN, DISCOVERED BY A REASONABLE PERSON IN THE SITUATION" (11) STATER V. U.S. STEEL, 871 F.3d 1174, 1176, 1181 (11 CIR. 2013) ("NON-DISCLOSURE CAUSED A MOCKERY OF JUSTICE") DEMIDANKUK V. PETROVSKY, 10 F.3d 338, 348 (6 CIR. 1993) CERT. DENIED 106 OCT. 1198 (1993) ("COURT GRANTED 60(b) WHEN RESPONDENTS (DECEIVED) THE COURT") BURDEN V. ZANT, 114 OCT. 654 (1994) BROUDY V. MATHER, 335 F.3d 1-5 (D.C. CIR. 2005) ("GRANTED 60(b)(4) CIVIL") NATIONAL CIR. FOR MFG. SERVICES V. DOD, 199 F.3d 507, 511 (D.C. CIR. 2000) ("GRANTED MOTION ON CLEAR ERROR OF LAW") PUMPHREY V. K.W. THOMPSON TOOL CO., 62 F.3d 1128, 1133 (9 CIR. 1995) CERT. DENIED 116 OCT. 1042 (1996) ("NON-DISCLOSURE OF VIDEOTAPE OF GUN MISTFIRE") CLISBY V. JONES, 960 F.2d 925, 935 (11 CIR. 1992) CHRISTEN V. ROBER, 135 OCT. 891 (2015) FO MELOT V. ALBAUGH 402 F.3d 1110, 1149-1153, 1239 (10 CIR. 2019) CERT. DENIED 142 2722 (2022) BLIM BANK SAL. V. HONICKMAN, LEXIS 2193 N. [5-7] (2025), BY THIS COURT RETURNING PETITIONER CHEN Y. LUMINA, BACK TO HIM, AND DISCHARGING PETITIONER.

✓ (FV8) SEE HEINEL V. MOORE, LEXIS 19107, AT 6 (FV3) (6 CIR. 2024) ("REQUESTING TO EXPAND THE RECORD TO INCLUDE EVIDENCE OF INNOCENCE, COA GRANTED") (FV9) PETITIONER'S POSTCONVICTION 3.850 MOTION INACCUATE, CLERK OF COURT NUMBER BY RESPONDENTS DONE INTENTIONAL, SEE APPENDIX 150A, 175A, WAS ON MEMORANDUM OF LAW, AND SUPPORTING FACTS, BOTH DATED MARCH 18TH, 2005, SEE YISRAVY V. DAVIS, 277 F.3d 898, 905 (7 CIR. 2003) ("PREJUDICIAL ERROR COMBINED WITH INACCUATE AND UNRELIABLE TRIAL TRANSCRIPT REQUIRED HABEAS RELIEF (11) (11)).

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: MAY 18TH 2026