

No. 25-7583

FILED

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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
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ASHBURN VA 20147
(City, State, Zip Code)

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(Phone Number)

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14.1 (A) QUESTIONS PRESENTED

1. Whether due process is violated where Plaintiff-Appellant Antonio Goodwin filed a dispositive motion on September 10, 2025 that should have been granted in Plaintiff-Appellant Antonio Goodwin's favor, where the dispositive motion filed on September 10, 2025 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp., where Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents identifying Antonio Goodwin on AT&T, AT&T Inc., and AT&T Corp. documents as an employee of those entities, where Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and the att.com/returns website, where a live AT&T customer service agent confirmed in writing "this is AT&T," where Plaintiff-Appellant Antonio Goodwin preserved those text messages, where Plaintiff-Appellant Antonio Goodwin has a video-recorded phone call message from AT&T stating "this is AT&T" from his employee document, where Plaintiff-Appellant Antonio Goodwin has a live agent texting Mr. Antonio Goodwin stating "this is AT&T" from Plaintiff-Appellant Antonio Goodwin's AT&T employee document connected to the AT&T work phone number 1-800-331-0500, where Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment, where Documents 155, 156, Exhibit A, Document 174, and Document 199 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee, where Plaintiff-Appellant Antonio Goodwin's AT&T employee clothing order, the AT&T phone number 1-800-331-0500, the AT&T video voice message stating "this is AT&T," and the AT&T live-agent text message stating "this is AT&T" proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee, where this evidence directly contradicts the February 26, 2024 declaration of Pamela M. Phillips stating she conducted an "exhaustive search" and found "no records" of employment, where that declaration identified AT&T Inc. at 208 S. Akard St., Dallas, Texas, which matches the corporate identity in Plaintiff-Appellant Antonio Goodwin's documents, and where the lower court nevertheless allowed sanctions proceedings to move forward while that dispositive motion remained unresolved through the December 30, 2025 sanctions hearing.

2. Whether sanctions may be imposed or upheld based on the September 25, 2025 in-person deposition where Plaintiff-Appellant Antonio Goodwin's dispositive motion filed September 10, 2025 remained pending and could have overpowered, eliminated, mooted, or taken the September 25, 2025 in-person deposition out of the equation entirely, where the deposition occurred after the discovery cutoff date, where ECF No. 123 filed September 3, 2025 was only a motion, where ECF No. 133 filed September 11, 2025 was only a reply, where Magistrate Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025 after the deposition date had already passed, and where sanctions should not be recommended or imposed while dispositive motions remained pending, while no order compelled the deposition at the relevant time, while the deposition occurred after the discovery cutoff, and while critical medical and caregiving evidence supported remote participation.

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

26(c) and 30(b)(4) by denying or functionally disregarding a medically supported request for remote participation while a dispositive motion remained unresolved, where Plaintiff-Appellant Antonio Goodwin presented evidence of May 2, 2025 emergency medical events, the May 5, 2025 physician letter from Dr. Suman Manchireddy, M.D., Medicaid Long Term Disability approval for Petitioner's wife's life-threatening long-term condition, Medicaid approval of Mr. Antonio Goodwin as his wife's certified Entyre Care caregiver, Entyre Care restrictions, Chemotherapy Transfusion Treatment at the Cancer Institute, treatment times, three doctors and nurses, pain doctor appointments, primary doctor appointments, and Entyre Care in-home nurse visits, and where the handling of the deposition dispute and refusal to grant accommodation amounted to discriminatory treatment against his legally disabled wife and against him as her caregiver.

4. Whether meaningful appellate review is denied where the official transcripts of the July 28, 2025 and December 30, 2025 hearings materially omit or misstate critical evidence concerning Plaintiff-Appellant Antonio Goodwin's September 10, 2025 dispositive motion, Plaintiff-Appellant Antonio Goodwin's employment relationship with AT&T, AT&T Inc., and AT&T Corp., the January 17, 2022 AT&T envelope containing Plaintiff-Appellant Antonio Goodwin's full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns, the preserved text messages and recorded communications stating "this is AT&T," the contradiction between that evidence and Pamela M. Phillips's February 26, 2024 declaration, the absence of any court order compelling attendance on September 25, 2025, the post-cutoff timing of the deposition, the May 2, 2025 emergency medical events, 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 Entyre Care in-home nurse visits.

5. Whether this case presents additional questions of national importance where Plaintiff-Appellant Antonio Goodwin's employment proof was not merely relevant to the Rule 11 sanctions issue, but was also central to the merits of his underlying claims involving race discrimination, retaliation, sexual harassment, harassment, disparate treatment, labor-law violations, and unequal access to workplace tools and opportunities; where the EEOC investigated his case, issued a right-to-sue letter, and Plaintiff-Appellant Antonio Goodwin was informed that AT&T would not have responded to the EEOC matter if Plaintiff-Appellant Antonio Goodwin had not been an employee; where the district court itself acknowledged that whether Plaintiff-Appellant Antonio Goodwin was employed by AT&T and whether Plaintiff-Appellant Antonio Goodwin was discriminated against in the course of employment were issues of sufficient complexity, and that the district court noted a likelihood of success and the warrant for appointment of counsel; and where Plaintiff-Appellant Antonio Goodwin also identified related disability-accommodation and disability-discrimination proceedings involving AT&T under the Americans with Disabilities Act.

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

Judicial Officers

District Judge Gloria M. Navarro

Magistrate Judge Daniel J. Albregts

RELATED CASES

This Petition arises from proceedings in the United States District Court or the District of Nevada and the United States Court of Appeals or 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. 26-123
- 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
- Documents 155 and 156, including Exhibit A
- Document 174
- Document 199
- 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
- Additional objections and later rulings tied to ECF Nos. 177, 179, 185, 186, 187, 188, and 189

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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 January 27, 2026.

- 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 _____ on _____ in Application No. _____

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
- 18 U.S.C. § 1001
- 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)
- Americans with Disabilities Act
- Americans with Disabilities Act Amendments Act of 2008 (ADAAA)

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. THE DISPOSITIVE MOTION FILED ON SEPTEMBER 10, 2025 SHOULD HAVE BEEN GRANTED IN PLAINTIFF-APPELLANT ANTONIO GOODWIN'S FAVOR

Plaintiff-Appellant Antonio Goodwin filed a dispositive motion on September 10, 2025.

The dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

That motion was central, controlling, and outcome-determinative. It was not collateral to the later sanctions dispute. It went to the core of Plaintiff-Appellant Antonio Goodwin's case, including Plaintiff-Appellant Antonio Goodwin's employment relationship with AT&T, AT&T Inc., and AT&T Corp., the legal validity of Respondents' continuing positions, the false-statement issues raised by Plaintiff-Appellant Antonio Goodwin, the merits of Plaintiff-Appellant Antonio Goodwin's discrimination-based claims, and the fairness of allowing sanctions proceedings to move forward while that dispositive motion remained unresolved.

As of the December 30, 2025 sanctions hearing, that dispositive 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:

- the dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin's favor;

- a ruling in Plaintiff-Appellant Antonio Goodwin's favor could have materially affected, overpowered, eliminated, or mooted the basis for sanctions;
- a ruling in Plaintiff-Appellant Antonio Goodwin's favor could have taken the September 25, 2025 in-person deposition out of the equation entirely;
- the pendency of the dispositive motion affected Plaintiff-Appellant Antonio Goodwin's procedural posture and his ability to defend against sanctions; and
- the sanctions hearing occurred while a fully briefed dispositive motion remained unresolved.

The evidence proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee.

That evidence included:

- an AT&T envelope dated January 17, 2022;
- Plaintiff-Appellant Antonio Goodwin's full name;
- employee number;
- AT&T password;
- AT&T employee clothing-order records;
- AT&T phone number 1-800-331-0500;
- att.com/returns;
- a live AT&T customer service agent confirming in writing, "this is AT&T";
- preserved text messages containing that AT&T confirmation;
- a video-recorded phone call message from AT&T stating "this is AT&T";
- a live agent texting Mr. Antonio Goodwin stating "this is AT&T" from Plaintiff-Appellant Antonio Goodwin's AT&T employee document connected to the AT&T work phone number 1-800-331-0500; and
- Plaintiff-Appellant Antonio Goodwin's offer to conduct a Zoom video-recorded call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment.

Documents 155, 156, Exhibit A, Document 174, and Document 199 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee.

In Documents 155, 156, Exhibit A, Document 174, and Document 199, Plaintiff-Appellant

Antonio Goodwin expressly argued that he received an AT&T envelope document with his employee number, AT&T password, and full name for his AT&T clothing order directly from the AT&T company; that the AT&T number on the envelope was 1-800-331-0500; that when the United States District Court called this AT&T 1-800-331-0500 number it would prove that Plaintiff-Appellant Antonio Goodwin was an AT&T employee; that Pamela M. Phillips used the same AT&T name in her written declaration on February 26, 2024; that Plaintiff-Appellant Antonio Goodwin had the original AT&T phone number 1-800-331-0500 message if anything had been changed by AT&T; that on Plaintiff-Appellant Antonio Goodwin's AT&T employment envelope received on January 17, 2022 there was an att.com/returns website with a live AT&T customer service agent; that the live AT&T customer service agent repeatedly stated in writing in text messages to Plaintiff-Appellant Antonio Goodwin that "this is AT&T"; that Plaintiff-Appellant Antonio Goodwin had those AT&T customer service live-agent text messages as well if anything had been changed by AT&T; and that Plaintiff-Appellant Antonio Goodwin was willing to schedule a Zoom video-recorded conference-call hearing with Stacey Campbell, AT&T, and the United States District Court to call the AT&T 1-800-331-0500 number on Plaintiff-Appellant Antonio Goodwin's employment envelope and prove that he was an AT&T employee from January 2022 onward.

This evidence directly contradicts the February 26, 2024 declaration of Pamela M. Phillips, which stated:

- she conducted an "exhaustive search,"
- and found "no records" of employment.

That declaration identified AT&T Inc. at 208 S. Akard St., Dallas, Texas, which matches the corporate identity in Plaintiff-Appellant Antonio Goodwin's documents.

Pamela M. Phillips's declaration language, as quoted in the filings, was that she had conducted an "exhaustive search of AT&T's employment records" and that there were "no records of Antonio Goodwin ever being employed by AT&T from January 2022 onward."

That declaration is directly contradicted by the:

- envelope,
- employee number,
- password,
- clothing order,

- paystubs,
- W-2 forms,
- 401(k) records,
- training documents,
- employee ID,
- check numbers,
- batch numbers,
- texts,
- emails,
- business bills, and
- corporate records

filed by Plaintiff-Appellant Antonio Goodwin.

This employment proof was not merely relevant to the Rule 11 sanctions issue. It was also central to the merits of the underlying claims involving:

- race discrimination,
- retaliation,
- sexual harassment,
- harassment,
- disparate treatment,
- labor-law violations, and
- unequal access to workplace tools and opportunities.

The EEOC evidence supported this same employment issue. The EEOC investigated the case, the EEOC issued a right-to-sue letter, and Plaintiff-Appellant Antonio Goodwin was informed that AT&T would not have responded to the EEOC matter if Plaintiff-Appellant Antonio Goodwin had not been an employee.

The district court itself acknowledged that whether Plaintiff-Appellant Antonio Goodwin was employed by AT&T and whether Plaintiff-Appellant Antonio Goodwin was discriminated against in the course of employment were issues of sufficient complexity, and that the district court noted

a likelihood of success and the warrant for appointment of counsel.

If the dispositive motion had been timely ruled upon and granted in Mr. Antonio Goodwin's favor in September 2025, that ruling could have controlled the case before the September 25, 2025 in-person deposition dispute ripened into sanctions.

The unresolved dispositive motion was not a side issue. It was the central procedural and substantive issue that should have been decided first.

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

This delay compounded the unfairness. Plaintiff-Appellant Antonio Goodwin faced sanctions proceedings while a dispositive motion that should have been granted in his favor remained unresolved.

II. EMPLOYMENT STATUS / MERITS CLAIMS AGAINST AT&T

Plaintiff-Appellant Antonio Goodwin raised core merits claims that he was an employee of AT&T and that contrary statements made by AT&T and its representatives were false.

Plaintiff-Appellant Antonio Goodwin possessed extensive documentation showing employment with AT&T entities, including employee identifiers, pay-related materials, retirement and 401(k) materials, passwords, internal documents, AT&T envelope documents, clothing-order materials bearing his name and AT&T information, check and batch-number materials, AT&T global password materials, text messages, emails, and more than 1,053 documents supporting his employment status.

Plaintiff-Appellant Antonio Goodwin received an AT&T envelope containing his name, AT&T employee number, AT&T password, and information for his AT&T clothing order. The number 1-800-331-0500 appeared on his AT&T materials, and if the Court or other authorities had called that number or gone to the referenced AT&T website, it would have confirmed that the materials were genuine AT&T documents. The Court failed to properly address that evidence, including ECF Nos. 155 and 156, Exhibit A.

The dispositive motion filed September 10, 2025 and the later supporting materials proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee and that the case should have been resolved in his favor on that issue.

Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.

Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents identifying Antonio Goodwin on AT&T, AT&T Inc., and AT&T Corp. documents as an employee of those entities.

Those documents proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.

AT&T, AT&T Inc., and AT&T Corp. shared the exact same headquarters address of 208 S. Akard St., Dallas, Texas.

This employment evidence was directly connected to the dispositive motion because the dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin's favor based in part on the overwhelming documentary proof of the employment relationship.

This employment evidence was also directly connected to the fairness of the proceedings because the lower courts allowed sanctions proceedings to go forward while Respondents continued disputing Plaintiff-Appellant Antonio Goodwin's employment relationship despite Plaintiff-Appellant Antonio Goodwin's filing of employment-related documents, including the January 17, 2022 envelope, paystubs, W-2 forms, 401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, corporate records, and other materials.

The Court should view the dispositive motion, the employment evidence, and the later sanctions proceedings together because the failure to grant the dispositive motion in Plaintiff-Appellant Antonio Goodwin's favor allowed Respondents to continue advancing positions contrary to the documentary record.

III. FALSE STATEMENTS / MISREPRESENTATION / 18 U.S.C. § 1001 CLAIMS

Plaintiff-Appellant Antonio Goodwin raised claims that AT&T representatives, including Pamela M. Phillips, made false statements under oath concerning his employment status.

Declarations and filings denied there were any records showing he had ever been employed by AT&T, AT&T Inc., or any other AT&T companies. Those statements were contradicted by the employment documents he filed and by the more than 1,053 materials he submitted. Pamela M. Phillips stated under oath that there were no records of his employment after an exhaustive search of AT&T's employment records, and that statement was false.

Plaintiff-Appellant Antonio Goodwin raised references to 18 U.S.C. § 1001 and raised that false statements had been made in a matter connected to federal proceedings. Plaintiff-Appellant Antonio Goodwin raised that the United States Attorney's Office in Baltimore, Maryland told him

to report the matter to the FBI, and that he was instructed by the FBI to contact legal aid if the matter proceeded. Plaintiff-Appellant Antonio Goodwin also raised that he filed complaints or intended to file complaints with the Colorado Supreme Court Office of Attorney Regulation Counsel regarding Stacey Campbell and his law firm, including references to Case No. 25-2430 and Lisa Parce.

False statements and false documentation by AT&T and its representatives affected the integrity and fairness of the litigation and should have been taken seriously rather than ignored.

Pamela M. Phillips's February 26, 2024 declaration identifying AT&T Inc. at 208 S. Akard St., Dallas, Texas, and simultaneously claiming there were no records of Antonio Goodwin ever being employed by AT&T from January 2022 onward, is directly contradicted by the January 17, 2022 AT&T envelope, the employee number, the password, the clothing order, paystubs, W-2 forms, 401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, and corporate records that Plaintiff-Appellant Antonio Goodwin filed.

That declaration was also contradicted by the preserved live-agent text messages saying "this is AT&T," the recorded phone-call message saying "this is AT&T," the AT&T work phone number 1-800-331-0500 printed on his employee material, and the att.com/returns website printed on the envelope material.

These false-statement issues were not peripheral. They were central to the dispositive motion, the employment issue, the merits of the case, and the fairness of every later ruling.

IV. DISCRIMINATION / ADA / DIFFERENTIAL-TREATMENT CLAIMS

Plaintiff-Appellant Antonio Goodwin raised claims that the handling of the deposition dispute and the refusal to grant accommodation amounted to discriminatory treatment against his legally disabled wife and against him as her caregiver.

Plaintiff-Appellant Antonio Goodwin raised that his wife was legally disabled and protected by the Americans with Disabilities Act. Plaintiff-Appellant Antonio Goodwin raised that since at least May 5, 2025, and continuing through January 9, 2026, he repeatedly requested remote-deposition relief and a protective order, but that Magistrate Judge Daniel J. Albregts and Stacey Campbell refused to grant accommodation even though they knew of his wife's life-threatening disabilities, strict caregiving restrictions, and medically documented need for caregiving support.

Plaintiff-Appellant Antonio Goodwin raised that he was treated differently despite presenting overwhelming medical documentation, Medicaid long-term disability approval, Entyre Care

caregiver approval, and a physician letter recommending remote participation. Plaintiff-Appellant Antonio Goodwin also raised broader disability-related materials involving AT&T and argued that disability-accommodation issues involving AT&T were not isolated.

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. 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.

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 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.

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, the remote-deposition issue, and the broader unfairness of allowing sanctions proceedings to move forward while the dispositive motion remained unresolved.

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 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 ENTIRE 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 ENTIRE CARE, MEDICAID, AND LONG TERM DISABILITY TO TAKE CARE OF MY WIFE LIFE THREATENING DISEASES 7 DAYS A WEEK, AS HER CAREGIVER.

Petitioner further states that the treatment schedule and 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.; and
- Entire 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.

Petitioner further states that this evidence strengthened Plaintiff-Appellant Antonio Goodwin's position throughout the case and supported relief in Plaintiff-Appellant Antonio Goodwin's favor before sanctions proceedings were allowed to go forward.

V. DUE PROCESS / BIAS / ABUSE OF DISCRETION / UNJUST RULING CLAIMS

Plaintiff-Appellant raised claims that the proceedings were handled unfairly and in a manner inconsistent with due process.

Those claims included delayed rulings on key motions, failure to timely rule on dispositive motions, failure to timely resolve discovery disputes, unequal treatment favoring the opposing party, arbitrary denial of requested relief, bias or appearance of bias, abuse of discretion in discovery and sanctions decisions, and violations of the Fifth Amendment Due Process Clause.

Plaintiff-Appellant specifically raised that Judge Daniel J. Albregts delayed ruling on the motion to extend discovery and compel deposition until November 25, 2025, close to 90 days after the motion practice began and after the September 25 deposition date had passed.

Plaintiff-Appellant raised that the Court also failed to timely rule on his dispositive motion and his supporting employment evidence. Plaintiff-Appellant raised that such delays and asymmetrical treatment unfairly benefited AT&T and Stacey Campbell while prejudicing him.

Plaintiff-Appellant further raised that sanctions should not be recommended or imposed while dispositive motions remained pending, while no order compelled the deposition at the relevant time, while the deposition occurred after the discovery cutoff, and while critical medical and caregiving evidence supported remote participation.

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 10, 2025, Petitioner filed the dispositive motion.
- 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;
- no order compelling Petitioner's appearance existed on September 25, 2025; and

- Petitioner's dispositive motion filed on September 10, 2025 was already pending.

The September 25, 2025 deposition also occurred after the discovery cutoff date.

The ruling by Judge Daniel J. Albregts came on November 25, 2025, 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.

These facts are especially important because the dispositive motion filed on September 10, 2025 should have been granted in Plaintiff-Appellant Antonio Goodwin's favor before sanctions proceedings were allowed to go forward. Instead, the case moved in the opposite order: the dispositive motion remained unresolved while sanctions were later pursued based on a deposition that had not been compelled by court order and that occurred after the discovery cutoff.

VI. TRANSCRIPT ACCURACY / RECORD INTEGRITY / FRAP 10(e) CLAIMS

Plaintiff-Appellant raised claims that the official transcripts and record did not truly disclose what occurred and omitted or misstated key facts necessary for fair appellate review.

Plaintiff-Appellant raised that the transcripts of the July 28, 2025 and December 30, 2025 hearings omitted or materially misstated medical evidence, caregiving restrictions, treatment schedules, the pending dispositive motion, the absence of any court order compelling attendance on September 25, 2025, the post-cutoff timing of the deposition, and Plaintiff-Appellant's repeated requests for remote accommodation and proper scheduling.

Plaintiff-Appellant raised that the record failed to accurately preserve hearing statements and critical timeline facts, including the difference between motions and court orders, the fact that ECF Nos. 123 and 133 were not orders, and the significance of the November 25, 2025 ruling arriving after the deposition date. Plaintiff-Appellant therefore sought relief under Fed. R. App. P. 10(e) and 28 U.S.C. § 753(b) to correct and settle the record.

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.

The transcripts omit or materially misstate key portions of the proceedings, including:

- Plaintiff-Appellant's dispositive motion filed on September 10, 2025 and the fact that it should have been granted in Plaintiff-Appellant Antonio Goodwin's favor;
- Plaintiff-Appellant Antonio Goodwin's employment relationship with AT&T, AT&T Inc., and AT&T Corp.;
- the January 17, 2022 AT&T envelope containing Plaintiff-Appellant Antonio Goodwin's name, employee number, AT&T password, clothing-order information, att.com/returns, and AT&T phone number 1-800-331-0500;
- the live-agent text messages and recorded phone-call communications stating "this is AT&T";
- Plaintiff-Appellant's request for a remote deposition due to caregiving and medical necessity;
- Plaintiff-Appellant's Entyre Care program restrictions and inability to travel during specific hours;
- medical documentation, physician recommendations, and the severity of Petitioner's wife's life-threatening medical conditions on May 5, 2025;
- whether any court order required Petitioner to appear on September 25, 2025; and
- the procedural timeline relating to Respondents' motion to compel and the Court's ruling, including ECF No. 123 and ECF No. 133.

The transcript deficiencies also include omissions or material misstatements regarding:

- his wife's approval for Medicaid Long Term Disability because of her life-threatening long-term condition;
- Medicaid Long Term Disability 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;
- 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.;
- the fact that those treatments involved three doctors and nurses;
- pain doctor appointments scheduled from approximately 3:00 p.m. to 5:00 p.m.;
- primary doctor appointments scheduled from approximately 3:00 p.m. to 5:00 p.m.; and
- Entyre Care long-term disability in-home nurse visits scheduled for two hours or more.

During the December 30, 2025 sanctions hearing, the record did not fully reflect critical procedural facts:

- 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; and
- a ruling in Plaintiff-Appellant Antonio Goodwin's favor could have materially affected, overpowered, eliminated, or taken the September 25, 2025 in-person deposition out of the equation.

The transcript deficiencies matter because they obscured the central theme of the case: the dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin's favor, Plaintiff-Appellant Antonio Goodwin was an AT&T employee, and the sanctions process moved forward on an incomplete and inaccurate record.

VII. RELATED ADA / PUBLIC IMPORTANCE / PATTERN EVIDENCE CLAIMS

Plaintiff-Appellant also raised claims that disability-accommodation issues involving AT&T were part of a broader pattern and should have been taken seriously in evaluating the case.

Plaintiff-Appellant raised references to prior EEOC disability matters involving AT&T, other disability-accommodation proceedings, broader public importance of remote access and disability accommodation, protection of caregivers in litigation, and fair treatment of disabled persons and their families in court proceedings.

Plaintiff-Appellant raised that he filed materials such as Document 152 listing related proceedings in which AT&T discriminated against individuals with disabilities under the ADA.

Plaintiff-Appellant raised that these materials were relevant because they showed that disability-accommodation disputes involving AT&T were not imaginary or isolated, and that the lower court should have taken his disability-related evidence more seriously.

Petitioner identifies related disability-related proceedings involving AT&T, including:

- EEOC v. AT&T, Case No. 3:11-cv-019-CCC, filed by the EEOC in United States District Court, concerning AT&T's failure to accommodate Miguel Melendez under the Americans with Disabilities Act, as amended by the Americans with Disabilities Act Amendments Act of 2008

(ADAAA);

- a disability-related matter involving a visually impaired employee;
- a disability-discrimination matter involving a weight limit policy;
- a disability-accommodation matter involving a deaf employee;
- a disability-accommodation matter involving an attendance policy;
- a disability-discrimination matter involving insulin-dependent diabetics;
- EEOC v. AT&T (BellSouth) (Weight Discrimination);
- EEOC v. AT&T (Diabetes);
- EEOC v. AT&T (Accommodation) (Leave);
- Kimberly Wall v. AT&T (Return-to-Office);
- Schroeder v. AT&T (Service Dog); and
- AT&T Pacific Bell (Hearing Impairment).

Plaintiff-Appellant 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 Plaintiff-Appellant states that AT&T paid money in a settlement concerning religious bias; and
- an age discrimination matter involving the firing of a 53-year-old sales manager while younger, lower-performing employees remained in similar positions.

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 issues 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 Plaintiff-Appellant Antonio Goodwin differently in a case that involved life-threatening disability conditions, medically necessary caregiving, a request for remote accommodation, and a dispositive motion that should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

VIII. ADDITIONAL OBJECTIONS TO ORDERS 177, 179, 185, 186, 187, 188, AND 189

Plaintiff-Appellant raised objections to later rulings and recommendations, including objections to orders and responses tied to ECF Nos. 177, 179, 185, 186, 187, 188, and 189.

Plaintiff-Appellant raised that ECF No. 189 was unjust because it denied or rejected filings and positions while the dispositive motion remained outstanding and while his evidence on employment status and disability accommodation had not been properly addressed.

Plaintiff-Appellant raised that ECF Nos. 185, 186, and 187 involved notices of appeal and responses related to the district court proceedings and sanctions issues. Plaintiff-Appellant raised that ECF No. 188 involved an emergency motion/protective-order response concerning his wife's disability and long-term disability approval.

Plaintiff-Appellant raised that these later orders and recommendations improperly dismissed or denied filings even though they were tied to unresolved dispositive issues, false-statement concerns, and serious disability-accommodation evidence.

These additional objections matter because they show the prejudice did not end with one order. It continued through a chain of rulings while the dispositive motion remained unresolved and while the employment proof, false-statement issues, and disability-accommodation evidence had not been properly addressed.

IX. RELIEF REQUESTED BELOW

Through the foregoing claims, Plaintiff-Appellant sought relief including a remote deposition, a protective order, denial or reversal of sanctions, timely rulings on pending dispositive motions, recognition of employment evidence, correction and settlement of the record, fair adjudication on the merits, reversal of unjust rulings, and any additional relief the Court deemed proper.

Plaintiff-Appellant's concise filing version also raised claims concerning: denial of disability accommodation; refusal to permit a remote deposition; improper sanctions; lack of any court order compelling attendance on September 25, 2025; post-cutoff discovery; unresolved dispositive motions filed on September 10, 2025; failure to rule on supporting filings including ECF Nos. 155 and 156; and medical necessity supported by the May 2, 2025 emergency medical event and related documentation.

X. CONNECTING THE DOTS: WHY THE DISPOSITIVE MOTION SHOULD HAVE CONTROLLED THE CASE BEFORE SANCTIONS WERE ALLOWED TO PROCEED

The timeline demonstrates a layered breakdown in fairness:

1. Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022

containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns.

2. Plaintiff-Appellant Antonio Goodwin preserved text messages from a live AT&T customer service agent stating "this is AT&T."

3. Plaintiff-Appellant Antonio Goodwin has a video-recorded phone-call message from AT&T stating "this is AT&T" from his employee document.

4. Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded conference call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment.

5. Pamela M. Phillips later declared on February 26, 2024 that she conducted an "exhaustive search of AT&T's employment records" and that there were "no records of Antonio Goodwin ever being employed by AT&T from January 2022 onward."

6. That declaration is contradicted by the envelope, employee number, password, clothing order, paystubs, W-2 forms, 401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, corporate records, and more than 1,053 filed materials.

7. The EEOC investigated Plaintiff-Appellant Antonio Goodwin's case and issued a right-to-sue letter.

8. Plaintiff-Appellant Antonio Goodwin was informed that AT&T would not have responded to the EEOC matter if he had not been an employee.

9. The district court itself acknowledged that whether Plaintiff-Appellant Antonio Goodwin was employed by AT&T and whether he was discriminated against in the course of employment were issues of sufficient complexity, and the district court noted a likelihood of success and the warrant for appointment of counsel.

10. On May 2, 2025, Petitioner's wife experienced emergency medical symptoms, including stroke concerns, severe hypertension, vertigo, and neurological evaluation.

11. Medical procedures were completed to ensure that her life-threatening liver abscess and Crohn's disease complications had not returned.

12. 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.

13. Petitioner's wife was approved by Medicaid Long Term Disability because of her life-threatening long-term condition.

14. Medicaid Long Term Disability approved Mr. Antonio Goodwin as her certified Entyre Care caregiver.
15. The Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute.
16. That treatment occurred at the Cancer Institute in Ashburn, Virginia.
17. 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.
18. Those treatments involved three doctors and nurses.
19. My wife pain doctor appointments were scheduled from approximately 3:00 p.m. to 5:00 p.m., including travel.
20. My wife primary doctors appointments were scheduled from approximately 3:00 p.m. to 5:00 p.m.
21. My wife Entyre Care long term disability in home nurse visit were scheduled for two hours or more.
22. Petitioner was required to provide care seven days a week because of the severity of her condition.
23. 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.
24. On July 28, 2025, Petitioner presented that medical evidence to the Court.
25. On September 3, 2025, Respondents filed ECF No. 123 seeking to extend deadlines and compel deposition.
26. On September 10, 2025, Petitioner filed a dispositive motion.
27. On September 11, 2025, Respondents filed ECF No. 133.
28. On September 25, 2025, Respondents conducted or attempted to enforce the in-person deposition.
29. At that time, there was no court order compelling attendance.
30. The deposition also occurred after the discovery cutoff date.
31. 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.
32. Document 152 identified related disability proceedings involving AT&T under the ADA.

33. Plaintiff-Appellant identified that AT&T had been involved in multiple disability-accommodation and disability-discrimination matters, including EEOC litigation.

34. Plaintiff-Appellant identified that AT&T, AT&T Inc., AT&T Corp., Stacey Campbell, and Pamela M. Phillips denied under oath for years that he was an employee, despite more than 1,053 documents filed by Plaintiff-Appellant reflecting his employment with AT&T entities.

35. On December 30, 2025, sanctions were pursued while the dispositive motion remained unresolved and while the transcripts omitted or misstated the core facts.

These facts are connected.

The dispositive motion filed on September 10, 2025 should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

Plaintiff-Appellant Antonio Goodwin was an AT&T employee.

Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents identifying Antonio Goodwin on AT&T, AT&T Inc., and AT&T Corp. documents.

The January 17, 2022 AT&T envelope, the employee number, the AT&T password, the clothing-order materials, the att.com/returns website, the AT&T phone number 1-800-331-0500, the live-agent text messages saying "this is AT&T," and the recorded phone-call message saying "this is AT&T" were direct proof of genuine AT&T employment records.

The medical evidence showed real and ongoing life-threatening caregiving obligations.

The chemotherapy transfusion treatment, treatment times, three doctors and nurses, pain doctor appointments, primary doctor appointments, and in-home nurse visits showed that the caregiving burden was active and continuous.

The Entyre Care restrictions showed that Plaintiff-Appellant Antonio Goodwin could not simply leave.

The absence of a court order showed that the September 25, 2025 deposition had not yet been compelled.

The post-cutoff timing showed an additional procedural defect.

The transcript omissions made it harder to correct the record.

The related ADA proceedings showed that disability-accommodation issues involving AT&T were part of a broader pattern relevant to the case.

When those facts are connected, they support one central conclusion: the dispositive motion

should have been granted in Plaintiff-Appellant Antonio Goodwin's favor, and the lower courts erred by allowing sanctions proceedings and related adverse actions to continue while that dispositive motion remained unresolved.

REASONS FOR GRANTING THE WRIT

This case presents exceptional questions involving:

- due process;
- dispositive-motion procedure;
- employment-status proof;
- sanctions authority;
- discovery limits;
- medical necessity in civil procedure;
- remote deposition accommodation;
- treatment of certified caregiving obligations;
- disability-accommodation principles;
- false statements in federal proceedings;
- record integrity on appeal; and
- fair adjudication of employment-discrimination claims.

This case is cert-worthy because the lower courts did not merely mishandle a routine scheduling dispute. The lower courts failed to grant a dispositive motion that should have been granted in Plaintiff-Appellant Antonio Goodwin's favor, while allowing sanctions proceedings and related prejudice to continue against Plaintiff-Appellant Antonio Goodwin.

Plaintiff-Appellant was subjected to sanctions even though:

- Plaintiff-Appellant Antonio Goodwin filed a dispositive motion on September 10, 2025 that should have been granted in his favor;
- that dispositive motion proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.;
- Documents 155, 156, Exhibit A, and Document 174 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;

- Plaintiff-Appellant Antonio Goodwin's AT&T employee clothing order proved beyond a reasonable doubt that he was an AT&T employee;
- AT&T phone number 1-800-331-0500 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- the AT&T video voice message stating "this is AT&T" proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- the AT&T live-agent text message stating "this is AT&T" to Mr. Antonio Goodwin proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents bearing his name on AT&T, AT&T Inc., and AT&T Corp. documents;
- Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns;
- a live AT&T customer service agent confirmed in writing "this is AT&T";
- Plaintiff-Appellant Antonio Goodwin preserved those text messages;
- Plaintiff-Appellant Antonio Goodwin has a video-recorded phone-call message from AT&T stating "this is AT&T";
- Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment;
- Pamela M. Phillips declared after an "exhaustive search" that there were "no records" of employment, even though the record showed the opposite;
- AT&T, AT&T Inc., and AT&T Corp. shared the same headquarters address of 208 S. Akard St., Dallas, Texas;
- the EEOC investigated the matter and issued a right-to-sue letter;
- Plaintiff-Appellant Antonio Goodwin was informed that AT&T would not have responded to the EEOC matter if he had not been an employee;
- the district court itself acknowledged the complexity of the employment issue and the likelihood of success sufficient to warrant appointment of counsel;
- a ruling granting the dispositive motion in Plaintiff-Appellant Antonio Goodwin's favor could have overpowered, eliminated, or taken the September 25, 2025 in-person deposition out of the

equation;

- 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;
- 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; and
- the official transcripts of the July 28, 2025 and December 30, 2025 hearings omitted or materially misstated critical evidence.

If a dispositive motion supported by employment evidence, timing evidence, medical evidence, EEOC evidence, and record-integrity concerns may be left unresolved while sanctions proceedings go forward, then due process protections, discovery protections, accommodation

protections, false-statement protections, and record-integrity protections are seriously weakened.

I. The Dispositive Motion Should Have Been Granted in Plaintiff-Appellant Antonio Goodwin's Favor

The dispositive motion filed on September 10, 2025 should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

That motion was central, controlling, and dispositive.

It was not collateral to the sanctions dispute. It bore directly on the posture of the case, the employment issue, the merits of Plaintiff-Appellant Antonio Goodwin's claims, the fairness of continuing proceedings against Plaintiff-Appellant Antonio Goodwin, and whether the September 25, 2025 deposition should have remained in issue at all.

A ruling in Plaintiff-Appellant Antonio Goodwin's favor could have materially affected, overpowered, eliminated, or taken the September 25, 2025 in-person deposition out of the equation.

Proceeding with sanctions before resolving that dispositive motion distorted the procedural posture of the case.

II. Plaintiff-Appellant Antonio Goodwin Raised Substantial Employment Proof Against AT&T

Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.

Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents identifying Antonio Goodwin on AT&T materials.

Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns.

A live AT&T customer service agent confirmed in writing "this is AT&T," Plaintiff-Appellant Antonio Goodwin preserved those text messages, Plaintiff-Appellant Antonio Goodwin has a recorded message stating "this is AT&T," and Plaintiff-Appellant Antonio Goodwin offered a live Zoom verification call using the same phone number.

Pamela M. Phillips's declaration claiming "no records" after an "exhaustive search" was contradicted by the envelope, employee number, password, clothing order, paystubs, W-2 forms, 401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, and corporate records.

This employment evidence strengthened the dispositive motion and was part of the reason that the dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

III. The Sanctions Process Improperly Moved Forward While the Dispositive Motion Remained Unresolved

Plaintiff-Appellant Antonio Goodwin's dispositive motion remained pending through the December 30, 2025 sanctions hearing.

At the same time:

- no court order compelled attendance on September 25, 2025;
- the deposition occurred after the discovery cutoff;
- the medical evidence supported remote participation;
- the employment evidence supported Plaintiff-Appellant Antonio Goodwin's position; and
- false-statement issues concerning the employment record remained unresolved.

Allowing sanctions proceedings to move forward under those circumstances was fundamentally unfair.

IV. The Medical and Caregiving Evidence Reinforced Why Relief Should Have Been Granted in Plaintiff-Appellant Antonio Goodwin's Favor

The May 2, 2025 emergency event, the May 5, 2025 doctor's letter, the Medicaid Long Term Disability approval, the Entyre Care caregiver approval, the Chemotherapy Transfusion Treatment at the Cancer Institute, the treatment times, the three doctors and nurses, the pain doctor appointments, the primary doctor appointments, and the in-home nurse visits all showed that Plaintiff-Appellant Antonio Goodwin's circumstances were medically serious, documented, and ongoing.

That evidence supported the request for remote participation and further demonstrated the unfairness of allowing sanctions proceedings to go forward while the dispositive motion remained unresolved.

V. The Official Transcripts Omit or Materially Misstate the Facts Needed for Fair Review of the Dispositive Motion and the Sanctions Proceedings

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

- the dispositive motion filed on September 10, 2025;

- the fact that the dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin's favor;
- the employment evidence showing that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.;
- the January 17, 2022 AT&T envelope evidence and communications stating "this is AT&T";
- the medical evidence;
- the timing of ECF No. 123 and ECF No. 133;
- the absence of a court order on September 25, 2025;
- the post-cutoff timing of the deposition; and
- the broader context of the sanctions proceedings.

Where a case turns on dispositive-motion timing, employment proof, medical necessity, false-statement concerns, and sanctions fairness, an incomplete transcript undermines meaningful review.

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

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

- fail to grant a dispositive motion that should have been granted in a plaintiff's favor;
- allow sanctions proceedings to move forward while that dispositive motion remains unresolved;
- disregard documentary proof of an employment relationship;
- disregard preserved live verification evidence tied to an employer's own phone number and website;
- ignore false-statement concerns involving declarations about employment records;
- 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; 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, the central error in this case is that the dispositive motion filed on September 10, 2025 should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

The evidence connected to that dispositive motion was substantial and interlocking.

Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.

Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents identifying Antonio Goodwin on AT&T, AT&T Inc., and AT&T Corp. documents.

Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns.

A live AT&T customer service agent confirmed in writing "this is AT&T," Plaintiff-Appellant Antonio Goodwin preserved those text messages, Plaintiff-Appellant Antonio Goodwin has a video-recorded phone-call message from AT&T stating "this is AT&T," and Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment.

Pamela M. Phillips declared on February 26, 2024 that she had conducted an "exhaustive search of AT&T's employment records" and that there were "no records of Antonio Goodwin ever being employed by AT&T from January 2022 onward," even though that declaration was directly contradicted by the envelope, employee number, password, clothing order, paystubs, W-2 forms, 401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, and corporate records that he filed.

That declaration identified AT&T Inc. at 208 S. Akard St., Dallas, Texas, which matched the corporate identity in Plaintiff-Appellant Antonio Goodwin's documents.

This employment proof was central not merely to sanctions, but to the merits of the underlying claims involving race discrimination, retaliation, sexual harassment, harassment, disparate treatment, labor-law violations, and unequal access to workplace tools and opportunities.

The EEOC investigated the case, issued a right-to-sue letter, and Plaintiff-Appellant Antonio Goodwin was informed AT&T would not have responded to the EEOC matter if he had not been an employee.

The district court itself acknowledged that whether Plaintiff-Appellant Antonio Goodwin was employed by AT&T and whether he was discriminated against in the course of employment were issues of sufficient complexity, and that the district court noted a likelihood of success and the warrant for appointment of counsel.

At the same time, Plaintiff-Appellant Antonio Goodwin presented extensive medical and caregiving evidence, including the May 2, 2025 emergency medical events, the May 5, 2025 physician letter from Dr. Suman Manchireddy, M.D., Medicaid Long Term Disability approval for Petitioner's wife's life-threatening long-term condition, Medicaid approval of Mr. Antonio Goodwin as his wife's certified Entyre Care caregiver, Entyre Care restrictions, Chemotherapy Transfusion Treatment at the Cancer Institute, treatment times, three doctors and nurses, pain doctor appointments, primary doctor appointments, and in-home nurse visits.

The record further showed that the September 25, 2025 in-person deposition occurred after the discovery cutoff and before any court order compelled attendance, because 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.

The record further showed that sanctions were pursued on December 30, 2025 while the dispositive motion remained unresolved for approximately 130 days.

The record further showed that the official transcripts of the July 28, 2025 and December 30, 2025 hearings materially omitted or misstated critical evidence concerning the dispositive motion, the employment relationship, the January 17, 2022 AT&T envelope and communications stating "this is AT&T," the medical necessity, the remote-deposition request, the absence of a court order, the post-cutoff timing of the deposition, and the broader fairness issues presented.

When these facts are connected, they support relief in Plaintiff-Appellant Antonio Goodwin's favor.

Petitioner therefore 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.

INDEX TO APPENDICES

Appendix A — Ninth Circuit Order / Opinion

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

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

Appendix D — January 17, 2022 AT&T envelope, att.com/returns materials, AT&T phone number 1-800-331-0500 materials, AT&T employee clothing-order materials, text messages stating “this is AT&T,” recorded phone-call message stating “this is AT&T,” Documents 155 and 156 including Exhibit A, Document 174, Document 199, and related employment-status proof

Appendix E — 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 F — 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; 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

Appendix G — Document 152, related proceedings materials, Document 198-2 pages 13-15 of 31, materials concerning EEOC and disability-related proceedings involving AT&T under the ADA, and objections tied to ECF Nos. 177, 179, 185, 186, 187, 188, and 189

TABLE OF AUTHORITIES CITED

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EEOC v. AT&T, Case No. 3:11-cv-019-CCC	49-53
Kimberly Wall v. AT&T	51
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STATUTES AND RULES

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PROOF OF SERVICE

I, Antonio Goodwin, do swear or declare that on this date, _____, 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

Thank You

Antonio Goodwin

21021 Sycolin Rd

Ashburn VA 20147