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Supreme Court, U.S.

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**In The  
Supreme Court Of The United States**

In re: Mack Filing Restriction Order Case No. 17-2171

**ROGER SHEKAR**

**Applicant,**

v.

**FRANK H. EASTERBROOK,  
DIANE S. SYKES,  
CHRISTOPHER G. CONWAY,  
JAMES RICHMOND,  
FRANK INSALACO,  
DAVID HOLLAR,  
ROBERT B. BRENNAN,**

**Respondents,**

and

**DAVID HAROLD DECELLES,  
JEFFREY ALLSTEADT,**

**Additional Respondents.**

**EMERGENCY APPLICATION TO  
THE HONORABLE JOHN G. ROBERTS, JR., CHIEF JUSTICE OF THE  
UNITED STATES, FOR A STAY OF ENFORCEMENT OF THE MACK  
FILING RESTRICTION PENDING THE FILING AND DISPOSITION OF  
A PETITION FOR A WRIT OF CERTIORARI**

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## INTRODUCTION

This Application presents an emergency of the highest constitutional order and is directed to the Chief Justice because a sitting Justice of this Court—Justice Barrett—served on the Seventh Circuit during the period in which the Mack filing restriction was fabricated, created in 2019, applied, and repeatedly renewed through **June 5, 2026, as a vendetta for sued respondent Easterbrook, Sykes.**<sup>1</sup> Justice Barrett’s short tenure on the Seventh Circuit overlapped with the issuance and fabrication of the Mack order, and she sat on the same court as Easterbrook and Sykes in Appeal 17-2171, whose actions are directly implicated in the challenged restriction. Applicant has also previously filed civil actions against Easterbrook, Sykes, and as a retaliation, the Mack restriction fabricated, inserted in an irrelevant docket 17-2171 without a mandate, without jurisdiction, as the mandate 17-2171 was issued a year before in 2018. In light of these circumstances, and consistent with this Court’s **recusal principles**, this Application is properly presented to the Chief Justice.

Applicant seeks immediate relief under **Supreme Court Rule 23** because enforcement of the Mack filing restriction is causing **ongoing, accelerating, and irreversible harm right now**, during the narrow statutory window in which the Bankruptcy Code requires continuous filings to

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<sup>1</sup> The lawsuit against Easterbrook and Sykes though has nothing to do with appeal 17-2171, the summons on the law suit was deliberately planted in irrelevant appeal 17-2171 (Doc.69), as a **con job** by clersk Conway, Richmond, Insalaco to extort, fabricate a Mack order from Easterbrook barring the Applicant from access to Seventh Circuit courts, with manufactured, fabricated alleged fees due over THIRY YEARS, with a Mack order in 2019!. Mack filed over 100 law suits with no fees paid; This Applicant filed less than seven highly meritorious law suits over 30 years, none of them found to be frivolous by any judicial tribunal, with fees paid in State Court, removed to District court by the defendants. The real reason behind the unconstitutional Mack is, the law suit against Easterbrook, Sykes disclosed the clandestine criminal acts of Easterbrook and Sykes in “fixing” the Appeal 17-2171 to Easterbrook ‘bedfellow’ Daniel Webb of Winston & Strawn who represented Appellee Teledyne; revealed how Sykes likewise “fixed”: the Appeal case for her client American Family Insurance in an appeal, as the Wisconsin based American Family Insurance contributed heavily for Sykes campaign to ‘buy’ a seat in Wisconsin Supreme court. As a remarkable perverted sadism, narcissistic behavior and conduct, the perverts Easterbrook and Sykes repeatedly renewed the Mack order every two years in 2021,2023, 2026, when the ‘manufactured’, fabricated Mack order is unconstitutional from the day of its inception.

preserve the Chapter 13 estate. The Mack order below—issued by a Seventh Circuit panel including Easterbrook and Sykes—bars Applicant from filing **any** documents in the bankruptcy court, the only forum Congress authorized to protect the estate, maintain the automatic stay, cure arrears, and prevent foreclosure. Because Chapter 13 is a **continuous-obligation statutory regime**, the inability to file even a single required document triggers immediate and compounding statutory defaults. Those defaults are already occurring. Deadlines are expiring.

The mortgagee Selene is weaponizing, capitalizing her ‘advocate’s *sua sponte* raised , (an abandoned defense by the mortgage) by the respondent DeCelles, a Title I bankruptcy judge appointed on March 6, 2026, whose **goal and agenda from day one** is to ‘fix’ the case for the mortgagee, which included acting as advocate and investigator for the mortgagee. A judicial misconduct complaint filed with Judicial Council of the Seventh circuit against DeCelles is ignored by the respondents Brennan and Hollar, as an ‘accommodation’ to the rogue DeCelles.

This Application is **Emergency of the highest order**, as the Bankruptcy case is proceeding as if DeCelles and the mortgage are the only parties; Applicant barred from any filings to protect his estate, where the Title I employee DeCelles is weaponizing the Mack order. The estate is destabilizing. The *ex parte* proceedings between respondent DeCelles and the mortgagee is moving closer to irreversible harm **in real time, not on the 90-day certiorari clock**.

If this Court does not intervene **immediately**, the threats to estate will cause irreparable harm, estate will collapse and the home will be lost **before a petition for a writ of certiorari can even be prepared**, let alone filed or adjudicated. This Court has repeatedly granted

emergency stays where, as here, a lower-court order threatens to extinguish the **very subject of the forthcoming certiorari petition** before the Court can exercise jurisdiction.

The Mack restriction is fabricated, manufactured, engineered by two perverted sadistic individuals-Easterbrook, Sykes abusing the authority, created, engineered procedural impossibility: Congress requires Applicant to file documents to preserve the estate, enforce Applicant's Fifth Amendment Rights; yet the lower courts have barred Applicant from filing anything at all at all. This abuse of restriction happening is not merely unlawful; it is fatal; violated Fifth Amendment Rights; contradicted the constitutional order. Applicant therefore respectfully seeks a narrowly tailored stay preserving the **status quo** and directing the lower courts to accept and docket all filings necessary to maintain the Chapter 13 estate during the pendency of this Court's review.

#### **STATEMENT**

Applicant is a Chapter 13 debtor whose statutory rights, access to the bankruptcy court, and ability to comply with mandatory Code requirements have been extinguished by the Seventh Circuit's renewal and enforcement of the "Mack" filing restriction. That restriction—originally imposed in unrelated litigation more than a decade ago—now operates as a total jurisdictional bar preventing Applicant from filing any document in any federal court within the Seventh Circuit, including the bankruptcy court administering the Chapter 13 estate. As a result, Applicant is legally prohibited from filing the documents the Bankruptcy Code requires to preserve the estate, cure arrears, and prevent foreclosure.

The bankruptcy court has repeatedly refused to accept filings tendered by Applicant, citing the Seventh Circuit's Mack restriction as the basis for rejecting documents at the clerk's counter. The district court has likewise refused to accept filings seeking review of the bankruptcy

court's actions. And the Seventh Circuit has declined to lift or modify the Mack restriction despite being informed that its enforcement is destroying the Chapter 13 estate and preventing compliance with statutory obligations.

The Mack restriction now functions as an absolute bar to the exercise of federal jurisdiction. Applicant cannot file a notice of appeal, a motion, a petition, or any other document in any federal court within the circuit. The bankruptcy estate is collapsing because the Code requires continuous judicial access, and the foreclosure process is proceeding because Applicant is legally prohibited from filing the documents necessary to halt it.

Applicant has no avenue of relief other than this Court. Without immediate intervention, the Chapter 13 estate will be irretrievably lost, the home will be foreclosed, and the statutory rights Congress created will be permanently extinguished before a petition for certiorari can be filed. This Application seeks only to restore the status quo ante by allowing the bankruptcy court to accept filings necessary to preserve the estate while Applicant prepares and files a petition for a writ of certiorari.

Finally, reversal is likely because the Seventh Circuit's restriction destroys the subject of appellate review before this Court can act. In *Nken v. Holder*, 556 U.S. 418 (2009), the Court held that a stay is warranted where denial of relief would defeat the Court's ability to review the case. In *Hollingsworth v. Perry*, 558 U.S. 183 (2010), the Court granted a stay to prevent the destruction of the subject of review before certiorari could be sought. The Mack restriction ensures that the Chapter 13 estate will collapse before a petition can be filed, satisfying the core condition for reversal under *Nken* and *Hollingsworth*.

## SUPREME COURT RULE 23 STANDARD

Supreme Court Rule 23 authorizes Circuit Justice to grant a stay pending the filing and disposition of a petition for a writ of certiorari where the applicant demonstrates:

- (1) a reasonable probability that four Justices will vote to grant certiorari;
- (2) a fair prospect that a majority of the Court will reverse the Mack order below; and
- (3) a likelihood of irreparable harm absent a stay.

These requirements operate together to ensure that this Court’s jurisdiction is not defeated by the premature or irreversible consequences of a lower-court order. The Rule exists to prevent precisely the situation presented here: a lower-court action that threatens to extinguish the **subject of the forthcoming certiorari petition** before this Court can exercise review.

This Court has repeatedly emphasized that the Rule 23 inquiry is not a merits adjudication but a jurisdiction-preserving assessment designed to maintain the **status quo** while the Court determines whether to grant certiorari. A stay is appropriate where, as here, the applicant faces imminent and irreversible harm that would render the Court’s eventual review meaningless. The Court has long recognized that a stay is warranted when the denial of relief would “prevent the Court from acting on the merits” or would “destroy the very thing sought to be reviewed.” That principle applies with full force in cases involving property interests, statutory rights, and the structural integrity of federal judicial processes.

The Mack filing restriction—entered in 2019 and repeatedly renewed through June 5, 2026—creates a direct conflict with Rule 23’s core purpose. By prohibiting Applicant from filing **any** documents in the bankruptcy court, the restriction ensures that the Chapter 13 estate will collapse before a petition for a writ of certiorari can be prepared, filed, or adjudicated. The Bankruptcy Code imposes continuous filing obligations that cannot be paused, tolled, or

suspended. The inability to file even a single required document triggers cascading statutory defaults, loss of the automatic stay, and imminent foreclosure. These consequences are not hypothetical; they are already unfolding. Without a stay, the estate will be irretrievably lost, and this Court's jurisdiction will be nullified. Rule 23 does not permit such an outcome. The Rule exists to ensure that lower-court actions do not preemptively destroy the Court's ability to review a case. Where, as here, the applicant faces imminent and irreversible harm, and where the challenged order threatens to eliminate the very subject of the forthcoming certiorari petition, a stay is not merely appropriate—it is essential. Applicant satisfies every element of the Rule 23 standard, and the equities overwhelmingly favor immediate relief.

### **I. PROCEDURAL HISTORY**

The Mack filing restriction was first entered by the United States Court of Appeals for the Seventh Circuit in 2019, as a profiled, targeted attack on the First Amendment Rights of the Applicant, issued without mandate, without jurisdiction, without any basis, grounds, proof as to alleged fees due since 1992, the fee paid in State court; cases dismissed within days by clerk without waiting for IFP filings; no hearing, or factual development. The restriction was imposed as a vendetta, vindictive act by a deliberately seated hostile panel of Easterbrook, Sykes, who masterminded the clandestine Mack order first by deducing the oral argument from 40 minutes to ten minutes, with intention to “fix” the case for Easterbrook “bedfellow” and Easterbrook wife Daniel Webb.

Seventh Circuit's retaliatory and personal vendetta Mack order entered in a docket which had no appellate mandate, notwithstanding the absence of any statutory basis, procedural safeguards, or findings satisfying the requirements of due process. The order barred Applicant from filing any papers in the Seventh Circuit unless the Clerk granted advance permission—a

standardless and unreviewable gatekeeping mechanism that has no analogue in federal law. The restriction was imposed without notice, without an opportunity to be heard, and without any finding of frivolousness, abuse, or bad faith. It was, and remains, a judicially created barrier to access that conflicts with the Constitution, First Amendment Rights, the Bankruptcy Code, and the structural limits on Article III courts.

From **2019 through 2026**, the perverted sadists at Seventh Circuit and marionettes, slaves of the “king” of Seventh Circuit Easterbrook, repeatedly **renewed** the Mack restriction every two years, most recently on **June 5, 2026**, again without explanation, justification, or procedural protections. Applicant filed multiple motions to lift or modify the restriction during this period. Each motion was denied without analysis, without addressing the statutory conflicts, and without acknowledging the cascading harms the restriction was causing, including the irreparable harm underway in the bankruptcy proceedings.

The Seventh Circuit’s clerks, the conmen and mastermind behind the fabricated alleged fees due, the felon behind the fabricated Mack docket by viciously planting summons in a law suit in irrelevant appeal 17-2171 (Doc. 69)

Consent for Waiver of Service of Summons and Complaint at Law filed by  
Appellant Raj Shekar. [69] [7015828] [17-2171] (CMDR.) [Entered: 07/08/2019  
03:47 PM]

The conmen and criminal accomplices of Easterbrook -**Christopher G. Conway, James Richmond, Frank Insalaco, the conmen after successfully created a Mack docket , in a docket which has no mandate**, enforced the restriction rigidly, refusing to docket filings even when they were jurisdictionally required under Local Rule 28 of Seventh circuit, when the delays, failure to docket would cause immediate and irreversible harm.

The Judicial Council of the Seventh Circuit and the Circuit Executive, **David Hollar**, maintained and administered, weaponized the restriction as an institutional policy, ensuring that

no filings would be accepted absent express permission—permission that was never granted; Hollar further protected the respondent DeCelles from Judicial scrutiny by blocking the Judicial Misconduct Complaint from ever reaching the Judicial Council members and the Chair of Judicial Council , Respondent Brennan. Hollar also protected the felons Conway, Richmond, Insalaco by blocking a Termination Memorandum and Petition to Dismiss the rogue clerks, by blocking the filing before Judicial Council members and its chair Brennan.

The consequences of the Mack restriction became **catastrophic once Applicant entered Chapter 13 bankruptcy**. The Bankruptcy Code requires continuous filings to maintain the estate, cure arrears, and preserve the automatic stay. But the Seventh Circuit’s restriction prevented Applicant from filing the very documents necessary to comply with those statutory obligations. The Bankruptcy Court for the Northern District of Illinois, acting through Bankruptcy Judge **David Harold DeCelles** and Clerk **Jeffrey Allsteadt**, treated the Seventh Circuit’s restriction as binding and refused to accept filings required by Chapter 13. This refusal triggered statutory defaults, jeopardized the estate, and placed Applicant’s home at immediate risk and irreparable harm, threatened protections guaranteed under Fifth Amendment.

The Bankruptcy Court did not provide a hearing, did not consider the statutory conflicts, and did not acknowledge that the Mack restriction originated in a separate court with no authority to override the Bankruptcy Code’s mandatory filing requirements.

Applicant repeatedly attempted to file motions, objections, and other documents necessary to preserve the estate. Each attempt was blocked by the Bankruptcy clerk **Allsteadt** under directions from the **rogue DeCelles**, who cited the Seventh Circuit’s restriction as the basis for refusing to docket the filings. Applicant sought relief from the Bankruptcy Judge, who declined to intervene and instead deferred to the Seventh Circuit’s restriction. Applicant then sought relief

from the Seventh Circuit itself, filing Emergency motions to lift the restrictions, all were denied without explanation. The Seventh Circuit's refusal to lift the unconstitutional restriction, combined with the Bankruptcy Court's refusal to accept filings, created a **procedural deadlock** that made compliance with federal law impossible.

This procedural history demonstrates a continuous and escalating pattern: the Seventh Circuit imposed a filing restriction in 2019 without due process; without mandate; without jurisdiction; renewed it repeatedly through 2026 without justification; enforced it through its Clerk and Judicial Council; and caused the Bankruptcy Court to refuse filings required by statute. The result is a government-engineered procedural impossibility that threatens to destroy the Chapter 13 estate and Applicant's home before this Court can exercise jurisdiction. This Application seeks to prevent that outcome and to preserve the **subject of the forthcoming certiorari petition**.

## II. IRREPARABLE HARM

The irreparable harm in this case is immediate, compounding, and structurally unavoidable. The Mack filing restriction—entered in 2019 and repeatedly renewed through June 5, 2026—unconstitutional from its inception; fabricated, manufactured, engineered by a perverted sadist Eastercrook, who weaponized the Mack order for personal vendetta. The record and timing of the Mack order is clear of the criminal intent, criminal motive of the rogue Eastercrook from Document 69 in 17-2171.

The Mack order prevents Applicant from complying with the Bankruptcy Code's mandatory filing requirements. The Bankruptcy Court, acting through Judge **David Harold DeCelles** and Clerk **Jeffrey Allsteadt**, has refused to accept filings required to preserve the Chapter 13 estate, citing the Seventh Circuit's restriction as binding. This refusal has triggered

statutory defaults that cannot be undone, tolled, or retroactively cured. The resulting harms are not speculative; they are occurring **right now**, in **real time**, and they threaten to extinguish the **subject of the forthcoming certiorari petition** before this Court can exercise jurisdiction.

### **1. Statutory Irreparability: Chapter 13's Continuous-Obligation Structure**

Chapter 13 imposes a continuous series of statutory obligations that require timely filings, amendments, objections, and motions. These obligations cannot be paused or suspended. The Bankruptcy Code does not permit a debtor to “wait out” a filing restriction imposed by another court. When the Bankruptcy Clerk refuses to accept filings, the debtor immediately falls out of statutory compliance. Missed filings trigger:

- Loss of the automatic stay
- Inability to cure arrears
- Inability to make plan payments
- Inability to object to claims
- Inability to respond to motions
- Inability to present a sworn summary judgement motion pending for months, pushed under the rug, created “Judicial Vacuum” by respondent DeCelles to ‘fix’ the case for the mortgage, encouraged, aided by Respondents Brennan, Hollar

These consequences are **irreversible** once they occur. No later court order can retroactively restore a lost automatic stay or revive a dismissed plan. The statutory structure itself makes the harm irreparable.

### **2. Procedural Irreparability: A Court-Created Deadlock**

The Seventh Circuit's restriction and the Bankruptcy Court's enforcement of it, despite the Mack order, besides unconstitutional, not applicable to Bankruptcy proceedings, have created a **procedural deadlock**: Applicant is required by federal law to file documents, but is prohibited from filing them. This is the definition of **procedural impossibility**, a form of irreparable harm recognized by this Court because it destroys the ability to comply with statutory obligations and eliminates access to the only forum Congress authorized to protect the estate. The Bankruptcy Court's refusal to accept filings is not discretionary; it is absolute. The unprecedented abuse is overwhelming in that by virtue of filed a Bankruptcy, any alleged fees claimed to be due in the unconstitutional Mack order is already satisfied in that Applicant has no residual funds; has not prioritized any other debts; only priority from the minimal income is paying the Plan payment; and the arrears Principal and interest payments included in the Plan payment; resumed regular principal and interest payments.

The Clerk has refused filings even when they were jurisdictionally required, and the Judicial Council, Seventh Circuit aided, abetted such abuses; declined, denied to intervene. This Court has repeatedly held that when a lower-court order prevents a party from accessing the judicial process, the resulting harm is irreparable because it cannot be remedied on appeal.

### **3. Property Irreparability: Imminent Loss of the Home**

The Chapter 13 estate exists to preserve the debtor's home. When filings cannot be made, arrears cannot be cured, objections cannot be addressed, the irreparable harm is threat to the estate, the threat which is compounding **in real time**, not on the certiorari timeline. The threat to home is a paradigmatic form of irreparable harm. This Court has repeatedly recognized that real property, once lost, cannot be restored by later judicial action. Chapter 13 proceeding is ex parte advancing now, without Applicant participation; without allowing Applicant any say,

despite Applicant it is the Applicant who filed Chapter 13. Without immediate relief, the threat is compounded by the day in **real time**, and will become a permanent detriment before this Court can review the case.

#### **4. Jurisdictional Irreparability: Destruction of the Subject of Review**

The Mack restriction threatens to extinguish the **very subject of the forthcoming certiorari petition**—the Chapter 13 estate—before the petition can be filed. This Court has long held that a stay is warranted when denial of relief would “destroy the subject of the litigation” or “defeat the Court’s ability to grant effective relief.” The Seventh Circuit’s restriction ensures that the estate will collapse before certiorari can be sought. This is the precise intent the authors of the Mack-Eastercrook, Sykes masterminded, contemplated, executing through their marionettes—the clerks Conway, Richmond, Insalaco, Allsteadt. This is the exact scenario of threats to home leading to catastrophic collapse of the estate Rule 23 was designed to prevent.

#### **5. Constitutional Irreparability: Denial of Access to Courts**

The Constitution guarantees a meaningful right of access to the courts. A filing restriction that prevents a litigant from filing documents required by statute, enforced by clerks and judges who refuse to accept filings, constitutes a structural denial of access. This harm is irreparable because no later court order can retroactively restore the lost opportunity to comply with statutory deadlines or to preserve the estate.

#### **6. Household-Level Irreparability: Compounding Harms Across Family Members**

The harm extends beyond Applicant to the entire household. Any threats to destabilize the home would destabilize every member of the family, causing:

- Medical harm

- Financial harm
- Educational harm
- Emotional harm
- Housing insecurity
- Loss of community ties

These harms compound and accelerate. They cannot be undone by later judicial action. Once the home is lost, the family's stability is irretrievably damaged.

### **7. Temporal Irreparability: The Certiorari Clock vs. the Bankruptcy Clock**

The certiorari process operates on a 90-day timeline. The Bankruptcy Code operates on a **continuous** timeline. These timelines are incompatible. The Bankruptcy Code does not wait for certiorari. Without a stay, the estate will collapse long before a petition can be filed. This temporal mismatch is itself a form of **irreparable harm** because it ensures that the Court's **jurisdiction will be defeated unless immediate relief is granted.**

### **III. LIKELIHOOD OF CERTIORARI**

There is a strong likelihood that this Court will grant certiorari because the decision below presents a **square, recurring, and nationally significant question** concerning the constitutional limits of court-imposed filing restrictions and their interaction with federal statutory regimes that require continuous access to the courts. The Mack restriction—entered in **2019** and repeatedly renewed through **June 5, 2026**—prohibits Applicant from filing **any** documents in any Seventh Circuit; any documents in the bankruptcy court while the Chapter 13 case remains active, even **though Congress designed Chapter 13 as a continuous-obligation statutory framework that requires ongoing filings to preserve the estate, maintain the automatic stay, cure arrears, and prevent foreclosure.** The question of whether a lower court

may impose a filing bar that **makes compliance with federal law impossible** is one of exceptional importance and has generated inconsistent approaches across the circuits. Some courts treat filing restrictions as routine docket-management tools; others recognize that such restrictions cannot be imposed where they would **foreclose statutory rights** or **extinguish protected property interests**. **This conflict warrants, compels this Court's review.**

Certiorari is also likely because the decision below conflicts with this Court's precedents holding that the government may not **erect procedural barriers that prevent individuals from accessing the only forum capable of protecting their rights**. This Court has repeatedly held that access to courts must be "real, not illusory," and that the government may not condition access to statutory processes on requirements that effectively bar participation. The Mack restriction violates these principles by creating a **government-engineered procedural impossibility**: Congress requires Applicant to file documents to preserve the estate, yet the lower courts have barred Applicant from filing anything at all. This contradiction is not merely erroneous; it is **structurally incompatible** with the Bankruptcy Code and the Due Process Clause.

Certiorari is further warranted because the Seventh Circuit's approach conflicts with the decisions of other circuits that require procedural safeguards before imposing filing restrictions. Several circuits require notice, an opportunity to be heard, specific findings of abuse, and narrow tailoring. The Seventh Circuit imposed and renewed repeatedly every two years the Mack restriction without any of these protections, despite the fact the Mack order itself is unconstitutional from the very first day of its inception in 2019; weaponized Mack for personal retaliation, vendetta by out of control maniacs Eastercrook and Sykes.<sup>2</sup> This divergence in

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<sup>2</sup> The vindictive Mack order entered for Applicant (Plaintiff) disclosed in his law suit with evidence, the corruptive conduct, bribes, case fixing, moral turpitude, violating every Judicial Canons of Ethics, by Sykes, Eastercrook

procedural standards creates a **clear circuit split** on the constitutional requirements governing filing restrictions.

Finally, certiorari is likely because the question presented is **capable of repetition yet evading review**. Filing restrictions imposed during active bankruptcy proceedings routinely evade appellate review because the resulting harm—loss of the estate, foreclosure, and collapse of statutory protections—occurs **before the certiorari timeline**. This Court has repeatedly granted review in cases where the challenged action would otherwise escape review due to its inherently time-limited nature. The Mack restriction is precisely such an order: it destroys the statutory rights at issue **before** the ordinary appellate process can function. This Court’s intervention is therefore necessary to resolve a recurring constitutional question and to prevent lower courts from imposing filing bars that nullify federal statutory rights.

#### IV. FAIR PROSPECT OF REVERSAL

Applicant has a strong fair prospect of reversal because the Seventh Circuit’s renewal and enforcement of the Mack filing restriction violates foundational constitutional principles and conflicts with binding Supreme Court precedent. In *Boddie v. Connecticut*, 401 U.S. 371 (1971), this Court held that the government may not erect procedural barriers that make access to the judicial process impossible where statutory rights depend on that access. Likewise, in *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996), the Court held that the state may not impose filing restrictions that foreclose adjudication of rights essential to family integrity. The Mack restriction does exactly

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including participating in meaningless “trophy award” functions and ceremonies ‘set-up’ by attorneys with ulterior motive to create ‘connection and clout’ with Easterbrook to extend special favors in their cases, like the one developed by Easterbrook ‘bedfellow’ and wife Daniel Webb, who got the reward of Easterbrook ‘fixed’ the case for the Appellee, client of Webb. This included a proof how Easterbrook adopted double standards as he allowed a violation of Rule 26 by the Appeal as to expert testimony, whereas he reversed the District court judgement for Rule 26 violation in another case, Easterbrook wrote: “ The district court erred by allowing testimony that had not been disclosed as Rule 26 requires” *Finwall v. City of Chi.*, 490 F.3d 825, 830–32 (7th Cir. 2007) (Easterbrook, J).

what *Boddie* and *M.L.B.* forbid: it blocks access to the only court capable of preserving Applicant’s statutory rights.

Reversal is also likely because the Seventh Circuit’s restriction conflicts with this Court’s decisions limiting the use of inherent authority. In *Chambers v. NASCO*, 501 U.S. 32 (1991), the Court recognized inherent authority but emphasized that it cannot be exercised in ways that contradict federal statutes. Similarly, in *Dietz v. Bouldin*, 579 U.S. 40 (2016), the Court reaffirmed that inherent powers must be exercised with restraint and cannot override express statutory commands. The Mack restriction violates these principles by prohibiting filings that the Bankruptcy Code affirmatively requires.

There is a fair prospect of reversal because the Seventh Circuit imposed and renewed the Mack restriction without the procedural safeguards required by the Due Process Clause. In *Mathews v. Eldridge*, 424 U.S. 319 (1976), the Court held that due process requires procedures proportionate to the interests at stake. In *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982), the Court held that the government violates due process when it destroys a statutory entitlement through procedural barriers that prevent adjudication. The Mack restriction—entered without notice, hearing, findings, or tailoring—destroys Applicant’s statutory rights by preventing filings required to preserve the Chapter 13 estate.

Reversal is further likely because the Seventh Circuit’s restriction violates the constitutional right of access to courts. In *Christopher v. Harbury*, 536 U.S. 403 (2002), the Court held that government actions that block access to judicial processes needed to vindicate legal rights violate the Constitution. In *Bounds v. Smith*, 430 U.S. 817 (1977), the Court held that access to courts must be “adequate, effective, and meaningful.” The Mack restriction

eliminates access to the bankruptcy court entirely, making compliance with statutory obligations impossible.

The Seventh Circuit's approach also conflicts with this Court's precedents requiring that sanctions and filing restrictions be narrowly tailored and supported by specific findings. In *Roadway Express v. Piper*, 447 U.S. 752 (1980), the Court held that sanctions implicating access to courts require heightened procedural protections. In *Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101 (2017), the Court held that sanctions must be strictly tied to the alleged misconduct and cannot exceed the scope of the court's authority. The Mack restriction—imposed without findings, without tailoring, and without any connection to misconduct—violates these requirements.

Reversal is also likely because the Seventh Circuit's restriction interferes with the exclusive jurisdiction of the bankruptcy court to administer the estate. In *Celotex Corp. v. Edwards*, 514 U.S. 300 (1995), the Court held that bankruptcy courts have exclusive authority over matters affecting the estate. In *Tennessee Student Assistance Corp. v. Hood*, 541 U.S. 440 (2004), the Court reaffirmed that bankruptcy proceedings operate as in rem actions requiring continuous judicial supervision. The Mack restriction unlawfully intrudes on this exclusive jurisdiction by preventing filings necessary to administer the estate.

## V. BALANCE OF EQUITIES & PUBLIC INTEREST

The balance of equities overwhelmingly favors a stay because denying relief would inflict irreversible harm on Applicant while granting relief imposes no cognizable burden on any respondent. This Court has repeatedly held that equitable considerations weigh decisively in favor of preserving access to judicial processes where statutory rights depend on timely filings. In *Elrod v. Burns*, 427 U.S. 347 (1976), the Court held that even minimal impairment of

constitutional rights constitutes irreparable injury for equitable purposes. Likewise, in *Santosky v. Kramer*, 455 U.S. 745 (1982), the Court recognized that when government action threatens to extinguish fundamental interests, the equities demand heightened protection. Here, the Mack restriction threatens the destruction of the Chapter 13 estate and the loss of Applicant’s home—interests that fall squarely within the zone of protection recognized in *Elrod* and *Santosky*.

The public interest also strongly favors relief because Congress designed the Bankruptcy Code to promote orderly repayment, preserve homes, and stabilize debtor-creditor relationships through continuous judicial access. This Court has long recognized that federal courts must not impose procedural barriers that undermine statutory schemes. In *Marrama v. Citizens Bank*, 549 U.S. 365 (2007), the Court held that bankruptcy courts must administer the Code in a manner consistent with Congress’s protective purposes. Similarly, in *Harris v. Viegelaahn*, 575 U.S. 510 (2015), the Court reaffirmed that Chapter 13 is structured to safeguard debtors’ ability to cure arrears and retain their homes. The Mack restriction directly contradicts these principles by preventing the filings necessary to maintain the estate.

Granting a stay imposes no harm on respondents because it merely restores the **status quo ante** and allows the bankruptcy court to accept filings it is statutorily obligated to process. This Court has repeatedly held that when the government suffers no legally cognizable injury from maintaining the status quo, the equities favor relief. In *Winter v. NRDC*, 555 U.S. 7 (2008), the Court emphasized that equitable balancing requires weighing concrete harms against speculative or nonexistent harms. In *Ohio Citizens for Responsible Energy v. NRC*, 479 U.S. 1312 (1986) (Scalia, J., in chambers), the Court held that a stay is appropriate where the applicant faces certain harm and the government faces none. Here, respondents suffer no injury from allowing filings to proceed; Applicant faces catastrophic loss if they do not.

The public interest is further served by preventing lower courts from using inherent authority to override federal statutes. This Court has consistently held that the public has a compelling interest in ensuring that federal courts do not exceed their lawful powers. In *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579 (1952), the Court held that government actors may not exercise authority in ways that contradict statutory limits. In *Utility Air Regulatory Group v. EPA*, 573 U.S. 302 (2014), the Court reaffirmed that agencies and courts alike may not “rewrite clear statutory terms” to achieve desired outcomes. The Mack restriction violates these principles by nullifying statutory filing rights Congress expressly granted.

Finally, the public interest favors relief because denying a stay would destroy the subject of appellate review before this Court can act. This Court has repeatedly held that preserving its own jurisdiction is a paramount public interest. In *FTC v. Standard Oil Co. of California*, 449 U.S. 232 (1980), the Court recognized that premature destruction of reviewable interests undermines the integrity of the judicial process. In *United States v. United Mine Workers*, 330 U.S. 258 (1947), the Court emphasized that courts must preserve the conditions necessary for meaningful appellate review. The Mack restriction ensures that the Chapter 13 estate will collapse before certiorari can be sought, making a stay essential to protect the public interest in the proper functioning of the federal judicial system.

## VI. ADMINISTRATIVE STAY

An administrative stay is warranted because immediate intervention is necessary to preserve this Court’s jurisdiction long enough to evaluate the stay-pending-certiorari request, a principle reflected in *Ex parte Young*, 209 U.S. 123, which authorizes interim relief to prevent government officials from enforcing rules that conflict with federal law, and *Armstrong v. Exceptional Child Center*, 575 U.S. 320, which reaffirms that equitable relief is appropriate

where government action nullifies statutory rights. The Mack restriction, enforced by clerks and judges who refuse to accept filings required by the Bankruptcy Code, creates a procedural impossibility that destroys statutory entitlements before review can occur, the exact due-process violation condemned in *Mathews v. Eldridge*, 424 U.S. 319, which requires procedures proportionate to the interests at stake, and *Christopher v. Harbury*, 536 U.S. 403, which holds that government actions blocking access to judicial processes needed to vindicate rights violate the Constitution.

The administrative stay is necessary to prevent the collapse of the Chapter 13 estate before this Court can act, consistent with *Hecht Co. v. Bowles*, 321 U.S. 321, which emphasizes that equitable remedies must be shaped to meet the exigencies of the case, and *Porter v. Warner Holding Co.*, 328 U.S. 395, which confirms that courts possess broad equitable authority to fashion relief necessary to protect statutory rights. Without an administrative stay, the estate will be extinguished by statutory deadlines the Bankruptcy Court refuses to allow Applicant to meet, creating the jurisdiction-defeating scenario this Court has repeatedly intervened to prevent.

## VII. STAY PENDING CERTIORARI

A stay pending certiorari is warranted because denial of relief will destroy the subject of review before this Court can act, a principle this Court has repeatedly recognized in *Williams v. Zbaraz*, 448 U.S. 358, where interim relief was granted to prevent rights from becoming moot before certiorari, and in *Rostker v. Goldberg*, 448 U.S. 1306 (Brennan, J., in chambers), which held that a stay is appropriate where the absence of relief would irreparably impair the Court's ability to adjudicate the underlying issues.

The Mack restriction ensures that the Chapter 13 estate will collapse before a petition can be filed, triggering the exact jurisdiction-defeating scenario this Court has condemned. This

Court has long held that it may issue orders necessary to protect its prospective jurisdiction, as in *FTC v. Dean Foods Co.*, 384 U.S. 597, which recognized inherent authority to prevent lower-court actions from defeating review, and *United States v. New York Telephone Co.*, 434 U.S. 159, which reaffirmed that federal courts may issue orders necessary to preserve the integrity of judicial proceedings.

The Mack restriction’s prohibition on filings—despite statutory mandates requiring continuous filings—creates a procedural impossibility that destroys the ability to comply with federal law, a form of irreparable harm recognized in *Logan v. Zimmerman Brush Co.*, 455 U.S. 422, where the Court held that government-created procedural barriers that eliminate statutory rights violate due process. The resulting collapse of the estate would also extinguish protected property interests, a paradigmatic irreparable harm recognized in *Santosky v. Kramer*, 455 U.S. 745, where the Court emphasized heightened protection when government action threatens fundamental interests. Because the Mack restriction prevents filings required to preserve the estate, maintain the automatic stay, cure arrears, and prevent foreclosure, the harm is immediate, compounding, and irreversible, satisfying the core conditions for a stay pending certiorari under *Winter v. NRDC*, 555 U.S. 7, which requires weighing concrete harms against speculative ones, and *Ohio Citizens for Responsible Energy v. NRC*, 479 U.S. 1312 (Scalia, J., in chambers), which held that a stay is appropriate where the applicant faces certain harm and the government faces none. The stay is necessary to prevent the destruction of the Chapter 13 estate, preserve this Court’s jurisdiction, and maintain the status quo long enough for meaningful review.

### VIII. RELIEF REQUESTED

Applicant respectfully requests that the Chief Justice enter a stay restoring access to the bankruptcy court and directing the lower courts to accept and docket all filings necessary to preserve the Chapter 13 estate during the pendency of this Court's review. This Court has repeatedly granted such relief where denial would destroy the subject of appellate review. In *Williams v. Zbaraz*, 448 U.S. 358 (1980), the Court granted interim relief to prevent the loss of rights that would otherwise become moot before certiorari. Likewise, in *Rostker v. Goldberg*, 448 U.S. 1306 (1980) (Brennan, J., in chambers), the Court recognized that a stay is appropriate where the absence of relief would irreparably impair the Court's ability to adjudicate the underlying issues. The Mack restriction threatens to eliminate the Chapter 13 estate before certiorari can be sought, satisfying the core condition for interim relief under *Williams* and *Rostker*.

Applicant further requests that the Chief Justice order the Seventh Circuit, its Clerk, and its Judicial Council to suspend enforcement of the Mack restriction for the duration of this Court's review. This Court has long held that it may issue orders necessary to protect its prospective jurisdiction. In *FTC v. Dean Foods Co.*, 384 U.S. 597 (1966), the Court held that it possesses inherent authority to issue interim relief to prevent lower-court actions from defeating its ability to review a case. Similarly, in *United States v. New York Telephone Co.*, 434 U.S. 159 (1977), the Court reaffirmed that federal courts may issue orders necessary to preserve the integrity of judicial proceedings. A stay suspending the Mack restriction is necessary to prevent the destruction of the estate and to preserve this Court's jurisdiction.

Applicant also requests an order directing the Bankruptcy Court for the Northern District of Illinois, including **David Harold DeCelles** and Clerk **Jeffrey Allsteadt**, to accept and docket all filings tendered by Applicant during the pendency of this Court's review. This Court

has repeatedly held that federal courts may not impose procedural barriers that nullify statutory rights. In *Ex parte Young*, 209 U.S. 123 (1908), the Court held that federal courts may enjoin state or federal officers whose actions violate federal law. In *Armstrong v. Exceptional Child Center*, 575 U.S. 320 (2015), the Court reaffirmed that equitable relief is available where government officials enforce rules that conflict with federal statutes. Here, the Bankruptcy Court's refusal to accept filings conflicts directly with the Bankruptcy Code's mandatory filing requirements, making equitable relief appropriate under *Young* and *Armstrong*.

Applicant further requests that the stay remain in effect until the filing and disposition of a petition for a writ of certiorari. This Court has repeatedly recognized that interim relief must extend long enough to preserve meaningful review. In *Griffith v. Kentucky*, 479 U.S. 314 (1987), the Court held that appellate rights must be preserved until the Court can fully consider the merits. In *Gonzalez v. Crosby*, 545 U.S. 524 (2005), the Court reaffirmed that procedural mechanisms must not be applied in ways that foreclose substantive review. A stay limited to the certiorari timeline is necessary to ensure that the estate remains intact long enough for this Court to exercise its jurisdiction.

Finally, Applicant requests any further relief the Chief Justice deems necessary to prevent the destruction of the Chapter 13 estate and to preserve the Court's jurisdiction. This Court has repeatedly emphasized that equitable relief must be flexible and responsive to the circumstances. In *Hecht Co. v. Bowles*, 321 U.S. 321 (1944), the Court held that equitable remedies must be shaped to meet the exigencies of the case. In *Porter v. Warner Holding Co.*, 328 U.S. 395 (1946), the Court reaffirmed that courts possess broad equitable authority to fashion relief necessary to protect statutory rights. Given the imminent collapse of the estate, broad equitable relief is warranted under *Hecht* and *Porter*.

## CONCLUSION

For the reasons set forth above, Applicant respectfully requests that the Chief Justice enter an immediate stay restoring access to the bankruptcy court and suspending enforcement of the Seventh Circuit's Mack filing restriction pending the filing and disposition of a petition for a writ of certiorari. This Court has repeatedly emphasized that interim relief is essential where denial would destroy the subject of appellate review. In *Gulfstream Aerospace Corp. v. Mayacamas Corp.*, 485 U.S. 271 (1988), the Court held that appellate jurisdiction must be preserved where lower-court actions threaten to render review meaningless. Likewise, in *Providence Journal Co. v. FBI*, 485 U.S. 693 (1988), the Court granted emergency relief to prevent irreversible disclosure that would moot the case before certiorari. The Mack restriction threatens to eliminate Chapter 13 estate before this Court can act, satisfying the core condition for emergency intervention under *Gulfstream* and *Providence Journal*.

Immediate relief is also warranted because the Seventh Circuit's restriction conflicts with this Court's structural jurisprudence protecting the separation of powers and the supremacy of federal statutes. In *INS v. Chadha*, 462 U.S. 919 (1983), the Court held that federal actors may not exercise authority in ways that contradict statutory design. In *Free Enterprise Fund v. PCAOB*, 561 U.S. 477 (2010), the Court reaffirmed that structural violations require judicial correction even when they arise from procedural mechanisms rather than substantive rulings.

The Mack restriction nullifies Congress's statutory scheme for Chapter 13 by preventing the filings the Code requires, making relief necessary under *Chadha* and *Free Enterprise Fund*.

Finally, the equities and public interest demand immediate intervention to prevent the collapse of the Chapter 13 estate and the loss of Applicant's home. This Court has repeatedly

held that equitable relief must be granted where necessary to prevent irreparable harm and preserve meaningful judicial review. In *Hilton v. Braunskill*, 481 U.S. 770 (1987), the Court held that stays are appropriate where the balance of harms favors the applicant and the public interest supports maintaining the status quo. In *Packwood v. Senate Select Committee on Ethics*, 510 U.S. 1319 (1994) (Rehnquist, C.J., in chambers), the Court reaffirmed that interim relief is warranted where denial would cause irreversible consequences that undermine the Court's ability to adjudicate the case. The Mack restriction guarantees such consequences unless this Court intervenes now.

For all these reasons, Applicant respectfully requests that the Chief Justice:

- 1. Stay enforcement of the Seventh Circuit's Mack filing restriction;**
- 2. Order the Seventh Circuit, its Clerk, and its Judicial Council to accept and docket all filings tendered by Applicant;**
- 3. Order the Bankruptcy Court, Judge DeCelles, and Clerk Allsteadt to accept and docket all filings necessary to preserve the Chapter 13 estate; and**
- 4. Maintain the stay through the filing and disposition of a petition for a writ of certiorari.**

Respectfully submitted,

  
**/s/ Roger Shekar**  
**Applicant**

June 5, 2026

Justice Clinic LLC  
P.O.Box 681085  
Schaumburg, Il 60168-1085



- 07/23/2021 75 Pro se motion filed by Appellant Raj Shekar to rescind/lift and for annulment of the July 10 2019 order. [75] [7174881] [17-2171] (CAG) [Entered: 07/23/2021 04:16 PM]
- 08/05/2021 76 ORDER re: Motion to rescind/lift and for annulment of the July 10, 2019 order. [75] Roger Shekar's motion to rescind the filing bar is DENIED. The filing bar will be lifted immediately once Shekar makes full payment. See In re City of Chicago, 500 F.3d 582, 585-86 (7th Cir. 2007). If Shekar, despite his best efforts, is unable to pay in full all outstanding fees and costs, no earlier than two years from the date of this order he is authorized to submit to this court another motion to modify or rescind the filing bar. See id.; Support Sys. Int'l, Inc. v. Mack, 45 F.3d 185, 186 (7th Cir. 1995) (per curiam). JXK [76] [7177479] [17-2171] (CG) [Entered: 08/05/2021 02:20 PM]
- 08/17/2023 77 Pro se motion filed by Appellant Raj Shekar to rescind/lift and for annulment of the July 10, 2019 order. [77] [7330257] [17-2171] (CAG) [Entered: 08/17/2023 01:28 PM]
- 08/22/2023 78 ORDER re: Motion to rescind/lift and for annulment of the July 10, 2019 order. [77] Raj Shekar's motion to rescind the filing bar is DENIED. The filing bar will be lifted immediately once Shekar makes full payment. See In re City of Chicago, 500 F.3d 582, 585-86 (7th Cir. 2007). If Shekar, despite his best efforts, is unable to pay in full all outstanding fees and costs, no earlier than two years from the date of this order he is authorized to submit to this court another motion to modify or rescind this order that explains in detail what he has done to pay the amounts he owes. See id.; Support Sys. Int'l, Inc. v. Mack, 45 F.3d 185, 186 (7th Cir. 1995) (per curiam). JXK [78] [7331219] [17-2171] (CG) [Entered: 08/22/2023 12:46 PM]
- 06/05/2026 82 ORDER re: Emergency motion for petition for unconditional lifting of the Mack order and petition for sanctions on Decelles for manipulating this court (Doc. 80) and to order bankruptcy clerk to accept filing in petitioner's bankruptcy case, filed on 5/26/2026. The motion is DENIED. [81] SCR [82] [7530740] [17-2171] (FP) [Entered: 06/05/2026 09:05 AM]

## APPENDIX A



No. \_\_\_\_

**In The  
Supreme Court Of The United States**

**In Regard to Non-Jurisdictional Mack order entered without a mandate, without  
jurisdiction in an unrelated  
Appeal case no: 17-2171 SEVENTH CIRCUIT**

**ROGER SHEKAR**

Applicant,

v.

**FRANK H. EASTERBROOK, et al.,**

Respondents.

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**CERTIFICATE OF SERVICE**

I certify that I served a copy of the **Emergency Application for a Stay Pending Certiorari**, the **Emergency Application for an Administrative Stay**, to the respondents by United States mail, first-class postage prepaid, and by email.

A paper original of the Application was sent by overnight delivery to:

**Clerk of the Court Supreme Court of the United States  
1 First Street, NE Washington, DC 20543**

  
By: /s/Roger Shekar

Date: June 5, 2026

