

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Antonio Goodwin — PETITIONER
(Your Name)

vs.

AT&T — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

US Court of Appeals For The Ninth Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

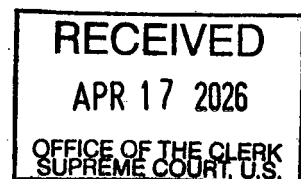
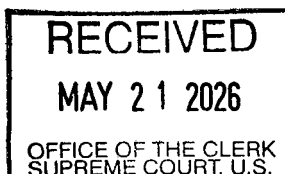
PETITION FOR WRIT OF CERTIORARI

Antonio Goodwin
(Your Name)

21021 Sycamore Rd Unit 503
(Address)

ASHBURN VA 20147
(City, State, Zip Code)

(702) 352-3293
(Phone Number)



QUESTION(S) PRESENTED

1. Whether a district court abuses its discretion under Federal Rules of Civil

Procedure 26(c) and 30(b)(4) by denying a medically supported request for a remote deposition where undisputed medical evidence established life-threatening caregiving obligations, where remote participation was medically recommended, where Petitioner's wife had been approved for Medicaid Long Term Disability because of her life-threatening long-term condition, where Medicaid Long Term Disability approved Petitioner as his wife's certified Entyre Care caregiver, and where the record further showed active and ongoing medical treatment, including that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute, together with pain doctor appointments, primary doctor appointments, and in-home nurse visits requiring Petitioner's physical presence.

2. Whether sanctions may be imposed for failure to attend an in-person deposition conducted on September 25, 2025, where the deposition occurred after the discovery cutoff date and before any court order compelled attendance, including where ECF No. 123 was filed on September 3, 2025, ECF No. 133 was filed on September 11, 2025, and Magistrate Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025, close to 90 days later and after the deposition date had already passed.

3. Whether due process is violated where sanctions are imposed while a dispositive motion filed on September 10, 2025 remained pending through the December 30, 2025 sanctions hearing, where Judge Daniel J. Albregts did not rule on the extension of the discovery cutoff, the deposition-related motion, and the relevant timing issues until November 25, 2025, long after the deposition date and after substantial prejudice had already occurred, and where a ruling in Petitioner's favor on that dispositive motion could have overpowered, eliminated, mooted, or taken the September 25, 2025 in-person deposition out of the equation entirely.

4. Whether sanctions may be upheld where the official transcripts of the July 28, 2025 and December 30, 2025 hearings materially omit or misstate critical evidence, including the May 2, 2025 emergency medical events, the May 5, 2025 physician letter from Dr. Suman Manchireddy, M.D., the Entyre Care restrictions, the Medicaid Long Term Disability approval for Petitioner's wife's life-threatening long-term condition, the Medicaid approval of Mr. Antonio Goodwin as his wife's certified Entyre Care caregiver, the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute, the fact that those

treatments involved three doctors and nurses the treatment dates and treatment times, the pain doctor appointments, the primary doctor appointments, the Entyre Care in home nurse visits, the absence of any court order compelling attendance on September 25, 2025, the post cutoff timing of the deposition, and the unresolved dispositive motion.

5. Whether this case presents an additional question of national importance where the record includes related proceedings and allegations that AT&T has been sued in multiple disability accommodation and disability discrimination matters under the Americans with Disabilities Act, and where Petitioner alleges that AT&T, AT&T Inc., AT&T Corp., Stacey Campbell, and Pamela M. Phillips treated

Petitioner differently in connection with disability related accommodation issues, while also disputing under oath for years that Petitioner was employed by AT&T despite Petitioner's filing of 1,053 documents identifying Antonio Goodwin as an employee of AT&T, AT&T Inc., and AT&T Corp.

LIST OF PARTIES

All parties appearing in the court whose judgment is sought to be reviewed are listed below

Petitioner

Antonio Goodwin pro se

Respondents

AT&T

Magistrate Judge Daniel J. Albregts

RELATED CASES

This Petition arises from proceedings in the United States District Court for the District of Nevada and the United States Court of Appeals for the Ninth Circuit.

The directly related proceedings include:

Antonio Goodwin v. AT&T, United States District Court, District of Nevada, Case

No. 2:23-cv-01950-GMN-DJA

Ninth Circuit appeal identified by Petitioner as No. 26-927

Relevant district court proceedings concerning the hearings held on July 28, 2025 and December 30, 2025

Relevant motion practice concerning ECF No. 123, filed September 3, 2025

Relevant reply filing ECF No. 133, filed September 11, 2025

Petitioner's dispositive motion filed September 10, 2025

Relevant ruling by Magistrate Judge Daniel J. Albregts entered November 25, 2025

Relevant Ninth Circuit judgment entered September 2, 2025

Document 152, described by Petitioner as a List of Related Proceedings That

AT&T Discriminated Against Individuals With Disabilities Under the Americans With Disabilities Act (ADA), filed October 28, 2025, in United States District

Court of Nevada Case No. 2:23-cv-01950-GMN-DJA

The related materials reflected in Document 198-2, filed January 19, 2026, pages 13-15 of 31, which Petitioner identifies as containing disability-related proceedings and EEOC matters involving AT&T

EEOC and ADA-Related Proceedings Identified by Petitioner

Petitioner further states that Document 152 identifies related disability proceedings involving AT&T under the Americans with Disabilities Act and related federal employment-discrimination laws, and that these related proceedings are relevant because they show that disability-accommodation and disability-discrimination issues involving AT&T were not unique, isolated, or imaginary.

Petitioner identifies the following as related disability-related proceedings and allegations involving AT&T:

1. EEOC v. AT&T, Case No. 3:11-cv-019-CCC, filed by the EEOC in United States District Court, alleging that AT&T's failure to accommodate Miguel Melendez violated the Americans with Disabilities Act, as amended by the Americans with Disabilities Act Amendments Act of 2008 (ADAAA). Petitioner states that the EEOC alleged AT&T failed to provide a reasonable accommodation, and the suit sought back pay, compensatory damages, punitive damages, injunctive relief, and training of AT&T managers and employees concerning equal employment opportunity laws.
2. A disability-related matter involving a visually impaired employee, in which the EEOC sued AT&T for allegedly failing to accommodate the employee, leading to a settlement and reinstatement.
3. A disability-discrimination matter involving an alleged weight limit policy, in which the EEOC alleged that AT&T maintained a 275-pound weight limit for field

employees that screened out qualified individuals with obesity, in violation of the ADA.

4. A disability-accommodation matter involving a deaf employee, in which the EEOC alleged that AT&T denied reasonable accommodation and prevented the employee from interacting meaningfully at work.
5. A disability-accommodation matter involving an attendance policy, in which AT&T was accused of refusing to reasonably accommodate a long-term employee's disability by exempting disability-related leave from a no-fault attendance policy.
6. A disability-discrimination matter involving insulin-dependent diabetics, in which Petitioner states that in 2009 the EEOC sued AT&T for refusing to consider an insulin-dependent diabetic for a job based on myths and stereotypes.
7. EEOC v. AT&T (BellSouth) (Weight Discrimination), described by Petitioner as an EEOC action alleging disability discrimination based on weight in violation of the ADA.
8. EEOC v. AT&T (Diabetes), described by Petitioner as a matter in which AT&T settled with the EEOC after failing to hire a diabetic applicant despite his qualifications.
9. EEOC v. AT&T (Accommodation) (Leave), described by Petitioner as a lawsuit alleging that AT&T denied a reasonable accommodation by refusing to exempt disability-related leave from a no-fault attendance policy.
10. Kimberly Wall v. AT&T (Return-to-Office), described by Petitioner as a recent lawsuit claiming that AT&T's mandatory return-to-office policy discriminated against a remote worker with disabilities, including CRPS and neuropathy.
11. Schroeder v. AT&T (Service Dog), described by Petitioner as a case involving whether AT&T failed to accommodate a worker's service dog under the ADA.
12. AT&T Pacific Bell (Hearing Impairment), described by Petitioner as an EEOC action alleging that AT&T failed to provide a sign-language interpreter for a deaf employee, thereby blocking meaningful workplace interaction.

Religious and Age Cases Included in Petitioner's Related Proceedings Materials

Petitioner's related-proceedings materials also referenced other employment-discrimination matters involving AT&T, including:

- a religious discrimination matter involving a technician who needed to attend Sunday morning worship services;
- a matter involving Jehovah's Witnesses, where Petitioner states that AT&T paid money in a settlement concerning religious bias;
- an age discrimination matter involving the firing of a 53-year-old sales manager while younger, lower-performing employees remained in similar positions.

Why These Related Cases Matter Here

Petitioner does not present these related proceedings as substitutes for the factual record in his own case. Instead, Petitioner presents them because they help explain why his own disability-accommodation allegations should have been taken seriously, why the Court should not treat the disability-accommodation conflict here as trivial, and why the Court should closely examine whether AT&T and its representatives treated Petitioner differently in a case that involved life-threatening disability conditions, medically necessary caregiving, and a request for remote accommodation.

Petitioner specifically states that Document 152 was filed as a List Of Related Proceedings That AT&T Discriminated Against Individuals With Disabilities Under The Americans With Disabilities Act (ADA), and that these were cases Petitioner filed in the United States District Court of Nevada related to his wife's life-threatening long-term

disabilities in Case No. 2:23-cv-01950-GMN-DJA.

Petitioner further states that Stacey Campbell and Judge Daniel J. Albregts requested my wife to sit in a 9 hour in person Deposition, on July 28, 2025, September 25, 2025, May 5, 2025, May 16, 2025 and more. Petitioner includes that statement as part of the disability-related factual context he presented below.

Petitioner further states:

YOUR HONOR PLAINTIFF FILE MOTION TO SUPPLEMENT RECORD

THE EEOC FILED A LAWSUIT AGAINST AT&T: EEOC VS AT&T IN A US DISTRICT COURT.

AT&T VIOLATED THE AMERICANS WITH DISABILITIES ACT (ADA) AGAINST MIGUEL

MELEMDEZ. YOUR HONOR I BRING FULL ATTENTION TO HOW EEOC LAWSUIT WAS

FILED AGAINST AT&T IN A US DISTRICT COURT WHICH IS EXACTLY THE SAME WAY I

ANTONIO GOODWIN FILED MY LAWSUIT IN THE US DISTRICT COURT OF NEVADA THE

ONLY DIFFERENCE HERE AT&T, AT&T INC AT&T CORP, STACEY CAMPBELL AND PAMELA

M, PHILLIPS LIE UNDER OATH FOR 3 YEARS CLAIMING THEY ARE NOT AT&T AND TRIED

TO DISMISS THE CASE BY WRITING PLAINTIFF ANTONIO GOODWIN WAS NEVER AN

EMPLOYEE OF ANY AT&T, AT&T INC. OR AT&T CORP COMPANIES. WHICH IS AN

EXTREMELY SERIOUS OFFENSE OF LYING UNDER OATH FOR 3 YEARS BY STACEY

CAMPBELL, PAMELA M, PHILLIPS, AT&T, AT&T INC AND AT&T CORP FOR NOT TELLING

THE TRUTH UNDER OATH FOR 3 YEARS. YOUR HONOR I FILED 1,053 DOCUMENTS

WITH MY NAME ANTONIO GOODWIN ON AT&T, AT&T INC AND AT&T CORP

DOCUMENTS AS AN EMPLOYEE OF AT&T, AT&T INC AN AT&T CORP IN THE US DISTRICT

COURT PROVING WITHOUT A REASONABLE DOUBT I WAS AN EMPLOYEE OF AT&T.

AT&T INC, AND AT&T CORP WHICH HAS THE EXACT SAME HEADQUARTERS 208 S

AKARD ST SUITE 100 DALLAS TX 75202. YOUR HONOR IT APPEARS I HAVE BEEN

TREATED DIFFERENT.

Petitioner includes that statement because it ties together the EEOC disability-related matters, the accommodation issues in his own case, and his allegation that he was treated differently despite extensive documentation showing his employment

relationship.

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OPINIONS BELOW

For cases from federal courts:

The opinion of the United States Court of Appeals 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 United States District Court 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.

Relevant orders of the United States District Court for the District of Nevada, Case No.

2:23-cv-01950-GMN-DJA, including rulings by District Judge Gloria M. Navarro and Magistrate Judge Daniel J. Albregts, are reproduced in the appendices identified below.

JURISDICTION

For cases from federal courts:

The date on which the United States Court of Appeals decided Petitioner's case was September 2, 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:

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

in Application No.

on

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

This case involves the following constitutional provisions, statutes, and rules:

U.S. Const. amend. V

28 U.S.C. § 1254(1)

28 U.S.C. § 753(b)

Fed. R. Civ. P. 26(c)

Fed. R. Civ. P. 30(b)(4)

Fed. R. App. P. 10(e)

Fifth Amendment to the United States Constitution

No person shall be deprived of life, liberty, or property, without due process of law.

Federal Rule of Civil Procedure 26(c)

Federal Rule of Civil Procedure 26(c) authorizes a court, for good cause, to issue a protective order to protect a party from annoyance, embarrassment, oppression, or undue burden or expense.

Federal Rule of Civil Procedure 30(b)(4)

Federal Rule of Civil Procedure 30(b)(4) permits a deposition to be taken by remote means.

Federal Rule of Appellate Procedure 10(e)

Federal Rule of Appellate Procedure 10(e) provides procedures for correcting or modifying the record on appeal where the record does not truly disclose what occurred.

28 U.S.C. § 753(b)

28 U.S.C. § 753(b) requires the proceedings of the court to be recorded and preserved accurately.

STATEMENT OF THE CASE

**I. MEDICAL NECESSITY, LIFE-THREATENING CONDITIONS, AND DOCUMENTED
CAREGIVING OBLIGATIONS**

Petitioner Antonio Goodwin served as the primary caregiver for his wife, who suffered from severe and life-threatening medical conditions.

On May 2, 2025, Petitioner's wife experienced serious medical symptoms that caused doctors to be concerned about life-threatening stroke symptoms. She underwent a neurological brain evaluation on or about May 2, 2025. Petitioner informed the Court that this emergency medical episode involved:

transportation to the emergency room on or about May 2, 2025;

severe hypertension, approximately 212/121;

vertigo creating risk of collapse;

risk of passing out;

breathing complications;

need for continuous supervision; and

need for immediate emergency response if symptoms worsened.

Petitioner also informed the Court that the medical procedures and evaluation were necessary to ensure that his wife's life-threatening conditions, including her liver abscess and Crohn's

disease complications, had not returned.

Her underlying medical conditions included:

Crohn's disease requiring multiple major surgeries;

approximately four bowel obstruction surgeries;

a life-threatening liver abscess condition;

liver abscess fragments affecting liver function;

ongoing neurological concerns;

ongoing MRI and biopsy testing; and

continuing medical complications requiring monitoring and immediate response.

On May 5, 2025, Dr. Suman Manchireddy, M.D. issued a written medical statement confirming:

Petitioner's wife had critical and life-threatening medical complications;

Petitioner was required to remain her primary caregiver through the end of 2025;

and

remote participation in legal proceedings, including deposition, was medically necessary.

In addition to the physician's written statement, Petitioner's wife was approved by Medicaid Long Term Disability because of her life-threatening long-term medical condition. Petitioner further states that Medicaid Long Term Disability approved Mr.

Antonio Goodwin to serve as his wife's certified Entyre Care caregiver.

That Medicaid approval is highly significant because it independently confirms, through a government-administered long-term care determination, the seriousness, duration, and disabling nature of his wife's condition, as well as Petitioner's necessary role as her caregiver.

Thus, the record contains not only Petitioner's description of the medical crisis and Dr. Suman Manchireddy's May 5, 2025 letter, but also a Medicaid Long Term Disability approval reflecting that Petitioner's wife's condition was severe enough to qualify for long-term disability support and that Petitioner himself was approved as the certified Entyre Care caregiver responsible for her care.

Petitioner presented this medical necessity to the Court and requested protection from an in-person deposition because his wife's condition was serious, unstable, and required his physical presence.

The medical record presented by Petitioner was not based on convenience, delay, or unwillingness to participate. It was based on emergency events, physician support, disability approval, certified caregiver approval, ongoing treatment, and medically documented need for physical presence. The request for a remote deposition was

therefore the narrowest and most reasonable accommodation available under the

Rules. Petitioner did not seek to stop discovery. Petitioner sought to participate in discovery without abandoning his wife during serious and ongoing medical treatment and life-threatening care needs.

II. THE PETITIONER'S WIFE HAS CHEMOTHERAPY TRANSFUSION TREATMENT AT THE CANCER INSTITUTE, INCLUDING TREATMENT TIMES, THREE DOCTORS, NURSES, AND ADDITIONAL MEDICAL SCHEDULING CONFLICTS

Petitioner further states the following additional critical medical evidence, which confirms the ongoing and intensive nature of his wife's life-threatening condition:

The Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute.

That treatment was part of her continuing medical care and was directly relevant to Petitioner's caregiving obligations and inability to attend an in-person deposition without jeopardizing medically necessary care.

Petitioner states that:

the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute in Ashburn, Virginia;

the chemotherapy transfusion treatment was scheduled from approximately 2:00 p.m. to 5:00 p.m.;

additional chemotherapy transfusion treatment and related treatment appointments were scheduled from approximately 1:15 p.m. to 4:00 p.m.;

the treatment involved three doctors and nurses;

the treatment required transportation, supervision, monitoring, coordination, and caregiving support; and

the treatment further established that his wife's condition was active, serious, medically intensive, and ongoing.

Petitioner further states that this cancer-related treatment was not theoretical or

speculative. It was scheduled treatment. It had treatment times. It involved multiple medical professionals. It required Petitioner's ongoing presence and support. It existed alongside the other serious medical evidence already before the Court, including the May 2, 2025 emergency event, the May 5, 2025 physician letter, the Medicaid Long Term

Disability approval, the Entyre Care caregiver approval, and the fixed caregiving restrictions

Petitioner further states that his wife's chemotherapy transfusion treatment occurred in a larger medical setting that included repeated appointments and overlapping care demands. In addition to the chemotherapy transfusion treatment at the Cancer Institute, Petitioner stated:

MY WIFE CHEMOTHERAPY TRANSFUSIONS/TREATMENTS ARE SCHEDULED
FROM 2:00PM TO 5:00PM AND 1:15PM TO 4:00PM AT THE CANCER INSTITUTE
INOVA HOSPITAL IN ASHBURN VA ATTACHED
YOUR HONOR MY WIFE PAIN DOCTOR APPOINTMENTS ARE SCHEDULED
3:00PM TO 5:00 PM DUE TO TRAVEL ADDED AS WELL ATTACHED,
MY WIFE PRIMARY DOCTORS APPOINTMENTS ARE SCHEDULED 3:00PM TO
5:00PM ATTACHED,

MY WIFE ENTYRE CARE LONG TERM DISABILITY IN HOME NURSE VISIT ARE
SCHEDULED FOR 2 HOURS OR MORE ATTACHED.
FURTHERMORE YOUR HONOR BECAUSE OF MY WIFE LIFE THREATEN
CONDITIONS I WAS APPROVED IMMEDIATELY THRU ENTYRE CARE, MEDICAID.
AND LONG TERM DISABILITY TO TAKE CARE OF MY WIFE LIFE THREATENING
DISEASES 7 DAYS A WEEK, AS HER CAREGIVER.

The cancer-treatment evidence matters for several reasons

First, it confirms that Petitioner's wife's medical condition was not merely historical. She was receiving active treatment.

Second, it confirms that the treatment burden involved specific time blocks, medical staff, clinical supervision, and repeated appointments.

Third, it confirms that Petitioner's daily responsibilities were not limited to generic caregiving. His role included transportation, clinical coordination, monitoring during treatment windows, and remaining available in case of adverse reactions or complications.

Fourth, it confirms that a remote deposition was the reasonable solution because the medical record did not show a litigant avoiding process. It showed a caregiver trying to comply with the case while also fulfilling medically necessary obligations tied to life-threatening conditions and chemotherapy transfusion treatment.

Petitioner further states that the treatment involved three doctors and nurses. To the extent the exact doctor names, appointment dates, and appointment records are available in the attached materials, those records should be included in the Appendix and treated as part of the factual record supporting this Petition. Petitioner preserves and incorporates those treatment records, dates, times, medical staff information, and

supporting attachments as part of this Petition. If the exact names of the three doctors are reflected in the treatment attachments, they may be inserted into the Appendix captioning and supporting materials without altering the substance of this Petition.

Petitioner further states that the treatment schedule and the related appointments establish a pattern of overlapping medical necessity:

- caregiving restrictions from approximately 8:00 a.m. to 2:00 p.m.;

- chemotherapy transfusion treatment from approximately 2:00 p.m. to 5:00 p.m.;

- additional treatment appointments from approximately 1:15 p.m. to 4:00 p.m.;

- pain doctor appointments from approximately 3:00 p.m. to 5:00 p.m.;

- primary doctors appointments from approximately 3:00 p.m. to 5:00 p.m.;

Entyre Care long term disability in home nurse visits lasting 2 hours or more.

That schedule demonstrates that Petitioner's day was filled with fixed and medically significant obligations. The deposition conflict therefore was not an isolated clash with one appointment. It was a clash with an entire, medically structured caregiving system.

III. ENTYRE CARE PROGRAM RESTRICTIONS, MEDICAID LONG TERM DISABILITY APPROVAL, AND DIRECT CONFLICT WITH THE DEPOSITION

Petitioner was also subject to strict caregiving obligations through the Entyre Care program.

During the proceedings, Petitioner explained that those restrictions included:

a required caregiving schedule from approximately 8:00 a.m. to 2:00 p.m.;

GPS monitoring;

restrictions limiting his ability to travel during those hours; and

responsibility to remain physically present to care for his wife due to her serious medical condition

The significance of these restrictions was not theoretical. Petitioner had been approved by Medicaid Long Term Disability as his wife's certified Entyre Care caregiver. That means his caregiving role was not informal or optional. It was formally recognized, medically grounded, and tied to his wife's life-threatening long-term disability

condition.

Despite those restrictions, Respondents scheduled an in-person deposition for 9:00 a.m. on September 25, 2025, directly inside the restricted caregiving period.

That scheduling created a direct, unavoidable conflict between the deposition and Petitioner's documented caregiving obligations.

This was not a matter of convenience. It was a matter of medical necessity, physical presence, certified caregiving responsibility, and immediate response to a life-threatening condition.

The conflict becomes even more serious when the entire day is considered together. Petitioner had caregiving restrictions from 8:00 a.m. to 2:00 p.m. The deposition was scheduled at 9:00 a.m., squarely within the restricted period. After that, the record

reflected that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the

Cancer Institute, with treatment blocks from 1:15 p.m. to 4:00 p.m. and 2:00 p.m. to 5:00 p.m., along with pain doctor appointments, primary doctor appointments, and in-

home nurse visits. In practical terms, the record showed a caregiving day filled with continuous medical obligations before, during, and after the time of the deposition.

Petitioner therefore requested a remote deposition under Rule 30(b)(4). That request would have allowed the case to move forward without endangering his wife or violating the restrictions tied to his certified caregiving role.

IV. THE SEPTEMBER 25, 2025 IN-PERSON DEPOSITION OCCURRED WITHOUT ANY

COURT ORDER COMPELLING ATTENDANCE

The in-person deposition at issue occurred on September 25, 2025.

The relevant procedural timeline is critical:

On September 3, 2025, Respondents filed ECF No. 123, a motion seeking to extend deadlines and compel Petitioner's deposition.

On September 11, 2025, Respondents filed ECF No. 133, a reply in support of that motion.

On September 25, 2025, Respondents proceeded with the in-person deposition date.

Magistrate Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025.

Thus, at the time of the September 25, 2025 deposition:

ECF No. 123 was only a motion;

ECF No. 133 was only a reply brief;

neither filing was a court order; and

no order compelling Petitioner's appearance existed on September 25, 2025.

The ruling by Judge Daniel J. Albregts came on November 25, 2025, which was close to 90 days after the September 3, 2025 motion, close to 75 days after the September 11, 2025 reply, and close to 60 days after the September 25, 2025 in-person deposition date had already passed.

That means the court order was issued after the fact. It did not exist when Respondents attempted to enforce the in-person deposition. It could not retroactively create an obligation that did not exist on September 25, 2025.

This timing matters because sanctions were later imposed based on nonappearance at a deposition for which there was no court order in effect at the time.

That problem becomes even more serious when connected to the medical record. Petitioner was not refusing to participate in the case. He presented the May 2, 2025 emergency facts, the May 5, 2025 physician letter, the Medicaid Long Term Disability approval, the Entyre Care caregiver approval, the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute, the treatment times, the involvement of three doctors and nurses, the pain doctor appointments, the primary doctor appointments, and the in-home nurse visits. A remote deposition was the

available and reasonable accommodation. Yet sanctions later flowed from failure to

attend an in-person deposition that had not even been ordered by the court at that time.

**V. THE SEPTEMBER 25, 2025 IN-PERSON DEPOSITION ALSO OCCURRED AFTER THE
DISCOVERY CUTOFF**

The procedural defect was not limited to the absence of a court order.

The September 25, 2025 in-person deposition also occurred after the discovery cutoff

date

Petitioner further states that Judge Daniel J. Albregts ruled on November 25, 2025 regarding the extension of the discovery cutoff and the extension relating to dispositive- motion timing, long after the relevant events had already occurred.

This sequence is critical:

Respondents sought relief through ECF No. 123 on September 3, 2025;

Respondents filed ECF No. 133 on September 11, 2025;

the in-person deposition date proceeded on September 25, 2025;

yet Judge Daniel J. Albregts did not rule until November 25, 2025, close to 90 days after the initial motion and long after the deposition date had passed.

Accordingly, the September 25, 2025 deposition was flawed in two separate and reinforcing ways:

1. it occurred after the discovery cutoff; and
2. it occurred before any court order compelled attendance.

These facts together demonstrate that Respondents pursued sanctions based on a deposition that was both procedurally unauthorized and temporally defective.

VI. THE DISPOSITIVE MOTION FILED ON SEPTEMBER 10, 2025 REMAINED PENDING

WHILE SANCTIONS WERE PURSUED

Petitioner filed a dispositive motion on September 10, 2025.

As of the December 30, 2025 sanctions hearing, that motion had remained pending for approximately 130 days without a ruling.

No ruling was issued on the dispositive motion in:

September 2025;

October 2025;

• November 2025; or

prior to the December 30, 2025 sanctions hearing.

This fact is materially important because:

a ruling in Petitioner's favor could have materially affected or mooted the basis for sanctions;

the pendency of the motion affected Petitioner's procedural posture and his ability to defend against sanctions; and

the sanctions hearing occurred while a fully briefed dispositive motion remained unresolved.

Petitioner further respectfully states that if the dispositive motion had been ruled on in Mr. Antonio Goodwin's favor in September 2025, that ruling could have overpowered, eliminated, mooted, or taken the September 25, 2025 in-person deposition out of the equation entirely.

In other words, the unresolved dispositive motion was not some collateral matter. It was a central procedural issue that could have changed the entire posture of the case before the deposition dispute ever ripened into sanctions.

Judge Daniel J. Albregts did not rule on the related extension issues until November 25, 2025, long after the motion practice began and long after the deposition date.

This delay compounded the unfairness. Petitioner faced sanctions proceedings while a potentially case-dispositive motion remained unresolved and while the timing issues surrounding discovery and deposition had not been timely resolved by court order.

VII. SANCTIONS WERE IMPOSED DESPITE MULTIPLE, INTERLOCKING PROCEDURAL AND EQUITABLE DEFECTS

Sanctions were imposed against Petitioner based on his nonappearance at the September 25, 2025 in-person deposition.

However, those sanctions were imposed under the following conditions:

no court order compelling attendance existed on September 25, 2025;

the deposition was conducted after the discovery cutoff date;

ECF No. 123 and ECF No. 133 had not yet been ruled upon;

Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025;

Petitioner's September 10, 2025 dispositive motion remained unresolved;

Petitioner had presented a May 5, 2025 doctor's letter from Dr. Suman

Manchireddy, M.D. confirming that remote participation was medically necessary;

Petitioner had informed the Court of the May 2, 2025 emergency room event, stroke concerns, neurological brain evaluation, severe hypertension, vertigo, and collapse risk;

Petitioner's wife had been approved by Medicaid Long Term Disability because of her life-threatening long-term condition;

Medicaid Long Term Disability approved Mr. Antonio Goodwin to be his wife's certified Entyre Care caregiver;

Petitioner was under Entyre Care program restrictions, including 8:00 a.m. to 2:00 p.m. caregiving hours, GPS monitoring, and mandatory physical presence;

Petitioner requested a remote deposition under Rule 30(b)(4);

the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute in Ashburn, Virginia;

the chemotherapy transfusion treatment was scheduled from approximately 2:00 p.m. to 5:00 p.m.;

additional treatment appointments were scheduled from approximately 1:15 p.m. to 4:00 p.m.;

those treatments involved three doctors and nurses;

my wife pain doctor appointments were scheduled from approximately 3:00 p.m. to 5:00 p.m., with travel included;

my wife primary doctors appointments were scheduled from approximately 3:00 p.m. to 5:00 p.m.; and

my wife Entyre Care long term disability in home nurse visit were scheduled for two hours or more.

These were not isolated defects. They were cumulative, interlocking defects that made the sanctions process fundamentally unfair. VIII.

**TRANSCRIPT DEFICIENCIES IN THE JULY 28, 2025
AND DECEMBER 30, 2025**

HEARINGS

Petitioner filed a motion under Federal Rule of Appellate Procedure 10(e) and 28 U.S.C. § 753(b) to correct and settle the record concerning the hearings held on July 28, 2025

and December 30, 2025.

Petitioner stated that the transcripts omit or materially misstate key portions of the proceedings, including:

1. Petitioner's request for a remote deposition due to caregiving and medical necessity;
2. Petitioner's Entyre Care program restrictions and inability to travel during specific hours;
3. medical documentation, physician recommendations, and the severity of Petitioner's wife's life-threatening medical conditions on May 5, 2025;
4. whether any court order required Petitioner to appear on September 25, 2025;
- and
5. the procedural timeline relating to Respondents' motion to compel and the Court's ruling, including ECF No. 123 and ECF No. 133.

Petitioner further states that the transcript deficiencies also include omissions or material misstatements regarding:

6. his wife's approval for Medicaid Long Term Disability because of her life-threatening long-term condition;
7. Medicaid Long Term Disability approval of Mr. Antonio Goodwin as his wife's certified Entyre Care caregiver;
8. the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute;
9. treatment dates and treatment times, including approximately 2:00 p.m. to 5:00 p.m. and approximately 1:15 p.m. to 4:00 p.m.;
10. the fact that those treatments involved three doctors and nurses;

11. pain doctor appointments scheduled from approximately 3:00 p.m. to 5:00 p.m.;

12. primary doctor appointments scheduled from approximately 3:00 p.m. to 5:00

p.m.; and

13. Entyre Care long-term disability in-home nurse visits scheduled for two hours or

more.

A. Entyre Care Restrictions and Deposition Conflict

During the December 30, 2025 hearing, Petitioner stated that he was subject to strict caregiving requirements through the Entyre Care program, including:

required caregiving hours from approximately 8:00 a.m. to 2:00 p.m.;

GPS monitoring and restrictions limiting travel during those hours; and

responsibility to remain physically present with his wife due to her serious

medical condition.

Petitioner further stated that Respondents scheduled an in-person deposition for 9:00 a.m. within those restricted hours, making attendance impossible.

B. Absence of Court Order for September 25, 2025 Deposition

During the December 30, 2025 hearing, discussion occurred regarding whether Petitioner was subject to a court order requiring appearance at the September 25, 2025 deposition.

Petitioner's understanding, based on the docket, was:

ECF No. 123-Respondents' motion to extend deadlines and compel deposition, filed September 3, 2025;

ECF No. 133-Respondents' reply in support, filed September 11, 2025;

no court order compelling the deposition existed at that time; and

Judge Daniel J. Albregts did not issue the ruling until November 25, 2025.

Thus, there was no court order in effect on September 25, 2025 requiring Petitioner to appear.

C. Transcript References to ECF No. 123 and ECF No. 133

During the December 30, 2025 hearing, the transcript appeared to reference ECF No.

123 and ECF No. 133 as if they created a court-ordered deposition date.

But:

ECF No. 123 was a motion, not an order;

ECF No. 133 was a reply, not an order;

neither filing constituted a court order compelling deposition; and

no order granting that relief was issued until November 25, 2025.

D. Medical Documentation and Doctor's Letter (July 28, 2025)

During the July 28, 2025 hearing, Petitioner presented and discussed medical documentation, including the written letter from Dr. Suman Manchireddy, M.D., dated

May 5, 2025, stating:

Petitioner's wife had critical and life-threatening medical complications;

Petitioner was required to remain as her primary caregiver through the end of 2025;

remote participation in proceedings, including deposition, was medically necessary; and

Petitioner's wife faced serious risks including stroke, neurological

complications, vertigo, and ongoing diagnostic procedures including MRI and biopsy testing.

Petitioner also informed the Court that his wife suffered from:

Crohn's disease requiring multiple major surgeries;

approximately four bowel obstruction surgeries;

a liver abscess condition carrying severe risk;

liver abscess fragments affecting liver function; and

ongoing life-threatening complications requiring constant monitoring.

Petitioner further states that the record should also reflect that his wife was approved for Medicaid Long Term Disability because of her life-threatening condition and that Medicaid Long Term Disability approved Mr. Antonio Goodwin as her certified Entyre Care caregiver.

E. Caregiving Emergency and Medical Facts

Petitioner further stated that:

his wife was transported to the emergency room on or about May 2, 2025;
doctors were concerned about life-threatening stroke symptoms;
she underwent a neurological brain evaluation on May 2, 2025;
medical procedures were completed to ensure that her life-threatening liver abscess and Crohn's disease had not returned;
she suffered vertigo creating risk of collapse;
she experienced severe hypertension of approximately 212/121;
she required continuous supervision because of risk of passing out and breathing complications; and
emergency medical services would be required if such episodes occurred.

F. Chemotherapy Transfusion Treatment, Three Doctors, Nurses, Dates, Times, and Additional Medical Scheduling Facts

Petitioner further states that the record should also reflect that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute.

Petitioner further stated that:

the treatment occurred at the Cancer Institute in Ashburn, Virginia;
treatment was scheduled from approximately 2:00 p.m. to 5:00 p.m.;
additional treatments were scheduled from approximately 1:15 p.m. to 4:00 p.m.;
those treatments involved three doctors and nurses;
those treatments required Petitioner's physical presence for transportation, coordination, monitoring, and caregiving support; and
those treatments further demonstrated that his wife's condition remained serious, active, and medically intensive.
Petitioner further states that the record should also reflect all dates, treatment times.

attached scheduling records, and medical staff information contained in the supporting records for the chemotherapy transfusion treatment at the Cancer Institute, including the records identifying the three doctors and nurses, to the extent those names and dates appear in the attached materials.

Petitioner further states that the record should also reflect:

my wife pain doctor appointments scheduled from approximately 3:00 p.m. to 5:00 p.m., with travel included;

my wife primary doctors appointments scheduled from approximately 3:00 p.m. to 5:00 p.m.; and

my wife Entyre Care long term disability in home nurse visit scheduled for two hours or more.

G. Omission of Material Fact Regarding Pending Dispositive Motion

Petitioner also stated that during the December 30, 2025 sanctions hearing, the record did not fully reflect a critical procedural fact:

Petitioner filed a dispositive motion on September 10, 2025;

as of the December 30, 2025 sanctions hearing, that motion had been pending for approximately 130 days;

no ruling was issued on the dispositive motion in September, October, November, or before the sanctions hearing.

Petitioner further stated that the absence of a ruling on that motion was directly relevant to the fairness of sanctions because:

a ruling in Petitioner's favor could have materially affected or mooted the basis for sanctions;

a ruling in Petitioner's favor in September 2025 could have overpowered, eliminated, or taken the September 25, 2025 in-person deposition out of the equation;

the pendency of the motion affected Petitioner's procedural posture; and

the sanctions hearing occurred while a fully briefed dispositive motion remained unresolved.

IX. EEOC DISABILITY-RELATED PROCEEDINGS, DOCUMENT 152, AND WHY THEY

MATTER

Petitioner further states that the disability-related issues in this case do not exist in a

vacuum

Petitioner filed Document 152, described as a List Of Related Proceedings That AT&T Discriminated Against Individuals With Disabilities Under The Americans With Disabilities Act (ADA). Petitioner states that this filing was made in the United States District Court of Nevada in Case No. 2:23-cv-01950-GMN-DJA, and that it related to his wife's life-threatening long-term disabilities

Petitioner states that the purpose of identifying these related proceedings was to show that AT&T had already faced ADA-related scrutiny, EEOC enforcement, and accommodation-based litigation in multiple contexts, including disability accommodation, hearing impairment, visual impairment, leave accommodation, diabetes, obesity/weight-related issues, and other matters involving reasonable

accommodation

Petitioner's theory is straightforward: when a defendant has repeatedly been accused of failing to accommodate disabilities, and when Petitioner's own case involves life-threatening disability-related caregiving, remote accommodation, and medical necessity, the lower courts should have taken the disability-accommodation issues more seriously, not less seriously.

Petitioner particularly relies on the EEOC action involving Miguel Melendez, which

Petitioner described as EEOC v. AT&T, Case No. 3:11-cv-019-CCC. Petitioner states that

the EEOC filed that lawsuit after attempting pre-litigation conciliation and alleged that

AT&T's failure to accommodate violated the ADA, as amended by the ADAAA. Petitioner

further states that the relief sought included back pay, compensatory damages, punitive damages, injunctive relief, and training. Petitioner identifies that matter because it involved the same broader legal concept at issue here: reasonable

accommodation

Petitioner also includes the quoted statements appearing in the materials, including:

"Workplace flexibility and making reasonable workplace modifications, such as

the use of computer software, to keep qualified employees working, not only makes good business sense in the 21st century, it is required by federal law,"

attributed in the materials to Malcolm Medley, director of the EEOC's Miami

District Office

"The EEOC will continue to protect employees against such unlawful discrimination."

"Employers have the obligation under the ADA to reasonably accommodate disabled individuals. We will vigorously prosecute cases where it appears that employment decisions are based on myths, fears or stereotypes about a person's ability because of his disability," attributed in the materials to Robert Weisberg, the EEOC's Miami regional attorney.

Petitioner does not cite these statements as binding law. Petitioner includes them because they reinforce the accommodation principle that Petitioner says should have governed his own case: when disability-related circumstances create a legitimate barrier, the law favors reasonable accommodation, not rigid insistence on unnecessary

in-person procedures.

Petitioner further states that the related cases matter because his own case involved not merely a scheduling request, but disability-related medical necessity tied to his wife's life-threatening condition. Petitioner's wife had emergency medical events, a physician letter requiring Petitioner's caregiving presence, Medicaid Long Term Disability approval, Entyre Care caregiver approval, chemotherapy transfusion treatment at the Cancer Institute, pain doctor appointments, primary doctor appointments, and in-home nurse visits. In Petitioner's view, these facts made the refusal to reasonably accommodate a remote deposition especially troubling when considered against the background of AT&T's other disability-accommodation

controversies.

Petitioner further states that the related proceedings also matter because he believes

AT&T and its representatives treated him differently than other litigants or other employees whose rights had been recognized in other disability-related proceedings. Petitioner specifically alleges that AT&T, AT&T Inc., AT&T Corp., Stacey Campbell, and Pamela M. Phillips denied under oath for three years that Petitioner was an employee of AT&T, despite Petitioner's filing of 1,053 documents bearing his name on AT&T, AT&T Inc., and AT&T Corp. documents, and despite Petitioner's allegation that those entities

shared the same headquarters address of 208 S Akard St Suite 100, Dallas, TX 75202.

Petitioner's point is that the disability-accommodation issue in this case should not be viewed narrowly or artificially. It was intertwined with larger issues of credibility, fair treatment, accommodation, and whether the lower courts gave meaningful weight to the disability-based circumstances presented.

X. CONNECTING THE DOTS: WHY THE SANCTIONS PROCESS WAS

FUNDAMENTALLY UNFAIR

The timeline demonstrates a layered breakdown in fairness:

1. On May 2, 2025, Petitioner's wife experienced emergency medical symptoms, including stroke concerns, severe hypertension, vertigo, and neurological evaluation.
2. Medical procedures were completed to ensure that her life-threatening liver abscess and Crohn's disease complications had not returned.
3. On May 5, 2025, Dr. Suman Manchireddy, M.D. documented that Petitioner's caregiving role was medically necessary and that remote participation should be permitted.
4. Petitioner's wife was approved by Medicaid Long Term Disability because of her life-threatening long-term condition.
5. Medicaid Long Term Disability approved Mr. Antonio Goodwin as her certified Entyre Care caregiver.
6. The Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute.
7. That treatment occurred at the Cancer Institute in Ashburn, Virginia.
8. That treatment was scheduled from approximately 2:00 p.m. to 5:00 p.m. and additional treatments were scheduled from approximately 1:15 p.m. to 4:00 p.m.
9. Those treatments involved three doctors and nurses
10. My wife pain doctor appointments were scheduled from approximately 3:00 p.m. to 5:00 p.m., including travel.
11. My wife primary doctors appointments were scheduled from approximately 3:00 p.m. to 5:00 p.m.
12. My wife Entyre Care long term disability in home nurse visit were scheduled for two hours or more.
13. Petitioner was required to provide care seven days a week because of the severity of her condition.
14. Petitioner was subject to Entyre Care caregiving restrictions from approximately 8:00 a.m. to 2:00 p.m., including GPS monitoring and limits on travel.

15. On July 28, 2025, Petitioner presented that medical evidence to the Court.
16. On September 3, 2025, Respondents filed ECF No. 123 seeking to extend deadlines and compel deposition.
17. On September 10, 2025, Petitioner filed a dispositive motion.
18. On September 11, 2025, Respondents filed ECF No. 133.
19. On September 25, 2025, Respondents conducted or attempted to enforce the in-person deposition.
20. At that time, there was no court order compelling attendance.
21. The deposition also occurred after the discovery cutoff date.
22. Judge Daniel J. Albregts did not rule until November 25, 2025, close to 90 days after the September 3 motion and after the September 25 deposition date had already passed.
23. Document 152 identified related disability proceedings involving AT&T under the ADA.
24. Petitioner alleged that AT&T had been involved in multiple disability-accommodation and disability-discrimination matters, including EEOC litigation.
25. Petitioner further alleged that AT&T, AT&T Inc., AT&T Corp., Stacey Campbell, and Pamela M. Phillips denied under oath for three years that he was an employee, despite 1,053 documents filed by Petitioner reflecting his employment with AT&T entities.
26. On December 30, 2025, sanctions were pursued while the dispositive motion remained unresolved and while the transcripts omitted or misstated the core facts.

This means Petitioner was sanctioned based on a deposition that was:

- scheduled during medically restricted caregiving hours;
- inconsistent with documented medical necessity;
- inconsistent with the treating physician's instruction that remote participation was medically necessary;

inconsistent with the fact that his wife had been approved by Medicaid Long Term Disability;

inconsistent with the fact that Petitioner had been approved as her certified Entyre Care caregiver;

inconsistent with the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute;

inconsistent with the treatment times, the attached treatment records, and the involvement of three doctors and nurses;

inconsistent with the pain doctor schedule, primary doctor schedule, and in-home nursing obligations;

requested to be conducted remotely;

conducted after the discovery cutoff;

conducted before any court order compelled attendance;

pursued while a dispositive motion remained unresolved;

pursued in a case where Petitioner had also identified multiple ADA-related proceedings involving AT&T; and

later framed in a record that omitted or misstated those facts.

That combination raises serious questions of due process, abuse of discretion, and record integrity.

This case is not about one missing fact. It is about a connected chain of facts. The emergency medical episode led to physician documentation. The physician documentation led to a medically supported request for remote participation. The disability approval and caregiver approval confirmed the seriousness of the medical situation. The chemotherapy transfusion treatment at the Cancer Institute, along with the treatment times, three doctors, nurses, and additional appointments, confirmed that the medical burden was ongoing and active. The Entyre Care restrictions showed that Petitioner could not simply leave. The lack of a court order showed that the deposition had not yet been compelled. The post-cutoff timing showed additional procedural defect. The unresolved dispositive motion showed that the case posture was unstable. Document 152 and the EEOC-related proceedings showed that

disability-accommodation issues involving AT&T were part of a broader pattern

Petitioner believed relevant to the case. The transcript omissions then made it harder to

correct the narrative on appeal. When those facts are connected, the sanctions process was fundamentally unfair.

REASONS FOR GRANTING THE WRIT

This case presents exceptional questions involving:

- due process;
- sanctions authority;
- discovery limits;
- medical necessity in civil procedure;
- remote deposition accommodation;
- treatment of certified caregiving obligations;
- disability-accommodation principles; and
- record integrity on appeal.

This case is cert-worthy because the sanctions did not arise from ordinary noncompliance. They arose from a combination of events showing a fundamental procedural mismatch between what the law required and what the record later suggested.

Petitioner was subjected to sanctions even though:

Magistrate Judge Daniel J. Albregts had not yet ordered the September 25, 2025 in-person deposition at the time it occurred;

the ruling came only on November 25, 2025, close to 90 days after the initial motion practice began and after the deposition date had already passed;

the deposition took place after the discovery cutoff;

a dispositive motion filed on September 10, 2025 remained unresolved through the December 30, 2025 sanctions hearing;

if the dispositive motion had been ruled on in Mr. Antonio Goodwin's favor in September 2025, that ruling could have overpowered, mooted, or taken the September 25, 2025 in-person deposition out of the equation;

Petitioner had submitted a May 5, 2025 doctor's letter from Dr. Suman

Manchireddy, M.D. requiring remote participation;

Petitioner had informed the Court of a May 2, 2025 emergency medical event,
including stroke concerns, neurological brain evaluation, severe hypertension, vertigo, and
the need to ensure that life-threatening liver abscess and Crohn's disease
complications had not returned;

Petitioner's wife had been approved by Medicaid Long Term Disability for her life- threatening
long-term condition;

Medicaid Long Term Disability approved Mr. Antonio Goodwin to be his wife's certified
Entyre Care caregiver;

the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer
Institute;

those treatments were scheduled from approximately 2:00 p.m. to 5:00 p.m. and
approximately 1:15 p.m. to 4:00 p.m.;

those treatments involved three doctors and nurses;

my wife pain doctor appointments were scheduled from approximately 3:00 p.m. to
5:00 p.m.;

my wife primary doctors appointments were scheduled from approximately 3:00
p.m. to 5:00 p.m.;

my wife Entyre Care long term disability in home nurse visit were scheduled for
two hours or more;

Petitioner filed Document 152 identifying related ADA disability proceedings involving AT&T; and

the transcripts of the July 28, 2025 and December 30, 2025 hearings omit or
materially misstate those facts

If sanctions may be upheld under those circumstances, then the protections of Rules 26(c),
30(b)(4), and 10(e), together with the Due Process Clause, are seriously
weakened.

**I. Sanctions Were Imposed Without Any Court Order Requiring Attendance on
September 25, 2025**

No court order existed on September 25, 2025 requiring Petitioner to appear.

The only filings in existence at that time were:

ECF No. 123, filed September 3, 2025; and

ECF No. 133, filed September 11, 2025.

Those were not court orders. They were motion papers.

Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025.

Thus, the sanctions were premised on failure to attend a deposition that had not yet been compelled by court order.

II. The Deposition Occurred After the Discovery Cutoff and Before the November 25, 2025 Ruling

The September 25, 2025 in-person deposition also occurred after the discovery cutoff. Judge Daniel J. Albregts ruled on the extension issues only on November 25, 2025, close to 90 days after the motion practice began.

That timing matters because the ruling did not precede the deposition. It followed it.

The sanctions therefore rested on an event that was both:

outside the discovery deadline; and

not compelled by prior court order.

III. The Unresolved September 10, 2025 Dispositive Motion Made the Sanctions

Process Unfair

Petitioner's dispositive motion, filed September 10, 2025, remained pending through the December 30, 2025 sanctions hearing.

That unresolved motion was materially relevant because a ruling in Petitioner's favor could have altered or mooted the basis for sanctions.

Petitioner further states that if the dispositive motion had been ruled on in Mr. Antonio Goodwin's favor in September 2025, it could have overpowered, eliminated, or taken

the September 25, 2025 in-person deposition out of the equation.

Proceeding with sanctions before resolving that motion distorted the procedural

posture of the case.

IV. The Courts Failed to Give Adequate Weight to Documented Medical Necessity, the Fact That the Petitioner's Wife Has Chemotherapy Transfusion Treatment at the

Cancer Institute, and Certified Caregiving Obligations

The medical evidence was substantial and specific.

On May 2, 2025, doctors were concerned about life-threatening stroke symptoms and conducted a neurological brain evaluation. Medical procedures were performed to

ensure that Petitioner's wife's life-threatening liver abscess and Crohn's disease complications had not returned.

On May 5, 2025, Dr. Suman Manchireddy, M.D. confirmed in writing that remote

participation was medically necessary and that Petitioner's caregiving presence was required through the end of 2025.

Petitioner also described:

severe hypertension, approximately 212/121;

vertigo;

collapse risk;

breathing complications;

continuous supervision needs; and

emergency caregiving obligations.

In addition, Petitioner's wife had been approved by Medicaid Long Term Disability for her life-threatening long-term condition, and Medicaid Long Term Disability approved Mr. Antonio Goodwin to serve as her certified Entyre Care caregiver.

The record further showed that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute, including:

treatment at the Cancer Institute in Ashburn, Virginia;

treatment blocks from approximately 2:00 p.m. to 5:00 p.m.;

additional treatment blocks from approximately 1:15 p.m. to 4:00 p.m.;

supervision by three doctors and nurses; and

a need for Petitioner's physical presence for transportation, support, monitoring, and caregiving coordination.

The record further showed:

pain doctor appointments from approximately 3:00 p.m. to 5:00 p.m.;

primary doctor appointments from approximately 3:00 p.m. to 5:00 p.m.; and

Entyre Care long-term disability in-home nurse visits lasting two hours or more.

Yet the case proceeded as though an in-person deposition at 9:00 a.m., during Entyre

Care restricted hours, posed no serious problem.

V. The Official Transcripts Omit or Materially Misstate the Facts Needed for Fair Appellate Review

The transcripts from July 28, 2025 and December 30, 2025 do not fully or accurately reflect:

the doctor's letter from May 5, 2025;

the emergency medical events of May 2, 2025;

the stroke concerns and neurological brain evaluation;

the need to ensure that liver abscess and Crohn's disease complications had not returned;

the Entyre Care restrictions, including 8:00 a.m. to 2:00 p.m. caregiving hours, GPS monitoring, and travel limits;

the fact that ECF No. 123 and ECF No. 133 were not court orders;

the fact that Judge Daniel J. Albregts did not rule until November 25, 2025;

the fact that the deposition occurred on September 25, 2025, before any such ruling;

the fact that the deposition occurred after the discovery cutoff;

the existence and significance of the September 10, 2025 dispositive motion;

the fact that a favorable ruling on that dispositive motion in September 2025 could have taken the in-person deposition out of the equation; .

the fact that Petitioner's wife had been approved by Medicaid Long Term Disability for her life-threatening condition;

the fact that Medicaid Long Term Disability approved Mr. Antonio Goodwin as her certified Entyre Care caregiver;

the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute;

the treatment dates and treatment schedules from approximately 2:00 p.m. to

5:00 p.m. and approximately 1:15 p.m. to 4:00 p.m.;

the fact that those treatments involved three doctors and nurses;

the pain doctor appointments;

the primary doctor appointments;

the Entyre Care long-term disability in-home nurse visits; and

the related ADA proceedings identified in Document 152 that Petitioner presented as relevant background on AT&T's disability-accommodation history.

Where sanctions turn on disputed events, an incomplete transcript undermines meaningful appellate review and raises serious due process concerns.

VI. This Case Presents Important and Recurring Questions of National Importance

This case affects litigants nationwide because it asks whether courts may:

impose sanctions where no court order existed at the relevant time;

permit depositions after the discovery cutoff and then sanction nonattendance;

disregard documented medical necessity and caregiving obligations;

disregard the fact that the Petitioner's Wife has Chemotherapy Transfusion

Treatment at the Cancer Institute and related treatment times, doctor

involvement, and clinical scheduling in evaluating the feasibility of in-person attendance;

disregard government-approved long-term disability caregiving status;

fail to take seriously a litigant's related-proceedings evidence showing repeated disability-accommodation controversies involving the same defendant;

leave dispositive motions unresolved while sanctions proceedings go forward;

and

uphold sanctions on an incomplete or inaccurate appellate record.

These questions recur across civil litigation and directly affect access to fair process.

CONCLUSION

The petition for a writ of certiorari should be granted.

For the foregoing reasons, Petitioner respectfully requests that this Court grant the petition for a writ of certiorari, vacate the judgment below, and remand for further proceedings consistent with this Court's ruling.

Respectfully submitted,

Antonio Goodwin

Pro Se Petitioner

21021 Sycolin Rd, Apt. 503

Ashburn, VA 20147

(702) 352-3293

Date:

2026

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Appendix B-District Court Order(s)/ Opinion(s)

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Appendix D--Dr. Suman Manchireddy, M.D. Letter dated May 5, 2025, and related medical records concerning the May 2, 2025 emergency event, neurological brain evaluation, stroke concerns, hypertension, vertigo, and related procedures

Appendix E - Evidence of Medicaid Long Term Disability approval for Petitioner's wife and evidence that Medicaid Long Term Disability approved Mr. Antonio Goodwin as certified Entyre Care caregiver

Appendix F -- Records relating to the fact that the Petitioner's Wife has Chemotherapy

Transfusion Treatment at the Cancer Institute, including Cancer Institute records, treatment dates, treatment times, records reflecting the involvement of three doctors and nurses, pain doctor appointment records, primary doctor appointment records, Entyre Care long term disability in home nurse visit records, ECF No. 123, ECF No. 133, Petitioner's dispositive motion filed September 10, 2025, transcript of July 28, 2025 hearing, transcript of December 30, 2025 hearing, and any sanctions order and related transcript references

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APPENDIX A

Ninth Circuit Order / Opinion

(Attach copy here)

APPENDIX B

District Court Order(s)/ Opinion(s)

(Attach copy here)

APPENDIX C

Motion to Correct and Settle the Record Under FRAP 10(e) and 28 U.S.C. § 753(b)

(Attach copy here)

APPENDIX D

Dr. Suman Manchireddy, M.D. Letter dated May 5, 2025, and related medical records concerning the May 2, 2025 emergency event, neurological brain evaluation, stroke concerns, hypertension, vertigo, and related procedures

(Attach copy here)

APPENDIX E

Evidence of Medicaid Long Term Disability approval for Petitioner's wife and evidence that Medicaid Long Term Disability approved Mr. Antonio Goodwin as certified Entyre Care caregiver

(Attach copy here)

APPENDIX F

Records relating to the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute, including Cancer Institute records, treatment dates,

treatment times, records reflecting the involvement of three doctors and nurses, pain doctor appointment records, primary doctor appointment records, Entyre Care long term disability in home nurse visit records, ECF No. 123, ECF No. 133, Petitioner's dispositive motion filed September 10, 2025, transcript of July 28, 2025 hearing, transcript of December 30, 2025 hearing, and any sanctions order and related

transcript references

(Attach copy here)

APPENDIX G

Document 152, related proceedings materials, Document 198-2 pages 13-15 of 31, and materials concerning EEOC and disability-related proceedings involving AT&T under the

ADA

(Attach copy here)

TABLE OF AUTHORITIES CITED

CASES PAGE NUMBER

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208 S Akard St Suite 100 Dallas TX 75202

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PROOF OF SERVICE

I, Antonio Goodwin do swear or declare that on this date 3-23-2026 as required by Supreme Court Rule 29 I have served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS and PETITION FOR A WRIT OF CERTIORARI on each

party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first class postage prepaid, or by delivery to a third party commercial carrier for delivery within 3 calendar

days.

The names and addresses of those served are as follows:

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

4-14- 2026.

Antonio Goodwin