

26-5511

ORIGINAL

No. _____

FILED

JUN 26 2026

OFFICE OF THE CLERK
SUPREME COURT, U.S.

IN THE

SUPREME COURT OF THE UNITED STATES

Antonio Goodwin — PETITIONER
(Your Name)

vs.

AT&T — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

US Court of Appeals For The Ninth Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Antonio Goodwin CASE
(Your Name)

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(City, State, Zip Code)

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SUPREME COURT, U.S.

14.1 (A) QUESTIONS PRESENTED

This case concerns the central issue of whether Antonio Goodwin was employed by AT&T, AT&T Mobility LLC, AT&T Inc., AT&T Corp., or any AT&T-related entities/Companies.

WHY THE FIFTH AMENDMENT OF THE CONSTITUTION, THE DUE PROCESS CLAUSE, WAS VIOLATED BY JUDGE DANIEL J. ALBREGTS, GLORIA NAVARRO, FRIEDLAND, NELSON, AND BADE. THE 63 INTERNAL AUTHENTIC AT&T EMPLOYMENT DOCUMENTS PROVE BEYOND AN REASONABLE DOUBT MR ANTONIO GOODWIN WAS AN EMPLOYEE OF AT&T, SENT DIRETLY FROM AT&T CORPORATE OFFICE TO THE EEOC. ON JANUARY 3, 2023

Why The Fifth Amendment Due Process Clause was violated by Judge Daniel J. Albregts, Gloria Navarro, Friedland, Nelson, and Bade regarding Mr. Antonio Goodwin filing sanctions against AT&T on Document 51 and 54 on April 10, 2025, against AT&T, Pamela M. Phillips, and Stacey Campbell for making false employment statements under oath by stating Mr. Antonio Goodwin was never an employee of any AT&T companies.

The Judges did not take any of Mr. Antonio Goodwin's evidence into consideration, as well as ignored Mr. Antonio Goodwin's 900 authentic AT&T employment documents in front of Judge Daniel J. Albregts, Judge Gloria Navarro, Judges Friedland, Nelson, and Bade. The Judges violated the Fifth Amendment Due Process Clause.

Mr. Antonio Goodwin's 900 authentic AT&T employment documents were filed 3 months before the Rule 11 sanctions were filed against Mr. Antonio Goodwin on June 5, 2025.

The Judges ignored Mr. Antonio Goodwin's 900 authentic AT&T employment documents from April 10, 2025, through March 31, 2026, and through the June 2, 2026 Order.

Furthermore, from September 10, 2025, through June 2, 2026, Mr. Antonio Goodwin's dispositive motion consisting of 1,053 AT&T employment documents and 5,000.00 AT&T employee images was never ruled on, which was filed on September 10, 2025, under ECF Nos. 131, 134, and 136, ECF Nos. 155 and 156, ECF No. 174, and ECF No. 199.

Furthermore, Antonio Goodwin's 63 authentic AT&T employee documents were sent directly from AT&T Corporate Office to the EEOC on January 3, 2023, which was filed before any sanction was granted on December 30, 2025, regarding Mr. Antonio Goodwin's AT&T employment with AT&T.

In civil litigation, this is an absolutely serious violation of the Fifth Amendment Due Process Clause.

2. WHY THE FIFTH AMENDMENT OF THE CONSTITUTION WAS VIOLATED REGRADING THE MOTION TO RECALL THE MANDATE IN THE NINTH CIRCUIT COURT FILED ON JUNE 9, 2026 BASED ON THE EXISTING DISCOVERED JANUARY 3, 2023 63 AUTHENTIC AT&T EMPLOYEE DOCUMENTS SENT DIRECTLY FROM AT&T CORPORATE OFFICE TO THE EEOC IN THE LAWSUIT AGAINST AT&T. WHICH THE 63 AUTHENTIC AT&T EMPLOYMENT DOCUMENTS PROVE BEYOND AN REASONABLE DOUBT MR ANTONIO GOODWIN WAS AN EMPLOYEE OF AT&T, THIS WAS A MATERIAL CONTRADICTION OF AT&T & PAMELA M. PHILLIPS' DECLARATION, AT&T/ PAMELA M. PHILLIPS QUOTE "THERE ARE NO RECORDS OF MR ANTONIO GOODWIN EVER BEING AN EMPLOYEE OF ANY AT&T COMPANIES. WHICH IS A SERIOUS VIOLATION OF THE FIFTH AMENDMENT DUE

PROCESS CLAUSE BY THE JUDGES., ALSO SANCTIONS WAS WRONGFULLY IMPOSED ON MR GOODWIN BY MAGISTRATE JUDGE DANIEL J. ALBREGTS AND DISTRICT JUDGE GLORIA M. NAVARRO, FOR MR ANTONIO GOODWIN STATING HE WAS AN AT&T EMPLOYEE AND MR GOODWIN STATING AT&T/STACEY CAMPBELL COMMITTED PERJURY/FRAUD ON DOCUMENT 54 AND 51. WHICH MR ANTONIO GOODWIN FILED 900 AUTHENTIC AT&T EMPLOYMENT DOCUMENTS SUPPORTING CLAIMS AGAINST AT&T/STACEY CAMPBELL. ALSO MR ANTONIO GOODWN WAS WRONGFULLY SANCTION FOR MISSING A IN PERSON DEPOSITION HELD ON SEPTEMBER 25, 2025

AFTER THE AUGUST 12, 2025 DISCOVERY CUT-OFF DATE AND AFTER THE FINAL RULING WAS MADE REGARDING EXTENDING THE DISCOVERY CUT OFF DATE ON NOVEMBER 25, 2025 IN THE US DISTRICT COURT OF NEVADA. WHICH THE RULING/ORDER WAS MADE ON NOVEMBER 25, 2025 3 MONTH PAST THE SEPTEMBER 25, 2025 IN PERSON DEPOSITION DATE.ON DOCUMENT 123 AND 133 (FRAUD ON THE COURT). WHICH AT&T/STACEY CAMPBELL IN PERSON DEPOSITION ON SEPTEMBER 25, 2025 WAS INVALID & FRAUD HOWEVER SANCTIONS WAS STILL IMPOSED ON PLAINTIFF ANTONIO GOODWIN BY JUDGE DANIEL J ALBREGTS AND JUDGE GLORIA NAVARRO FOR MISSING AN INVALID IN PERSON DEPOSITION AFTER THE DISCOVERY CUT-OFF DATE ON AUGUST 12, 2025.. THIS IS A SERIOUS VIOLATIONS OF THE FIFTH AMENDMENT OF THE CONSTITUTION DUE PROCESS CLAUSE, AND MR ANTONIO GOODWIN REQUEST FOR THE MOTION TO RECALL THE MANDATE IN THE NINTH CIRCUIT COURT FILED ON JUNE 9, 2026 AS WELL AS A SPECIFIC WRITTEN FINDINGS OF EACH CATEGORY FOR THE ILLEGAL FRIVOLOUS DISMISSALS BY JUDGES FRIEDLAND, R. NELSON, AND BADE. WHICH MR ANTONIO GOODWIN REQUEST HAVE BEEN IGNORED AND VIOLATED UNDER THE FIFTH AMENDMENT TO THE CONSTITUTION DUE PROCESS CLAUSE, THE JUDGES NEVER GRANTED WRITTEN FINDINGS FOR CASE NUMBER 26-927 IN THE NINTH CIRCUIT COURT OF APPEAL. UNJUST

When litigants raise a Fifth Amendment due-process argument, they often contend that:

- Material evidence was not considered.
- They were denied a meaningful opportunity to present their case.
- The court failed to rule on critical issues.
- Sanctions or dismissal were imposed without adequate procedural protections.
- The proceedings were fundamentally unfair.

3.Why The Fifth Amendment due process Clause was violated where Plaintiff-Appellant Antonio Goodwin filed a dispositive motion on September 10, 2025 that should have been granted in Plaintiff-Appellant Antonio Goodwin's favor, where the dispositive motion filed on September 10, 2025 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp., where

Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents ECF Nos. 131, 134, and 136, ECF Nos. 155 and 156, ECF No. 174, ECF No. 199, identifying Antonio Goodwin on AT&T, AT&T Inc., and AT&T Corp. documents as an employee of those entities, where Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and the att.com/returns website, where a live AT&T customer service agent confirmed in writing "this is AT&T," where Plaintiff-Appellant Antonio Goodwin preserved those text messages, where Plaintiff-Appellant Antonio Goodwin has a video-recorded phone call message from AT&T stating "this is AT&T" from his employee document, where Plaintiff-Appellant Antonio Goodwin has a live agent texting Mr. Antonio Goodwin stating "this is AT&T" from Plaintiff-Appellant Antonio Goodwin's AT&T employee document connected to the AT&T work phone number 1-800-331-0500, where Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment, where Documents 155, 156, Exhibit A, Document 174, and Document 199 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee, where Plaintiff-Appellant Antonio Goodwin's AT&T

employee clothing order, the AT&T phone number 1-800-331-0500, the AT&T video voice message stating "this is AT&T," and the AT&T live-agent text message stating "this is AT&T" proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee, where this evidence directly contradicts the February 26, 2024 declaration of Pamela M. Phillips stating she conducted an "exhaustive search" and found "no records" of employment, where that declaration identified AT&T Inc. at 208 S. Akard St., Dallas, Texas, which matches the corporate identity in Plaintiff-Appellant Antonio Goodwin's documents, and where the lower court nevertheless allowed sanctions proceedings to move forward while that dispositive motion remained unresolved through the December 30, 2025 sanctions hearing.

4 Why invalid sanctions was imposed or upheld based on the September 25, 2025 in-person deposition where Plaintiff-Appellant Antonio Goodwin's dispositive motion filed September 10, 2025 ECF Nos. 131, 134, and 136, ECF Nos. 155 and 156, ECF No. 174, ECF No. 199, remained pending and Would have overpowered, eliminated, mooted, or taken the September 25, 2025 in-person deposition out of the equation entirely, where the deposition occurred after the discovery cutoff date, where ECF No. 123 filed September 3, 2025 was only a motion, where ECF No. 133 filed September 11, 2025 was only a reply, where Magistrate Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025 after the deposition date had already passed, and where sanctions should not be recommended or imposed while dispositive motions remained pending, while no order compelled the deposition at the relevant time, while the deposition occurred after the discovery cutoff, and while THE 63 AUTHENTIC AT&T EMPLOYMENT DOCUMENTS PROVE BEYOND AN REASONABLE DOUBT MR ANTONIO GOODWIN WAS AN EMPLOYEE OF AT&T, SENT DIRECTLY FROM AT&T CORPORATE OFFICE TO THE EEOC IN THE LAWSUIT AGAINST AT&T ON JANUARY 3, 2023.

5 WHY THE FEDERAL FALSE-STATEMENT, PERJURY, AND DECLARATION-UNDER-PENALTY-OF-PERJURY WAS NOT IMPOSE AGAINST AT&T, PAMELA M. PHILLIPS AND STACEY CAMPBELL / & Fifth Amendment Due Process Clause Violated

Plaintiff respectfully contends that the record raises serious issues under federal false-statement, perjury, and declaration-under-penalty-of-perjury laws because AT&T, Pamela M. Phillips, and Stacey Campbell maintained for nearly three years that Antonio Goodwin was never an employee of any AT&T company, while AT&T's own records sent directly to the EEOC include 63 authentic AT&T employee documents identifying Plaintiff's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T EEOC response materials, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

Plaintiff respectfully contends that Pamela M. Phillips' declaration is materially contradicted by AT&T's own documents because the declaration stated that there were no records showing Antonio Goodwin was ever employed by any AT&T company. Plaintiff contends that this statement was false, material, and prejudicial because it was used to support AT&T's position that Plaintiff's employment evidence and claims were frivolous or unsupported.

Plaintiff respectfully contends that these facts implicate, at minimum, the following federal statutes and legal concerns:

18 U.S.C. § 1001 — False Statements to the Federal Government.

Plaintiff contends that AT&T, Pamela M. Phillips, and Stacey Campbell made materially false employment statements within matters involving federal jurisdiction, including the EEOC proceedings and federal court proceedings, by asserting that Plaintiff was never employed by any AT&T company despite AT&T-generated employment records. Which may Constitute as a Felony.

18 U.S.C. § 1621 — Perjury.

Plaintiff contends that any sworn statement or declaration made under oath denying the existence of Plaintiff's AT&T employment records may constitute perjury if the statement was knowingly false and material.

18 U.S.C. § 1623 — False Declarations Before Court or Grand Jury.

Plaintiff contends that any false declaration submitted in a federal court proceeding concerning Plaintiff's employment status may implicate 18 U.S.C. § 1623 if the declaration was knowingly false and material.

28 U.S.C. § 1746 — Unsworn Declarations Under Penalty of Perjury.

Plaintiff contends that Pamela M. Phillips' declaration, if submitted under penalty of perjury, carried the same seriousness as sworn testimony and should not have been accepted without meaningful review once Plaintiff presented AT&T records contradicting it.

18 U.S.C. § 1503 — Obstruction of Justice.

Plaintiff contends that if false employment statements were knowingly used to influence the federal court's handling of Plaintiff's case, sanctions, dismissal, or frivolousness determination, such conduct may raise obstruction-of-justice concerns.

18 U.S.C. § 1519 — Falsification or Concealment of Records in Federal Matters.

Plaintiff contends that if employment records existed and were concealed, misrepresented, omitted, or contradicted by declarations in a federal matter, such conduct may raise concerns under federal record-falsification or concealment laws. Fraud on the Court.

Plaintiff contends that the false employment statements were not minor factual disputes. Plaintiff contends that the employment-status issue was central to the entire case, the sanctions, the dismissal, and the Ninth Circuit's treatment of the appeal. Plaintiff therefore respectfully contends that the contradiction between the Phillips declaration and the 63 AT&T/EEOC employee documents raises a serious fraud-on-the-court issue requiring judicial review.

Plaintiff respectfully acknowledges that criminal determinations are for the United States Attorney, the Department of Justice, or the appropriate federal authorities. Plaintiff raises these statutes to show the seriousness, materiality, and extraordinary nature of the false-employment-record issue and why recall of the mandate is necessary to prevent manifest injustice.

Plaintiff respectfully submits that the 63 AT&T employee documents sent directly from AT&T to the EEOC on January 3, 2023 Which proved that AT&T had employment records concerning Antonio Goodwin employment with AT&T. AT&T, Pamela M Phillips and Stacey Campbell Premeditated Concealment of vital employment evidence

Plaintiff-Appellant Antonio Goodwin, proceeding pro se, respectfully moves this Court to recall the mandate in Ninth Circuit Case No. 26-927.

Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict AT&T & Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company.

Plaintiff respectfully requests that Judges Michelle T. Friedland, Ryan D. Nelson, and Bridget S. Bade recall the mandate, reopen the appeal, and issue specific written findings addressing whether Plaintiff's AT&T employment evidence was deemed frivolous, insufficient, inadmissible, unsupported, or ignored without a merits determination.

Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. CONCEALMENT WAS COMMITTED BY AT&T, PAMELA M PHILLIPS, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO

AND NOW CONCEALMENT WAS COMMITTED BY JUDGE Friedland, Nelson, and Bade from the ninth circuit court of appeal on June 9, 2026 and June 2, 2026

6. INTRODUCTION

This case concerns the central issue of whether Antonio Goodwin was employed by AT&T, AT&T Mobility LLC, AT&T Inc., AT&T Corp., or any AT&T-related entities/Companies. Document 32 By Judge Gloria M Navarro

Plaintiff contends that the answer is proven by extensive AT&T employment evidence, including 1,053 AT&T employment documents, more than 5,000 AT&T employment-related images and records, and now 63 authentic AT&T employee documents sent directly from AT&T to the EEOC on January 3, 2023.

Plaintiff further contends that Pamela M. Phillips submitted a declaration stating that no records existed showing Antonio Goodwin was ever employed by any AT&T company. Plaintiff respectfully contends that this declaration is materially contradicted by AT&T's own documents sent to the EEOC.

Plaintiff respectfully submits that the Ninth Circuit's mandate should be recalled because sanctions and dismissal were imposed against Mr. Goodwin by Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro without an express merits ruling on Plaintiff's AT&T employment evidence, and because Judges Friedland, R. Nelson, and Bade dismissed or treated the appeal as frivolous without specific written findings addressing the AT&T employment evidence.

II. EEOC CHRONOLOGICAL TIMELINE

Plaintiff's AT&T employment evidence began before the federal court case.

In 2023, Plaintiff Antonio Goodwin pursued the EEOC matter against AT&T concerning Plaintiff's employment, racial discrimination, sexual harassment, labor law violations, and related claims.

Plaintiff contends that the EEOC matter was captioned and treated as Antonio Goodwin v. AT&T, and that the EEOC documents for approximately three years identified AT&T as the respondent.

Plaintiff contends that during the EEOC investigation, AT&T responded to the EEOC and did not state that Antonio Goodwin was never an employee of AT&T until after Plaintiff filed the federal lawsuit in the United States District Court for the District of Nevada.

Plaintiff contends that on or about January 2024, the EEOC issued Plaintiff Antonio Goodwin a Right to Sue letter against AT&T.

Plaintiff contends that on May 9, 2024, EEOC Government Specialist Kathleen Gilliam communicated with Plaintiff concerning the EEOC investigation and AT&T employment evidence.

Plaintiff contends that Kathleen Gilliam stated in substance: "If you was not an employee of AT&T Mr. Goodwin, AT&T would not have ever responded to the EEOC lawsuit filed against AT&T."

Plaintiff contends that the EEOC evidence, EEOC Right to Sue letter, EEOC investigation records, and AT&T's own EEOC response materials were repeatedly submitted to the District Court and the Ninth Circuit but were never meaningfully addressed in written findings.

Plaintiff now possesses 63 authentic AT&T employee documents sent directly from AT&T to the EEOC. These records include Plaintiff's AT&T Mobility employment history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T EEOC response materials, and AT&T employment-related records.

Plaintiff respectfully contends that these 63 documents prove that AT&T possessed employment records concerning Antonio Goodwin and that AT&T/Pamela M. Phillips' declaration stating that no such records existed is materially contradicted.

Plaintiff requests that Judges Friedland, R. Nelson, and Bade recall the mandate and issue specific written findings addressing whether the Phillips declaration, Stacey Campbell's employment statements, and AT&T's position that Plaintiff was never employed by any AT&T company can be reconciled with the AT&T-generated employee records.

7. Why a district court abuses its discretion under Federal Rules of Civil Procedure/Fifth Amendment Due Process Clause violated

UNJUST SANCTIONS IMPOSED AGAINST PLAINTIFF ANTONIO GOODWIN

Plaintiff contends that sanctions were imposed against him by Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro despite Plaintiff's repeated submission of AT&T employment evidence.

Plaintiff contends that Rule 11 sanctions were granted or allowed against Plaintiff on June 5, 2025, after Plaintiff had already filed sanctions against AT&T on April 10, 2025 in ECF Nos. 51 and 54.

Plaintiff contends that by April 10, 2025, Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro already had before them more than 900 pages of authentic AT&T employment evidence.

Plaintiff contends that additional sanctions were imposed after the December 30, 2025 sanctions hearing based on the September 25, 2025 deposition issue.

Plaintiff contends that the December 30, 2025 sanctions were unjust because the deposition was scheduled after the August 12, 2025 discovery cut-off date and before the Court's November 25, 2025 ruling addressing the discovery extension issue.

Plaintiff respectfully contends that sanctions were imposed without adequate procedural protection, without a fair merits determination of Plaintiff's dispositive motion, Plaintiff 63 Authentic AT&T Employment documents sent directly from AT&T Corporate Office to the EEOC On January 3, 2023 and without express written findings addressing Plaintiff's AT&T employment evidence.

Plaintiff contends this violated the Fifth Amendment Due Process Clause.

8. Whether meaningful appellate review is denied where the official transcripts of the July 28, 2025 and December 30, 2025 hearings materially omit or misstate critical evidence concerning Plaintiff-Appellant Antonio Goodwin's September 10, 2025 dispositive motion, Plaintiff-Appellant Antonio Goodwin's employment relationship with AT&T, AT&T Inc., and AT&T Corp., the January 17, 2022 AT&T envelope containing Plaintiff-Appellant Antonio Goodwin's full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns, the preserved text messages and recorded communications stating "this is AT&T," the contradiction between that evidence and Pamela M. Phillips's February 26, 2024 declaration, the absence of any court order compelling attendance on September 25, 2025, the post-cutoff timing of the deposition, the May 2, 2025 emergency medical events, the May 5, 2025 physician letter, the Medicaid Long

Term Disability approval, the Entyre Care caregiver approval, the fact that the Petitioner's Wife has Chemotherapy Transfusion Treatment at the Cancer Institute, the treatment times, the involvement of three doctors and nurses, the pain doctor appointments, the primary doctor appointments, and the Entyre Care in-home nurse visits.

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

9.) Plaintiff contends that sanctions proceedings and dismissal ultimately occurred without an express merits determination regarding the employment evidence that Plaintiff believes established his employment relationship with AT&T.

Plaintiff Antobio Goodwin disputes the characterization of his employment status in the courts as a "contested issue of fact" and Frivolous. WHICH IS AN EXTREMELY SERIOUS VIOLATION OF THE FIFTH AMENDMENT OF THE CONSTITUTION DUE PROCESS CLAUSE AFTER CLOSE TO 3 YEARS OF THE COURTS HAVING DOCUMENT 51, 54, 131, 134, 136, 155, 156 EXHIBIT A ECF No. 174, ECF No. 199, and Plaintiff Antonio Goodwin 63 AT&T, employee documents submitted to the EEOC on January 3, 2023 sent directly from the AT&T corporate office to the EEOC lawsuit against AT&T. Re- filed on June 9, 2026 in the Ninth Circuit Court

raises a serious fraud-on-the-court issue and requires judicial review. For JUDGE DANIEL J ALBREGTS, AND JUDGE GLORIA NAVARRO, .Friedland, Nelson, and Bade.

LIST OF PARTIES

All parties appearing in the court whose judgment is sought to be reviewed are listed below.

Petitioner

Antonio Goodwin, pro se

Respondents

AT&T

Judicial Officers

District Judge Gloria M. Navarro

Magistrate Judge Daniel J. Albregts

RELATED CASES

This Petition arises from proceedings in the United States District Court for the District of Nevada
and the United States Court of Appeals for the Ninth Circuit.

The directly related proceedings include:

- Antonio Goodwin v. AT&T, United States District Court, District of Nevada, Case No. 2:23-cv-01950-GMN-DJA
- Ninth Circuit appeal identified by Petitioner as No. 26-927
- Relevant district court proceedings concerning the hearings held on July 28, 2025 and December 30, 2025
- Relevant motion practice concerning ECF No. 123, filed September 3, 2025
- Relevant reply filing ECF No. 133, filed September 11, 2025
- Petitioner's dispositive motion filed September 10, 2025
- Documents 155 and 156, including Exhibit A
- Document 174
- Document 199
- Relevant ruling by Magistrate Judge Daniel J. Albregts entered November 25, 2025
-

- Relevant Ninth Circuit judgment entered September 2, 2025
- Document 152, described by Petitioner as a List of Related Proceedings That AT&T Discriminated Against Individuals With Disabilities Under the Americans With Disabilities Act (ADA), filed October 28, 2025, in United States District Court of Nevada Case No. 2:23-cv-01950-GMN-DJA
- The related materials reflected in Document 198-2, filed January 19, 2026, pages 13-15 of 31, which Petitioner identifies as containing disability-related proceedings and EEOC matters involving AT&T
- Additional objections and later rulings tied to ECF Nos. 177, 179, 185, 186, 187, 188, and 189

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18 U.S.C. § 1503 — Obstruction of Justice.	
18 U.S.C. § 1519 — Falsification or Concealment of Records in Federal Matters.	
Fraud Of The Court	
Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from	

AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company.

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The 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company.

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OPINIONS BELOW

For cases from federal courts:

The opinion of the United States Court of Appeals appears at Appendix A to the petition and is:

- reported at _____; or,
- has been designated for publication but is not yet reported; or,
- is unpublished.

The opinion of the United States District Court appears at Appendix B to the petition and is:

- reported at _____; or,
- has been designated for publication but is not yet reported; or,
- is unpublished.

Relevant orders of the United States District Court for the District of Nevada, Case No. 2:23-cv-01950-GMN-DJA, including rulings by District Judge Gloria M. Navarro and Magistrate Judge Daniel J. Albregts, are reproduced in the appendices identified below.

JURISDICTION

For cases from federal courts:

The date on which the United States Court of Appeals decided Petitioner's case was June 2, 2026

- No petition for rehearing was timely filed in my case.
- A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.
- An extension of time to file the petition for a writ of certiorari was granted to and including _____ on _____ in Application No. _____.

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

This case involves the following constitutional provisions, statutes, and rules:

- U.S. Const. amend. V
- 18 U.S.C. § 1001
- 18 U.S.C. § 1621
- 18 U.S.C. § 1623
- 28 U.S.C. § 1746
- 18 U.S.C. § 1503
- 18 U.S.C. § 1519
- 28 U.S.C. § 1254(1)
- 28 U.S.C. § 753(b)
- Fed. R. Civ. P. 26(c)
- Fed. R. Civ. P. 30(b)(4)
- Fed. R. App. P. 10(e)
- Americans with Disabilities Act
- Americans with Disabilities Act Amendments Act of 2008 (ADAAA)

Fifth Amendment to the United States Constitution

No person shall be deprived of life, liberty, or property, without due process of law.

Federal Rule of Civil Procedure 26(c)

Federal Rule of Civil Procedure 26(c) authorizes a court, for good cause, to issue a protective order to protect a party from annoyance, embarrassment, oppression, or undue burden or expense.

Federal Rule of Civil Procedure 30(b)(4)

Federal Rule of Civil Procedure 30(b)(4) permits a deposition to be taken by remote means.

Federal Rule of Appellate Procedure 10(e)

Federal Rule of Appellate Procedure 10(e) provides procedures for correcting or modifying the record on appeal where the record does not truly disclose what occurred.

28 U.S.C. § 753(b)

28 U.S.C. § 753(b) requires the proceedings of the court to be recorded and preserved accurately.

STATEMENT OF THE CASE

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

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

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

As of the December 30, 2025 sanctions hearing, that dispositive motion had remained pending for approximately 130 days without a ruling.

No ruling was issued on the dispositive motion in:

- September 2025;
- October 2025;
- November 2025; or
- prior to the December 30, 2025 sanctions hearing.

This fact is materially important because:

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

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

That evidence included:

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

Documents 155, 156, Exhibit A, Document 174, and Document 199 proved beyond a reasonable

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

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

Antonio Goodwin expressly argued that he received an AT&T envelope document with his employee number, AT&T password, and full name for his AT&T clothing order directly from the AT&T company; that the AT&T number on the envelope was 1-800-331-0500; that when the United States District Court called this AT&T 1-800-331-0500 number it would prove that Plaintiff-Appellant Antonio Goodwin was an AT&T employee; that Pamela M. Phillips used the same AT&T name in her written declaration on February 26, 2024; that Plaintiff-Appellant Antonio Goodwin had the original AT&T phone number 1-800-331-0500 message if anything had

been changed by AT&T; that on Plaintiff-Appellant Antonio Goodwin's AT&T employment envelope received on January 17, 2022 there was an att.com/returns website with a live AT&T customer service agent; that the live AT&T customer service agent repeatedly stated in writing in

text messages to Plaintiff-Appellant Antonio Goodwin that "this is AT&T"; that Plaintiff-Appellant Antonio Goodwin had those AT&T customer service live-agent text messages as well if anything

had been changed by AT&T; and that Plaintiff-Appellant Antonio Goodwin was willing to schedule

a Zoom video-recorded conference-call hearing with Stacey Campbell, AT&T, and the United States District Court to call the AT&T 1-800-331-0500 number on Plaintiff-Appellant Antonio Goodwin's employment envelope and prove that he was an AT&T employee from January 2022 onward.

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

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

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

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

That declaration is directly contradicted by the:

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

filed by Plaintiff-Appellant Antonio Goodwin.

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

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

The EEOC evidence supported this same employment issue. The EEOC investigated the case, the EEOC issued a right-to-sue letter, and Plaintiff-Appellant Antonio Goodwin was informed that

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

Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents

include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an

employee of any AT&T company. **Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.**

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

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

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

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

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

II. EMPLOYMENT STATUS / MERITS CLAIMS AGAINST AT&T

Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company. **Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.**

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

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

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

The dispositive motion filed September 10, 2025 and the later supporting materials proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee and

that the case should have been resolved in his favor on that issue.

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

Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents identifying Antonio Goodwin on AT&T, AT&T Inc., and AT&T Corp. documents as an employee of those entities. Those documents proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.

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

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

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

ID, check numbers, batch numbers, texts, emails, business bills, corporate records, and other materials.

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

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

Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company. **Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.**

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

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

Plaintiff-Appellant Antonio Goodwin raised references to 18 U.S.C. § 1001 and raised that false statements had been made in a matter connected to federal proceedings. Plaintiff-Appellant Antonio Goodwin raised that the United States Attorney's Office in Baltimore, Maryland told him to report the matter to the FBI, and that he was instructed by the FBI to contact legal aid if the matter proceeded. Plaintiff-Appellant Antonio Goodwin also raised that he filed complaints or intended to file complaints with the Colorado Supreme Court Office of Attorney Regulation Counsel regarding Stacey Campbell and his law firm, including references to Case No. 25-2430 and Lisa Parce.

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

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

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

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

Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. CONCEALMENT WAS COMMITTED BY AT&T, PAMELA M PHILLIPS, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO AND NOW CONCEALMENT WAS COMMITTED BY JUDGE Friedland, Nelson, and Bade from the ninth circuit court of appeal on June 9, 2026 and June 2, 2026

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

Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.

Plaintiff has now obtained 63 authentic AT&T-generated employment documents that were sent directly by AT&T to the Equal Employment Opportunity Commission ("EEOC") during the administrative investigation process. These documents contain overwhelming and indisputable evidence establishing Plaintiff's employment relationship with AT&T and its entities, including AT&T Mobility LLC, AT&T Inc., and AT&T Corp.

The evidence specifically includes Plaintiff's Antonio Goodwin employee history records, official employee identification number, employee passcode, internal AT&T write-ups, coaching records, and employment-related records generated and maintained by AT&T itself. Most critically, these records were produced directly by AT&T in response to an EEOC investigation, confirming their authenticity and reliability.

This overwhelming documentary evidence directly and irreconcilably contradicts the declaration submitted by AT&T & Pamela M. Phillips, in which represented to the Court that there were no records showing Antonio Goodwin was ever employed by any AT&T entity.

The existence of these 63 internal AT&T employment documents demonstrates that material facts presented before the Court were fundamentally false and that the Court's prior rulings were made without consideration of critical evidence establishing Plaintiff's employment status. The contradiction is not minor or disputed — it strikes at the very foundation of the case and raises serious concerns regarding the accuracy and truthfulness of representations made during these proceedings.

Where the existing discovered evidence directly disproves prior sworn statements relied upon by the Court, extraordinary relief is warranted to prevent manifest injustice. The integrity of judicial proceedings requires that decisions be based upon truthful and complete facts, particularly where overwhelming documentary evidence establishes the opposite of what was previously represented.

Accordingly, Plaintiff 63 Authentic AT&T Employee documents he respectfully requests that this Court grant relief in favor of Antonio Goodwin, vacate any rulings premised upon the false assertion that Plaintiff was never employed by AT&T, and provide such further relief as justice requires.

Justice demands that this matter be decided on the truth — and the truth is now overwhelmingly established by AT&T's own records. That Plaintiff Antonio Goodwin was an employee of AT&T. Furthermore Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.

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

Those claims included delayed rulings on key motions, failure to timely rule on dispositive motions, failure to timely resolve discovery disputes, unequal treatment favoring the opposing party, arbitrary denial of requested relief, bias or appearance of bias, abuse of discretion in discovery and sanctions decisions, and violations of the Fifth Amendment Due Process Clause. Plaintiff-Appellant specifically raised that Judge Daniel J. Albregts delayed ruling on the motion to extend discovery and compel deposition until November 25, 2025, close to 90 days after the motion practice began and after the September 25 deposition date had passed.

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

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

The relevant procedural timeline is critical:

- **On September 3, 2025, Respondents filed ECF No. 123, a motion seeking to extend deadlines and compel Petitioner's deposition.**
- **On September 10, 2025, Petitioner filed the dispositive motion.**
- **On September 11, 2025, Respondents filed ECF No. 133, a reply in support of that motion.**
- **On September 25, 2025, Respondents proceeded with the in-person deposition date.**
- **Magistrate Judge Daniel J. Albregts did not issue the relevant ruling until November 25, 2025.**

Thus, at the time of the September 25, 2025 deposition:

- **ECF No. 123 was only a motion;**
- **ECF No. 133 was only a reply brief;**
- **neither filing was a court order;**
- **no order compelling Petitioner's appearance existed on September 25, 2025; and**

• Petitioner's dispositive motion filed on September 10, 2025 was already pending. The September 25, 2025 deposition also occurred after the discovery cutoff date. The ruling by Judge Daniel J. Albregts came on November 25, 2025, close to 90 days after the September 3, 2025 motion, close to 75 days after the September 11, 2025 reply, and close to 60 days after the September 25, 2025 in-person deposition date had already passed. That means the court order was issued after the fact. It did not exist when Respondents attempted to enforce the in-person deposition. It could not retroactively create an obligation that did not exist on September 25, 2025.

These facts are especially important because the dispositive motion filed on September 10, 2025

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

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

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

Plaintiff-Appellant raised that the transcripts of the July 28, 2025 and December 30, 2025 hearings omitted or materially misstated medical evidence, caregiving restrictions, treatment schedules, the pending dispositive motion, the absence of any court order compelling attendance on September 25, 2025, the post-cutoff timing of the deposition, and Plaintiff-Appellant's repeated requests for remote accommodation and proper scheduling. Plaintiff-Appellant raised that the record failed to accurately preserve hearing statements and critical timeline facts, including the difference between motions and court orders, the fact that

ECF Nos. 123 and 133 were not orders, and the significance of the November 25, 2025 ruling arriving after the deposition date. Plaintiff-Appellant therefore sought relief under Fed. R. App. P. 10(e) and 28 U.S.C. § 753(b) to correct and settle the record.

Petitioner filed a motion under Federal Rule of Appellate Procedure 10(e) and 28 U.S.C. § 753(b) to correct and settle the record concerning the hearings held on July 28, 2025 and December 30, 2025.

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

- Plaintiff-Appellant's dispositive motion filed on September 10, 2025 and the fact that it should have been granted in Plaintiff-Appellant Antonio Goodwin's favor;
- Plaintiff-Appellant Antonio Goodwin's employment relationship with AT&T, AT&T Inc., and AT&T Corp.;
- the January 17, 2022 AT&T envelope containing Plaintiff-Appellant Antonio Goodwin's name, employee number, AT&T password, clothing-order information, att.com/returns, and AT&T phone number 1-800-331-0500;
- the live-agent text messages and recorded phone-call communications stating "this is AT&T";
- Plaintiff-Appellant's request for a remote deposition due to caregiving and medical necessity; including ECF No. 123 and ECF No. 133.

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

- Petitioner filed a dispositive motion on September 10, 2025;
- as of the December 30, 2025 sanctions hearing, that motion had been pending for approximately 130 days;
- no ruling was issued on the dispositive motion in September, October, November, or before the sanctions hearing; and

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

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

VII. RELATED ADA / PUBLIC IMPORTANCE / PATTERN EVIDENCE CLAIMS

Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company. **Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.**

Plaintiff-Appellant also raised claims that disability-accommodation issues involving AT&T were part of a broader pattern and should have been taken seriously in evaluating the case. Plaintiff-Appellant raised references to prior EEOC disability matters involving AT&T, other disability-accommodation proceedings, broader public importance of remote access and disability accommodation, protection of caregivers in litigation, and fair treatment of disabled persons and their families in court proceedings.

Plaintiff-Appellant raised that he filed materials such as Document 152 listing related proceedings in which AT&T discriminated against individuals with disabilities under the ADA. Plaintiff-Appellant raised that these materials were relevant because they showed that disability-accommodation disputes involving AT&T were not imaginary or isolated, and that the lower court should have taken his disability-related evidence more seriously.

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

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

(ADAAA);

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

- AT&T Pacific Bell (Hearing Impairment).

Plaintiff-Appellant also referenced other employment-discrimination matters involving AT&T, including:

- a religious discrimination matter involving a technician who needed to attend Sunday morning worship services;
- a matter involving Jehovah's Witnesses, where Plaintiff-Appellant states that AT&T paid money in a settlement concerning religious bias; and
- an age discrimination matter involving the firing of a 53-year-old sales manager while younger, lower-performing employees remained in similar positions.

Petitioner does not present these related proceedings as substitutes for the factual record in his own case. Instead, Petitioner presents them because they help explain why his own disability-accommodation issues should have been taken seriously, why the Court should not treat the disability-accommodation conflict here as trivial, and why the Court should closely examine whether AT&T and its representatives treated Plaintiff-Appellant Antonio Goodwin differently in a case that involved life-threatening disability conditions, medically necessary caregiving, a request for remote accommodation, and a dispositive motion that should have been granted in Plaintiff-Appellant Antonio Goodwin's favor.

IX. RELIEF REQUESTED BELOW

Plaintiff respectfully submits that extraordinary circumstances exist because Plaintiff has now located and possesses 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents

include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company. **Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.**

Additional evidence below

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

the merits, reversal of unjust rulings, and any additional relief the Court deemed proper.

Plaintiff-Appellant's concise filing version also raised claims concerning: denial of disability accommodation; refusal to permit a remote deposition; improper sanctions; lack of any court order compelling attendance on September 25, 2025; post-cutoff discovery; unresolved dispositive motions filed on September 10, 2025; failure to rule on supporting filings including ECF Nos. 155 and 156; and These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company. medical necessity supported by the May 2, 2025 emergency medical event and related documentation.

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

The timeline demonstrates a layered breakdown in fairness:

1. Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns.
2. Plaintiff-Appellant Antonio Goodwin preserved text messages from a live AT&T customer service agent stating “this is AT&T.”
3. Plaintiff-Appellant Antonio Goodwin has a video-recorded phone-call message from AT&T stating “this is AT&T” from his employee document.
4. Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded conference call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment.
5. Pamela M. Phillips later declared on February 26, 2024 that she conducted an “exhaustive search of AT&T’s employment records” and that there were “no records of Antonio Goodwin ever being employed by AT&T from January 2022 onward.”
6. That declaration is contradicted by the envelope, employee number, password, clothing order, paystubs, W-2 forms, 401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, corporate records, and more than 1,053 filed materials.
7. The EEOC investigated Plaintiff-Appellant Antonio Goodwin’s case and issued a right-to-sue letter.
8. Plaintiff-Appellant Antonio Goodwin was informed that AT&T would not have responded to the EEOC matter if he had not been an employee.
9. The district court itself acknowledged that whether Plaintiff-Appellant Antonio Goodwin was employed by AT&T and whether he was discriminated against in the course of employment were issues of sufficient complexity, and the district court noted a likelihood of success and the warrant for appointment of counsel.
25. On September 3, 2025, Respondents filed ECF No. 123 seeking to extend deadlines and compel deposition.
26. On September 10, 2025, Petitioner filed a dispositive motion.
27. On September 11, 2025, Respondents filed ECF No. 133.
28. On September 25, 2025, Respondents conducted or attempted to enforce the in-person deposition.
29. At that time, there was no court order compelling attendance.
30. The deposition also occurred after the discovery cutoff date.
31. Judge Daniel J. Albregts did not rule until November 25, 2025, close to 90 days after the September 3 motion and after the September 25 deposition date had already passed.
32. Document 152 identified related disability proceedings involving AT&T under the ADA.
33. Plaintiff-Appellant identified that AT&T had been involved in multiple disability-accommodation and disability-discrimination matters, including EEOC litigation.
34. Plaintiff-Appellant identified that AT&T, AT&T Inc., AT&T Corp., Stacey Campbell, and Pamela M. Phillips denied under oath for years that he was an employee, despite more than 1,053 documents filed by Plaintiff-Appellant reflecting his employment with AT&T entities.
35. On December 30, 2025, sanctions were pursued while the dispositive motion remained unresolved and while the transcripts omitted or misstated the core facts.

These facts are connected.

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

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

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

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

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

The post-cutoff timing showed an additional procedural defect.

The transcript omissions made it harder to correct the record.

the dispositive motion

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

Plaintiff has now obtained 63 authentic AT&T-generated employment documents that were sent directly by AT&T to the Equal Employment Opportunity Commission ("EEOC") during the administrative investigation process. These documents contain overwhelming and indisputable evidence establishing Plaintiff's employment relationship with AT&T and its entities, including AT&T Mobility LLC, AT&T Inc., and AT&T Corp.

The evidence specifically includes Plaintiff's employee history records, official employee identification number, employee passcode, internal AT&T write-ups, coaching records, and employment-related records generated and maintained by AT&T itself. Most critically, these records were produced directly by AT&T in response to an EEOC investigation, confirming their authenticity and reliability.

This overwhelming documentary evidence directly and irreconcilably contradicts the declaration submitted by Pamela M. Phillips, in which she represented to the Court that there were no records showing Antonio Goodwin was ever employed by any AT&T entity.

The existence of these 63 internal AT&T employment documents demonstrates that material facts presented before the Court were fundamentally false and that the Court's prior rulings were made without consideration of critical evidence establishing Plaintiff's employment status. The contradiction is not minor or disputed — it strikes at the very foundation of the case and raises serious concerns regarding the accuracy and truthfulness of representations made during these proceedings.

Where newly discovered evidence directly disproves prior sworn statements relied upon by the Court, extraordinary relief is warranted to prevent manifest injustice. The integrity of judicial proceedings requires that decisions be based upon truthful and complete facts, particularly where overwhelming documentary evidence establishes the opposite of what was previously represented.

Accordingly, Plaintiff respectfully requests that this Court grant relief in favor of Antonio Goodwin, vacate any rulings premised upon the false assertion that Plaintiff was never employed by AT&T, and provide such further relief as justice requires.

Justice demands that this matter be decided on the truth — and the truth is now overwhelmingly established by AT&T's own records. That Plaintiff Antonio Goodwin was an employee of AT&T. Furthermore Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.

Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. CONCEALMENT WAS COMMITTED BY AT&T, PAMELA M PHILLIPS, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO AND NOW CONCEALMENT WAS COMMITTED BY JUDGE Friedland, Nelson, and Bade from the ninth circuit court of appeal on June 9, 2026 and June 2, 2026

REASONS FOR GRANTING THE WRIT

Fifth Amendment To The Constitution The Due Process Clause Violations, Plaintiff Evidence was Ignored by Judges and court. Plaintiff has now located 63 authentic AT&T employee documents sent directly from AT&T to the Equal Employment Opportunity Commission ("EEOC"). These documents include Plaintiff Antonio Goodwin's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T response materials sent directly to the EEOC, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp. to Antonio Goodwin employment with AT&T

These 63 AT&T-generated employee documents directly contradict Pamela M. Phillips' declaration stating that there were no records of Antonio Goodwin ever being an employee of any AT&T company. **Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.** Plaintiff Over Emphasize below

Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. CONCEALMENT WAS COMMITTED BY AT&T, PAMELA M PHILLIPS, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO AND NOW CONCEALMENT WAS COMMITTED BY JUDGE Friedland, Nelson, and Bade from the ninth circuit court of appeal on June 9, 2026 and June 2, 2026

REASONS FOR GRANTING THE WRIT

I. INTRODUCTION

This case concerns the central issue of whether Antonio Goodwin was employed by AT&T, AT&T Mobility LLC, AT&T Inc., AT&T Corp., or any AT&T-related entity.

Plaintiff contends that the answer is proven by extensive AT&T employment evidence, including 1,053 AT&T employment documents, more than 5,000 AT&T employment-related images and records, and now 63 authentic AT&T employee documents sent directly from AT&T Corporate Office to the EEOC.

Plaintiff further contends that AT&T & Pamela M. Phillips submitted a declaration stating that no records existed showing Antonio Goodwin was ever employed by any AT&T company. Plaintiff respectfully contends that this declaration is materially contradicted by AT&T's own documents sent to the EEOC.

Plaintiff respectfully submits that the Ninth Circuit's mandate should be recalled because sanctions and dismissal were imposed against Mr. Goodwin by Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro without an express merits ruling on Plaintiff's AT&T employment evidence, and because Judges Friedland, R. Nelson, and Bade dismissed or treated the appeal as frivolous without specific written findings addressing the AT&T employment evidence.

This case presents exceptional questions involving:

- Fifth Amendment to the Constitution due process Clause violations by the judges and court;
- dispositive-motion procedure;
- employment-status proof;
- sanctions authority;
- discovery limits;
- remote deposition accommodation;
- treatment of certified caregiving obligations;
- disability-accommodation principles;
- false statements in federal proceedings;
- record integrity on appeal; and
- fair adjudication of employment-discrimination claims.

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

Plaintiff-Appellant was subjected to sanctions even though:

- Plaintiff-Appellant Antonio Goodwin filed a dispositive motion on September 10, 2025 that should have been granted in his favor;
- that dispositive motion proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.;
- Documents 155, 156, Exhibit A, and Document 174 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- Plaintiff-Appellant Antonio Goodwin's AT&T employee clothing order proved beyond a reasonable doubt that he was an AT&T employee;
- AT&T phone number 1-800-331-0500 proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- the AT&T video voice message stating "this is AT&T" proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- the AT&T live-agent text message stating "this is AT&T" to Mr. Antonio Goodwin proved beyond a reasonable doubt that Plaintiff-Appellant Antonio Goodwin was an AT&T employee;
- Plaintiff-Appellant Antonio Goodwin filed more than 1,053 documents bearing his name on AT&T, AT&T Inc., and AT&T Corp. documents;
- Plaintiff-Appellant Antonio Goodwin received an AT&T envelope dated January 17, 2022 containing his full name, employee number, AT&T password, clothing-order records, AT&T phone number 1-800-331-0500, and att.com/returns;
- a live AT&T customer service agent confirmed in writing "this is AT&T";
- Plaintiff-Appellant Antonio Goodwin preserved those text messages;
- Plaintiff-Appellant Antonio Goodwin has a video-recorded phone-call message from AT&T stating "this is AT&T";

- Plaintiff-Appellant Antonio Goodwin offered to conduct a Zoom video-recorded call with the Court, AT&T, and counsel to call 1-800-331-0500 live to verify employment;
 - Pamela M. Phillips declared after an “exhaustive search” that there were “no records” of employment, even though the record showed the opposite;
 - AT&T, AT&T Inc., and AT&T Corp. shared the same headquarters address of 208 S. Akard St., Dallas, Texas;
 - the EEOC investigated the matter and issued a right-to-sue letter;
 - Plaintiff-Appellant Antonio Goodwin was informed that AT&T would not have responded to the EEOC matter if he had not been an employee;
 - the district court itself acknowledged the complexity of the employment issue and the likelihood of success sufficient to warrant appointment of counsel;
 - a ruling granting the dispositive motion in Plaintiff-Appellant Antonio Goodwin’s favor could have overpowered, eliminated, or taken the September 25, 2025 in-person deposition out of the equation;
 - Magistrate Judge Daniel J. Albregts had not yet ordered the September 25, 2025 in-person deposition at the time it occurred;
 - the ruling came only on November 25, 2025, close to 90 days after the initial motion practice began and after the deposition date had already passed;
 - the deposition took place after the discovery cutoff;
- If a dispositive motion supported by employment evidence, timing evidence, medical evidence, EEOC evidence, and record-integrity concerns may be left unresolved while sanctions proceedings go forward, then due process protections, discovery protections, accommodation

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

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

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

That motion was central, controlling, and dispositive.

It was not collateral to the sanctions dispute. It bore directly on the posture of the case, the employment issue, the merits of Plaintiff-Appellant Antonio Goodwin’s claims, the fairness of continuing proceedings against Plaintiff-Appellant Antonio Goodwin, and whether the September

25, 2025 deposition should have remained in issue at all.

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

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

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

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

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

A live AT&T customer service agent confirmed in writing “this is AT&T,” Plaintiff-Appellant Antonio

Goodwin preserved those text messages, Plaintiff-Appellant Antonio Goodwin has a recorded

message stating “this is AT&T,” and Plaintiff-Appellant Antonio Goodwin offered a live Zoom verification call using the same phone number.

Pamela M. Phillips’s declaration claiming “no records” after an “exhaustive search” was contradicted by the envelope, employee number, password, clothing order, paystubs, W-2 forms,

401(k) records, training documents, employee ID, check numbers, batch numbers, texts, emails, business bills, and corporate records.

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

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

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

At the same time:

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

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

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

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

- the dispositive motion filed on September 10, 2025;
- the fact that the dispositive motion should have been granted in Plaintiff-Appellant Antonio Goodwin’s favor;
- the employment evidence showing that Plaintiff-Appellant Antonio Goodwin was an employee of AT&T, AT&T Inc., and AT&T Corp.;
- the January 17, 2022 AT&T envelope evidence and communications stating “this is AT&T”;
- the medical evidence;
- the timing of ECF No. 123 and ECF No. 133;
- the absence of a court order on September 25, 2025;
- the post-cutoff timing of the deposition; and
- the broader context of the sanctions proceedings.

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

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

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

- fail to grant a dispositive motion that should have been granted in a plaintiff’s favor;
- allow sanctions proceedings to move forward while that dispositive motion remains unresolved;
- disregard documentary proof of an employment relationship;
- disregard preserved live verification evidence tied to an employer’s own phone number and website;
- ignore false-statement concerns involving declarations about employment records;
- impose sanctions where no court order existed at the relevant time;
- permit depositions after the discovery cutoff and then sanction nonattendance;
- disregard documented medical necessity and caregiving obligations; and
- uphold sanctions on an incomplete or inaccurate appellate record.

These questions recur across civil litigation and directly affect access to fair process.

Plaintiff-Appellant Antonio Goodwin, proceeding pro se, respectfully moves this Court to recall the mandate in Ninth Circuit Case No. 26-927.

CONCLUSION

The petition for a writ of certiorari should be granted.

For the foregoing reasons, Fifth Amendment To The Constitution The Due Process Clause Violations

Based upon the extraordinary circumstances now before the Court, Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.

Plaintiff has now obtained 63 authentic AT&T-generated employment documents that were sent directly by AT&T to the Equal Employment Opportunity Commission (“EEOC”) during the administrative investigation process. These documents contain overwhelming and indisputable evidence establishing Plaintiff’s employment relationship with AT&T and its entities, including AT&T Mobility LLC, AT&T Inc., and AT&T Corp.

The evidence specifically includes Plaintiff’s employee history records, official employee identification number, employee passcode, internal AT&T write-ups, coaching records, and employment-related records generated and maintained by AT&T itself. Most critically, these records were produced directly by AT&T in response to an EEOC investigation, confirming their authenticity and reliability.

This overwhelming documentary evidence directly and irreconcilably contradicts the declaration submitted by Pamela M. Phillips, in which she represented to the Court that there were no records showing Antonio Goodwin was ever employed by any AT&T entity.

The existence of these 63 internal AT&T employment documents demonstrates that material facts presented before the Court were fundamentally false and that the Court’s prior rulings were made without consideration of critical evidence establishing Plaintiff’s employment status. The contradiction is not minor or disputed — it strikes at the very

foundation of the case and raises serious concerns regarding the accuracy and truthfulness of representations made during these proceedings.

Where newly discovered evidence directly disproves prior sworn statements relied upon by the Court, extraordinary relief is warranted to prevent manifest injustice. The integrity of judicial proceedings requires that decisions be based upon truthful and complete facts, particularly where overwhelming documentary evidence establishes the opposite of what was previously represented.

Accordingly, Plaintiff respectfully requests that this Court grant relief in favor of Antonio Goodwin, vacate any rulings premised upon the false assertion that Plaintiff was never employed by AT&T, and provide such further relief as justice requires.

Justice demands that this matter be decided on the truth — and the truth is now overwhelmingly established by AT&T’s own records. That Plaintiff Antonio Goodwin was an employee of AT&T. Furthermore Plaintiff Antonio Goodwin respectfully submits that relief should be granted in his favor in the interest of justice.

FEDERAL FALSE-STATEMENT, PERJURY,
AND DECLARATION-UNDER-PENALTY-OF-PERJURY ISSUES

Plaintiff respectfully contends that the record raises serious issues under federal false-statement, perjury, and declaration-under-penalty-of-perjury laws because AT&T, Pamela M. Phillips, and Stacey Campbell maintained for nearly three years that Antonio Goodwin was never an employee of any AT&T company, while AT&T's own records sent directly to the EEOC include 63 authentic AT&T employee documents identifying Plaintiff's AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T EEOC response materials, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp.

Plaintiff respectfully contends that Pamela M. Phillips' declaration is materially contradicted by AT&T's own documents because the declaration stated that there were no records showing Antonio Goodwin was ever employed by any AT&T company. Plaintiff contends that this statement was false, material, and prejudicial because it was used to support AT&T's position that Plaintiff's employment evidence and claims were frivolous or unsupported.

Plaintiff respectfully contends that these facts implicate, at minimum, the following federal statutes and legal concerns:

18 U.S.C. § 1001 — False Statements to the Federal Government.

Plaintiff contends that AT&T, Pamela M. Phillips, and Stacey Campbell made materially false employment statements within matters involving federal jurisdiction, including the EEOC proceedings and federal court proceedings, by asserting that Plaintiff was never employed by any AT&T company despite AT&T-generated employment records.

18 U.S.C. § 1621 — Perjury.

Plaintiff contends that any sworn statement or declaration made under oath denying the

existence of Plaintiff's AT&T employment records may constitute perjury if the statement was knowingly false and material.

18 U.S.C. § 1623 — False Declarations Before Court or Grand Jury.

Plaintiff contends that any false declaration submitted in a federal court proceeding concerning Plaintiff's employment status may implicate 18 U.S.C. § 1623 if the declaration was knowingly false and material.

28 U.S.C. § 1746 — Unsworn Declarations Under Penalty of Perjury.

Plaintiff contends that Pamela M. Phillips' declaration, if submitted under penalty of perjury, carried the same seriousness as sworn testimony and should not have been accepted without meaningful review once Plaintiff presented AT&T records contradicting it.

18 U.S.C. § 1503 — Obstruction of Justice.

Plaintiff contends that if false employment statements were knowingly used to influence the federal court's handling of Plaintiff's case, sanctions, dismissal, or frivolousness determination, such conduct may raise obstruction-of-justice concerns.

18 U.S.C. § 1519 — Falsification or Concealment of Records in Federal Matters.

Plaintiff contends that if employment records existed and were concealed, misrepresented, omitted, or contradicted by declarations in a federal matter, such conduct may raise concerns under federal record-falsification or concealment laws.

Fraud on the Court.

Plaintiff contends that the false employment statements were not minor factual disputes. Plaintiff contends that the employment-status issue was central to the entire case, the sanctions, the dismissal, and the Ninth Circuit's treatment of the appeal. Plaintiff therefore respectfully contends that the contradiction between the Phillips declaration and the 63 AT&T/EEOC employee documents raises a serious fraud-on-the-court issue requiring judicial review.

Plaintiff respectfully acknowledges that criminal determinations are for the United States Attorney, the Department of Justice, or the appropriate federal authorities. Plaintiff raises these statutes to show the seriousness, materiality, and extraordinary nature of the false-employment-record issue and why recall of the mandate is necessary to prevent manifest injustice.

Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. THIS WAS A CONCEALMENT OF PLAINTIFF ANTONIO

GOODWIN 63 INTERNAL AT&T AUTHENTIC EMPLOYMENT DOCUMENTS WHICH WAS COMMITTED BY AT&T, PAMELA M PHILLIPS, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO AND NOW CONCEALMENT BY JUDGE Friedland, Nelson, and Bade from then in the circuit court of appeal on June 9, 2026 and June 2, 2026

III. DISTRICT COURT CHRONOLOGICAL TIMELINE

Plaintiff filed the federal case in the United States District Court for the District of Nevada.

On February 26, 2024, Pamela M. Phillips submitted a declaration on behalf of AT&T stating that there were no records showing that Antonio Goodwin was ever employed by any AT&T company.

Plaintiff contends that AT&T, Stacey Campbell, and Pamela M. Phillips maintained the position that Antonio Goodwin was never an employee of AT&T in January 2022 or at any time.

Plaintiff contends that this position directly contradicted Plaintiff's AT&T employment evidence, including W-2 records, AT&T payroll records, AT&T pay stubs, AT&T employee identification information, AT&T employee credentials, passwords, AT&T 401(k) records, AT&T employment communications, AT&T text messages, AT&T training materials, AT&T University certificates, AT&T CEO Randall Stephenson training documents, AT&T business cards, AT&T employee envelope records, Plaintiff's AT&T employee telephone number 1-800-331-0500, att.com records, and other AT&T employment-related documentation.

Plaintiff contends that from February 2024 through March 2024, employment evidence was repeatedly placed before Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro.

On February 20, 2025, during the Joint Initial Disclosure dispute, Plaintiff specifically raised that AT&T was making false employment statements despite AT&T employment evidence already being before the Court.

On April 10, 2025, Plaintiff filed sanctions against AT&T in ECF Nos. 51 and 54 for making false employment statements under oath regarding Antonio Goodwin allegedly never being an employee of any AT&T company.

Plaintiff contends that ECF Nos. 51 and 54 placed before Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro more than 900 pages of authentic AT&T employment evidence.

Plaintiff contends that this 900-page employment record was before the Court before any

Rule 11 sanctions were filed or granted against Plaintiff.

On April 11, 2025, Magistrate Judge Daniel J. Albregts denied Plaintiff's sanctions motion through ECF No. 66.

On April 17, 2025, Plaintiff filed a motion for reconsideration of ECF No. 66 and resubmitted more than 900 pages of AT&T employment-related evidence supporting Plaintiff's position that he was employed by AT&T.

Plaintiff contends that no order expressly analyzed or resolved the merits of the more than 900 pages of AT&T employment evidence submitted in connection with Plaintiff's sanctions motions and reconsideration requests.

On June 5, 2025, Rule 11 sanctions proceedings were granted or allowed against Plaintiff despite Plaintiff's position that the Court already possessed more than 900 pages of authentic AT&T employment evidence as of April 10, 2025. And the Concealment of 63 internal authentic AT&T employee documents identifying Plaintiff's Antonio Goodwin AT&T Mobility LLC employee history, AT&T employee number, name, passcode, AT&T write-ups, AT&T coaching records, AT&T EEOC response materials, and AT&T employment-related documents connected to AT&T Mobility LLC, AT&T, AT&T Inc., and AT&T Corp. to Antonio Goodwin as an AT&T employee on January 3, 2023. Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. THIS WAS A CONCEALMENT OF PLAINTIFF ANTONIO GOODWIN 63 INTERNAL AT&T EMPLOYMENT RECORDS COMMITTED BY AT&T, PAMELA M PHILLIPS, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO AND NOW CONCEALMENT BY JUDGE **Friedland, Nelson, and Bade from the ninth circuit court of appeal on June 9, 2026 and June 2, 2026**

Plaintiff respectfully contends that Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro violated Plaintiff's Fifth Amendment due process rights by imposing or allowing sanctions without first expressly resolving Plaintiff's evidence that AT&T's employment-denial position was false.

IV. DISCOVERY CUT-OFF, ECF NOS. 123 AND 133, AND SEPTEMBER 25, 2025 DEPOSITION SANCTIONS

Plaintiff contends that the discovery cut-off date was August 12, 2025.

Plaintiff contends that after the August 12, 2025 discovery cut-off date, AT&T and Stacey Campbell sought an extension and attempted to proceed with an in-person deposition of Antonio Goodwin.

Plaintiff contends that AT&T's motion concerning discovery and deposition issues was filed as ECF No. 123 on September 3, 2025.

Plaintiff contends that AT&T's reply or related filing was ECF No. 133 on September 11, 2025.

Plaintiff contends that the deposition was scheduled for September 25, 2025, at 9:00 a.m., after the August 12, 2025 discovery cut-off date and before the Court entered its later ruling on the extension issue.

Plaintiff contends that Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro did not issue the order granting or addressing AT&T's requested discovery extension until November 25, 2025.

Plaintiff contends that the November 25, 2025 order was approximately three months after the August 12, 2025 discovery cut-off date and approximately two months after the September 25, 2025 in-person deposition date.

Plaintiff contends that he was later sanctioned for not attending the September 25, 2025 deposition even though, according to Plaintiff, the deposition was invalid because it was scheduled after the discovery cut-off date and before the Court granted the extension.

Plaintiff respectfully contends that Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro imposed sanctions against Plaintiff for an invalid deposition that occurred outside the discovery period and before a valid court order authorized the extended discovery deadline.

Plaintiff further contends that Judges Friedland, R. Nelson, and Bade ignored or failed to expressly address the August 12, 2025 discovery cut-off date, ECF No. 123, ECF No. 133, the September 25, 2025 deposition date, and the November 25, 2025 late ruling when dismissing or treating Plaintiff's appeal as frivolous.

V. SEPTEMBER 10, 2025 DISPOSITIVE MOTION AND EMPLOYMENT EVIDENCE

On September 10, 2025, Plaintiff filed ECF Nos. 131, 134, and 136 seeking dispositive relief in Plaintiff's favor.

Plaintiff contends that the September 10, 2025 dispositive motion included approximately 1,053 authentic AT&T employment documents and approximately 5,000 AT&T employment-related images.

Plaintiff contends that these filings were submitted before the September 25, 2025 deposition, before the December 30, 2025 sanctions hearing, before ECF No. 189, and before dismissal of the case.

Plaintiff contends that the September 10, 2025 dispositive motion directly presented the employment-status issue to Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro and requested a ruling in Plaintiff's favor.

Plaintiff contends that the September 10, 2025 dispositive motion was never expressly adjudicated on the merits before sanctions were imposed against Plaintiff.

Plaintiff further contends that ECF Nos. 155 and 156, filed on November 19 and November 20, 2025, provided additional AT&T employment evidence before the December 30, 2025 sanctions hearing.

Plaintiff contends that ECF No. 174, ECF No. 199, Exhibit A, and related submissions provided further employment evidence before dismissal.

Plaintiff respectfully contends that the Court possessed repeated submissions of AT&T employment evidence from February 2024 through January 2026 and never issued an express written ruling determining whether Plaintiff's employment evidence established that Antonio Goodwin was employed by AT&T.

Furthermore there was a message for All AT&T employees from current AT&T CEO John Stankey in Plaintiff Antonio Goodwin 63 internal authentic AT&T employee documents package sent directly from the AT&T Corporate office to the EEOC on January 3, 2023 regarding the lawsuit Antonio Goodwin vs AT&T. THIS WAS A CONCEALMENT OF PLAINTIFF ANTONIO GOODWIN 63 INTERNAL AT&T EMPLOYMENT RECORDS COMMITTED BY AT&T, PAMELA M PHILLIPS DECLARATION, STACEY CAMPBELL, JUDGE DANIEL J ALBREGTS, JUDGE GLORIA NAVARRO AND NOW CONCEALMENT BY JUDGE Friedland, Nelson, and Bade from the ninth circuit court of appeal on June 9, 2026 and June 2, 2026

VI. SANCTIONS WRONGFULLY IMPOSED AGAINST PLAINTIFF

Plaintiff contends that sanctions were imposed against him by Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro despite Plaintiff's repeated submission of AT&T employment evidence.

Plaintiff contends that Rule 11 sanctions were granted or allowed against Plaintiff on June 5, 2025, after Plaintiff had already filed sanctions against AT&T on April 10, 2025 in ECF Nos. 51 and 54.

Plaintiff contends that by April 10, 2025, Magistrate Judge Daniel J. Albregts and District Judge Gloria M. Navarro already had before them more than 900 pages of authentic AT&T employment evidence documents. Proving beyond a reasonable doubt that Plaintiff Antonio Goodwin was an AT&T Employee. 3 months before the June 5, 2025 Rule 11 sanctions were granted or allowed against Plaintiff for stating he was an AT&T employee and stating AT&T, Stacey Campbell, Pamela M Phillips, was committing Perjury and Fraud under oath which the

Plaintiff contends that additional sanctions were imposed after the December 30, 2025 sanctions hearing based on the September 25, 2025 deposition issue.

Plaintiff contends that the December 30, 2025 sanctions were unjust because the deposition was scheduled after the August 12, 2025 discovery cut-off date and before the Court's November 25, 2025 ruling addressing the discovery extension issue.

Plaintiff respectfully contends that sanctions were imposed without adequate procedural protection, without a fair merits determination of Plaintiff's 1053 dispositive motion documents

on September 10, 2025, Without fair merits determination of The existence of these 63 internal AT&T employment documents demonstrates that material facts presented before the Court were fundamentally false and that the Court's prior rulings were made without consideration of critical evidence establishing Plaintiff's employment status. The contradiction is not minor or disputed — it strikes at the very foundation of the case and raises serious concerns regarding the accuracy and truthfulness of representations made during these proceedings. And without express written findings addressing Plaintiff's AT&T employment evidence.

VII. NINTH CIRCUIT COURT VIOLATED THE FIFTH AMENDMENT DUE PROCESS CLAUSE BY IGNORING MATERIAL EVIDENCE, FAILING TO MAKE SPECIFIC FINDINGS, AND DISMISSING THE CASE WITHOUT ADDRESSING THE RECORD

Plaintiff Antonio Goodwin respectfully contends that the United States Court of Appeals for the Ninth Circuit, specifically Judges Michelle T. Friedland, Ryan D. Nelson, and Bridget S. Bade, violated Plaintiff's constitutional rights under the Fifth Amendment Due Process Clause in Case No. 26-927 by dismissing Plaintiff's appeal on June 2, 2026, under 28 U.S.C. § 1915(a) and 28 U.S.C. § 1915(e)(2) without reviewing, addressing, or making any specific findings regarding the overwhelming evidence contained in the record.

Plaintiff respectfully contends that the Ninth Circuit Court failed to conduct meaningful judicial review and ignored substantial material evidence proving Plaintiff's employment relationship with AT&T, despite Plaintiff submitting over 1,053 authenticated AT&T employment documents, more than 5,000 supporting exhibits, and 63 additional authentic AT&T corporate records sent directly by AT&T to the Equal Employment Opportunity Commission (EEOC) confirming Plaintiff's employment history with AT&T Mobility LLC, AT&T, AT&T INC, AND AT&T CORP.

Plaintiff contends that the Ninth Circuit Judges dismissed the appeal as frivolous while completely failing to address whether they agreed with statements made by AT&T, attorney Stacey Campbell, Pamela M. Phillips, Magistrate Judge Daniel J. Albregts, and District Judge Gloria M. Navarro that Plaintiff Antonio Goodwin was allegedly never employed by any AT&T company.

Plaintiff respectfully contends that by refusing to address this central factual dispute while simultaneously dismissing the appeal as frivolous, the Ninth Circuit deprived Plaintiff of constitutionally required notice and a meaningful opportunity to be heard, in direct violation of the Fifth Amendment Due Process Clause of the United States Constitution.

Plaintiff further contends the Ninth Circuit violated established constitutional and statutory law by failing to provide any written findings explaining whether Plaintiff's evidence was reviewed, rejected, deemed inadmissible, considered insufficient, considered unsupported, or determined to lack probative value.

Specifically Direct violation of the Fifth Amendment , Judge Friedland, Nelson, and Bade Ignored and Conceal Plaintiff Employment documents as frivolous

1. Plaintiff's 63 authenticated AT&T employment documents proving employment

with AT&T Mobility LLC, AT&T, AT&T INC, AND AT&T CORP January 3, 2023

2. Plaintiff's racial discrimination evidence presented against AT&T.
3. Plaintiff's sexual harassment evidence submitted into the district court record.
4. Plaintiff's labor law violation evidence submitted against AT&T and its corporate entities.

Plaintiff's dispositive motion September 10, 2025 and supporting exhibits filed before dismissal.

Plaintiff's dispositive motion 1053 employee records including employee number, employment history, coaching records, internal AT&T documents, payroll records, 401(k) statements, W-2 records, and EEOC materials sent directly from AT&T. 900 Authentic Employee documents April 10, 2025 document 51, and 54

Plaintiff contends the Ninth Circuit violated fundamental constitutional protections by issuing a dismissal without making findings on the record and without addressing any of Plaintiff's material evidence.

Plaintiff further contends that such conduct violated multiple laws and constitutional protections, including but not limited to:

1. Fifth Amendment Due Process Clause

By depriving Plaintiff of meaningful appellate review while refusing to address material evidence contained in the record.

2. 28 U.S.C. § 1915(a) and § 1915(e)(2)

By dismissing the appeal as frivolous without explaining what evidence or claims were allegedly frivolous.

3. Requirement of Meaningful Judicial Review

By failing to review and address overwhelming evidence directly contradicting factual assertions relied upon by the lower court.

4. Fundamental Fairness Doctrine under Due Process

By denying Plaintiff a fair opportunity to understand the basis for dismissal.

5. Prohibition Against Arbitrary Judicial Action under the Fifth Amendment

By issuing a dismissal without factual findings while ignoring substantial evidence favorable to Plaintiff.

6. Denial of Access to Higher Court Review

By failing to provide specific written findings direct violation of the Fifth Amendment Due Process Clause of the United States Constitution.

Plaintiff respectfully contends, the direct violation of the Fifth Amendment Due Process Clause of the United States Constitution. Judge Friedland, Nelson, and Bade Ignored and Conceal Plaintiff Employment documents. There are Know specific written findings from Judges Friedland, Nelson, and Bade explaining what evidence was reviewed and why Plaintiff's claims were dismissed as frivolous,

Plaintiff therefore respectfully asserts that the Ninth Circuit Court violated Plaintiff's constitutional rights under the Fifth Amendment and denied Plaintiff due process of law by ignoring material evidence, failing to conduct meaningful review, failing to make specific findings, and issuing an arbitrary dismissal contrary to constitutional protections and federal law.

VIII. FIFTH AMENDMENT DUE PROCESS ARGUMENT

The Fifth Amendment states that no person shall be deprived of life, liberty, or property without due process of law.

Due process requires notice, an opportunity to be heard, a fair and impartial decision-maker, consideration of material evidence, and decisions made according to established legal procedures.

Plaintiff respectfully contends that due process was violated because:

Material AT&T employment evidence was not meaningfully considered;

Plaintiff's dispositive motion filed September 10, 2025 was not expressly ruled on before sanctions and dismissal;

Sanctions were imposed against Plaintiff despite unresolved employment evidence;

Plaintiff was sanctioned for the September 25, 2025 deposition despite the August 12, 2025 discovery cut-off issue;

ECF Nos. 123 and 133 and the November 25, 2025 delayed discovery ruling were not properly addressed;

Pamela M. Phillips' declaration was relied upon despite contradiction by AT&T employment evidence;

The EEOC evidence from 2023, the January 2024 Right to Sue letter, the May 9, 2024 EEOC investigation evidence, and the 63 AT&T documents sent directly to the EEOC were not addressed in detail;

Judges Friedland, R. Nelson, and Bade did not provide specific findings explaining why Plaintiff's AT&T employment evidence was frivolous or legally insufficient.

Plaintiff respectfully contends that this created a fundamentally unfair proceeding and resulted in manifest injustice.

IX. NEWLY EXISTING DISCOVERED 63 AT&T EMPLOYEE DOCUMENTS FILED JANUARY 3, 2023

Plaintiff has now located 63 authentic AT&T employee documents sent directly from AT&T to the EEOC.

These documents include:

Antonio Goodwin's AT&T Mobility LLC employee history;

Antonio Goodwin's AT&T employee number;

Antonio Goodwin's name and passcode;

AT&T write-ups;

AT&T coaching records;

AT&T's complete EEOC response materials;

AT&T Mobility LLC employment-related records;

AT&T and AT&T corporate records connected to Plaintiff's employment evidence;

Records involving AT&T Inc., AT&T Corp., and the current AT&T Inc./AT&T Corp. CEO

John T. Stankey as part of Plaintiff's AT&T employee documents sent directly from AT&T.

Plaintiff respectfully contends that these documents are authentic because they came directly from AT&T to the EEOC.

Plaintiff respectfully contends that these documents directly contradict Pamela M. Phillips' declaration that no records existed showing Antonio Goodwin was ever employed by any AT&T company.

Plaintiff respectfully submits that these 63 AT&T documents create extraordinary circumstances justifying recall of the mandate.

X. REQUESTED RELIEF

Plaintiff **Antonio Goodwin** respectfully and urgently requests that this Court grant relief in Plaintiff's favor and enter orders providing the following relief necessary to correct manifest injustice, constitutional violations, and

fundamental errors that occurred throughout these proceedings: **Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution.**

1. **Recall the mandate** issued in United States Court of Appeals for the Ninth Circuit Case No. 26-927;
2. **Recall Order Based off the 63 authentic AT&T employee documents** sent directly by AT&T Inc. to the Equal Employment Opportunity Commission ("EEOC");
3. **the 63 authentic AT&T/EEOC employment documents**, conclusively establish Plaintiff Antonio Goodwin's employment relationship with AT&T;

4. **Vacate and set aside any determination of frivolousness** entered against Plaintiff under **28 U.S.C. § 1915(a)** and **28 U.S.C. § 1915(e)(2)** because the determination was based upon the demonstrably false assertion that Plaintiff was never employed by AT&T;

5. Judicial Misconduct Review Judges **Michelle T. Friedland, Ryan D. Nelson, and Bridget S. Bade** in Concealing Plaintiff Antonio Goodwin

6. Employment Evidence with AT&T, Stacey Campbell, Pamela M. Phillips, Magistrate Judge **Daniel J. Albregts**, and District Judge **Gloria M. Navarro** that Antonio Goodwin was never employed by AT&T; **Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution.**

7. **Vacate and set aside any determination Plaintiff Antonio Goodwin** AT&T employment evidence was deemed **frivolous, insufficient, inadmissible, unsupported, unrelated, lacking probative value, or otherwise disregarded without constitutional due process review;**

8. Grant Relief in Plaintiff Favor **April 10, 2025 sanctions motions** filed against AT&T, **ECF Nos. 51 and 54**, regarding false employment statements made under oath; by AT&T, Pamela M Phillips, Stacey

Campbell (**Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution**)

9. Grant Relief **April 17, 2025 reconsideration filing**, including the more than **900 pages of employment evidence** submitted directly establishing Plaintiff's AT&T employment relationship; (**Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution**)

10. Grant Relief in Plaintiff Favor **September 10, 2025 dispositive motion**, including **ECF Nos. 131, 134, and 136**, which remained unresolved; (**Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution**)

Grant Relief **ECF Nos. 155, 156, 174, 199, Exhibit A**, and all related submissions containing additional employment evidence ignored by the Court; (**Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution**)

the **August 12, 2025 discovery cut-off date**, and whether subsequent discovery proceedings violated procedural fairness and due process protections; (**Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution**)

11. **Grant Relief ECF No. 123, ECF No. 133, the September 25, 2025 deposition, and the November 25, 2025 discovery ruling**, including whether proceedings occurring after discovery closure were improperly relied upon against Plaintiff; (Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution)
12. **Vacate and set aside any determination** of sanctions imposed against Plaintiff Antonio Goodwin by Magistrate Judge **Daniel J. Albregts** and District Judge **Gloria M. Navarro**, including whether those sanctions were based upon incomplete facts and false employment representations; (Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution)
13. Direct violation of the Fifth Amendment Due Process Clause of the United States Constitution **Court and Judges Ignored EEOC evidence from 2023, the January 2024 Right to Sue letter, the May 9, 2024 EEOC investigation evidence, EEOC Government Specialist Kathleen Gilliam's statement confirming AT&T would not have responded to the EEOC if Plaintiff had not been employed by AT&T, and the 63 authentic AT&T employee documents sent directly from AT&T to the EEOC;**
14. Vacate all rulings, findings, sanctions, dismissals, and determinations entered against Plaintiff that were based upon false employment representations contradicted by overwhelming documentary evidence;
15. Grant any and all further relief this Court deems necessary, just, proper, and required in the interest of justice.

CONCLUSION

The Petition for Writ of Certiorari should be granted.

For all the foregoing reasons, Plaintiff Antonio Goodwin respectfully submits that the record now establishes overwhelming evidence of **extraordinary circumstances, constitutional violations, Fifth Amendment Due Process**

Clause violations, fundamental judicial error, ignored material evidence, and manifest injustice requiring immediate relief in Plaintiff's favor.

Plaintiff has now obtained **63 authentic AT&T-generated employment documents** that were sent directly by **AT&T** to the **Equal Employment Opportunity Commission ("EEOC")** during the official administrative investigation process.

These documents constitute **overwhelming, indisputable, and conclusive evidence** establishing Plaintiff Antonio Goodwin's employment relationship with **AT&T Mobility LLC, AT&T Inc., AT&T Corp., and AT&T entities.**

The evidence specifically contains Plaintiff's Antonio Goodwin **official employee history records, AT&T employee identification number, employee passcode, internal AT&T write-ups, coaching records, employment history records, and internal employment-related documents generated, maintained, and preserved by AT&T itself.**

Most critically, these records were not created by Plaintiff.

These records were **produced directly by AT&T itself in response to a federal EEOC investigation**, establishing unquestionable authenticity, reliability, and evidentiary value.

This overwhelming documentary evidence **directly, irreconcilably, and completely contradicts** the declaration submitted by **AT&T & Pamela M. Phillips**, in which **AT&T & Pamela M Phillips** represented to the Court that

there were no records showing Antonio Goodwin was ever employed by any AT&T entity.

The existence of these **63 internal AT&T employment documents** proves **that material factual representations presented before the Court were fundamentally false.**

As a direct result, rulings entered by the Court were made **without consideration of critical evidence establishing Plaintiff's employment status and without full consideration of the truth.**

The contradiction presented by these records is not minor.

It is not disputed.

It is not harmless.

It strikes directly at **the foundation of the entire case itself.**

Plaintiff further submits that throughout these proceedings, overwhelming employment evidence was repeatedly ignored, including **more than 900 pages of employment evidence submitted April 17, 2025, Plaintiff's April 10, 2025 sanctions motions (ECF Nos. 51 and 54), Plaintiff's September 10, 2025 dispositive motions (1053 pages of employment evidence submitted ECF Nos. 131, 134, and 136), ECF Nos. 155, 156, 174, 199, Exhibit A, and additional employment evidence establishing Plaintiff's employment relationship with AT&T.**

Plaintiff further submits that the proceedings resulted in serious **Fifth Amendment Due Process Clause violations**, because material evidence directly proving employment was ignored while rulings, sanctions, dismissals, and a frivolousness determination were entered against Plaintiff despite overwhelming contradictory evidence.

The dismissal entered by the **Ninth Circuit Court of Appeals** under **28 U.S.C. § 1915(a)** and **28 U.S.C. § 1915(e)(2)** labeling Plaintiff's appeal frivolous was entered despite the existence of overwhelming evidence directly establishing Plaintiff's employment relationship with AT&T.

If courts may ignore overwhelming documentary evidence generated directly by a defendant corporation, disregard federal EEOC investigative records, overlook material contradictions in sworn declarations, and impose sanctions against a litigant while refusing to address critical evidence submitted into the record, then fundamental constitutional protections guaranteed under the **Fifth Amendment Due Process Clause** cease to have meaning.

Where newly discovered evidence directly disproves prior sworn statements relied upon by the Court, **extraordinary relief is not only appropriate —**

extraordinary relief becomes legally necessary to prevent manifest injustice.

The integrity of judicial proceedings requires that courts decide cases based

upon truth, evidence, constitutional due process, and complete factual accuracy.

Justice requires correction when rulings are based upon false factual representations.

The law requires relief when overwhelming evidence proves prior findings were fundamentally wrong.

Accordingly, Plaintiff Antonio Goodwin respectfully requests that this Court

grant relief in Plaintiff's favor, vacate all rulings premised upon the false assertion that Plaintiff was never employed by AT&T, vacate the frivolousness determination, reverse all sanctions and adverse rulings entered against Plaintiff, reopen review of the evidence, and provide all further relief necessary to fully correct the constitutional violations and manifest injustice that occurred throughout these proceedings.

Justice demands that this matter be decided on truth.

The truth is now overwhelmingly established by AT&T's own internal records.

Those records conclusively prove that Plaintiff Antonio Goodwin was in fact an employee of AT&T.

The evidence is overwhelming.

The contradiction is undeniable.

The constitutional violations are substantial.

The record supports only one lawful outcome.

Relief must be granted in favor of Plaintiff Antonio Goodwin in the interest of justice.

Dated: June 25, 2026 Respectfully
submitted, /s/ Antonio Goodwin
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