



No. 26-366

In the Supreme Court of the United States

In re BAHIG F. BISHAY,
Plaintiff-Petitioner,
in individual capacity and in the capacity of Private
Attorney General, acting at the behest of all citizens of
the United States under 18 U.S.C. §§1961-1968
(1994 ed. and Supp. III)

v.

FRANK DENNIS SAYLOR, IV, et al., solely in
individual capacities, Defendants-Respondents.

**ON PETITION FOR WRIT OF MANDAMUS
TO THE U.S. DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

**PETITION FOR WRIT OF MANDAMUS
REQUIRING THE DISTRICT COURT TO
COMPLY WITH *** NONDISCRETIONARY ***
FEDERAL RULES OF CIVIL PROCEDURE**

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THE QUESTION PRESENTED

Based on the procedural history chronicled in this document, did the U.S. District Court for the District of Columbia violate [nondiscretionary] *Federal Rules of Civil Procedure*, specifically Rules: 12(a); 55(a) and (b); and 54(b) and (c)?

If the answer is to the affirmative, should this Court, as the ultimate enforcer of the *Federal Rules of Civil Procedure*, require the District Court to comply with said federal rules, pursuant to the authority conferred upon this Court in Title 28, United States Code, § 2072(a) and (b), and other authorities?

THE DISCRETE ISSUE PRESENTED

Pursuant to the Court's supervisory authority to administer the *rule of law* as pertaining to inferior courts, as set forth in Article III, Sections 1 and 2 of the U.S. Constitution; the *All Writs Act*, 28 U.S.C. §§ 1651 and 1292(a)(1); the *Judiciary Act* of 1789; the *Fifth* and the *Fourteenth* Amendments to the U.S. Constitution; 42 U.S.C. §§ 1983 and 1985(3); Rule 20 *in aid of the Court's appellate jurisdiction based on exceptional circumstances* amply exhibited here, with relief [un]available in form or substance after, on February 10, 2026, this Court's Clerk informed the within Petitioner that his recent Rule 22 Application must be replaced with this Petition; and *Public Policy* as pertaining to the within Plaintiff-Petitioner and those similarly situated U.S. citizen(s) in his capacity of Private Attorney General so authorized by the U.S. Congress under 18 U.S.C. §§1961-1968 (1994 ed. and Supp. III), PAG-Bishay now, respectfully, moves the Justice(s) of this Court to require the U.S. District Court for the District of Columbia to forthwith comply with the strict, [nondiscretionary] *Federal Rules of Civil Procedure*, specifically Rules: 12(a); 55(a) and (b); and 54(b) and (c), all of which clearly and unambiguously require the District Court Clerk to forthwith perform the following [ministerial] acts:

Rule 12(a) states:

(a) Time to Serve a Responsive Pleading.

Unless another time is specified by a federal statute, the time for serving a responsive pleading is as follows:

(1) In General.

(A) defendant must serve an answer:

- (i) within 21 days after being served with the summons and complaint...

Rule 55 states:

(a) *Entering a Default.* When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, *the clerk must enter the party's default.*

(b) *Entering a Default Judgment.*

(1) *By the Clerk.* If the plaintiff's claim is for a sum certain or a sum that can be made certain by computation, the clerk -- on the plaintiff's request, with an affidavit showing the amount due -- must enter judgment for that amount and costs against a defendant who has been defaulted for not appearing and who is neither a minor nor an incompetent person.

(2) *By the Court.* In all other cases, the party must apply to the court for a default judgment... If the party against whom a default judgment is sought has appeared personally or by a representative, that party or its representative must be served with written notice of the application at

least 7 days before the hearing. The court may conduct hearings or make referrals -- preserving any federal statutory right to a jury trial -- when, to enter or effectuate judgment, it needs to:

- (A) conduct an accounting;
- (B) determine the amount of damages;
- (C) establish the truth of any allegation by evidence; or
- (D) investigate any other matter.

Rule 54 states:

(b) **Judgment on Multiple Claims or Involving Multiple Parties.** When an action presents more than one claim for relief -- whether as a claim, counterclaim, crossclaim, or third-party claim -- or when multiple parties are involved, the court may direct entry of a final judgment as to one or more, but fewer than all, claims or parties only if the court expressly determines that there is no just reason for delay. Otherwise, any order or other decision, however designated, that adjudicates fewer than all the claims or the rights and liabilities of fewer than all the parties does not end the action as to any of the claims or parties and may be revised at any time before the entry of a judgment adjudicating all the claims and all the parties' rights and liabilities.

(c) ***Demand for Judgment***; Relief to Be Granted. A default judgment must not differ in kind from, or exceed in amount, what is

demanded in the pleadings. Every other final judgment should grant the relief to which each party is entitled, even if the party has not demanded that relief in its pleadings.

[Bold and italic text provided for emphasis]

**THE ABOVE REFERENCED FEDERAL
AUTHORITY IS [NONDISCRETIONARY]**

Notwithstanding the clarity of the above referenced [non]discretionary federal authority, the U.S. District Court for the District of Columbia and its Clerk failed to comply with the mandates set forth therein (*supra*), despite repeated written demands submitted by PAG-Bishay which fell on deaf ears, as the record reflects at **RA 6-7**¹, where the District Clerk repeatedly ignored PAG-Bishay's written demand(s) for strict compliance with the federal rules cited in this booklet. *Supra*.

Instead, in an effort to escape said discrete ministerial duties (*supra*), the Clerk placed every document PAG-Bishay submitted in the proverbial *black hole*, as reflected in Civil Docket For Case # 1:25-CV-03102 [**RA 241-244; 249-252**], where, on October 15, 2025; on October 17, 2025; on October 22,

¹ **RA__** refers to single or multiple documents presented in the U.S. District Court for the District of Columbia and the U.S. Court of Appeals for the District of Columbia Circuit, all of which are published and available for review at the U.S. Court of Appeals for the District of Columbia Circuit, Docket No. 25-5412, at Document No. 2157469; all are described with the required specificity at pp. 18-24 of this booklet. **Further, for the Court's convenience, the entire record shall be separately submitted once a Docket Number is issued.**

2025; again on October 22, 2025; on October 30, 2025; on November 1, 2025; on November 8, 2025; on December 22, 2025; and on January 14, 2026, the District Clerk published the following, instead:
REQUEST FOR LEAVE TO FILE REVIEW.

**PETITIONER-PLAINTIFF'S RULE 26.1
CORPORATE DISCLOSURE STATEMENT**

The Petitioner-Plaintiff, as well as the U.S. citizens referenced throughout this document, are natural persons. As such, a corporate disclosure statement is not required. *Fed. R. APP. P.* 26.1(a).

PARTIES NAMED BELOW

Plaintiff-Petitioner

Bahig F. Bishay, Plaintiff and Private Attorney General acting at the behest of all citizens of the United States, so authorized as such by the United States Congress under 18 U.S.C. §§ 1961-1968 (1994 ed. and Supp. III).

Defendants-Respondents

The below listed twenty-two (22) parties were named defendants solely in individual capacity.

As reflected in the record referenced in this document, none of said individuals who were named in the *Verified Complaint* dated August 31, 2025, and in the twenty two (22) Summonses issued by the U.S. District Court for the District of Columbia in Civil Action No. 125-cv-03102, either answered said Verified Complaint or filed and served a responsive pleading, as required under Rule 12(a) of the *Federal Rules of Civil Procedure*; and none either filed an appearance or hired counsel to appear on his/her behalf, as confirmed in the below dockets:

Frank Dennis Saylor, solely in individual capacity.

Denise Casper, solely in individual capacity.

Richard Stearns, solely in individual capacity.

Indira Talwani, solely in individual capacity.

Leo Sorokin, solely in individual capacity.

Angel Kelley, solely in individual capacity.

Julie Kobick, solely in individual capacity.

Brian Murphy, solely in individual capacity.

Robert Farrell, solely in individual capacity.

Trevor McFadden, solely in individual capacity.

Amit Mehta, solely in individual capacity.

Debney Friedrich, solely in individual capacity.

David Barron, solely in individual capacity.

Sandra Lynch, solely in individual capacity.

Kermit Lipez, solely in individual capacity.

Jeffrey Howard, solely in individual capacity.

Ojetta Thompson, solely in individual capacity.

William Kayatta, Jr., solely in individual capacity.

Gustavo Gelpi, solely in individual capacity.

Lara Montecalvo, solely in individual capacity.

Julie Rikelman, solely in individual capacity.

Seth Aframe, solely in individual capacity.

RELATED PROCEEDINGS

- 1) *Bishay v. Harris, et al*, U.S. District Court for the District of Columbia Civil Action No. 1:21-cv-01831.
- 2) *Bishay v. Harris, et al*, U.S. Court of Appeals for the District of Columbia Circuit No. 22-5060.
- 3) *Bishay v. Harris, et al*, U.S. Court of Appeals for the District of Columbia Circuit No. 23-5019.
- 4) *Bishay v. Harris, et al*, U.S. Court of Appeals for the District of Columbia Circuit No. 24-5040.
- 5) *Bishay v. McFadden, et al*, U.S. District Court for the District of Columbia Civil Action No. 1:24-cv-02086.
- 6) *Bishay v. McFadden, et al*, U.S. Court of Appeals for the District of Columbia Circuit No. 24-5197.
- 7) *In re Bahig Bishay*, U.S. Supreme Court No. 24-1213; U.S. Court of Appeals for the District of Columbia Circuit No. 25-5412.
- 8) *Bishay v. Town of Sharon, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:23-cv-12094.
- 9) *Bishay v. Town of Sharon, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:23-cv-11848.
- 10) *Bishay v. Town of Sharon, et al*, U.S. Court of Appeals for the First Circuit No. 24-1928.

11) *Bishay v. Town of Sharon, et al*, U.S. Court of Appeals for the First Circuit No. 24-1929.

12) *Bishay v. Gelpi, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:24-cv-12331.

13) *Bishay v. Gelpi, et al*, U.S. Court of Appeals for the First Circuit No. 25-1292.

14) *Bishay v. Ocwen Financial Corporation, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:24-cv-12661.

15) *In re Bahig Bishay*, U.S. Court of Appeals for the First Circuit No. 24-2147.

16) *Bishay v. Ocwen Financial Corporation, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:24-mc-91591.

17) *Bishay v. Town of Sharon, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:25-mc-91085.

18) *Bishay v. Farrell*, U.S. District Court for the District of Massachusetts C.A. No. 1:25-mc-91086.

19) *Ibrahim, et al, v. Town of Walpole, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:25-mc-91285.

20) *Ibrahim, et al, v. Town of Walpole, et al*, U.S. District Court for the District of Massachusetts C.A. No. 1:25-mc-91321.

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H. Wasserman, <i>“Nationwide” Injunctions Are Really “Universal” Injunctions and They Are Never Appropriate</i> , 22 Lewis & Clark L. Rev. 335 (2018)	8
Samuel L. Bray and William Baude, <i>Proper Parties, Proper Relief</i> , 137 Harv. L. Rev. 153 (2023)	9

OPINIONS BELOW

*Order of D.C. Cir.*², dated January 21, 2026 [RA 248]; Appendix A. There was no opinion or order entered in the district court pertaining to the only issue presented in this petition, concerning the Petitioner's repeated demands made on the district court for strict compliance with the *Federal Rules of Civil Procedure*, as further detailed in this document.

JURISDICTION

Jurisdiction is conferred under Rule 20 of the Rules of the Court and the authority vested in its Justices under Section 13 of the *Act of 1789*; Article III, Section 2 of the Constitution; 28 U.S.C., §1651; and in its Chief Justice under 28 U.S.C. §§ 291 & 294.

Further, this Court is presumed amply aware that it is the final policing authority required to enforce 100% compliance with *all* [] *Federal Rules of Civil Procedure*, including [*nondiscretionary*] Rules: 12(a); 55(a) and (b); 54(b) and (c), as set forth in Title 28, United States Code, § 2072(a) and (b), *to wit*:

² *Judicial Notice*: by 3 Order(s) issued by the Chief Justice of the United States on December 11, 2024, the Chief Justice disqualified the D.C. Circuit (in its entirety) and, instead, under Title 28, United States Code, section 291(a), selected three judicial officers from other circuits to sit by designation in a related matter [D.C. Cir. No. 24-5197], thus *en banc* relief is [un]available in the D.C. Cir.. *Infra* at pp. 14-15.

“The Supreme Court shall have the power to prescribe general rules of practice and procedure and rules of evidence for cases in the United States district courts and courts of appeals. Such rules shall not abridge, enlarge or modify any substantive rights. All laws in conflict with such rules shall be of no further force or effect after such rules have taken place.”

(Added Pub. L. 100-702, title IV, § 401(a), Nov. 19, 1988, 102 Stat. 4648, eff. Dec. 1, 1988; amended Pub. L. 101-650, title III, §§ 315, 321, Dec. 1, 1990, 104 Stat. 5115, 5117.)

**FEDERAL RULES OF CIVIL PROCEDURE;
CONSTITUTIONAL & STATUTORY
AUTHORITY**

- [Non]discretionary *Federal Rules of Civil Procedure*: 12(a); 55(a) and (b); 54(b) and (c)
- Article III, Sections 1 and 2 of the U.S. Constitution
- *All Writs Act*, 28 U.S.C. §§ 1651 and 1292(a)(1)
- *Judiciary Act* of 1789
- *Fifth* and *Fourteenth* Amendments to the U.S. Constitution
- 42 U.S.C. §§ 1983 and 1985(3)
- 18 U.S.C. §§ 1961-1968 (1994 ed. and Supp. III)

STATEMENT OF THE CASE & PROCEDURAL HISTORY

Following this Court's three Order(s) in CASA (*id*), declaring that Congress never authorized federal courts to issue "*nationwide*" or "*universal*" *injunctions*; and after twenty-one (21) federal judges sitting in the District of Columbia, the District of Massachusetts and the First Circuit enjoined PAG-Bishay from prosecuting civil rights/constitutional claims he brought through eleven (11) [separate] actions filed in the District(s) of Massachusetts and Columbia: (a) reflecting distinctly different causes; (b) naming distinctly different parties³; (c) seeking distinctly different remedies; and (d) supported by

³ **Specifically:** (1) *Bishay v. Harris, et al*, U.S. District Court for the District of Columbia Civil Action No. 1:21-cv-01831; (2) *Bishay v. McFadden, et al*, U.S. District Court for the District of Columbia Civil Action No. 1:24-cv-02086; (3) *Bishay v. Town of Sharon, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:23-cv-12094; (4) *Bishay v. Town of Sharon, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:23-cv-11848; (5) *Bishay v. Gelpi, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:24-cv-12331; (6) *Bishay v. Ocwen Financial Corporation, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:24-cv-12661; (7) *Bishay v. Ocwen Financial Corporation, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:24-mc-91591; (8) *Bishay v. Town of Sharon, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:25-mc-91085; (9) *Bishay v. Farrell*, U.S. District Court for the District of Massachusetts Civil Action No. 1:25-mc-91086; (10) *Ibrahim, et al, v. Town of Walpole, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:25-mc-91285; and (11) *Ibrahim, et al, v. Town of Walpole, et al*, U.S. District Court for the District of Massachusetts Civil Action No. 1:25-mc-91321.

distinctly different legal authorities *** all of which had been blocked by said twenty-one judges in reliance on a [single] injunction issued by a federal judge sitting in the District of Columbia in 2022 (*id*), which was forthwith deemed dissolve[ed] pursuant to this Court's three Order(s) of June 27, 2025 in *CASA*, declaring that such injunction(s) were never authorized by Congress, at any time, thus decisively [un]enforceable, *ab initio*⁴ *** on August 31, 2025,

⁴ As this Court's Docket reflects, specifically in the *Petition for a Writ of Mandamus* PAG-Bishay submitted on April 28, 2025 [Pet. No. 24-1213] prior to this Court's issuance of its three Order(s) in *CASA* on June 27, 2025, PAG-Bishay provided the following ***Questions Presented concerning nationwide injunctions***, as follows: if the D.C. judges' dismissal order(s) are deemed [un]constitutional, which included a "permanent injunction" barring PAG-Bishay from bringing any constitutional claim anywhere in the United States through "***nationwide injunction***", should such injunction be deemed **VOID**, *ab initio*, as this Court so held more than half century ago in *Walker v. City of Birmingham*, 388 U.S. 307, 87 S.Ct. 1824, 18 L.Ed.2d 1210 (1967), to wit: "***This is raw tyranny under the guise of maintaining law and order. We cannot in all good conscience obey such an injunction which is an unjust, undemocratic and unconstitutional misuse of the legal process.***" In the event the current Supreme Court chooses not to endorse the 1967 *Walker* court ruling (*supra*), should the current Court at least offer judicial perspective concerning H. Bill titled "***No Rogue Rulings Act***" through the within matter after District Judge Trevor McFadden entered a ***nationwide injunction*** later endorsed by the D.C. Circuit, barring PAG-Bishay from bringing [any] constitutional, civil-right or statutory claim anywhere in the United States [] -- thus requiring Congress to amend Chapter 85 of title 28, United States Code, Section 2 through §1370, abolishing, *ab initio*, "***nationwide injunctions***", particularly as such injunctions squarely conflict with "due process" rights and civil liberties guaranteed under the 5th and 14th Amendments, as said H. Bill reflects as follows: "***Notwithstanding any other provision of***

PAG-Bishay brought the within new civil action in the U.S. District Court for the District of Columbia, charging twenty-two (22) defendants, solely in their [in]dividual capacities⁵, with the following counts:

law, no United States district court shall issue any order providing for injunctive relief – except in the case of such an order that is applicable only to limit the actions of a party to the case before such district court with respect to the party seeking injunctive relief from such district court.”

⁵ State and/or federal employees, including judicial officers named solely in [i]ndividual capacity, are the “actors” *acting under color of law* within the meaning set forth in 18 U.S.C., § 242, 42 U.S.C. § 1983, as part of the *Civil Right Act of 1871*, the 5th and the 14th Amendments to the U.S. Constitution; whose acts were *not* “judicial acts” authorized by the United States Congress. *Infra*. Accordingly, all respondents named solely in [individual] capacities could’ve been self-represented, or represented by their insurers or private counsels, but could *not* have used taxpayers’ money by engaging attorneys employed by the U.S. Department of Justice (“DOJ”), nor could’ve caused the DOJ to employ private counsels to represent them, as set forth in 28 CFR § 50.15. In any event, as detailed here, said individuals chose *not* to defend nor obey the twenty-two (22) Summonses issued and served on them, thus they defaulted under Rules 54 and 55 of the *Federal Rules of Civil Procedure*. Therefore, as also detailed here, said individuals were *not* doing the business of the sovereign [the United States of America] when they took matters into their own hands and abrogated, negligently, willfully, and fraudulently U.S. [c]onstitutional mandates and specific protections available to *all* citizens of the United States under state and/or federal law, as chronicled in the *Verified Complaint* dated August 31, 2025, which was promptly served, together with all 22 Summonses issued by the D.C. District Court, pursuant to the U.S. Supreme Court’s holding in *Ex part Young*, to wit: “*when an official acts pursuant to an unconstitutional statute, the absence of valid authority leaves the official ultra vires his authority, and thus a private actor stripped of his status*

- I. *DELIBERATE BREACH OF JUDICIAL OATH(S);*
- II. *DELIBERATE BREACH OF OATH(S) OF OFFICE;*
- III. *CONTEMPT OF CONSTITUTIONAL MANDATES;*
- IV. *VIOLATION(S) OF CIVIL AND CONSTITUTIONAL RIGHTS;*
- V. *JUDICIAL BIAS AND PREJUDICE (FN-6);*
- VI. *OBSTRUCTION OF JUSTICE THROUGH [UN]AUTHORIZED, CONSPIRATORIAL NATIONWIDE - UNIVERSAL INJUNCTION;*

as a representative of the sovereign.” Ex parte Young, 209 U.S. 123, 28 S.Ct. 441, 52 L.Ed. 714 (1908)....

⁶ *Judicial Notice*: sadly, after decades of professional-ethical improprieties in which district and 1st Circuit judges engaged to obstruct PAG-Bishay from lawfully prosecuting constitutional-statutory claims he brought in the U.S. District Court for the District of Massachusetts, which ended up in the hands of 1st Circuit judges, in 2014, PAG-Bishay unearthed the malignant source of the malfeasance when he suddenly learned, through investigation, that senior judge Sandra Lynch’s husband, whose last name is Lund, was actually a senior partner in a Boston law firm that was actively representing several defendants PAG-Bishay named in multiple actions not knowing that said defense attorneys were partners with 1st Circuit judge Lynch’s husband. These serious improprieties were deliberately concealed from PAG-Bishay by said judges and attorneys and once PAG-Bishay published this fatal discovery [as reflected in multiple First Circuit dockets], the 1st Circuit published several notices conceding “disqualification” in *en banc* forums concerning matters naming PAG-Bishay.

- VII. *CONTEMPT OF THE JUNE 2025 SUPREME COURT'S ORDER(S) IN TRUMP V. CASA, WITH SELF-PROCLAIMED IMPUNITY;*
- VIII. *AIDING AND ABETTING EIGHT (8) FEDERAL CRIMES;*
- IX. *ENGAGING IN CIVIL CONSPIRACY UNDER THE FEDERAL RICO ACT TO FORECLOSE UNFETTERED CONSTITUTIONAL RIGHTS, ALSO WITH SELF-PROCLAIMED IMPUNITY; and*
- X. *AIDING PROPERTY-TAKING WITHOUT PAYMENT OR DUE PROCESS OF LAW GUARANTIED UNDER THE FIFTH AND THE FOURTEENTH AMENDMENTS...*

In said *Verified Complaint*; pursuant to the constitutional & civil rights available to PAG-Bishay under the *Fifth* and the *Fourteenth* Amendments to the U.S. Constitution; 42 U.S.C. §§ 1983 and 1985(3); Public Policy as pertaining to him and those similarly situated citizens of the United States under 18 U.S.C. §§1961-1968 (1994 ed. and Supp. III), PAG-Bishay relied on, *and specifically cited*, this Court's June 27, 2025 Order(s), striking down *all* previously issued "*universal injunctions*", here as pertaining to district judge Trevor McFadden's "*universal injunction*" issued against PAG-Bishay in *Bishay v. Harris, et al.*, U.S. District Court for the District of Columbia, C.A. No. 1:21-cv-01831, which district judge Amir Ali *unlawfully* applied to the new, *separate* [] action PAG-Bishay brought on August 31, 2025, styled *Bishay v. Saylor IV., et al*, U.S. District Court for the District of Columbia, C.A. No. 25-03102, where judge Ali deliberately engaged in the following unlawful acts: (i) contempt of the *Judicial*

Oath he took in 2024; (ii) contempt of clear and unambiguous constitutional mandates set forth in the *Fifth* and the *Fourteenth* Amendments to the U.S. Constitution; (iii) contempt of protected civil rights under 42 U.S.C. §§ 1983 & 1985(3); (iv) engaged in obstruction of justice, under 18 U.S.C. § 1503, 1505; (v) engaged in aiding and abetting eight (8) federal crimes; (vi) participated in a civil conspiracy with the 22 defendants named in the August 31, 2025 new action, under the federal RICO Act, to foreclose otherwise unfettered constitutional rights; (vii) aided and abetted property taking without payment or due process of law, in stark violation of the 5th and the 14th Amendments; and (viii) contemptuously defied this Court's three Order(s) in *Trump v. CASA, Inc.*, 24A884, 24A885, 24A886, where this Court clearly and unambiguously declared said ***nationwide-universal injunction[s]*** [un]authorized by Congress, thus were/are [un]enforceable, *ab initio*, as follows:

These injunctions -- known as "***universal injunctions***" -- likely exceed the equitable authority that Congress has granted to federal courts. Such injunctions are sometimes called "***nationwide injunctions***," *reflecting their use by a single district court to bar the enforcement of a law anywhere in the Nation*. But the term "universal" better captures how these injunctions work. Even a traditional, parties-only injunction can apply beyond the jurisdiction of the issuing court. *Steele v. Bulova Watch Co.*, 344 U. S. 280, 289 (1952) (When "exercising its

equity powers,” a district court “may command persons properly before it to cease or perform acts outside its territorial jurisdiction”). The difference between a traditional injunction and a universal injunction is not so much where it applies, *but whom it protects*: A universal injunction prohibits the Government from enforcing the law against anyone, anywhere. H. Wasserman, “*Nationwide*” Injunctions Are Really “*Universal*” Injunctions and They Are Never Appropriate, 22 Lewis & Clark L. Rev. 335, 338 (2018)...

Our early refusals to grant relief to nonparties are consistent with the party-specific principles that permeate our understanding of equity.

“[N]either declaratory nor injunctive relief,” we have said, “can directly interfere with enforcement of contested statutes or ordinances except with respect to the particular federal plaintiffs.”

Doran v. Salem Inn, Inc., 422 U. S. 922, 931 (1975); see also *Gregory v. Stetson*, 133 U.S. 579, 586 (1890) (“*It is an elementary principle that a court cannot adjudicate directly upon a person’s right without having him either actually or constructively before it. This principle is*

fundamental"); Baude, 137 Harv. L. Rev., at 168 (noting the “party-specific understanding of what equitable remedies do”)...

Under our well-established precedent, the equitable relief available in the federal courts is that “*traditionally accorded by courts of equity*” at the time of our founding. *Grupo Mexicano*, 527 U.S., at 319. Nothing like a universal injunction was available at the founding, or for that matter, for more than a century thereafter. *Thus, under the Judiciary Act, federal courts lack authority to issue them...*

Accordingly, to avoid delays, and together with the submission of the August 31, 2025 *Verified Complaint*, PAG-Bishay provided the U.S. District Court for the District of Columbia true and accurate copy of this Court’s Order(s) dated June 27, 2025 (*supra*), as reflected in RA 77-174.

In response, the U.S. District Court for the District of Columbia issued twenty two (22) Summonses, which were timely served on the twenty two (22) defendants named in the August 31, 2025 *Verified Complaint*, as reflected in RA 176-233.

Notwithstanding the clarity of the foregoing, on October 15, 2025, district judge Amir Ali suddenly proffered that the 2022 “*nationwide-universal injunction*”, which was issued by a different judge in a [separate] action naming different parties; different

facts; different legal authorities; and different reliefs sought, remained [en]forceable on August 31, 2025 (according to Ali), in the face of this Court's three Order(s) of June 27, 2025 in CASA eradicating all *nationwide-universal injunctions* once and for all.

In addition, district judge Amir Ali opined that the ten (10) [s]tatutory and [c]onstitutional violations listed in the August 31, 2025 *Verified Complaint*, chronicled above in this booklet, are "*judicial acts*" authorized by Congress as such. Copy of district judge Amir Ali's Order is reflected in **RA 235-237**.

On October 20, 2025 [**RA 14-233**], in response, PAG-Bishay served on the District Clerk: (i) *Notice Via Restricted Mail Delivery*; (ii) *Plaintiff's Rule 54 & 55 Affidavit*; (iii) *Plaintiff's Rule 54 & 55 Application for the Entry of Default(s) and Default Judgment(s)*; (iv) *Judgment [proposed]*; and (v) *Demand for the Forthwith Statutory Recusal, Ab Initio, of U.S. District Judge Amir Hatem Ali; and Other Relief*, therefore deeming the October 15, 2025 Order **VOID**, *ab initio*, based on the following statutory mandate:

"Whenever a party to any proceeding in a district court makes and files a timely and sufficient affidavit that the judge before whom the matter is pending has a personal bias or prejudice either against him or in favor of any adverse party, such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding."

In said [s]tatutory demand, PAG-Bishay averred as follows:

- I) *DISTRICT JUDGE AMIR HATEM ALI IS FORTHWITH DEEMED STATUTORILY RECUSED;*
- II) *DISTRICT JUDGE ALI'S OCTOBER 15, 2025 ORDER IS FORTHWITH VACATED;*
- III) *BASED ON PUBLIC DOCKET NUMBER 25-03102 REFLECTING NEITHER ANSWER(S) NOR RESPONSIVE PLEADING(S) FILED AND SERVED BY OR ON BEHALF OF THE TWENTY TWO DEFENDANTS LISTED IN SAID VERIFIED COMPLAINT, WITHIN 21-DAYS, AS MANDATED UNDER RULE 12(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE, AND PURSUANT TO RULE 55(a) and (b) and RULE 54(b) and (c), THE CLERK OF THIS FEDERAL TRIBUNAL MUST FORTHWITH ENTER TWENTY TWO DEFAULT(S) AND TWENTY TWO DEFAULT JUDGMENT(S), AS CONFIRMED IN THE PLAINTIFF'S AFFIDAVIT AND SOUGHT IN THE APPLICATION APPENDED HERETO; and*
- IV) *THE CLERK OF THIS FEDERAL TRIBUNAL MUST FORTHWITH ENTER FINAL JUDGMENT IN THE FORM AND CONTENT APPENDED HERETO AS "PROPOSED".*

The District Clerk informed PAG-Bishay that the above referenced demand was forthwith transmitted to district judge Ali by the Clerk on October 20, 2025.

The District Court's Docket, however, reflects no action taken by the Clerk or any district judge,

particularly pursuant to the [nondiscretionary] mandates set forth in Rules 54 and 55, describing the Clerk's [strict] ministerial duties (*supra*).

No other entries were made by on behalf of district judge Ali since October 15, 2025, nor by any other district judge, despite the clarity of the mandate set forth in 28 U.S.C. § 144, as follows: "***... such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding.***" *Supra*.

Once again, on October 30, 2025, PAG-Bishay served on the District Clerk ***SECOND DEMAND MADE ON ANGELA D. CAESAR, IN THE CAPACITY OF "CLERK" OF THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, FOR THE FORTHWITH ENTRY, WITHOUT FURTHER DELAY, OF THE TWENTY TWO DEFAULT(S) AND THE DEFAULT JUDGMENT(S) PREVIOUSLY DEMANDED ON OCTOBER 20, 2025, PURSUANT TO RULES: 12(a); 55(a) and (b); and 54(b) and (c), OF THE FEDERAL RULES OF CIVIL PROCEDURE***, as reflected in **RA 11-13**.

On November 10, 2025, pursuant to the mandate(s) set forth in 28 U.S.C. § 144 (*supra*); and after district judge Amir Ali was [statutorily] recused, *ab initio*, with no other district judge assigned as statutorily mandated (*supra*), PAG-Bishay submitted a demand directed to the D.C. District Court's Chief Judge, Hon. James Boassberg, requesting that he orders the Clerk (who was/is in contempt of the *Federal Rules of Civil Procedure*) to forthwith comply with the strict mandates set forth in Rule 12(a); Rule

55(a) and (b); and Rule 54(b) and (c), without further delay, as reflected in RA 8-10.

Once again, the District Clerk placed the above-described document in the same *black hole*: **REQUEST FOR LEAVE TO FILE REVIEW**, as reflected in RA 251-252.

On November 14, 2025, after affording the D.C. District Court ample opportunity to forthwith comply with the mandate(s) set forth in 28 U.S.C. § 144 (*supra*); and in light of the District Clerk's repeated refusal to comply with the *Federal Rules of Civil Procedure* (*supra*), PAG-Bishay paid the required fee and submitted in the U.S. Court of Appeals for the District of Columbia Circuit his *Petition for a Writ of Mandamus Under 28 U.S.C. § 1292(a)(1)*, seeking to *Direct the District Court and its Clerk to Forthwith Comply with the Federal Rules of Civil Procedure*, as reflected in RA 1-244; Appendix B.

On January 21, 2026, and while the D.C. Circuit remained *disqualified* after the U.S. Chief Justice disqualified said circuit [in its entirety] in the related matter described in FN-2 of this document, three D.C. Circuit judges *** presumably aware of their disqualification; notwithstanding the clarity of the procedural history chronicled above *** recklessly denied PAG-Bishay's *Petition for Interlocutory-Injunctive Relief* submitted on November 14, 2025, without a memorandum [Appendix A], disingenuously purporting that PAG-Bishay "*has not shown a clear and indisputable right to the relief requested*", which is the strict compliance with the *Federal Rules of Civil Procedure*. *Supra*.

Further, if anything, it is abundantly clear that this Court already reversed the D.C. Circuit's *Cheney* judgment cited in Appendix A which dealt with *discovery* disputes relating to *senior officials in the Executive Branch and a task force established to give advice and make policy recommendations to the President of the United States*; and further held that alternative avenues of relief were [un]available, which the above chronicled procedural history confirms here, as pertaining to the within matter.

Moreover, the three circuit judges who referenced the *Cheney* matter were well aware that: (i) they were *disqualified*; and (ii) *en banc* relief is *not* available to PAG-Bishay based on the three Order(s) issued by the Chief Justice of the United States referenced in FN-2 of this document.

**REASON WHY THE PETITION
SHOULD BE GRANTED**

PAG-Bishay avers that all prerequisites are met for mandamus relief in this matter, as this Court recognized in *Cheney v. United States Dist. Court for DC*, 542 US 367, concerning lower courts and the codification at 28 U.S.C. § 1651(a), *to wit*: "*The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.*"

This Court also held that "*The traditional use of the writ in aid of appellate jurisdiction both at common law and in the federal courts has been to confine [the court against which mandamus is sought] to a lawful exercise of its prescribed jurisdiction.*" *Roche v. Evaporated Milk Assn.*, 319 U.S. 21, 26 (1943).

This Court further held that, in *Will v. United States*, 389 U.S. 90, 95 (1967), "*judicial usurpation of power*" or a "*clear abuse of discretion*", under *Bankers Life & Casualty Co. v. Holland*, 346 U.S. 379, 383 (1953), "*will justify the invocation of this extraordinary remedy*". See *Will*, 389 U.S., at 95.

Here, as detailed above, all conditions are met, as this Court described in *Kerr v. United States Dist. Court for Northern Dist. of Cal.*, 426 U.S. 394, 403 (1976), as follows:

First, "*the party seeking issuance of the writ [must] have no other adequate means to attain the*

relief he desires", a condition designed to ensure that the writ will not be used as a substitute for the regular appeals process under *Fahey*. In the within matter, PAG-Bishay has no other appellate remedies after the D.C. Circuit conceded its *disqualification* in the entirety; and the Chief Justice of the United States so concurred, as evidenced in his three Order(s) dated December 11, 2024, referenced in FN-2 of this document.

Second, the right to the issuance of the writ is "*clear and indisputable*" under *Kerr*, at 403 (quoting *Bankers Life & Casualty Co.*, at 384), because in the within matter: (i) the entire D.C. Circuit conceded its *disqualification* to act in any judicial capacity in a related matter; (ii) the Chief Justice of the United States so concurred, as evidenced in the three Order(s) he issued on December 11, 2024 in said related matter; and (iii) complying with the *Federal Rules of Civil Procedure* is [non]discretionary.

Third, under the standard of "discretion", there is *no* discretion concerning the strict mandates set forth in the *Federal Rules of Civil Procedure*. *Supra*.

CONCLUSION & RELIEF SOUGHT

Based on the foregoing procedural history; with *no alternative relief available*; and PAG-Bishay' earlier *Petition For A Writ of Mandamus* dated April 28, 2025 [Pet. 24-1213] asking the Court to rule on whether federal courts are authorized by Congress to issue "*nationwide-universal*" *injunctions*, for which PAG-Bishay spent \$12,000 on formatting, printing, filing and serving, seeking the discrete relief

described in FN-4 of this Petition, and that on October 6, 2025, this Court *denied* PAG-Bishay's earlier Petition perhaps because this Court had already revers[ed] the underlying impediment PAG-Bishay presented in Pet. 24-1213, as the Court so declared on June 27, 2025 in *CASA*, confirming that Congress never authorized such injunction(s), thus deeming all "*universal injunctions*" **VOID**, *ab initio*, specifically here as pertaining to the civil and constitutional rights PAG-Bishay invoked in the within matter under 42 U.S.C., §§ 1983 & 1985(3); the 5th and the 14th Amendments to the U.S. Constitution, on his own behalf and at the behest of *all* similarly situated citizens of the United States pursuant to the authority vested in him by the U.S. Congress under 18 U.S.C. §§ 1961-1968 (1994 ed. and Supp. III); and pursuant to the supervisory appellate authority vested in this Court under Article III, §§ 1 and 2 of the United States Constitution, PAG-Bishay here respectfully moves the Justice(s) of this Court to direct the U.S. District Court for the District of Columbia to forthwith comply with the *Federal Rules of Civil Procedure*, as detailed above in this Petition.

Respectfully submitted on February 17, 2026, by:
Bahig F. Bishay,

Bahig F. Bishay
Bahig F. Bishay, Plaintiff-
Petitioner & Private
Attorney General
Authorized by the U.S.
Congress under
18 U.S.C. §§ 1961-1968
(1994 ed. and Supp. III)