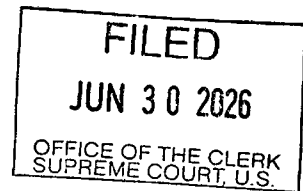


ORIGINAL

No 26-5088

ORIGINAL

IN THE SUPREME COURT
OF THE UNITED STATES



Susan Lloyd, Petitioner

V

Commonwealth of PA, etal Respondents

ON PETITION FOR A WRIT OF CERTIORARI TO
UNITED STATES 3rd CIRCUIT APPEALS COURT

PETITION FOR WRIT OF CERTIORARI

Susan Lloyd

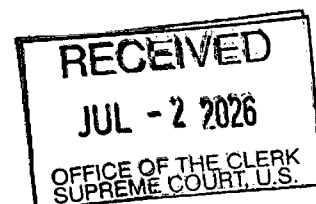
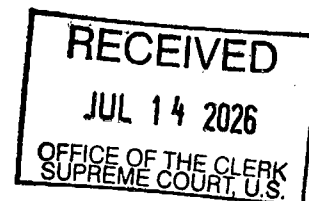
A handwritten signature in dark ink, consisting of a stylized 'S' and 'L' followed by a long horizontal stroke.

55 Stanley Ave

Landisville, PA 17538

Domino7575@yahoo.com

2133219999



QUESTION PRESENTED

1. Can Pennsylvania be held liable for enacting an unconstitutional certificate of merit
2. Did Uwchlan Township Police violate Lloyds 1st amendment and 14th amendment and equal protection rights
3. Can Sara Gray be sued for abuse of process
4. Is the Pennsylvania Board of Veterinary Medicine immune when they commit fraud
5. Should claims against Shannon Stanek and Exton vet clinic been dismissed

LIST OF PARTIES

PETITIONER

Susan Lloyd

RESPONDENTS

Commonwealth of PA

Uwchlan Township Police Department

Nicole Navarra

Maureen Evans

Pennsylvania State Board of Veterinarian Medicine

Shannon Stanek

Exton Vet Clinic

Emily Ramos / Emily Bourret

Sara Gray

Bennett Bricklin and Saltzburg

Peet Dukey
Heather Westfall
June and John Doe Partner
Aryan Jackson
Helen + Dominic
Clerks Office
Brantham Valley SPCA
Daniel Schiff

RELATED CASES

Susan Lloyd v Commonwealth of PA, Eastern District of PA, case
22-5148

Susan Lloyd v Commonwealth of PA, 3rd Circuit court of appeals,
25-2642

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INTERESTED PARTIES

All of the above respondents are interested parties. All other
parties were dismissed through settlement or voluntarily by
Lloyd

111

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V

IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

OPINIONS BELOW

1. Petitioner prays that a writ of certiorari issues to review the judgments below.
2. Commonwealth of PA and Veterinarian Board were dismissed on September 19 2024 and entered on the same date by the Eastern District of PA (Appendix A)
3. Sara gray, BBS law, Ramos, Exton vet clinic and Stanek were dismissed on September 26 2024 and orders entered on the same date by the Eastern District of PA (Appendix B)
4. On September 30 2024 all claims against Uwchlan Township, Navarra and Evans were dismissed except 1st amendment claims and were entered by the Eastern District of PA on September 30 2024 (Appendix C)
5. On August 25 2025 order granting summary judgment to Uwchlan Township for 1st amendment claims was ordered and entered on August 25 2025 by Eastern District of PA (Appendix D)
6. 3rd circuit appeals court order from March 30 2026 affirming Eastern District and entered on march 30 2026 (Appendix E)
7. Denial of rehearing from 3rd circuit on June 10 2026 entered on June 10 2026. (Appendix F)

JURISDICTION

8. The 3rd circuit affirmed the Eastern district of PA on March 30 2026 and it was entered on the same date(Appendix E) `
9. Lloyd filed timely rehearing that was denied June 10 2026 and entered on the same date. (Appendix F)
10. The jurisdiction of this court is invoked under 28 USC 1254.
11. This case involves questions of immunity that must be answered and whether Pennsylvania certificate of merit is unconstitutional
12. Lloyds case has garnered much public interest due to Lloyd trying to abolish Pennsylvania's certificate of merit and articles were even published in regards to Lloyds case as a direct result (APPENDIX G)

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

13. 1st Amendment
14. 14th Amendment
15. Pennsylvania certificate of merit is unconstitutional
16. Immunity is unconstitutional

STATEMENT OF THE CASE

15. This case was originally filed in the Eastern District of PA on December 23 2022. It was assigned case 22-5148

16. Orders were made dismissing case parties on September 19 2024, September 26 2024, September 30 2024, August 25 2025

17. Lloyd appealed dismissal on August 28 2025 to the 3rd circuit. It was assigned case 25-2642

18. They affirmed on March 30 2026

19. Lloyd filed for rehearing on March 30 2026.

20. It was denied on June 10 2026

21. Lloyd now filed this writ of certiorari.

22. No Defendant should have been dismissed

**PENNSYLVANIA CAN BE HELD LIABLE FOR ENACTING AN UNCONSTITUTIONAL
CERTIFICATE OF MERIT**

23. Pennsylvania enacted an unconstitutional certificate of merit which caused Lloyd harm in state court

24. Lloyds case was dismissed against Stanek and Exton vet in state court due to the unconstitutional certificate of merit

25. 36 states have either refused to enact the certificate of merit or abolished it because it VIOLATES 1st and 14th amendment rights.

26. The 3rd circuit does not even pay attention to this matter and they affirmed the eastern district by stating that Berk v

Choy has recently decided the certificate of merit is not allowed to be used in federal court

27. However, Lloyds claims are for the harm the unconstitutional certificate of merit has caused Lloyd in state court.

28. The certificate of merit caused impairment of Lloyds access to court and Lloyd suffered actual injury

29. Actual injury occurs when a plaintiff has been hindered in an effort to pursue a non frivolous legal claim. *Oliver v Fauver* 118 F 3d 175, 177 (3rd circ 1997).

30. Lloyd had a filed expert report at all relevant times in state court against Stanek and Exton Vet that they are grossly negligent

31. Lloyds claims were dismissed based on the unconstitutional certificate of merit

32. Stanek intentionally destroyed video and concealed medical records from Lloyd so Lloyd could not obtain an expert at the time she filed the case

33. Lloyd was not allowed to complete discovery to further her claims based on the unconstitutional certificate of merit

34. Despite Lloyd having a filed expert report at all relevant times that Stanek is grossly negligent in Dominos death, Lloyds case was still dismissed

34. Pennsylvania certificate of merit is even more unconstitutional as it forces a pro se litigant to attach an expert report to the certificate of merit and an attorney is not required to do so and under the law an attorney and pro se litigant must be treated equally. In Commonwealth v Abu-Jamal 521 Pa 188,200, 555 A 2d 846, 852(1989), A pro se litigant is subject to the same rules of procedure as an attorney

35. Oklahoma has banned the certificate of merit in John v Saint Francis Hospital 2017 OK 81 as it "is an impermissible barrier to court access and an unconstitutional special law."

36. Washington banned the certificate of merit in Putnam v. Wenatchee Valley Med. Center 216 P 3d 374, 166 Wn 2d 974 (Washington 2009), because it was "unconstitutional because it unduly burdens the right of access to courts and violates the separation of powers."

37. "The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he receives an injury. One of the first duties of government is to afford that protection." Marbury v. Madison, 5 U.S. (1 Cranch) 137, 163, 2 L.Ed. 60 (1803).

³⁸
38. The people have a right of access to courts; indeed, it is "the bedrock foundation upon which rest all the people's rights and obligations." John Doe v. Puget Sound Blood Ctr., 117 Wash.2d 772, 780, 819 P.2d 370 (1991). This right of access to

courts "includes the right of discovery authorized by the civil rules." Id. As we have said before, Requiring medical malpractice plaintiffs to submit a certificate prior to discovery hinders their right of access to courts. Through the discovery process, plaintiffs uncover the evidence necessary to pursue their claims. Id. Obtaining the evidence necessary to obtain a certificate of merit may not be possible prior to discovery, when health care workers can be interviewed and procedural manuals reviewed. Requiring plaintiffs to submit evidence supporting their claims prior to the discovery process violates the plaintiffs' right of access to courts. It is the duty of the courts to administer justice by protecting the legal rights and enforcing the legal obligations of the people. Id. at 780, 819 P.2d 370. Accordingly, we must strike down this law. Putnam v. Wenatchee Med. Ctr ., 166 Wn. 2d 974, 216 P.3d 374 (2009).

³⁹
~~76~~. The Utah Supreme Court held that the requirement in a medical malpractice to obtain an "affidavit of merit" is unconstitutional as it results in an impermissible delegation of judicial power. Vega V Jordan Valley Medical Center 2019 UT 35 .
⁴⁰
~~77~~. In Oklahoma, John V Saint Francis Hospital 405 P 3d 681, 691 (2017) determined that certificates of merit are unconstitutional. In its decision dated October 24, 2017, the Supreme Court of the State of Oklahoma ("Oklahoma Supreme Court") held that "the thrice incarnated affidavit of merit

requirement found in Okla. Stat. tit. 12, § 19.1 (Supp. 2013)" with regard to Oklahoma medical malpractice cases is unconstitutional because it "is an impermissible barrier to court access and an unconstitutional special law."

41. In Timothy Martin V Washington Department of Corrections (exhibit), the Washington Supreme Court determined a certificate of merit is facially invalid under its constitution. We addressed the constitutionality of the statute in Putman v. Wenatchee Valley Medical Center, PS(exhibit) [...]," Associate Chief Justice Charles W. Johnson wrote for the court. "In that case, we held that RCW 7.70.150 was unconstitutional on two separate grounds: violation of the right of access to the courts and violation of the separation of powers."

42. Arkansas does not require a certificate of merit due to the unconstitutional nature of it. "[t]he constitutional infirmity in Â§ 16-114-209(b) is the provision for dismissal if the affidavit does not accompany a complaint within thirty days. We do not hold today that the balance of 16-114-209(b), requiring a reasonable-cause affidavit, is constitutionally infirm. The case is Summerville V Thrower No. 06-501, (Ark. S. C. March 15, 2007).

43. The First Amendment provides the right of access to the courts when an injury is suffered.

44
81. Article VI, Clause 2 of the US Constitution stipulates that state governments are required to obey federal law in the United States and which allow Plaintiffs access to the courts under the First Amendment when an injury occurs. The Supremacy Clause is a clause within Article VI of the U.S. Constitution (exhibit) which dictates that federal law is the "supreme law of the land." This means that judges in every state must follow the Constitution, laws, and treaties of the federal government which includes giving litigants a right to access the courts when an injury occurs.

45
82. By forcing litigants to obtain certificates of merits, is unconstitutional as determined in many other states. By forcing Lloyd as a pro se litigant to do something that an attorney is not even required to do is even more of a violation of Lloyds constitutional rights.

46
83. Lloyd is pro se for one reason only: she cannot afford an attorney

47
84. Lloyds case also has merit and is not frivolous.

48
85. Lloyd has a filed expert report that Stanek is grossly negligent in Dominos death

44
86. There are only 14 states which require a certificate of merit as per article written by american bar association on December 11 2020 titled Certificates of Merit: Practical Guidance to Avoid Procedural Pitfalls. . The rest do not as they

agree it at least may infringe on a litigants right to access the courts

50/ 31. Furthermore, 1042.3 is unconstitutional as it treats pro se litigants differently than an attorney. A pro se litigant must attach an opinion letter when a lawyer does not. In Commonwealth v Abu-Jamal 521 Pa 188,200, 555 A 2d 846, 852(1989), A pro se litigant is subject to the same rules of procedure as an attorney and yet Pennsylvania forces a pro se litigant to do what an attorney does not have to do.

51/ 34. Furthermore, The Supreme Court of Pennsylvania has amended Rule 1042.1 et seq. governing the certificate of merit. Currently, the rules of civil procedure provide for dismissal of a complaint for failure to file a certificate of merit. However, they are silent as to procedure when a certificate of merit is filed, but does not comply with the rules.

52/ 35. Lloyd filed 4 certificates of merit for Stanek and Exton vet in state court and said an expert is not needed and they are unconstitutional

53/ 36. Lloyds claims were dismissed anyways

Therefore, Pennsylvania should be held liable for enacting an unconstitutional certificate of merit. Lloyd also asked for declarative and injunctive relief so her claims should not have been dismissed

DID UWCHLAN TOWNSHIP POLICE VIOLATE LLOYDS 1ST, 14TH AND EQUAL
PROTECTION RIGHTS

5427. Lloyd reported Stanek to Uwchlan Township for intentionally
killing Domino with pentobarbital

5428. After stating they will charge Stanek, Uwchlan Township
abandoned Lloyd

5429. They then blocked Lloyd and deleted all of Lloyds reviews
from their official government Facebook pages

5430. This violates lloyds 1st amendment rights as in Lloyd v
Streetsboro. 0:18-cv-03485 6th circuit which states a govt
official is not allowed to block you on their official social
media pages

5431. Uwchlan Township never disputed that the pages they blocked
Lloyd on were their official govt pages

5432. LLOYD then created a new page and began to rewrite reviews
and comments on Uwchlan Township Police page

6043. Even during litigation, they continued to block Lloyd

6044. Despite the 3rd circuit and Schmehl knowing this, they still
ruled against Lloyd

6045. The 3rd circuit was wrong as they stated Lloyd is bringing
this up for the first time on appeal

⁶³
~~46.~~ Once again, the 3rd circuit knows nothing about this case and never read a single word that Lloyd wrote

⁶⁴
~~47.~~ Lloyd filed a motion for reconsideration with the trail court with exhibits showing how Uwchlan Defendants have continued to block Lloyd

⁶⁵
~~48.~~ FRCP rules allow a party to file a motion for reconsideration and attach new information

⁶⁶
~~49.~~ The 3rd circuit lied to rule against Lloyd

⁶⁷
~~50.~~ Judge Schmehl admits that Lloyds comments are not visible to the public on Uwchlna's page but then dismissed Lloyds case anyways

⁶⁸
~~51.~~ Attorney Rhoads repeatedly lied to Judge Schmehl and he continued to allow it to happen the entire case despite Lloyd showing each and every time how Rhoads was nothing but a liar

⁶⁹
~~52.~~ Lloyds evidence attached to the case shows that it was uwchlan Township who blocked Lloyd and to date, Lloyd still is not able to comment on their page from her real Facebook account

"sue michelle"

⁷⁰
~~53.~~ However, if Lloyd creates a fake facebook profile then she can comment until Uwchlan Township realizes it is Lloyd and then they block Lloyd once again

Therefore, none of Lloyds claims should have been dismissed.

Rhoads should have been sanctioned for intentionally lying to

11

Schemhl but instead, judges in PA allow lawyers to lie. Thats
all lawyers do is lie in PA court system

CAN A LAWYER WHO INTENTIONALLY IS DECEITFUL TO A JUDGE BE SUED
FOR ABUSE OF PROCESS

11/54. Gray throughout the state case matter, repeatedly told Judge
Binder that Lloyd had all of Dominos records since December
2021.

12/55. Sara Gray then admitted to not giving Lloyd Dominos xray
until July 2023, NINETEEN MONTHS after Lloyds first request and
NINE MONTHS after filing non pros

13/56. Despite a court order for discovery deadline being in
place, Gray refused to participate the entire case

14/57. As a result, Lloyd was not allowed to do any depositions,
send any subpoenas or complete written discovery despite the
state docket showing Lloyd tried over 30 times and each time,
Gray objected

15/58. Gray then filed non pros for a purpose it was not intended.

16/59. Non pros is to weed out frivolous claims

17/60. Gray knew Lloyd had a filed expert report that Stanek and
Exton vet is grossly negligent, a report that to date she lies
and says does not exist

78

81. Gray intentionally lied to the state court judges over 60 times.

79

82. Gray should have lost her license to practice law but instead, once again, PA courts allow lawyers to blatantly lie

80

83. Gray is so sick she even told the state court that Lloyd had her dog dead body in her house for 9 months knowing he was at Penn vet the entire time

81

84. This is what PA gives a law license to, a narcissistic delusional liar

82

85. Gray knew at the time she filed non pros that Stanek intentionally killed Lloyds service dog and then destroyed all video from her office and falsified medical records to conceal gross negligence

83

86. Rule 1042.6 only states when non pros can be entered when no certificate of merit has been filed.

84

87. Pennsylvania refers back to Rule 126 which states Rule 126. Liberal Construction and Application of Rules. The rules shall be liberally construed to secure the just, speedy and inexpensive determination of every action or proceeding to which they are applicable. The court at every stage of any such action or proceeding may disregard any error or defect of procedure which does not affect the substantial rights of the parties. Gray repeatedly told false statements over 60 times including just some of the following: Lloyd had all of Dominos records by

December 2021 despite later admitting she refused to give Lloyd Dominos xray until July 2023. Lloyd has no expert despite Gray having a copy at all relevant times. Domino and Lloyd left Stanek office at 139 pm despite her own clients medical records showing she took Dominos vitals between 156 and 202 pm. Lloyd had Dominos dead body in her house for 9 months despite knowing he was at Penn vet the entire time

⁸⁵
~~88~~. Gray is a sick delusional liar that the PA court system allows to have a license

⁸⁶
~~89~~. Gray intentionally took advantage of Lloyd as she knows Lloyd is poor and cannot afford an attorney

⁸⁷
~~90~~. Gray knows that PA judges do not read anything a pro se litigant writes and just dismissed cases

⁸⁸
~~91~~. So Gray intentionally lied over 60 times to get Lloyds case dismissed

⁸⁹
~~92~~. Lloyds meritorious state case against Stanek was dismissed not on the merits, but based on the unconstitutional certificate of merit and Sara Gray intentional false statements to mislead the court

⁹⁰
~~93~~. As officers of the court, lawyers must be candid and forthright. Lawyers are officers of the court. They must be completely truthful. Pennsylvania's ethics rules forbid "dishonesty, fraud, deceit or misrepresentation." Pa. R. Pro. Conduct 8.4(c).

91
74. "Rule 11 also imposes an implied 'duty of candor,' which attorneys violate whenever they misrepresent the evidence supporting their claims.

92
75. Sara Gray intentionally deceived the Pennsylvania judges over 60 times even going against Staneks medical records to do

so

93
76. Gray should be in prison for all of the lies she told in Lloyds case

94
77. When Lloyd sued her for abuse of process, her only defense was it is zealous representation of her clients to intentionally and repeatedly lie to judges

95
78. Not at any time did Sara Gray ever address Lloyds expert report that Stanek is grossly negligent in Dominos death and instead continued to lie that Lloyd has no expert despite having a copy of it in her dirty unclean hands

96
79. Gray refused to attend any deposition and refused to allow Lloyd to send any subpoenas the entire case in violation of court discovery deadlines

97
80. All Gray did was intentionally be dishonest to Binder, Lazarus and the PA superior court to get Lloyds meritorious case dismissed and should be held liable for abuse of process in this matter.

98
81. Instead of dismissing Gray and her lawfirm with prejudice, the court should have allowed Lloyd to refile in state court and

should have sent Gray to prison for all of her lies and intentional dishonesty.

⁹⁴/₈₂. But instead, Lloyd meritorious case was dismissed in a manifest injustice and Gray was told it is okay for her to lie to judges

¹⁰⁰/₈₃. Lloyd was never granted any hearings in Chester county and not allowed to do any depositions or send any subpoenas as a direct result of Sara Gray intentional deceit over 60 times.

¹⁰¹/₈₄. The records clearly show Lloyd had a filed expert report that Stanek is grossly negligent in Dominos death and Gray email admits to refusing to give Lloyd Dominos xray until July 2023

¹⁰²/₈₅. Gray knew Lloyd needed this xray to obtain an expert as Staneks xray was normal of Domino so she intentionally concealed this xray from Lloyd for NINETEEN MONTHS

¹⁰³/₈₆. Stanek intentionally injected Domino with pentobarbital to kill him which autopsy shows caused flash pulmonary edema as per Lloyds expert report (a known side effect of pentobarbital)

¹⁰⁴/₈₇. Stanek then destroyed all video from her office and falsified and destroyed medical records to conceal the use of pentobarbital to kill Domino

¹⁰⁵/₈₈. In fact the very first motion Lloyd filed was for sanctions against Stanek for refusing to give lloyd Dominos records

¹⁰⁶/₈₉. That motion was filed in June 2022. It was denied based on non pros despite non pros not being filed until October 2022.

- ¹⁰⁷
~~90~~. That proves how little attention that the underlying judges paid to this matter
- ¹⁰⁹
~~91~~. Despite Lloyd jumping up and down over 30 times asking for discovery, the judges ignored Lloyd and then lied and said Lloyd had all of Dominos records by Dec 2021
- ¹⁰⁹
~~92~~. They even fault Lloyd for not adding pentobarbital to her claims in June 2022 despite knowing that she did not discover them until October 2022 when toxicology came back from UC davis
- ¹¹⁰
~~93~~. All the state court judges did was sign off on GRays delusional lies and never read a single word that Lloyd wrote
- ¹¹¹
~~94~~. Stanek under the vet client patient relationship had a duty to disclose the pentobarbital to Lloyd but instead fraudulently concealed it and then Lloyd was never allowed to amend to add it on because of Gray and her delusional lies
- ¹¹²
~~95~~. As a direct result, to date, the pentobarbital claims have never been heard in any court

Gray should be disbarred, in prison and none of Lloyds claims should have been dismissed.

IS THE PENNSYLVANIA VET BOARD IMMUNE WHEN THEY COMMIT FRAUD

113
96. Vet board is not immune as they falsely advertise on their website that the Board protects the public from being misled by incompetent, unscrupulous and unauthorized persons and from unprofessional or illegal practices by persons licensed to practice veterinary medicine. Nothing could be further from the truth.

114
97. This statement is fraud as despite knowing Stanek is grossly negligent in Dominos death, they have done nothing to protect the public from Stanek

115
98. City Net v Gianato US COURT OF APPEALS 4th Circ No. 18-1575
-While courts have recognized the public interest in affording public officers immunity from suit to protect their ability to exercise independent discretion in carrying out their official duties, it surely does not serve the public interest to extend immunity protection to public officials who defraud the government," U.S. Circuit Judge Paul V. Niemeyer, a Ronald Reagan appointee, wrote in the 13-page opinion. "Thus, while immunity should protect discretion, it must not shield fraud."
Lloyd was neve allowed to do discovery to find out which state actors were involved so she was never allowed to add them on

116
99. The vet board is aware that Stanek has harmed many animals and still has done nothing

117
100. The vet board is aware that Stanek admits to having severe mental illness and still does nothing

- 118
101. The vet board is aware that Stanek admits to being under the influence of prescription pain meds when she killed Domino and still does nothing
- 119
102. The vet board is aware that Stanek blames her killing of animals on her brain tumor and still does nothing
- 120
103. The vet board knows that Stanek admits she has harmed many animals and still does nothing
- 121
104. The vet board is nothing but fraud
- 122
105. The vet board also violated Lloyds due process rights by not holding a hearing prior to dismissing Lloyds complaints against Stanek
- 123
106. The vet board also conceals complaints from the public so the same vets can continue to kill animals for fun
- 124
107. Because of the vet board allowing Stanek to continue to harm animals for over 20 years, many more animals are dead including Domino
- 125
108. Stanek even killed her own dog by spraying it in the face with a high powered hose until it got aspiration pneumonia
- 126
109. Stanek has no regards for any animals life
- 127
110. She lets animals under her care run across busy roads and parking lots by themselves
- 128
111. She touches open wounds with her filthy dirty hands
- 129
112. She cooks raw chicken next to sterile medical equipment
- 130
113. She sends animals home bleeding profusely after surgery

¹³¹
~~114~~. She admits to giving animals wrong diagnoses causing harm

¹³²
~~115~~. Stanek, even with her own mental illness, projected her own "brain tumor" onto Domino and told Lloyd domino had a brain tumor with no testing, nothing

¹³³
~~116~~. Stanek intentionally killed Domino because she was high on drugs and her mental illness

¹³⁴
~~117~~. As a result, Domino is dead

¹³⁵
~~118~~. Thanks to the vet board allowing vets in PA to kill animals for fun, many more animals are dead

¹³⁶
~~119~~. The vet board has no concern for any animals life and they dont care how many animals are dead as a direct result of

Shannon Stanek or any other vet in PA

¹³⁷
~~120~~. Lloyd has an advocacy group, justice for domino and double stuff

¹³⁸
~~121~~. Lloyd has met hundreds of other people in PA whose animal was killed by a vet

¹³⁹
~~122~~. Despite all of us having falsified medical records, autopsies and expert reports, the vet board has never done anything to any vet and as a result, thousands if not millions of animals have been killed for fun by these vets whose only goal was supposed to keep them safe

¹⁴⁰
~~123~~. The vet board does not care when an animal is intentionally killed by a vet

141
~~124~~. They then conceal all of the complaints from the public so
more animals can be intentionally killed

142
~~125~~. Thats the pennsylvania vet board for ya

NONE of lloyds claims should have been dismissed

STANEK, EXTON VET AND RAMOS SHOULD NOT HAVE BEEN DISMISSED

143
~~126~~. Judge Schmehl had a duty to make sure that Lloyds claims
were heard

144
~~127~~. Despite having a filed expert report that Stanek is grossly
negligent in Dominos death, Schmehl still dismissed Lloyds
claims

145
~~128~~. Part of Lloyds relief was injunctive and declaratory and
Schmehl had a legal obligation to tell the state court that
Lloyds claims must be heard

146
~~129~~. Instead, he caused further injury to Lloyd by dismissing
Lloyds meritorious case

NONE of Lloyds claims should have been dismissed

REASONS FOR GRANTING THE PETITION

147

88. The US Supreme Court needs to hear this case as Lloyds constitutional rights were violated and a manifest injustice was done

148

89. Lloyd has had other meritorious cases in the Eastern District of PA and every single one of them was dismissed with no hearing and no discovery just like this one.

149

90. Judge Schmehl never reads a single word that Lloyd wrote and it is apparent neither did the 3rd circuit

150

91. Judge Schemhl has taken the majority of Lloyds cases and dismissed each one with no hearing, no discovery, nothing

151

92. Both courts went against every law known to dismiss Lloyds cases

152

93. This is a public issue which affects any person or animal harmed by a physician or veterinarian in Pennsylvania

153

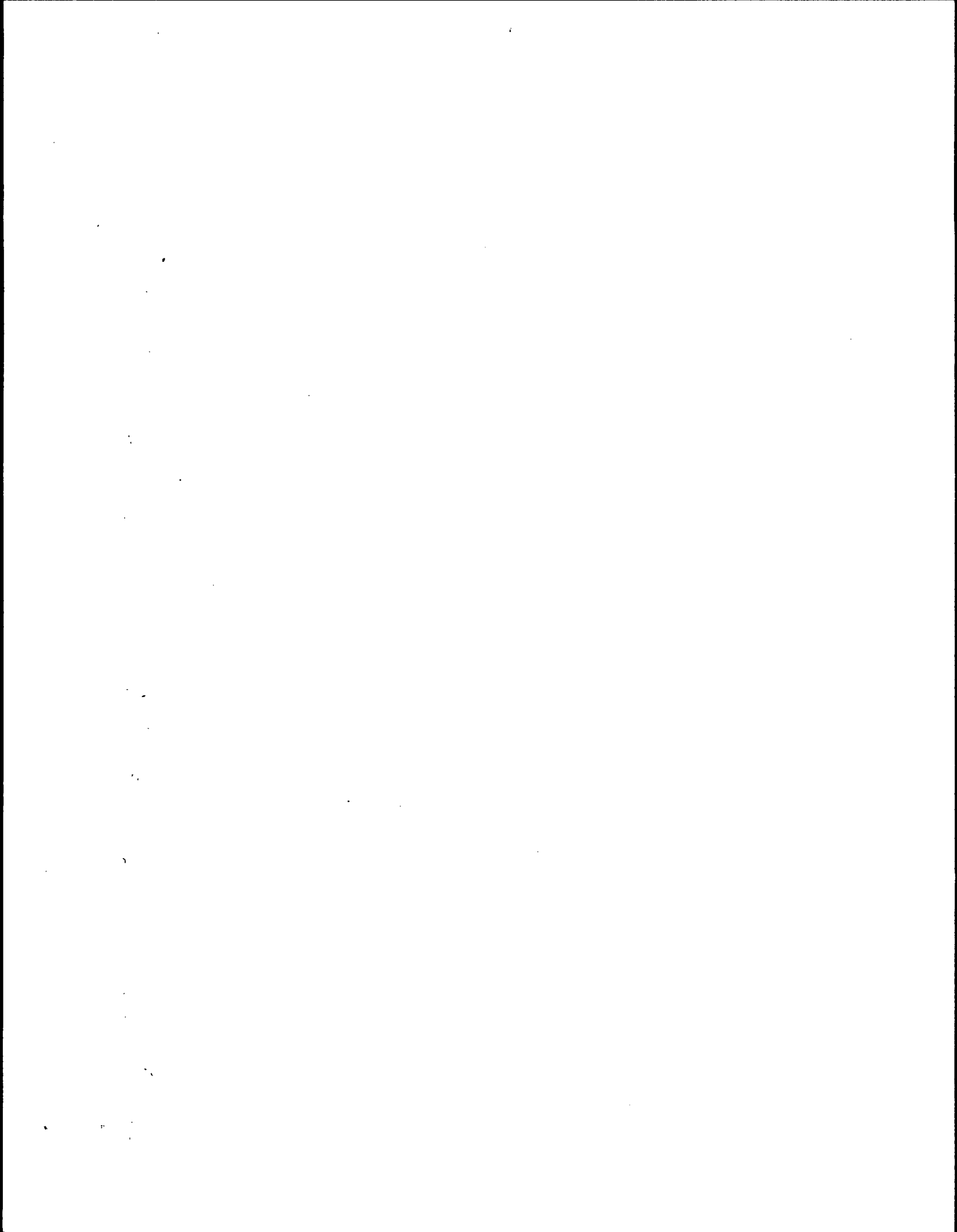
94. Lloyd is treated like shit by the court system as she is poor and cannot afford an attorney

154

95. These corporations hire attorneys who all they do is lie to the judges and since Lloyd is pro se, the judges do not read a single word that Lloyd writes

155

96. Lloyds case has garnered public attention and has been published in articles including "Appellate watch: Do certificates of merit violate the remedies clause or right to a jury trial" published August 20 2025 by Francis Notarianni



156

97. The certificate of merit is not being used for its intended purpose to weed out frivolous cases but instead is being used such as in this matter, to abuse litigants

157

98. Pennsylvania is so intent on NOT abolishing the unconstitutional certificate of merit, that Lloyd believes this is the very reason why her case was dismissed because of Lloyds advocacy to do so and their hatred of Lloyd

158

99. Lloyds case was clearly NOT dismissed based on the merits

159

100. Lloyds filed expert report shows that Stanek is grossly negligent in Dominos death

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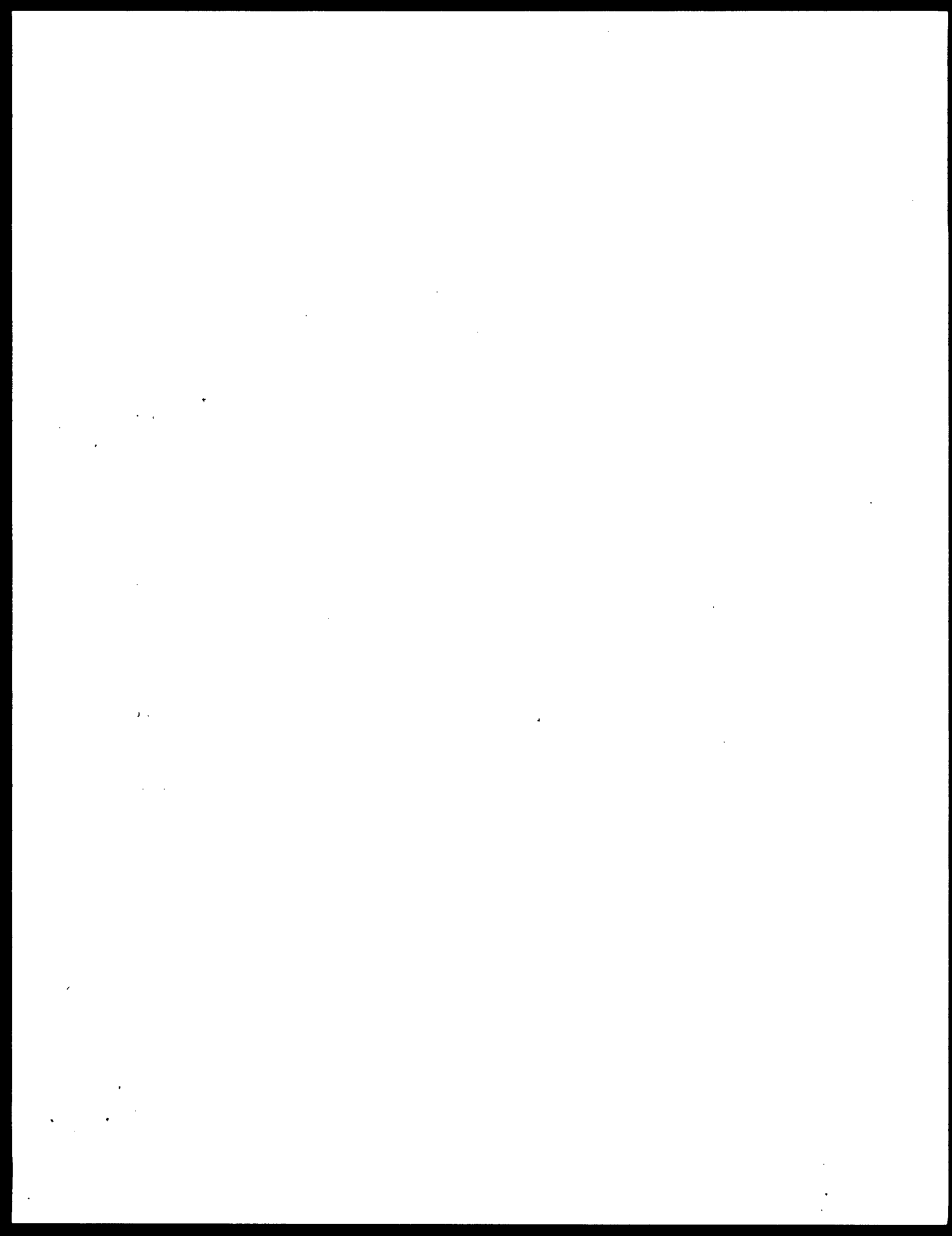
101. This case is about a service dog that was intentionally killed but also applies to all medical malpractice cases in pennsylvania, whether human or animal

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102. Physicians are intentionally destroying medical records that a patient needs to pursue litigation and then using the unconstitutional certificate of merit to dismiss meritorious cases

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103.. Stanek intentionally killed Domino and then fraudulently concealed medical records from Lloyd and then destroyed all video from her office to conceal gross negligence and then admits to harming many other animals but blames her mental illness and her fictitious brain tumor.



- 163
104. Stanek spends all day begging the public for money. She then uses the money to go on lavish cross country trips and cruises. None of it was ever used to help any animal
- 164
105. One minute stanek is being pushed in a wheelchair and the next she is climbing a mountain and drinking alcohol in public
- 165
106. Then the next day she back to being pushed in a wheelchair
- 166
107. Instead of giving up her practice because her mental illness affects her ability, stanek is so greedy for money, she continues to kill as many animals as possible
- 167
108. Stanek then hired Sara Gray to intentionally deceive the state judges over 60 times (even going against her own clients medical records to do so)
- 168
109. They both should have been sent to prison years ago but nope the PA court system says it is okay to kill animals for fun and then hire an attorney to lie over 60 times
- 169
110. Stanek even refused to aid Lloyd in any autopsy despite Domino dying immediately after leaving her office
- 170
111. Her and Gray did everything possible to prevent the truth of what sicko Stanek did to Domino
- 171
112. Follow justice for domino and double stuff on Facebook where Lloyd calls out these vets who kill animals for fun and the corrupt PA court judges
- 172
113. As shown in many other states, the certificate of merit is unconstitutional as it violates 1st amendment right of access to

the court, 14th amendment right to discovery and 7th amendment right to jury trial but PA does not care. Their only goal is to abuse litigants who are too poor to afford an attorney who will lie in court

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114. Lloyds case has been published in articles as this is a public issue.

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115. Due to the unconstitutional certificate of merit, Lloyd did not spend one minute in any courtroom in Chester county and was repeatedly denied discovery and then faulted by Chester County Judge Binder for not having any evidence and then further abused by the federal court system and Uwchlan Police

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116. Meanwhile, more animals are intentionally killed by Shannon Stanek who has zero regards for any animals life

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117. How many more animals have to be dead before someone stops her

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118. To date, in a manifest injustice, the pentobarbital claims have not been heard in any court despite Lloyd having a filed expert report at all times that Stanek is grossly negligent

CONCLUSION

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119. This writ of certiorari should be granted as Lloyds constitutional rights were violated and no claim should have been dismissed

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120. No other litigant should have to be abused (like Lloyd was) by the very system that was meant to protect injured parties

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121. Lloyds case was dismissed based on her pro se status and the judges hatred of Lloyd (not the merits)

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122. There was a manifest injustice done

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123. It is obvious the judges never read anything Lloyd ever wrote and just signed off on lawyers who lie in filed documents

183
124. It is clear to win in Pennsylvania court system, you have to pay a lawyer to lie in filed documents as that is all they ever do. None of them have any integrity or morals and the judges just sign off whatever they say and never read a single word that Lloyd writes.

184
125. Stephen Rhoads, lawyer for Uwchlan Township, even lied to Judge Schmhel and said his clients never heard of Stanek until Lloyd reported her and yet they have a glowing review Stanek wrote of them 10 years ago that is still open to the public and Stanek posts constant pictures and posts of how her and Uwchlan Township police are friends

185
126. Again. Lawyers in Pennsylvania are nothing but deceitful egregious liars with zero morals who abuse Lloyd at all costs

186
CONCLUSION

127. The petition for a writ of certiorari should be granted so this manifest injustice can be corrected and these Defendants are taught a lesson they will hopefully never forget.

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