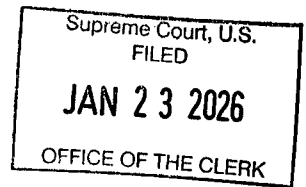


25-7626  
No. \_\_\_\_\_

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES



IN RE DEVIN RANDOLPH,

Petitioner.

**PETITION FOR AN EXTRAORDINARY WRIT OF MANDAMUS**

Directed to the United States District Court

for the Southern District of Ohio

Case No. 2:25-cv-284

Devin Randolph

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Gahanna, Ohio 43230

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Pro Se Petitioner

## QUESTION PRESENTED

Whether extraordinary relief in the nature of mandamus is warranted to require the United States District Court for the Southern District of Ohio to properly identify the operative complaint, clarify the defendants properly included in the action, address representation and service defects involving Bath & Body Works, Inc. and Vorys, address default/default-related relief, answer the structural-relief questions presented in Exhibit A and address all requested relief in Exhibit A, provide emergency stay or pause relief if necessary, establish meaningful medical-accommodation and protected medical-proof procedures, correct the Rule 26(f) record and discovery posture, stabilize proceedings after the lower court refused meaningful correction, and reassign or transfer the case to a neutral judge and region, including the Southern District of New York if necessary to restore public confidence and meaningful access to court.

## **LIST OF PARTIES**

### **Petitioner:**

Devin Jamil Randolph - Plaintiff / Petitioner, proceeding pro se.

### **Respondents / Parties in the Lower-Court Proceeding and Proposed ECF No. 52-1:**

#### **1. Bath & Body Works, Inc.**

Respondent / Defendant. Known public stock ticker symbol: BBWI.

#### **2. Victoria's Secret & Co.**

Respondent / Defendant listed in proposed ECF No. 52-1. Known public stock ticker symbol: VSCO.

#### **3. Premise Health Holding Corp., doing business as L Brands Wellness Center / Premise Occupational Health Services**

Respondent / Defendant listed in proposed ECF No. 52-1. Petitioner lists Premise Health because proposed ECF No. 52-1 alleges that Premise Health was involved in occupational-health treatment, medical-record handling, PHI issues, workers' compensation documentation, and employment-status issues connected to the same lower-court proceeding. No known public stock ticker symbol.

#### **4. Vorys, Sater, Seymour & Pease LLP**

Respondent / Defendant listed in proposed ECF No. 52-1. Petitioner also identifies Vorys because Vorys appeared in the lower-court proceeding and instructed Petitioner not to communicate directly with Bath & Body Works, Inc., but Vorys is also listed as a co-defendant in proposed ECF No. 52-1. Petitioner respectfully submits that this creates a service, representation, and notice issue requiring clarification. No known public stock ticker symbol.

#### **5. Dilip Gokhale, Director of the EEOC Cleveland Field Office, in his individual capacity**

Respondent / Defendant listed in proposed ECF No. 52-1 in his individual capacity only. No known public stock ticker symbol.

**6. John/Jane Does 1-10**

Respondents / Defendants listed in proposed ECF No. 52-1. Their identities are presently unknown and were preserved in the proposed pleading for later identification if permitted. No known public stock ticker symbol.

## **RELATED CASES**

Randolph v. Bath & Body Works, Inc., Case No. 2:25-cv-284, United States District Court for the Southern District of Ohio.

Related appellate or emergency filings arise from the same district-court case, the same disputed procedural posture, and the same medical-accommodation, service, operative-complaint, and access-to-court issues.

## TABLE OF CONTENTS

|                                                                                                  |    |
|--------------------------------------------------------------------------------------------------|----|
| Motion for Leave to Proceed In Forma Pauperis .....                                              | 6  |
| Affidavit or Declaration in Support of Motion for Leave to Proceed<br>In Forma Pauperis .....    | 7  |
| Petition for an Extraordinary Writ of Mandamus (Cover Page) .....                                | 14 |
| Question Presented .....                                                                         | 15 |
| List of Parties .....                                                                            | 16 |
| Related Cases .....                                                                              | 18 |
| Table of Contents .....                                                                          | 19 |
| Index of Appendices .....                                                                        | 20 |
| Table of Authorities .....                                                                       | 21 |
| Opinions Below .....                                                                             | 23 |
| Jurisdiction and Rule 20 Basis .....                                                             | 24 |
| Constitutional, Statutory, and Rule Provisions Involved .....                                    | 25 |
| Statement of the Case and Procedural Posture .....                                               | 26 |
| Reasons for Granting Extraordinary Relief .....                                                  | 29 |
| Service, Operative-Complaint, Representation, Default,<br>and Party-Identity Clarification ..... | 32 |
| Relief Requested .....                                                                           | 34 |
| Request for Preservation of Patent-Related Federal Review Issues .....                           | 36 |
| Conclusion .....                                                                                 | 37 |
| Proof of Service .....                                                                           | 38 |
| NOT PART OF PETITION:                                                                            |    |
| - Transmittal Letter to Clerk                                                                    |    |
| - Clerk and Petitioner Checklist                                                                 |    |

## INDEX OF APPENDICES

Exhibit A – Rule 22/23 Emergency Application Materials  
Referenced as background support only.

**Exhibit A consists of the Rule 22/23 emergency application materials and the supporting appendices identified below.**

Appendix A – Lower-Court Orders, Docket Entries, and Procedural Materials in Respect of Which the Writ Is Sought, Including Docket and Procedural Records and Appendix A-5 / Docket 21

Appendix B – Medical Documentation and Medical-Accommodation Materials

Appendix C – Judicial Status, Reassignment, and Appearance Records

Appendix D – Consolidated Stabilization Packet and Stabilization / Clarification Materials Submitted in the Lower Court

Appendix E – Oversight, Review, and Administrative Materials

Appendix F – Administrative Record / PACER Access Statement

Appendix G – Notices and Preservation Sections Concerning John/Jane Doe Allegations, Wexner-Related Issues, and Judicial-Appeal Concerns

Appendix H – Defense-Side References to Multiple Bath & Body Works-Related Entities

Appendix I – Bath & Body Works Statement Indicating the Full Doctor's Note Was Not Reviewed

Appendix J – Disputed Rule 26(f) Statement, Objections, and Adoption of Defense-Side Procedural Narrative

Appendix K – Vorys Representation Concerning EEOC Agreement Excluding Petitioner and Disputed EEOC Settlement Notice

Appendix L – Email Regarding Ohio Tax Credit Activity, Employment Baseline Increase, and Bath & Body Works-Related Entities

Appendix M – Original Complaint, Amended Complaint Filing Record, and Clarification Regarding Amended Complaint

Appendix N – Proposed Second Amended Complaint Materials, Including Proposed ECF No. 52-1

Appendix O – Additional Documents Previously Submitted or Retained

## TABLE OF AUTHORITIES

### Cases

Bounds v. Smith, 430 U.S. 817 (1977)

Lewis v. Casey, 518 U.S. 343 (1996)

Liteky v. United States, 510 U.S. 540 (1994)

Tennessee v. Lane, 541 U.S. 509 (2004)

United States v. Petlechkov, 72 F.4th 699 (6th Cir. 2023)

### Statutes

28 U.S.C. § 1254(1)

28 U.S.C. § 137

28 U.S.C. § 455

28 U.S.C. § 1367

28 U.S.C. § 1651(a)

28 U.S.C. § 2101(e)

42 U.S.C. § 12101 et seq.

42 U.S.C. § 12203

42 U.S.C. § 2000e et seq.

29 U.S.C. § 2615

### Rules

Supreme Court Rule 9.1

Supreme Court Rule 12.6

Supreme Court Rule 14.1

Supreme Court Rule 20

Supreme Court Rule 22

Supreme Court Rule 23

Supreme Court Rule 29

Supreme Court Rule 33.2

Supreme Court Rule 34.1(e)

Supreme Court Rule 39

Federal Rule of Civil Procedure 4

Federal Rule of Civil Procedure 15

Federal Rule of Civil Procedure 26(f)

Federal Rule of Civil Procedure 55

Federal Rule of Civil Procedure 69

28 U.S.C. § 1404(a)

## OPINIONS BELOW

The lower-court orders and docket entries relevant to this petition appear in the appendices previously submitted or retained by the Clerk's Office, including orders and entries concerning screening, amendment, filing restrictions, reassignment, scheduling, Rule 26(f), and discovery-related proceedings in *Randolph v. Bath & Body Works, Inc.*, Case No. 2:25-cv-284, United States District Court for the Southern District of Ohio.

Petitioner respectfully identifies the relevant lower-court materials as including, among others: (1) the initial screening order allowing only the ADA retaliation claim to proceed; (2) orders and docket entries concerning amendment or attempted amendment of the complaint; (3) orders or entries affecting the operative complaint and the proposed Second Amended Complaint, including proposed ECF No. 52-1; (4) orders and entries concerning filing restrictions and limitations on Petitioner's ability to submit medical or clarification materials; (5) entries concerning reassignment or referral from Magistrate Judge Elizabeth A. Preston Deavers to Magistrate Judge S. Courter M. Shimeall; (6) Rule 26(f), scheduling, discovery, response-obligation, and procedural-posture entries; and (7) any orders or docket entries refusing, delaying, or failing to clarify the threshold issues identified in this petition.

Petitioner respectfully submits that the opinions and orders below are unpublished docket orders and entries from the United States District Court for the Southern District of Ohio and appear in the appendix materials already submitted or retained, or in the docket for Case No. 2:25-cv-284.

## **JURISDICTION AND RULE 20 BASIS**

Petitioner respectfully invokes Supreme Court Rule 20 and 28 U.S.C. § 1651(a), to the extent the Court determines that extraordinary relief in the nature of mandamus is necessary or appropriate in aid of the Court's appellate jurisdiction.

Rule 20 provides that issuance of an extraordinary writ is not a matter of right, but of discretion sparingly exercised. Petitioner respectfully submits that the present case involves exceptional circumstances because the lower-court proceeding is moving forward while threshold duties remain unresolved, including the duty to properly identify the operative complaint, clarify the defendant list, address service and representation defects, and provide meaningful accommodation before discovery and adverse consequences continue.

Petitioner also preserves, in the alternative and as background only, related review principles under 28 U.S.C. § 1254(1), 28 U.S.C. § 2101(e), Supreme Court Rule 22, and Supreme Court Rule 23, to the extent the Court determines that the procedural posture should be treated as emergency interim relief or referral from the Circuit Justice rather than, or in addition to, extraordinary writ relief. This filing is submitted as one corrected Rule 20 mandamus petition.

Petitioner does not ask this Court to decide the employment merits in the first instance. Petitioner asks that the lower court be directed to perform the threshold procedural acts required before the case can proceed: properly identify the operative complaint, clarify the defendants and counsel authorized to appear, address the Vorys/Bath & Body Works representation issue, address default and default-related consequences if legally required, consider the relief requested in Exhibit A, and restore a neutral forum and lawful sequencing.

## CONSTITUTIONAL, STATUTORY, AND RULE PROVISIONS INVOLVED

1. The Due Process Clause of the Fifth Amendment and the due-process principles applicable to fair judicial access and meaningful opportunity to be heard.
2. 28 U.S.C. § 1651(a), authorizing writs necessary or appropriate in aid of the Court's jurisdiction.
3. 28 U.S.C. § 1254(1), concerning Supreme Court review of cases from the courts of appeals.
4. 28 U.S.C. § 2101(e), concerning review before judgment in appropriate circumstances.
5. Supreme Court Rule 20, governing extraordinary writs.
6. Supreme Court Rule 14.1, concerning required petition content, including questions presented, list of parties, and opinions below.
7. Supreme Court Rule 29, concerning service.
8. Supreme Court Rule 39, concerning in forma pauperis proceedings.
9. Federal Rule of Civil Procedure 4, concerning service of summons and complaint.
10. Federal Rule of Civil Procedure 15, concerning amended pleadings and the operative pleading.
11. Federal Rule of Civil Procedure 26(f), concerning discovery planning and scheduling.
12. Federal Rule of Civil Procedure 55, concerning default and default judgment, and Federal Rule of Civil Procedure 69, concerning execution on a judgment, to the extent default-related or collection-related relief becomes legally available after the operative complaint and proper defendant list are identified.

## STATEMENT OF THE CASE AND PROCEDURAL POSTURE

Petitioner is a pro se litigant in *Randolph v. Bath & Body Works, Inc.*, Case No. 2:25-cv-284, in the United States District Court for the Southern District of Ohio. Petitioner alleges that more than 365 days have passed while threshold issues concerning service, proper identification of the operative complaint, amendment, appearance, employer identity, Rule 26(f), filing restrictions, medical accommodation, default consequences, and access to court remain disputed or unresolved.

Petitioner alleges that the court of appeals declined mandamus relief on the understanding that the district court could address procedural issues first. Petitioner further alleges that the district court later continued the case without correcting threshold procedures necessary before discovery, scheduling, and adverse consequences continued.

Petitioner relies on Docket 21 as part of the threshold-sequencing problem. Petitioner alleges that the lower court refused to expedite amendment/screening issues, temporarily stayed Defendant's response obligation, stated amendment issues would be considered later, and then permitted scheduling activity while complaint-selection, service, amendment, and response-obligation issues remained disputed.

Petitioner also relies upon ECF No. 69, the January 13, 2026 Opinion and Order. Petitioner alleges that ECF No. 69 struck attempted amendment materials, including proposed ECF No. 52-1, imposed filing restrictions requiring prior permission before additional materials could be docketed, and prevented preservation of materials Petitioner intended to use for discovery and record development. Petitioner further alleges that he possessed physician-supported medical documentation and accommodation evidence, but meaningful submission and consideration of that material was not permitted before litigation obligations continued. Petitioner respectfully requests that the Court refer to Exhibit A and the medical appendices for the fuller record concerning ECF No. 69, medical-stay and rest requests, protected medical proof, discovery-related evidence, and the resulting inability to obtain meaningful medical-accommodation review.

Petitioner also relies on ECF No. 79 and ECF No. 80. Petitioner alleges that ECF No. 79 notified the court that the statement that Petitioner did not respond in any way was inaccurate, that no Rule 26(f) meeting occurred, and that Defendant's unilateral schedule used Petitioner's submitted materials while giving Bath & Body Works more time and procedural advantage. ECF No. 80 reassigned referred matters, but Petitioner alleges that reassignment did not cure the inaccurate record, medical-accommodation problem, Rule 26(f) defects, amendment issues, service issues, or judicial-appearance concerns.

Petitioner further alleges that the reassignment reflected in ECF No. 80 followed significant concerns regarding the handling of the record, accommodation requests, procedural representations, and judicial neutrality. Petitioner contends that he submitted objections, accommodation-related concerns, and procedural objections to the court, and that portions of the resulting record inaccurately reflected his participation and positions. Although reassignment later occurred, Petitioner respectfully submits that reassignment did not resolve the consequences of those alleged inaccuracies or the underlying procedural issues that remained disputed.

Petitioner further asks the Court to consider a question central to the accommodation issues preserved in Appendix I: how can an employer meaningfully evaluate, consider, or provide an accommodation when the employer earlier acknowledged in writing that the full doctor's note was not reviewed? Petitioner contends that this issue is similar to the concerns raised regarding the Southern District of Ohio and the regional appellate handling because, in Petitioner's view, the medical note was not meaningfully reviewed and, in Petitioner's view, was not reviewed at all in the Southern District of Ohio or in the regional appellate proceedings. Petitioner alleges that, just as the court record did not meaningfully address the medical proof, the employer also failed to fully review the doctor's note when it had the opportunity to do so before the alleged wrongful termination. Medical-accommodation review remains urgent. Doctors are now recommending surgery involving Petitioner's dominant wrist,

while other injuries from the red-light car accident remain under evaluation. Petitioner submits this supports stay/pause relief and protected medical-proof review before further adverse litigation obligations continue.

**Layered clarification required by the Clerk's party-list correction:**

The original complaint filed in the lower court named Bath & Body Works, Inc.; Vorys, Sater, Seymour & Pease LLP; the U.S. Equal Employment Opportunity Commission Cleveland Branch; and Spitz, The Employee's Law Firm. Petitioner later sought to amend and clarify the claims and parties as additional records and contradictions emerged.

The proposed Second Amended Complaint, ECF No. 52-1, listed additional parties and clarified allegations involving Bath & Body Works, Inc.; Victoria's Secret & Co.; Premise Health Holding Corp. d/b/a LBrands Wellness Center / Premise Occupational Health Services; Vorys, Sater, Seymour & Pease LLP; Dilip Gokhale, Director of the EEOC Cleveland Field Office, in his individual capacity; and John/Jane Does 1-10.

Petitioner alleges that the lower court did not properly identify which complaint controls. This is critical because the operative complaint determines which parties must be served, what claims are active, which defendants must respond, whether Rule 55 default can be evaluated, and which counsel or party may receive notice.

Petitioner further alleges that service and representation became especially unclear because Vorys, Sater, Seymour & Pease LLP instructed Petitioner not to communicate directly with Bath & Body Works, Inc., and to communicate through Vorys instead. But Vorys is also listed as a proposed co-defendant in ECF No. 52-1. Petitioner respectfully submits that this creates a representation, service, notice, and default-sequencing problem because Vorys may be treated as counsel for Bath & Body Works in one posture while also being a respondent or defendant in another posture.

## **REASONS FOR GRANTING EXTRAORDINARY RELIEF**

### **I. The writ would be in aid of this Court's appellate jurisdiction.**

Petitioner respectfully submits that the present case is moving forward in a posture that may prevent meaningful later review. If discovery, sanctions, dismissal, default consequences, or adverse procedural consequences occur before threshold issues are clarified, later appellate review may not adequately restore medical access, correct the record, resolve representation defects, or undo the prejudice caused by proceeding under a disputed operative pleading and schedule.

### **II. Exceptional circumstances exist because the ordinary corrective path has allegedly failed.**

Petitioner sought clarification and correction in the district court, sought judicial review, and pursued appellate mandamus relief. Petitioner alleges that each path left the same core problem unresolved: the district court continued from a disputed procedural posture rather than resetting the case to lawful threshold sequencing. Exhibit A explains the medical, procedural, and constitutional context in detail.

### **III. Adequate relief cannot be obtained in another court because the court of appeals deferred to the district court, and the district court did not provide the requested correction.**

Petitioner respectfully submits that mandamus is sought to require lawful threshold action: proper identification of the operative complaint, a clear defendant list, representation and service clarification, protected medical-proof procedures, and correction of the Rule 26(f) and discovery posture before ordinary litigation or adverse consequences continue.

### **IV. The operative complaint, service, representation, and default issues must be clarified before further proceedings.**

A central issue is which complaint controls the case. Petitioner alleges that the original complaint was screened, but later amendment filings, proposed ECF No. 52-1, filing restrictions, reassignment, and procedural orders created uncertainty over whether the original complaint, an amended complaint, or

the proposed Second Amended Complaint controls. This matters because service, response obligations, representation status, and any request for entry of default or default judgment depend on the operative complaint and the defendants properly included therein.

**V. Bath & Body Works and Vorys default/default-related relief should be addressed after the operative complaint and representation problem are corrected.**

Petitioner respectfully requests that this Court enter, or direct the lower court to enter or determine, default and default-related consequences against Bath & Body Works, Inc. and Vorys, Sater, Seymour & Pease LLP if the Court determines that they were properly included, properly served, lacked proper representation, failed to plead or otherwise defend, or proceeded through counsel in a manner inconsistent with the operative pleading and co-defendant posture. Petitioner also preserves default-judgment and collection-related relief to the extent legally available after Rule 55 and Rule 69 prerequisites are satisfied.

**VI. The medical-accommodation and due-process issues require action on all emergency-application relief.**

Petitioner alleges that medical proof, including a doctor's note and related documentation, was not meaningfully considered before the case was pushed forward under ordinary litigation demands. Petitioner further alleges that ECF No. 69 and related filing restrictions limited his ability to docket protected medical proof, request rest/stay relief, and correct the record, while Defendant received additional time and the benefit of materials Petitioner submitted for court review. Petitioner asks that this Court address the structural-relief questions presented in the emergency application materials referenced as Exhibit A and address all requested relief in Exhibit A, including emergency stay or pause relief, medical-accommodation procedures, protected submission of medical proof, correction of the Rule 26(f) record, correction of record conflicts, and stabilization of proceedings because the lower court allegedly refused meaningful correction before discovery continued.

**VII. Reassignment or transfer to a neutral judge and region, including New York, is warranted if neutral adjudication cannot be restored.**

Petitioner respectfully requests reassignment to a new judge and transfer outside the present Ohio/Sixth Circuit regional environment, including to the Southern District of New York if the Court determines that a neutral, rule-based forum is necessary. Petitioner seeks New York because the alleged procedural conflict involves Ohio-based district-court handling, Ohio entities, Ohio administrative actors, local counsel, disputed reassignment history after a magistrate's inaccurate record handling, Bath & Body Works/LBrands-related local identity issues, and orders that on paper gave Bath & Body Works additional time or procedural advantage while Petitioner's medical proof and objections remained unresolved. Petitioner does not seek a preferred merits forum, but a neutral forum capable of addressing the threshold issues without local entanglement, prejudgment, or appearance concerns.

VIII. The requested mandamus relief does not ask this Court to decide the employment merits in the first instance.

**SERVICE, OPERATIVE-COMPLAINT, REPRESENTATION, DEFAULT, AND PARTY-  
IDENTITY CLARIFICATION**

Petitioner respectfully includes this section because service, notice, representation, default, and party identity are themselves part of the procedural problem supporting mandamus.

Petitioner does not refuse service and seeks to comply in good faith. However, Petitioner respectfully submits that service and notice obligations cannot be accurately determined until the lower court properly identifies the operative complaint and the defendants properly included in the action.

Under Federal Rules of Civil Procedure 4 and 15, service and response obligations depend upon the operative pleading and the parties properly included in that pleading. Under Rule 55, default-related relief likewise depends on whether a properly included party failed to plead or otherwise defend after proper service and after the governing pleading is identified.

The complaint originally approved for screening and service was later affected by subsequent orders, amendment attempts, reassignment, filing restrictions, and unresolved proposed pleadings. Proposed ECF No. 52-1 added or clarified parties and claims, including Premise Health, Victoria's Secret & Co., Vorys, and Dilip Gokhale, but the lower court did not clearly establish whether proposed ECF No. 52-1 was the operative complaint before the case proceeded on scheduling, discovery, service, response obligations, or adverse consequences.

Petitioner respectfully submits that this Court should require the lower court to properly identify the operative complaint before further proceedings continue, because the selected operative complaint determines which parties are defendants, which claims are active, which defendants must respond, whether Bath & Body Works and Vorys are subject to default/default judgment analysis, and which counsel or representatives may receive notice or service.

This issue is especially important as to Bath & Body Works, Inc. Petitioner has previously explained that there were conflicting entity references involving Bath & Body Works and related entities, including whether the correct employer or corporate defendant was Bath & Body Works, Inc., another Bath & Body Works-related entity, or an entity connected to the former LBrands / Victoria's Secret / Premise Health structure.

Vorys, Sater, Seymour & Pease LLP instructed Petitioner not to communicate directly with Bath & Body Works, Inc., and to communicate through Vorys. However, Vorys is also listed as a proposed co-defendant in ECF No. 52-1. Petitioner respectfully submits that this creates a service, notice, representation, and default uncertainty because Vorys may be treated as counsel for Bath & Body Works in one posture while also being a proposed respondent or defendant in another posture.

Accordingly, Petitioner preserves the position that service obligations, response obligations, and default/default-judgment issues relating to Bath & Body Works, Inc., Vorys, Victoria's Secret & Co., Premise Health Holding Corp. d/b/a LBrands Wellness Center / Premise Occupational Health Services, Dilip Gokhale, and John/Jane Does 1-10 cannot be accurately determined until the lower court first properly identifies the operative complaint and the parties properly included therein.

Petitioner includes this clarification not to avoid service, but to show why threshold clarification must occur before adverse consequences are imposed. Petitioner respectfully requests that this Court require the lower court to properly identify the operative complaint, clarify the defendants properly included in the action, address the Vorys/Bath & Body Works representation problem, address Rule 55 default/default-judgment issues, and restore the legally required sequence before service, response obligations, discovery, sanctions, dismissal, collections, or merits-related proceedings continue.

## RELIEF REQUESTED

Petitioner respectfully requests that the Court issue an extraordinary writ of mandamus, or other appropriate extraordinary relief, directing the Southern District of Ohio to properly identify the operative complaint and resolve the threshold procedural, representation, default, service, and medical-accommodation issues identified in this petition and Exhibit A in proper sequence.

At minimum, Petitioner requests that the Court require the lower court to: (1) properly identify the operative complaint and defendants properly included therein; (2) determine whether proposed ECF No. 52-1 must be treated as operative, considered, or otherwise corrected; (3) clarify service and appearance status; (4) clarify proper party identity; (5) resolve the Bath & Body Works / Vorys / Victoria's Secret / Premise Health service and representation issue; (6) address whether Bath & Body Works, Inc. and Vorys should be placed into default, default judgment, default-related collections, or other appropriate consequences if Rule 55 and Rule 69 prerequisites are met; (7) address Rule 26(f) compliance; (8) provide medical-accommodation procedures, including protected submission of medical proof; and (9) determine whether discovery may proceed only after those threshold issues are resolved.

Petitioner further requests that this Court address the structural-relief questions presented in the Rule 22/23 emergency application materials referenced as Exhibit A and address all requested relief in Exhibit A. That requested relief includes, at minimum: emergency stay or pause relief; medical-accommodation procedures; protected submission of private medical proof; correction of the Rule 26(f) record and Defendant's unilateral discovery schedule; correction of record conflicts; discovery stabilization; amendment and operative-complaint review; judicial-appearance concerns; service and notice clarification; preservation of federal review issues; and any other stabilization relief necessary because the lower court allegedly refused to provide meaningful correction before proceedings continued.

Petitioner requests that this Court enter, or direct entry of, default/default-related relief against Bath & Body Works, Inc. and Vorys, Sater, Seymour & Pease LLP if this Court determines the record permits such relief; or, in the alternative, direct the lower court to decide default/default-judgment and collection-related issues after the operative complaint, representation status, and proper defendant list are identified.

Petitioner also requests reassignment to a new judge and transfer to a neutral region if this Court determines that neutral adjudication cannot be restored within the current district or region. Petitioner specifically requests transfer to the Southern District of New York, or another neutral out-of-region district, because the dispute involves Ohio-based court handling, Ohio entities and officials, local counsel, Bath & Body Works/LBrands-related identity issues, and appearance-of-neutrality concerns. Petitioner seeks a neutral, rule-based forum capable of addressing the threshold issues without local entanglement or prejudgment.

Petitioner does not ask this Court to decide employment liability, damages, patent ownership, or factual merits in the first instance, except to the extent default/default-related relief is legally available on the procedural record. Petitioner asks that improper continuation under the disputed posture be corrected through mandamus relief before further adverse consequences continue.

## **REQUEST FOR PRESERVATION OF PATENT-RELATED FEDERAL REVIEW ISSUES**

Petitioner respectfully submits that he is an inventor with United States and PCT/international patent-related interests that may be affected by the integrity of federal proceedings, federal-agency conduct, and the timing of procedural relief. Petitioner does not ask this Court to adjudicate the merits, value, scope, ownership, or licensing status of any patent or patent application in this Rule 20 petition.

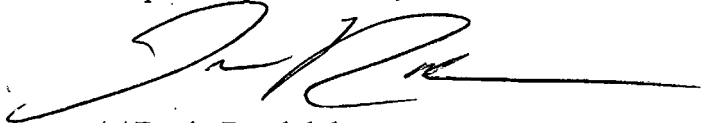
Petitioner respectfully requests only that, if this Court determines that any federal governmental misconduct, denial of meaningful access to court, improper administrative handling, or other federal wrongdoing affected Petitioner's rights, the Court preserve Petitioner's ability to seek appropriate federal review or referral. Petitioner further requests that, if appropriate, the Court permit or direct notice to the Department of Justice or other proper federal authority regarding whether any federal finding should be communicated to the United States Patent and Trademark Office or relevant PCT/international patent authorities.

Petitioner makes this request because patent prosecution, licensing, and valuation may be affected by unresolved federal procedural issues, court-access issues, and the ability to demonstrate that Petitioner was pursuing rights in good faith while under medical and procedural constraints. Petitioner does not seek special patent treatment in this petition; he seeks preservation of any lawful remedy, referral, or federal-agency clarification that may become appropriate if wrongdoing or procedural deprivation is found.

## CONCLUSION

For the foregoing reasons, and for the reasons stated in Exhibit A and the accompanying appendices, Petitioner respectfully requests that the Court grant an extraordinary writ of mandamus, or such other relief as may be just and proper, to require proper identification of the operative complaint, resolve service, representation, default, medical-accommodation, Rule 26(f), structural-relief, and emergency-application issues, answer the structural-relief questions presented in Exhibit A and address all requested relief in Exhibit A, and restore lawful threshold sequencing, meaningful accommodation, stabilization, and access to fair judicial review in a neutral forum.

Respectfully submitted,



/s/ Devin Randolph

Devin Randolph

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Date: June 10, 2026