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No. 25A442

In the Supreme Court of the United States

Palanikumar Gnanam et al.
Petitioner(s)

v.

Nathaniel Chibuzor Keita et al.
Respondent(s)

On Petition for a Writ of Certiorari to the District Court of Appeal of Florida, Fifth District

PETITION FOR WRIT OF CERTIORARI

Palanikumar V. Gnanam
Mullairani Gnanam
Pro Se Petitioners
10597 Creston Glen Cir E.
Jacksonville, FL 32256
Ph: 904-472-1198
Email: pk_gnanam@yahoo.com

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QUESTIONS PRESENTED

The underlying state court proceedings, including appellate review, took place during the pendency of Chapter 7 Bankruptcy filing by the Respondent, Nathaniel Chibuzor Keita, which was concealed from the Petitioners and the state courts, resulting in the entry and enforcement of a judgment in violation of federal law.

1. Does the **Supremacy Clause** permit a state court to avoid the self-executing effect of a Federal Bankruptcy Discharge by ruling that federal filings are not "automatically impugned" to state proceedings? (Appendix T-2-B, 165a).

2. Whether a state court violates the **Supremacy Clause** and the "**no fair ground of doubt**" standard established in *Taggart v. Lorenzen*, 587 U.S. 554, 561 (2019), by refusing to vacate judgments rendered in undisputed violation of the federal automatic stay, and permitting enforcement of a judgment concealed from the bankruptcy court, based on a determination that federal bankruptcy law is "inapplicable" to state court proceedings. (Appendices C, 14a; T-1-A, 154a).

3. Whether the "**objective reasonableness**" standard for civil contempt established in *Taggart*, 587 U.S. at 561, is defeated when a party commits fraud on the court by maintaining contradictory evidence across jurisdictions — dismissed by the trial court as merely saying different things in different courts — to enforce a judgment rendered in undisputed violation of the federal automatic stay. (Appendices I, 63a; T-1-D, 157a; T-1-B, 156a; T-3, 170a).

4. Whether a state court violates the **Due Process Clause of the Fourteenth Amendment** by summarily rejecting a meritorious defense of judgment voidness and denying a meaningful forum for relief against a debt predicated on a party's intentional concealment of a bankruptcy filing. (Appendices H, 49a; M, 96a; N, 100a).

LIST OF PARTIES TO PROCEEDING

Petitioners are Palanikumar V. Gnanam, ***Pro se***, and Mullairani Gnanam, ***Pro se***.

Respondents are Nathaniel Chibuzor Keita and Lana Paige Tompkins.

LIST OF ALL PROCEEDINGS

1. Pursuant to Supreme Court Rule 14.1(b)(iii), the following are all proceedings in state and federal courts directly related to the case in this Court:

2. Florida Supreme Court, Case No. SC2025-0657, Palanikumar V. Gnanam, et al. v. Nathaniel Chibuzor Keita, et al. (Order denying discretionary jurisdiction dated August 18, 2025, Appendix A, 11a).

3. Florida Fifth District Court of Appeal, Case No. 5D2024-2417, Palanikumar V. Gnanam, et al. v. Nathaniel Chibuzor Keita, et al. (PCA Affirmance and Order granting attorney fees dated August 12, 2025; Appendices B, 13a; C, 14a).

4. County Court, Fourth Judicial Circuit, Duval County, Florida, Case No. 162024CC000687AXXXMA, Nathaniel Chibuzor Keita, et al. v. Palanikumar V. Gnanam, et al. (Final Judgments and subsequent orders; Appendices F, 22a; F-0, 24a; F-1, 25a; F-2, 30a; F-3, 31a).

5. United States Bankruptcy Court for the Middle District of Florida, Case No. 3:25-bk-00977-BAJ, In re: Nathaniel Chibuzor Keita (Chapter 7 filing and discharge; Appendix I, 63a).

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In the Supreme Court of the United States

No. 25A442

Palanikumar Gnanam, et al., PETITIONER(S)
v.
Nathaniel Chibuzor Keita, et al., RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO THE DISTRICT COURT OF APPEAL OF FLORIDA, FIFTH DISTRICT

PETITION FOR WRIT OF CERTIORARI

Pro se Petitioners/Appellants/Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, under the protection of US Supreme Court precedent for Pro Se litigants[1] entitling them to liberal construction, file this petition, titled "PETITION FOR WRIT OF CERTIORARI". The Petitioners have been **pro se throughout the entire case**, including the trial court, appellate courts, and the Supreme Court.

OPINIONS BELOW

The order of the Florida Supreme Court denying discretionary review (Appendix A) is unreported. The Per Curiam Affirmance and the Order Granting Attorneys' Fees of the Florida Fifth District Court of Appeal (Appendices B; C) are unpublished. The Trial Court's ruling on the inapplicability of the automatic stay (Appendix T-1-A) and the subsequent

[1] "Pro se filings are entitled to liberal construction *Haines v. Kerner*, 404 U.S. 519 (1972). In *Erickson v. Pardus*, 551 U.S. 89 (2007)."

Final Judgment Awarding Attorneys' Fees (Appendix G-2) are unreported. The original Trial Court Final Judgments, Denial of 7 motions, Final Judgment Awarding Attorneys' Fees (Appendix F), entered by Judge Ruth following his disqualification by operation of law on July 27, 2024 are unreported. The **five substantive orders denying relief** (including the denial of the Claim of Exemption and four *Nunc Pro Tunc* denials (Appendix P-1 through P-5) and the **Order of Recusal** entered on March 4, 2026 (Appendix P-6) by Judge Lee, following her disqualification by operation of law on February 27, 2026 (Appendix P-0) and opposing counsel's letter to judge dated March 2, 2026 (Appendices O; T-1-K), are unreported. The successor judge Brady's orders denying a stay of enforcement and denying relief from the writ of garnishment, entered March 24, 2026 (Appendices Q-1; Q-2), and the successor judge's own Order of Recusal entered July 6, 2026 (Appendix Q-4), are likewise unreported.

JURISDICTION

The jurisdiction of this Court is invoked under **28 U.S.C. § 1257(a)**.

The Florida Supreme Court denied discretionary review on **August 18, 2025** (Appendix A). The Florida Fifth District Court of Appeal previously entered the **May 1st Barring Order** Chain on May 1, 2025 (Appendix E), a Per Curiam Affirmance on **August 12, 2025** (Appendix B), and an Order Granting Attorneys' Fees on **August 12, 2025** (Appendix C). The trial court decisions that were appealed were entered in August **2024** (Appendix F), which include the original Final judgment, order denying 7 motions, and awarding of attorney fees. It must be noted that the **Respondent concealed bankruptcy** and violated the Automatic Stay (Appendix I, **March 28 through**

August 7, 2025), and this is not reflected in the Dec 4, 2025, Trial Court, 5DCA, and SCOFL orders.

The final judgment of the County Court for the Fourth Judicial Circuit, which resolved the federal questions presented herein by rejecting the federal bankruptcy defense and awarding fees, was entered on **December 4, 2025** (Appendix G).

Pursuant to an application for an extension of time, **Justice Clarence Thomas** granted an extension on **November 21, 2025**, extending the time to file this Petition to **January 15, 2026**. Pursuant to the Clerk's letter dated January 21, 2026, granting 60 days to resubmit in corrected form under Rule 14.5.

The trial court jurisdictional sequence continued with the entry of **six orders** on **March 4, 2026 (**Appendix P**)**, which finalized the trial court's rejection of Petitioners' federal bankruptcy and due process defenses following the judge's disqualification. The absolute foreclosure of further review by the Florida Supreme Court and the Fifth District Court of Appeal **renders these post-affirmance state court orders entirely unappealable within the state judiciary for the Pro se Petitioners**, leaving this Court as the sole and exclusive venue in which these federal constitutional questions can be resolved.

Section 1257(a) is a jurisdictional limit, not a prudential exhaustion doctrine; review extends only to the judgment of the highest state court in which a decision could be had. *Costarelli v. Massachusetts*, 421 U.S. 193, 195 (1975). The Fifth District's May 1, 2025 Order barred Pro se Petitioners from all further pro se filings, directed its Clerk to accept none, and foreclosed any motion for rehearing, clarification, certification, or written opinion (Appendix E). It then affirmed per curiam without opinion (Appendix B) —

a disposition the Florida Supreme Court lacks jurisdiction to review. That Court denied discretionary review and entertained no rehearing (Appendix A). The state appellate ladder was thus closed at both the state higher courts. As to the orders entered thereafter, the county court is the highest court of the State in which a decision could be had. The question under § 1257(a) is whether a decision could be had, not why it could not. *Largent v. Texas*, 318 U.S. 418, 421 (1943).

Petitioners also sought relief by Petition for Writ of Mandamus directed to the Clerk, filed February 17, 2026. Thus far, the County Clerk has not made any filing. No order or ruling of any kind has been entered. The County Court for the Fourth Judicial Circuit is therefore the highest court of the State in which a decision on these questions could be had.

After this Court rejected the under-seal motion, Petitioners timely filed a paid Petition by August 24, 2026; returned September 2, 2026, it is **timely resubmitted on or before November 2, 2026**.

The Petition challenges a state court judgment that decided federal questions of law, namely the effect of the **Supremacy Clause** and the **Fourteenth Amendment Due Process Clause** on judgments entered in violation of the Federal Bankruptcy Code **(11 U.S.C. §§ 362, 524, 541)**.

CONSTITUTIONAL PROVISIONS AND STATUTES INVOLVED

The following constitutional and statutory provisions are involved in this case and **are set out in their entirety in** Appendix 8a**:**

CONSTITUTIONAL PROVISIONS AND STATUTES INVOLVED

A. U.S. CONST. ART. VI, CL. 2 (SUPREMACY CLAUSE)

B. U.S. CONST. AMEND. XIV, § 1 (DUE PROCESS CLAUSE)

C. 11 U.S.C. § 362(a) (AUTOMATIC STAY)

D. 11 U.S.C. § 524(a) (EFFECT OF DISCHARGE)

E. 11 U.S.C. § 541. Property of the estate

F. 11 U.S.C. § 554(d). Abandonment of property of the estate

G. Fla. Stat. § 77.041 (Not in Appendix):

(1) Upon application for a writ of garnishment by a plaintiff...

(2) The plaintiff must mail, by first class, a copy of the writ of garnishment...

(3) Upon the filing by a defendant of a sworn claim of exemption and request for hearing, a hearing will be held as soon as is practicable to determine the validity of the claimed exemptions. If the plaintiff or the plaintiff's attorney does not file a sworn written statement that answers the defendant's claim of exemption within 8 business days after hand delivering the claim and request or, alternatively, 14 business days if the claim and request were served by mail, **no hearing is required and the clerk must automatically dissolve the writ** and notify the parties of the dissolution by mail.

STATEMENT OF THE CASE

This case involves a documented breakdown of the federal-state judicial hierarchy. It centers on a state court's explicit refusal to recognize the jurisdictional

finality of a federal bankruptcy stay and its subsequent entry of enforcement judgments based on a record corrupted by the Respondent's intentional concealment of his bankruptcy status and contradictory evidence in the courts, constituting a fraud on the court. See U.S. Const. art. VI, cl. 2; see also *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238, 244-45 (1944).

The Florida courts below have effectively held that federal bankruptcy law—specifically the Automatic Stay (11 U.S.C. § 362) and the Discharge Injunction (11 U.S.C. § 524)—is a "discretionary" suggestion that state court judges may opt to ignore based on their own local procedural preferences.

The Florida court below did exactly that. Despite the mandatory protections of a pending Chapter 7 bankruptcy filing (**Case No. 3:25-bk-00977-BAJ;** Appendix I), the Fifth District Court of Appeal issued a judgment for attorney fees (Appendix C) predicated on trial court orders that were void *ab initio*. When these violations were finally brought to light, the trial court refused to vacate the void judgments, furthering the error by explicitly ruling from the bench that "the automatic stay in bankruptcy proceedings does not apply to this particular case..." (Appendix T-1-A).

Furthermore, the court sanctioned a "**fraud on the court**" by allowing the Respondent to maintain conflicting positions in federal and state jurisdictions. When confronted with the Respondent's concealment of his bankruptcy and his contradictory sworn statements to the state and bankruptcy courts, the trial court dismissed the deception by treating the contradiction as people saying different things in different courts (Appendices T-1-B; T-1-C; T-1-D; Z-1-A; Z-1-C).

STATEMENT OF THE CASE

Petitioners had requested Respondents' documents including income statements and tax returns on May 15, 2024, before trial. The request was never answered, so the Petitioners moved to compel production (Appendix K). The trial court has not ruled on that motion (Appendix V).

The same court found Petitioners had **proven "Mr. Keita made contradictory statements,"** yet demanded "proof that Mr. Keita actually lied to you" (Appendices T-1-D; Z-1-D), while **leaving unruled the motion to compel the records** that would supply it. **Respondent's bankruptcy schedules were sworn under penalty of perjury.** Fed. R. Bankr. P. 1008.

Respondent's failure to produce documents within his sole possession supports an **adverse inference** that **documents do not support sworn testimony** (Appendices I; T-3-A).

A. The Concealed Bankruptcy and the Void State Proceedings

i. The Judgments and the Bankruptcy.

The original Final Judgments were entered on August 1, 2024, and August 29, 2024 (Appendices F-1; F-3). While an appeal was pending, the Respondent, Nathaniel Chibuzor Keita, filed for Chapter 7 Bankruptcy on March 28, 2025 (**Case No. 3:25-bk-00977-BAJ;** Appendix I), triggering the Automatic Stay under **11 U.S.C. § 362(a) and vesting the judgments in the bankruptcy estate under** 11 U.S.C. § 541(a)(1). This stay remained active until August 7, 2025. Respondent never scheduled the judgments as assets. Schedule A/B answers "No" to other amounts owed to him, "No" to contingent and unliquidated claims of every nature, and "No" to accounts receivable already earned; the only third-party claim disclosed is an insurance claim for water damage to a

vehicle. The judgment appears in no category (Appendix I). Because the judgments were never scheduled, they were not abandoned to Respondent at closing under 11 U.S.C. § 554(c), and under 11 U.S.C. § 554(d) they remain property of the bankruptcy estate. Respondent has had no interest in them since March 28, 2025, and he and his counsel have no standing to enforce them.

ii. Concealment from the Courts and the Trustee.

During the stay, Respondent concealed the bankruptcy from the Petitioners and the Florida courts. On May 1, 2025—while the federal stay was in full effect—the Florida Fifth District Court of Appeal ("5DCA") **issued an order barring the Petitioners** from further filings (Appendix E) and on June 25, 2025, it denied **their emergency motion to stay**, reminding them that the May 1 order "remains in effect" (Appendix E-3). By barring the filing of a reply brief and a response to the motion for attorney's fees during the stay, the court committed a **dual constitutional injury**: a violation of the Automatic Stay and a simultaneous denial of **Due Process under the Fourteenth Amendment**. Because the order was a "continuation of a judicial proceeding" against a debtor's interests, it was **void ab initio**. See *Borg-Warner Acceptance Corp. v. Hall*, 685 F.2d 1306, 1308 (11th Cir. 1982).

Furthermore, the state appellate courts issued their orders without reviewing the **Critical Contradictory Evidence** that was taking place at the same time, but was concealed. This includes the Bankruptcy Case filings (Appendix I) and the July 30, 2024, Trial Statement (Appendix T-3), which directly contradict Respondent's sworn testimony. By con-

cealing the bankruptcy status (Appendix I), Respondent successfully prevented the state court from realizing that its factual basis had been fundamentally undermined and that its jurisdiction had been suspended.

B. The State Court's Explicit Repudiation of Federal Supremacy

i. Discovery of Concealed Bankruptcy and Violation of Stay

Upon discovering the concealed bankruptcy in late August 2025, Petitioners immediately moved to vacate the state court judgments as *void ab initio* (Appendices M; N). This challenge was not merely a request for equitable relief, but a jurisdictional necessity: under 11 U.S.C. § 362, the state court's power had been statutorily suspended, rendering its May 1, 2025, sanctions order (Appendix E) a legal nullity.

At the hearing on October 17, 2025, the Trial Court was presented with the federal docket and the unmistakable mandate of the Supremacy Clause (U.S. CONST. ART. VI, CL. 2). The court, however, did not simply misinterpret federal law; it explicitly rejected its application. As recorded in the transcript, the Trial Judge declared:

"The automatic stay in bankruptcy proceedings does not apply to this particular case" (Appendix T-1-A). "The motion to vacate judgment orders... as void for violation of the automatic stay is denied." (Appendix T-1-A).

ii. Disregard of Discharge and Fraud

The refusal was not confined to the stay. At the same hearing, the court ruled that Plaintiffs had no duty

to disclose the bankruptcy at all — "there is no obligation that the Plaintiffs to disclose a bankruptcy proceeding" (Appendix T-1-C).

When Petitioners raised the federal discharge injunction, the court rejected it on a factual premise: "he haven't paid the judgment. How can he put something into a bankruptcy proceed that he doesn't have? You didn't pay the judgment. He doesn't have it." (Appendix T-1-E). The premise was wrong on the facts and on the law. The writ of garnishment had issued on Wells Fargo on November 5, 2024 — as the trial court's own orders recite (Appendices P-2; P-3) — and the funds had been held since. And whether the judgment had been collected was beside the point. Under 11 U.S.C. § 541(a)(1), the August 2024 judgments were a pre-petition receivable that became property of the bankruptcy estate the moment Respondent filed on March 28, 2025. Respondent did not schedule it. His Schedule A/B reports no other amounts owed to him, no contingent or unliquidated claims of any nature, and no accounts receivable already earned (Appendix I). See *Barger v. City of Cartersville*, 348 F.3d 1289 (11th Cir. 2003). The concealment the state court declined to examine is recorded in Respondent's own federal filings.

The court's written order, entered March 4, 2026 nunc pro tunc to that hearing, denied the motion: "the Defendants' Motion to Terminate/Vacate Final Judgment, Orders, Motions as Void for Violation of the Automatic Stay is DENIED." (Appendix P-5).

Furthermore, when Petitioners identified that Respondent had maintained "**mutually exclusive**" positions in different forums—marking the case as "Pending" in federal court to hide his interest in the state court judgments from the Trustee, while sim-

ultaneously seeking enforcement of those same judgments in state court—the Trial Court dismissed the deception. **The court's treatment of the contradiction as people saying different things in different courts (Appendices T-1-B; T-1-D) effectively sanctioned a jurisdictional fraud**. This dismissal permitted Respondent to enjoy the benefits of a federal discharge while simultaneously profiting from state court judgments he had intentionally concealed from the Bankruptcy Estate—**leaving the Petitioners trapped between a federal stay that was ignored and a state enforcement action fueled by a corrupted record.**

C. The State Court's Ratification of Void Acts and the Resulting Due Process Violation

i. Ratification of Void Orders

Instead of curing the documented jurisdictional defects, the state courts engaged in a progressive ratification of void proceedings. On August 12, 2025 — immediately following the expiration of the automatic stay — the Fifth District Court of Appeal issued a Per Curiam Affirmance (Appendix B) and a Fee Order (Appendix C). These actions were **fatally dependent** on the antecedent void orders issued while the federal stay was in effect. By affirming a record from which Petitioners had been unconstitutionally excluded, the appellate court effectively "laundered" a jurisdictional and Due Process (Fourteenth Amendment) nullity into a final judgment.

ii. Enforcement of a Discharged Debt.

This systematic breakdown of federal protection culminated on December 4, 2025. Despite being presented with evidence of the Respondent's federal dis-

charge and the mandatory permanent injunction under 11 U.S.C. § 524, the Trial Court denied all post-judgment relief (Appendix G). The Final Judgment of Garnishment was signed at 10:45 a.m., before the 3:00 p.m. hearing (Appendices G-1; S, Part IV). **The court explicitly ruled that federal filings are not "automatically impugned" to the state case** (Appendix T-2-B), **justifying this "proof gap" by asserting that the court sits in the "United States of Florida"** (Appendices T-2-A; Z-2-A). This reliance on a state-centric "United States of Florida" jurisdiction completed the violation of the Fourteenth Amendment.

Because the 5DCA mandate was the fruit of a void proceeding (the May 1st Order) that had silenced the Petitioners, the Trial Court's adherence to it finalized a deprivation of property without a meaningful opportunity to be heard. This "ratification" of a void act created an unconstitutional paradox: the Respondent enjoys the "fresh start" of a federal discharge while simultaneously utilizing state-sanctioned enforcement to collect a concealed extinguished debt (his counsel's pre-petition fees, Appendix X.53), violating Supremacy and Due Process Clauses.

D. The State Court's Documented Conflict with Federal Bankruptcy Law

This case presents a direct conflict between state judicial enforcement and the mandatory provisions of the Bankruptcy Code. The following proceedings demonstrate a persistent refusal to recognize federal jurisdictional boundaries:

1. **The Jurisdictional Vacuum:** On August 1, 2024 the Duval County Court entered a Final

Judgments and denied seven motions (Appendices F-1; F-2; F-3). While these judgments were under appellate review, Respondent filed for Chapter 7 Bankruptcy on March 28, 2025 (Appendix I; **Case No. 3:25-bk-00977-BAJ**), invoking the **Automatic Stay under 11 U.S.C. § 362,** wherein he disclaimed all income-related trial testimony (Appendix T-3-A).

2. **The Fraudulent Concealment:** During the stay, Respondent committed a **jurisdictional fraud** by representing to the Bankruptcy Court in his sworn schedules (Appendix I) that the state litigation was merely "Pending" in the trial court. This intentional concealment of the "On Appeal" status shielded the judgments from the Bankruptcy Trustee while Respondent simultaneously utilized the state court to secure their enforcement. Furthermore, Respondent concealed his attorney's financial interests on Schedule G (Appendix X.53), omitted trial counsel on Schedule E/F, and hid the judgment itself on Schedule A/B—deliberately preventing trustee abandonment under **11 U.S.C. § 554(d)** and permanently trapping the asset within the federal estate.

3. **The Due Process Blockade**: During the federal stay, the **5DCA barred Petitioners from filing** and **denied stay** (Appendices E-0; E-3), silencing them from filing a reply brief and fee response.

4. **Enforcement of Extinguished Debt:** This systemic breakdown culminated in the **December 4, 2025, Order** (Appendix G), which enforced a debt that had been federally extinguished by the **Permanent Discharge Injunction (11 U.S.C. § 524)** by adhering to a mandate born of a void proceeding.

STATEMENT OF THE CASE

5. **Exhaustion of State Remedies**:

a) Following the trial court's ruling on December 4, 2025, that federal bankruptcy filings are not 'automatically impugned' to state proceedings, Petitioner took immediate action to bridge this 'Proof Gap.' On December 9, 2025, Petitioner filed an **Emergency Motion to Compel the Clerk to Search and Produce Notice of Automatic Stay** (Appendix J), followed by an **Emergency Motion to Compel Production of Documents from Plaintiffs** (Appendix K) on December 11, 2025.

b) Despite the emergency nature of these motions and the self-executing mandate of 11 U.S.C. § 362, the trial court has refused to rule on either motion (Appendix V). This deliberate inaction has created a **jurisdictional vacuum**. By maintaining a 'Proof Gap' (Appendices T-2-B; X.6; X.7) while simultaneously refusing to allow the Petitioner to fill it through discovery or clerk verification, the state court has effectively suspended the Supremacy Clause to allow the Respondent to continue enforcing a judgment rendered in undisputed violation of a federal stay.

c) On December 29, 2025, Petitioner filed a **Consolidated Motion to Set Aside and Vacate Order** (Appendix L) specifically challenging the court's refusal to acknowledge the federal discharge and the fraud underlying the judgment, exhausting all available state remedies.

6. **The Ongoing Controversy: Wells Fargo's Selective Compliance and the Unlawful "Verbal Rollover" Hold. The second writ will not support the hold as there is neither a written order that authorizes this rollover nor vacates Clause E.** Respondents filed only counsel's affidavit, not a competent sworn answer, to the Claim of Exemption, were a "no-show" to the Hearing, and under Fla. Stat. § 77.041(3) the clerk's duty to dissolve the writ was ministerial. (Appendix T-4-A, T-4-B).

This case presents an active deprivation of property. Under the December 4, 2025 Final Judgment (D#241), Wells Fargo disbursed $25,239.49 to Respondents' counsel under Clause C (Appendix G-1), but refused to comply with Clause E, which ordered the immediate release of Petitioners' joint bank accounts and safe deposit boxes (Appendix G, G-1).

Instead of releasing this property, Wells Fargo's counsel and Respondents' counsel Kyle Peters verbally agreed during a January 8, 2026 hearing—where Primary Petitioner was **electronically muted** during almost the entire Hearing — to "roll over" these released assets directly into a second, post-discharge writ (D#262) for $39,131.00 (Appendix T-4-A).

No written order ever authorized this rollover or vacated Clause E. Over 200 days later, Petitioners' legally released property remains frozen under a bank-imposed "Legal Order Hold" actively maintained by KP Law, PLLC (Appendices T-4-C; X, item 55).

REASONS FOR GRANTING THE WRIT

Review is warranted under **Supreme Court Rule 10(c)** because the state court decision on a federal

question conflicts with decisions of this Court and the **Supremacy Clause**. The decision below **creates a dangerous precedent**: it allows state courts to "opt out" of the mandatory self-executing automatic stay and federal injunctions by declaring them "inapplicable" and permits a party to profit from a "fraud on the court."

A. The State Court Violated the Supremacy Clause and the "No Fair Ground of Doubt" Standard established in *Taggart v. Lorenzen.*

i. Refusal to Apply the Stay

Review is necessary because the final state court judgment stands in direct, irreconcilable conflict with the Federal Bankruptcy Code and the **Supremacy Clause** (U.S. Const. Art. VI, Cl. 2, Appendix 8a). The state court ignored federal law by declaring that the automatic stay "does not apply" to a proceeding involving a federal bankruptcy, thereby creating a "state-law exception" to a mandatory federal injunction, which directly violates the **Supremacy Clause** and this Court's precedent.

Appellate and post-judgment fee proceedings are inherently affirmative exercises of state power that determine whether liability and attorney's fees will be enforceable. Once bankruptcy was filed, those proceedings fell squarely within the shadow of the automatic stay, because they fixed enforceability against the federal debtor and the bankruptcy estate—an area Congress placed exclusively under federal control.

REASONS FOR GRANTING THE WRIT

ii. The Open Taggart Question

Taggart v. Lorenzen, 587 U.S. 554, 561 (2019) held that a creditor may be held in civil contempt for violating a bankruptcy discharge order where there is no fair ground of doubt as to whether the order barred the creditor's conduct, but **did not decide whether the same objective standard governs violations of the automatic stay**.

Lower courts have since taken differing approaches. Compare *Suh v. Anderson (In re Jeong),* 2020 WL 1277575 (B.A.P. 9th Cir. Mar. 16, 2020) with *In re Spiech Farms*, LLC, 603 B.R. 395, 408 n.22 (Bankr. W.D. Mich. 2019). This case presents that question: whether a party who omits a judgment from his sworn bankruptcy schedules, conceals his bankruptcy (Appendix I), and then later enforces that judgment can claim any objectively reasonable basis for believing the stay did not bar his conduct.

The state court, without interpreting **11 U.S.C. § 362** or confronting ambiguity in its scope, categorically declared the automatic stay inapplicable because Keita was the Plaintiff. 11 U.S.C. § 362(a)(1) is not the only applicable statute; so is § 362(a)(3), which stays any act to exercise control over property of the estate without regard to which party filed the complaint. The August 2024 judgment became property of the estate under 11 U.S.C. § 541(a)(1) when Keita filed on March 28, 2025. He never scheduled it. Every act to enforce that judgment was an act to exercise control over estate property.

The federal automatic stay (11 U.S.C. § 362) was active, undisputed, and documented on the federal docket. Yet, the trial court explicitly ruled that the stay **"does not apply to this particular case."** (Appendices T-1-A; T-1-I). The court did not

merely misread the statute; it declined to apply it, displacing federal law in violation of the Supremacy Clause. Stay is "automatic", not "discretionary."

iii. Void Orders Entered During the Stay

Federal law—including the controlling precedent of the Eleventh Circuit—mandates that actions taken in violation of the Automatic Stay are *"void and without effect,"* *Borg-Warner,* 685 F.2d at 1308. This Florida trial court, by rejecting Borg-Warner, did not give effect to it (Appendix Z-1-E). By refusing to vacate the May 1st Order (Appendix E) and the subsequent fee judgments (Appendix C), the state court attempted to **breathe life into a legal nullity.**

"The States cannot, in the exercise of control over local laws and practice, vest State courts with power to violate the supreme law of the land. The Constitution grants Congress exclusive power to regulate bankruptcy and under this power Congress can limit the jurisdiction which courts, State or Federal, can exercise over the person and property of a debtor who duly invokes the bankruptcy law." ***Kalb v. Feuerstein***, 308 U.S. 433, 439 (1940).

The 5DCA's May 1 Barring Order Chain (Appendix E) and others were entered during the pendency of a federal bankruptcy stay (Appendix I). Whether the state court was 'aware' of the stay or whether the Respondent intentionally 'concealed' it is a distinction without a legal difference. As established in *McComb v. Jacksonville Paper Co.*, 336 U.S. 187 (1949), **the intent of the violator is irrelevant to the remedial enforcement of an injunction.** Because 11 U.S.C. § 362 is a self-executing federal mandate, the May 1 order chain was en-

tered without jurisdiction and is void ab initio. Consequently, all subsequent orders based on them—including the **September 5, 2025 Mandate, August 12, 2025 Per Curiam Affirmance (PCA) and Fee Order (Appendices D; B; C) issued by the 5DCA**—are '**poisoned fruit**' derived from a foundational violation of federal supremacy.

The PCA and Fee orders are legal nullities because they were predicated on the **May 1, 2025, barring order**, which was entered in direct violation of the **Automatic Stay (11 U.S.C. § 362)**, and were also dependent on **August 2024 Judgments** that were **federally extinguished** by the **Discharge Injunction** (11 U.S.C. § 524), **or remained property of the estate** (11 U.S.C. § 541) (Appendix I). The December 4, 2025, Final Fee Judgment (Appendix G-2), dependent on the void PCA and Fee Order, is likewise void. Furthermore, as this judgment seeks to **monetize litigation regarding a debt that was permanently extinguished, its enforcement constitutes an ongoing violation of the Supremacy Clause.**

The conflict is a direct affront to the hierarchy of mandates. By **prioritizing its own internal mandate over the absolute federal mandate** of 11 U.S.C. § 362, the state court has **effectively nullified the Supremacy Clause**. Under Florida Supreme Court law (*Topps v. State*, 865 So. 2d 1253 (Fla. 2004)), **an unelaborated PCA carries no preclusive effect on unbriefed, unlitigated issues, and under Kalb v. Feuerstein, a stay-violating mandate is a nullity.**

The Eleventh Circuit has further held that a bankruptcy court may hold even the United States in civil contempt under 11 U.S.C. § 105 for willful violation of the § 524 discharge injunction, **applying the**

same willfulness test the Circuit uses for violations of the § 362 automatic stay. *Hardy v. United States (In re Hardy)*, 97 F.3d 1384, 1389-90 (11th Cir. 1996).

A state court cannot 'breathe life' into a void fee order by incorporating it into a Final Judgment after the stay is lifted. By allowing the September 5 Mandate to enforce fee judgments derived from acts during the stay, the state court gave effect to orders that federal law treats as void. *Borg-Warner*, 685 F.2d at 1308.

iv. ***Enforcement of the Concealed Judgment***

The **conflict reached its zenith on December 4, 2025**, when the trial court **enforced a concealed judgment** that remained property of the bankruptcy estate under 11 U.S.C. § 541(a)(1) and 554(d), or, to the extent discharged, **a pre-petition debt federally extinguished by the Permanent Discharge Injunction** under 11 U.S.C. § 524(a)(2). **The court created an unconstitutional "proof gap" by explicitly ruling that federal bankruptcy filings are not "automatically impugned" to the state case** (Appendix T-2-B).

By asserting that the **state court operates within a separate "United States of Florida"** (Appendices T-2-A; T-2-D), the court claimed a sovereign right to ignore the self-executing nature of the automatic stay and the federal discharge. **By enforcing a judgment "fatally dependent" on a void appellate mandate** — the 'poisoned fruit' of automatic stay violation — the state court finalized a deprivation of property without Due Process.

Under this Court's landmark holding in *Armstrong v. Manzo*, 380 U.S. 545 (1965), **a post-deprivation hearing cannot cure a constitutional infirmity**

unless the court "wiped the slate clean" and considered the case anew. ***Id. at 552***. Here, the trial court did the opposite: it ratified a process from which Petitioners were unconstitutionally silenced during the federal stay, creating an **unconstitutional paradox.**

v. Enforcement Through Procedural Paralysis

The 'United States of Florida' (Appendix T-2-A) rule is not merely a verbal remark; it is being enforced through procedural paralysis. **When the Petitioner moved to compel the Clerk to recognize the federal record (Appendix J) and moved to compel the Respondent to produce the financial statements that would expose his contradictory testimony (Appendix K), the trial court chose silence over adjudication.**

The lower court's orders are a legal nullity by analogy, under *Roman Catholic Archdiocese of San Juan v. Acevedo Feliciano*, 589 U.S. 57, 65 (2020), once jurisdiction is suspended by federal law, a state court must 'proceed no further,' and any subsequent orders are '**absolutely void**.'

This Court should grant certiorari to determine whether a state court may bypass the Supremacy Clause by creating an unbridgeable 'Proof Gap'—**demanding 'certified' proof of federal law while simultaneously blocking the motions intended to produce that proof.** Such a 'vacuum' ensures that federal bankruptcy law is neither automatic nor uniform.

REASONS FOR GRANTING THE WRIT

B. The Decision Below Conflicts with the "Void Ab Initio" Rule and the Fundamental Duty of Candor Required to Maintain Federal-State Comity.

Review is necessary because the Florida courts have created a "state-law exception" to the long-standing federal rule that actions taken in violation of the automatic stay are **void ab initio**—legally non-existent from their inception. *See Borg-Warner,* 685 F.2d at 1308. By refusing to vacate judgments entered and finalized during a jurisdictional vacuum, the state court has attempted to "breathe life" into a federal nullity.

i. Void Acts Under the Stay

1. The automatic stay is "one of the fundamental debtor protections provided by the bankruptcy laws." *Jove Eng'g, Inc. v. IRS*, 92 F.3d 1539, 1550 (11th Cir. 1996). **But its reach is not confined to actions against the debtor: § 362(a)(3) independently stays "any act** ... to exercise control over property of the estate," and acts taken in violation of the stay are void and without effect. 11 U.S.C. § 362(a)(3); *Borg-Warner*, 685 F.2d at 1308. By issuing the September 5 Mandate (Appendix D) based on a sequence of events initiated by the void May 1 Barring Order (Appendix E-0), the court below did not merely err; it created a '**Procedural Blockade'.**[2] This blockade allowed a state-court procedural bar—created during a jurisdictional void—to permanently insulate a violation of federal law from appellate review making it a refusal to yield to the Supremacy Clause.

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[2] Procedural Blockade also violates the Due Process Clause of the Fourteenth Amendment.

2. The state court's attempt to utilize a procedural bar to insulate a violation of the federal stay is a direct assault on the Supremacy Clause. As this Court held in *Perez v. Campbell*, 402 U.S. 637, 652 (1971), **any state law or judicial action which 'stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress' in the Bankruptcy Code is invalid.** By prioritizing a state-court mandate over a self-executing federal injunction, **the court below has effectively declared that state procedure can override federal substantive law—a result that Perez and the Supremacy Clause expressly forbid.**

3. The Respondent's failure to abide by the federal stay cannot be excused by the State Court's finding that the parties were merely saying different things to two courts (Appendices T-1-B; T-1-D; Z-1-C). In the analogous context of discharge orders, this Court has held that a party's subjective good-faith belief that its conduct was lawful ordinarily will not insulate it from civil contempt if that belief was objectively unreasonable. Taggart, 587 U.S. at 561–62.

ii. ***Fraud Left Unadjudicated***

4. Jurisdictional Fraud the Trial Court Declined to Adjudicate. This jurisdictional failure was facilitated by Respondents' **Fraud on the Court**, which corrupted the judicial process at both the state and federal levels. Fraud on the court is not ordinary fraud between litigants. It is "tampering with the administration of justice," a wrong that "involves far more than an injury to a single litigant" and reaches "the institutions set up to protect and safeguard the public." *Hazel-Atlas,* 322 U.S. at 246. Relief from a judgment so procured is therefore not

confined by the time limits and diligence requirements that govern ordinary fraud. *Id.* at 244-45.

As documented in the Sworn Bankruptcy Schedules (Appendix I), Petitioners' Motion to Vacate (Appendix H) Ground 1, and Petitioners' Supplement to Amended Motion to Set Aside and Vacate (Appendix N), the Respondent engaged in an unconscionable "shell game" to circumvent federal oversight:

- **Concealment of Appellate Status:** Respondent intentionally misrepresented the litigation as "Pending" in the trial court rather than "On Appeal" to prevent the Bankruptcy Trustee from intervening. (Appendix I)
- **The 376% Income Fabrications:** Respondent's sworn testimony regarding income was contradicted by his federal filings by a staggering **376%**. Trial Court (Appendix T-3-A) was up to $99,000, whereas in the Federal Bankruptcy Court it was around $26,295 (**Form 107;** Appendix I).
- **The Sworn Address Contradiction**: Respondent swore to the Bankruptcy Court that he had resided at 7638 Fawn Lake Drive continuously for the three years preceding his petition (Appendices U-2; U-3), while the state court record and the very judgments he was enforcing placed him at 8104 Summer Gate Ct (Appendices U-1; U-4; T-3-D; T-3-E; Z-1-A; Z-1-B).
- **Tompkins' Testimony, Joined by Keita**: Tompkins testified to a **$150 monthly rent differential** and that "we moved in" on January 1, 2024—a date Keita himself supplied. Yet **certified mail to Keita** at that address was returned "**Addressee not known at place of address.**" No witness testified to a twelve-month term;

counsel supplied it, and it produced the $1,800 award (Appendices T-3-D; T-3-F; X, items 52, 54).

When presented with this evidence of clear and convincing fraud, the trial court explicitly abdicated its duty to protect the integrity of the proceedings. Rather than vacating the judgments, the court **treated contradiction, as people can say different things in different courts** as being acceptable (Appendices T-1-B; T-1-D; Z-1-C).

5. Respondent is Judicially Estopped from assuming the contrary position and enforcing the very judgments he omitted for having obtained a no-asset discharge on sworn schedules stating **he held no receivable, no contingent or unliquidated claim, and no accounts receivable already earned** (Appendix I).

This trial court's statement is a direct repudiation of *Chambers v. NASCO, Inc.*, 501 U.S. 32, 44, 57 (1991). This Court held in *Chambers* that a court possesses the **inherent power to vacate and set aside judgments when a party practices a fraud upon the court** — a "historic power of equity to set aside fraudulently begotten judgments" that is "necessary to the integrity of the courts." Id. at 44. That power reaches a "sordid scheme of deliberate misuse of the judicial process." Id. at 57. **By treating material perjury as a permissible litigation tactic rather than corruption of the judicial process itself, the trial court failed to vindicate its own authority.**

When a state court allows a party to **shield assets from a federal trustee** through deception and then enforces a judgment born of that deception, it sanctions a subversion of federal-state comity. Certiorari

is required to reaffirm that a state court cannot "ratify" a judgment that federal law deems void and that equity deems fraudulent.

iii. Enforcement Despite Release and Discharge

6. This systemic evasion of federal supremacy is epitomized by the extra-judicial "verbal rollover" hold used by Respondents and the Garnishee **to bypass Adjudication Clause E of the court's own final judgment** (Appendices G-1; T-4-A; T-4-C). The "historic power of equity to set aside fraudulently begotten judgments," Chambers, 501 U.S. at 44, **is empty if a state-court litigant can selectively obey the portion of an order that pays them (Clause C) while actively defying the portion of the same order that releases the debtor's property (Clause E)**. Respondents' own counsel told the court the order "specifically says those are to be released" (Appendix T-1-H).

By presenting the underlying judgments to the Clerk as "wholly unsatisfied" to obtain a second writ just fifteen days after December 4, 2025 Final Judgment directed a $25,239.49 disbursement, and by maintaining a continuous lock on safe deposit boxes that were released by the same Final Judgment (Appendix T-4-C), Respondents have engaged in an unconscionable "**shell game**" designed to bypass the federal Chapter 7 Trustee under 11 U.S.C. § 541 (Appendices R; S, Part III). This is **fraud on the court**: each new instrument—the December 4 judgment, the second writ, and the March 4 orders—overlaid a void predecessor, omitting the bankruptcy, to keep collecting a discharged debt, potentially multiple times (Appendices X.45; Z-3-A).

REASONS FOR GRANTING THE WRIT

By authorizing a post-discharge garnishment prosecuted by an unlisted attorney under a concealed fee agreement (Appendix X.53), for an undisclosed judgment that remains property of the federal estate under 11 U.S.C. § 554(d), the lower courts have unconstitutionally sanctioned the seizure of estate assets in facial defiance of the 11 U.S.C. § 524 discharge injunction.

This active subversion of the judicial process to enforce a **concealed judgment** that remained property of the bankruptcy estate under 11 U.S.C. §§ 541(a)(1) and 554(d), or, to the **extent discharged, to collect a debt in violation of** 11 U.S.C. § 524(a)(2), represents the exact type of cross-tribunal bad faith that requires this Court's intervention to maintain the integrity of federal-state comity.

7. By enforcing a debt that was permanently discharged, the Trial Court violated the 'Fresh Start' policy that sits at the heart of the Bankruptcy Code. As this Court held in *Local Loan Co. v. Hunt*, 292 U.S. 234, 244 (1934), the discharge is intended to give the debtor a 'new opportunity in life and a clear field for future effort, unhampered by the pressure and discouragement of preexisting debt.' Allowing the Respondent to **enforce a concealed judgment after discharge**—while **sanctioning a 'double life'** in the process—defeats the very purpose of federal bankruptcy law.

C. The State Court Violated the Fourteenth Amendment by Denying a Meaningful Forum to Challenge a Void Judgment

and Sanctioning a "Double Life" in the Judiciary.

Review is necessary because the state court proceedings **failed to afford Petitioners the most rudimentary procedural protections required by the Fourteenth Amendment**. When a state court allows a litigant to maintain a **"double life"—claiming insolvency in federal court while pursuing fabricated assets in state court**—and then bars the opposing party from challenging that deception, the "opportunity to be heard" becomes a hollow formality.

i. Denial of a Meaningful Forum.

Under the Due Process Clause, an "opportunity to be heard" must be granted "at a meaningful time and in a meaningful manner." *Armstrong*, 380 U.S. at 552. The state court violated this mandate through a multi-step procedural blockade.

1. At the July 30, 2024 trial, the Primary Petitioner—known to the court to be in India—was denied remote access and excluded from the proceeding, leaving the Co-Petitioner to face opposing party counsel and judge alone (Appendix W).
    a. **Primary Petitioner Mr. Gnanam does not speak once in the certified transcript of his own trial, and does not appear on its Appearances page — not as counsel, not as a party, not even as present —although he is a named Defendant in the caption** (Appendix X.8).
    b. The seven pending defense motions swept aside that day were drafted by the Primary Petitioner, who was not permitted to attend (Appendix F-2).

2. The 5DCA's May 1, 2025, Order Chain (Appendix E) stripped **Petitioners of their right to file** responses at the exact moment the federal stay required a suspension of all activity.
    a. As a result of this, the Primary Petitioner, **after finding out about the contradictions in testimony and federal violations, could not file in the Appellate Courts**.
3. The Trial Court's summary denial of the **Motion to Vacate** (Appendix M) — **delivered only verbally** on October 17, 2025 (Appendix T-1-A)—refused to address the merits of a voidness defense rooted in federal law, and Primary Petitioner was muted during that argument (Appendix T-1-J).
    a. The Primary Petitioner's prepared presentation of the federal bankruptcy mandates was cut off by the court (Appendix T-1-G).
4. At the January 8, 2026 hearing, the Primary Petitioner was electronically muted by Judge Shayla Lee for almost the entire proceeding, and when the Co-Petitioner asked that he be heard, the court refused because he is not a Florida attorney (Appendix T-4-D), leaving her alone without legal training. **There are no written orders that adjudicate Automatic Stay, Discharge Injunction, or Fraud on the Court.**
    a. **Primary Petitioner Mr. Gnanam does not speak once in the sixty-minute certified transcript of the January 8, 2026 hearing** — present, on camera, and recorded in the Appearances only as "Also present," while the court disposed of the judgments against him, the garnishment of his accounts, without hearing his motion to strike.

REASONS FOR GRANTING THE WRIT

By silencing Petitioners (May 1 Barring Order) during the pendency of a federal stay and then validating it the Florida courts denied a "meaningful forum" to challenge a federally non-existent judgment. The court was not merely "mistaken" on the facts; it unconstitutionally withdrew the forum required to correct a jurisdictional defect.

ii. Substantive Deprivation Based on Sanctioned Deception.

The integrity of the judicial system depends on the candor of the parties' sworn statements across forums. Here, **the Respondent's "double life" corrupted the proceedings**: at the July 30, 2024 trial he swore to income of $72,000–$99,000 (Appendix T-3-A) and rental property yielding $750 monthly (Appendix T-3-B); eight months later he swore to the Bankruptcy Court that his 2023 income was $26,295 and disclosed no such asset (Appendix I).

When this unconscionable scheme was brought to the trial court's attention, the court's response was a direct assault on Due Process. By observing that **people can say different things in different courts** (Appendices T-1-B; T-1-D), and requiring further proof that the same court was blocking (Appendix K), the trial judge did more than overlook perjury; the court **substantively sanctioned a fraud on the court**.

As this Court has held, a court possesses the inherent power to set aside a judgment procured by fraud upon the court. *Chambers,* 501 U.S. at 44, 57. By rejecting the federal defense and proceeding to enforce the **December 4, 2025, Fee Judgment** (Appendix G-2), the state court sanctioned a deprivation of Petitioners' property based on a debt that was a legal fiction. This Court must intervene to clarify that the

Fourteenth Amendment does not permit a state court to "close the door" on a federal jurisdictional defense by condoning transparent deception across jurisdictions.

The state court's decision to "close the door" on a federal jurisdictional defense via a procedural bar violates the Supremacy Clause. Where Congress has exercised its bankruptcy power to withdraw a state court's authority, whether the jurisdictional question was or could have been contested in the state court is immaterial. *Kalb,* 308 U.S. at 443–44. The judgments the Respondent concealed from the bankruptcy trustee were property of the estate (see Part A, supra), and only the trustee had standing to pursue them. *In re Schwartz*, 954 F.2d 569, 571-572 (9th Cir. 1992). A state-court barring order cannot supply the authority that federal law withheld.

D. The State Court's Refusal to Apply the "Void Ab Initio" Rule Conflicts with Federal Consensus and Violates Substantive Due Process.

Review is necessary because the decision below creates an irreconcilable conflict with the uniform federal rule that actions taken in **violation of the Automatic Stay** are **void ab initio**. By affirming a judgment that is a legal nullity and subsequently enforcing a debt that has been federally discharged, the Florida courts have asserted a power of "judicial revival" that violates the **Due Process Clause** of the Fourteenth Amendment.

i. The Irreconcilable Conflict Regarding the "Void Ab Initio" Rule.

The state court's explicit ruling that the **Automatic Stay "does not apply to this particular case"** (Appendix T-1-A) places it in direct conflict with the

consensus among federal courts of appeals. The Eleventh Circuit holds that actions taken in **violation of the Automatic Stay** are **"void and without effect."** *Borg-Warner,* 685 F.2d at 1308; see also *In re Schwartz,* 954 F.2d 569, 571-572 (9th Cir. 1992). As this Court held in *Kalb,* 308 U.S. at 438, state court actions taken in the face of a bankruptcy stay are "beyond its power, void, and subject to collateral attack." This case presents the opportunity to ensure § 362 is obeyed: the trial court gave effect to an appellate-court mandate (Appendix D) resting on orders entered during the stay (Appendix E).

ii. Enforcement of a "Legal Nullity" Violates Due Process.

The state court's continued enforcement—culminating in the entry of the **Fee Judgment** (Appendix G-2)—is more than a statutory error; it is a **Due Process violation**. Under the **Due Process Clause**, a state may not deprive a citizen of property based on a judgment that has been federally extinguished.

Even if the state court judgments were not void from their inception, to the extent they rest on a discharged debt they were permanently extinguished by the **Permanent Discharge Injunction** and the bankruptcy closing on August 7, 2025 (Appendix I). Under **11 U.S.C. § 524(a)(1)**, a federal discharge **"voids any judgment at any time obtained"** to the extent that such judgment is a determination of personal liability. By enforcing a "Fee Judgment" that is "fatally dependent" on a void and discharged underlying debt, the state court has finalized a **Due Process violation** by authorizing a deprivation of property without a valid legal basis.

REASONS FOR GRANTING THE WRIT

Once Keita filed, the judgment belonged to the estate, not to Keita individually, **and only the trustee had standing to enforce it**. *Parker v. Wendy's Int'l, Inc.*, 365 F.3d 1268, 1272 (11th Cir. 2004). **Keita, enforcing it in his own name, had no objectively reasonable basis for believing his conduct lawful**. See *Taggart*, 587 U.S. at 561–62. Keita owed Peters fees for pre-petition work (Appendix X.53); **that debt was discharged, and 11 U.S.C. § 524(a)(2) barred its collection**, yet the trial court directed $25,239.49 of Petitioners' funds to Respondents' counsel (Appendix G-1).

To allow the decision below to stand would be to permit state courts to bypass the Due Process Clause by "breathing life" into debts that the federal sovereign has declared dead.

iii. Orders of Disqualified Judges

Judge Ruth was **disqualified by operation of law on July 27, 2024**, thirty days after the Fla. R. Gen. Prac. & Jud. Admin. 2.330 motion filed June 27, 2024 went undenied (Appendices F; F-0). He nonetheless conducted the trial on July 30, 2024, denied seven pending defense motions (Appendix F-2), and entered the Final Judgments (Appendices F-1; F-3), keeping the Primary Petitioner excluded from trial. All judgments were drafted by opposing counsel Peters and rubber-stamped by the Judge. Orders entered by a disqualified judge are void, not voidable. *Godin v. Owens*, 275 So. 3d 700 (Fla. 5th DCA 2019). This voidness predates the bankruptcy and is independent of it.

Judge Ruth was again disqualified by operation of law on December 20, 2024 on a renewed Rule 2.330 motion (D#159) **raising the same grounds**.

REASONS FOR GRANTING THE WRIT

Judge Lee was disqualified by operation of law on February 27, 2026 (Appendix P-0). Two days after counsel's **inducement letter** (Appendix O), she entered five orders against Petitioners, **four nunc pro tunc 138 days late** (Appendices O; P).

Judge Brady ordered Respondents to respond to Petitioners' motion to vacate those orders, warning that "**failure to do so shall result in motions being granted**" (Appendix Q-3). Once the response and replies were filed, she **suddenly recused herself** without ruling, giving no reason beyond "**the undersigned should not preside over this cause**" (Appendix Q-4). The last filing before recusal was Petitioners' Notice of Fraud on Court (Appendix X.45).

In 2024, the court permitted the premature filing of this action and proceeded despite a fundamental failure of service under the Hague Convention. Petitioners **pleaded premature filing** under Fla. Stat. § 83.49 **twenty-three times** in their Amended Answer. Respondents' 67-page court-ordered response does not contain the word "premature" or cite the statute. No court has ever adjudicated it. (Appendices H; **S**).

Excluded from his own trial (Part C, item 1), the Primary Petitioner could not present evidence or cross-examine witnesses, rendering the resulting judgment a **jurisdictional nullity and a violation of the Fourteenth Amendment**.

iv. Unadjudicated Exemptions

At the January 8, 2026 **Claim of Exemption hearing, the court refused to reach Petitioners' threshold motion to strike Plaintiffs' Counsel's answer (Appendices P-1; T-4; X.24; Z-3-B).** That answer was an attorney's affidavit sworn only "to the

best of my knowledge and belief" (Appendix Y) incompetent to satisfy the statute's sworn-answer requirement and therefore a nullity. Cf. *Zoda v. Hedden*, 596 So. 2d 1225, 1226 (Fla. 2d DCA 1992) (counsel's affidavit relying on unattached documents was incompetent hearsay). Counsel Peters had stated he did not know of the bankruptcy (Appendices X.32, X.33), and he later called his sworn answer "merely a pleading device" (Appendix S, Part IV). **Respondents were a "no-show" to the Hearing.**

The court also declined to address the "Other Exemptions" claimed under federal bankruptcy law. With no competent sworn answer filed, Fla. Stat. § 77.041(3) required the clerk to automatically dissolve the writ. Every act taken under the dissolved writ —including the Fee Judgment—is void.

The Trial Court's orders of December 4 and 8, 2025 (Appendix G) complete the pattern. Petitioners had placed the Bankruptcy Record and the Discharge Injunction before the court. **The orders, drafted by Plaintiffs' counsel and adopted by the court** (Appendices T-1-H; T-1-K)**, omit the pending motions raising federal violations and are silent as to 11 U.S.C. §§ 362, 524, and 541.** The result is a record suggesting these threshold defenses were never raised, insulating the federal violations from appellate review. Each new instrument **overlaid a void predecessor while omitting the bankruptcy entirely** (Appendix X.45). The Fee Judgment entered on that record **monetizes a violation of federal law behind a wall of state-court procedure.**

REASONS FOR GRANTING THE WRIT

CONCLUSION

This case presents an alarming departure from the Supremacy Clause and this Court's bankruptcy jurisprudence. By unilaterally declaring that the automatic stay "does not apply," enforcing a judgment Respondent concealed from the bankruptcy trustee **through a jurisdictional fraud**, and collecting a pre-petition debt federally extinguished by the permanent discharge injunction, the Florida courts have asserted a power that the Supremacy Clause expressly denies them. These constitutional injuries are layered and cumulative: the disqualifications of Judges Ruth and Lee, the premature filing, the automatic stay violation, the estate's title to the concealed judgment, the discharge, and fraud on the court, any one of which is independently sufficient to grant complete relief and void the entire state-court enforcement framework ab initio. See **Appendix S, Part IV.**

The constitutional injury was finalized through a complete breakdown of procedural fairness. The Primary Petitioner was physically excluded from his own trial, and subsequently muted on camera for the entirety of the January 8, 2026, hearing, suppressing presentation of federal law. Such procedural blocks cannot be cured after the fact by orders entered nunc pro tunc, which cannot "make the record what it is not." *Acevedo Feliciano*, 589 U.S. at 65. Independently, **Judge Ruth was disqualified three days before trial and Judge Lee five days before her March 4, 2026 orders**; orders entered by a disqualified judge are void (Appendices F-0; P-0).

Finally, the statutory and equitable dimensions of this case converge to implicate the very integrity of the judicial process. Under **11 U.S.C. § 541 and § 554(d)**, the concealed judgments remain property of

the federal bankruptcy estate, completely stripping Respondent Keita of standing to enforce them. Yet, Keita secured a "No-Asset" federal discharge by swearing under penalty of perjury to the Bankruptcy Trustee that he owned no valuable assets, while simultaneously utilizing the state court to enforce and collect those very same estate-owned judgments.

The trial court's explicit sanctioning of this deception—declaring that "a contradiction is a contradiction" and that Respondent "may have said something different" (Appendices T-1-B; T-1-D)—is a direct assault on the rule of law.

The trial judgments rest on contradicted sworn testimony by Keita and Tompkins about income, residence, and rent (Appendices T-3; U; Z). Under *Chambers v. NASCO*, this Court must intervene to ensure state-sanctioned enforcement cannot be used to monetize a statutory standing fraud and collect a federally dead debt.

PRAYER FOR RELIEF

For the foregoing reasons, Petitioners respectfully request that this Court:

1. **GRANT** the Petition for Writ of Certiorari.
2. **VACATE**, as void, the judgments and mandates of the Florida Fifth District Court of Appeal and the Duval County Court, including: the Trial Judgments of August 2024 and the March 4, 2026, Orders, entered by judges disqualified by operation of law; the May 1, 2025, Barring Order, entered during the Automatic Stay (11 U.S.C. § 362), and the August 12, 2025, Per Curiam Affirmance and September 5, 2025, Mandate that rest on it; and the Final Fee Judgment and Orders of

December 4 and 8, 2025, which enforce an estate-owned judgment (11 U.S.C. §541) and a discharged debt (11 U.S.C. § 524). Each rests on a record procured through a documented Fraud on the Court.

3. **REMAND** the case with instructions to recognize the Automatic Stay (11 U.S.C. § 362), the Permanent Discharge Injunction (11 U.S.C. § 524), and the estate's title to the judgments (11 U.S.C. §§ 541, 554) as absolute jurisdictional bars, to adjudicate the documented Fraud on the Court and material perjury by Keita and Tompkins regarding income, residence, and assets, and to address the Due Process violations regarding the technological and physical exclusion of the Petitioners from hearings and trial, each of which rendered the state court actions void ab initio.

4. **DIRECT** on remand the restoration of all funds disbursed to Respondents or their counsel under the judgments below, and the release of the accounts and safe deposit boxes ordered released by Adjudication Clause E of the December 4, 2025, Final Judgment (Appendix G-1).

5. **GRANT** such other and further relief as this Court deems just and proper.

Dated: November 1, 2026

Respectfully submitted,

/s/ *Palanikumar V Gnanam* /s/ *Mullairani Gnanam*

Palanikumar V Gnanam
Pro Se Petitioner
904-472-1198 (phone)
pk_gnanam@yahoo.com

Mullairani Gnanam
Pro Se Petitioner
10597 Creston Glen Cir E
Jacksonville, FL 32256

PRAYER FOR RELIEF