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IN THE

SUPREME COURT OF THE UNITED STATES

LARRY INOA,

Petitioner,

v.

PAMELA CASEY O'BRIEN, ET AL.,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO SUPREME JUDICIAL COURT FOR THE COMMONWEALTH OF MASSACHUSETTS

Docket No. FAR-30961

PETITION FOR A WRIT OF CERTIORARI

VOLUME 1 of 1

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QUESTIONS PRESENTED

1. Whether the Due Process Clause of the Fourteenth Amendment permits a state appellate court to deny a self-represented litigant an opportunity to pursue an appeal of a civil-rights action based on late docketing, where the petitioner asserts that he timely filed his notice of appeal and the appellate court later issued a notice stating that the failure to enter the appeal timely was informational and did not itself dismiss the appeal. See U.S. Const. amend. XIV, § 1; Mass. R. App. P. 3(a)(1), 10.

2. Whether a state court's application of an excusable-neglect standard to a motion to docket an appeal late may foreclose review of a federal civil-rights claim consistently with the Fourteenth Amendment when the litigant asserts that the court did not meaningfully consider the circumstances offered to explain the delay and the resulting denial of access to appellate review. See U.S. Const. amend. XIV, § 1; cf. Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. P'ship, 507 U.S. 380 (1993).

PARTIES TO THE PROCEEDING

Pursuant to Supreme Court Rule 14.1(b), the following list identifies all individuals who were parties to the proceeding in the court whose judgment is sought to be reviewed.

Larry Inoa, Petitioner, Pro Se

Pamela Casey O'Brien, Respondent

Vinela Marmolejos, Respondent

Christopher C. Harding, Respondent

Theresa A. Bisenius, Respondent

Mary McDonough, Respondent

Dina Carter, Respondent

Geoffrey E. Snyder, Respondent

Michele A. Cristello, Respondent

Randy J. Kaplan, Respondent

CORPORATE DISCLOSURE STATEMENT

Pursuant to Supreme Court Rule 29.6, Petitioner Larry Inoa is an individual and a natural person. Petitioner has no parent corporations, and no publicly held company owns any stock in any entity involved in this petition.

RELATED PROCEEDINGS

Pursuant to Supreme Court Rule 14.1(b)(iii), the following proceedings are directly related to the case in this Court.

Larry Inoa v. Pamela Casey O'Brien, et al., Nos. 17W1383 & 17W1382, Massachusetts Trial Court, Essex Probate and Family Court (Salem). Stipulation of the Parties entered April 9, 2018.

Larry Inoa v. Pamela Casey O'Brien, et al., No. 2184CV00771, Suffolk Superior Court. Judgment of Dismissal entered January 28, 2022.

Larry Inoa v. Pamela Casey O'Brien, et al., No. 2025-J-0325, Massachusetts Appeals Court (Single Justice). Notice of Docket Entry and Order entered May 9, 2025; Order Denying Reconsideration entered May 28, 2025.

Larry Inoa v. Pamela Casey O'Brien, et al., No. 2025-P-0719, Massachusetts Appeals Court (Full Panel). Memorandum and Order entered May 18, 2026.

Larry Inoa v. Pamela Casey O'Brien, et al., No. FAR-30961, Massachusetts Supreme Judicial Court. Notice of Denial of Application for Further Appellate Review entered July 31, 2026.

TABLE OF CONTENTS

QUESTIONS PRESENTED.....i

PARTIES TO THE PROCEEDING.....ii

CORPORATE DISCLOSURE STATEMENT.....ii

RELATED PROCEEDINGS.....iii

TABLE OF CONTENTS.....iv

INDEX TO APPENDICES.....v

TABLE OF AUTHORITIES.....viii

OPINIONS BELOW.....1

JURISDICTION.....2

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED.....3

STATEMENT OF THE CASE.....5

REASONS FOR GRANTING THE PETITION.....13

CONCLUSION.....20

INDEX TO APPENDICES

APPENDIX A: Rule 23.0 Memorandum and Order, Massachusetts Appeals Court (Full Panel), No. 2025-P-0719 (May 18, 2026) **App.2**

APPENDIX B: Notice of Denial of Application for Further Appellate Review, Massachusetts Supreme Judicial Court, No. FAR-30961 (July 31, 2026)..**App. 10**

APPENDIX C: Notice of Docket Entry and Order, Massachusetts Appeals Court (Single Justice), No. 2025-J-0325 (May 9, 2025) .....**App. 13**

APPENDIX D: Order Denying Reconsideration, Massachusetts Appeals Court (Single Justice), No. 2025-J-0325 (May 28, 2025) .....**App. 16**

APPENDIX E: Judgment of Dismissal, Suffolk Superior Court, No. 2184CV00771 (January 28, 2022) .....**App. 19**

APPENDIX F: Civil Action Cover Sheet .....**App. 21**

APPENDIX G: Complaint for Judicial Review .....**App. 24**

APPENDIX H: Transcript of Rule 12 Hearing ..... **App. 78**

APPENDIX I: Notice of Appeal (May 6, 2025) ..... **App. 104**

APPENDIX J: Statement of Case and Notice of Assembly ..... **App. 129**

APPENDIX K: Notice of Failure to Enter Appeal Timely ..... **App. 140**

APPENDIX L: Motion for Reconsideration ..... **App. 143**

APPENDIX M: Notice of Entry of FAR Application ..... **App. 154**

APPENDIX N: Informal Reply Brief ..... **App. 171**

APPENDIX O: Stipulation of the Parties, Essex Probate and Family Court (April 9, 2018) ..... **App. 191**

APPENDIX P: Supremacy Clause, U.S. Const. art. VI, cl. 2 ..... **App. 194**

APPENDIX Q: Fourteenth Amendment, § 1, U.S. Const. amend. XIV, § 1 ..... **App. 201**

APPENDIX R: 42 U.S.C. § 1983 ..... **App. 204**

APPENDIX S: Massachusetts Rules of Appellate Procedure, Rule 10... **App. 206**

APPENDIX T: Massachusetts Rules of Appellate Procedure, Rule 3..... **App. 220**

APPENDIX U: 28 U.S.C. § 1257 ..... **App. 240**

TABLE OF AUTHORITIES

Cases:

Brown v. Mississippi, 297 U.S. 278 (1936).....14, 19

Department of Revenue Child Support Enforcement v. Grullon, 485 Mass. 129, 147 N.E.3d 106 (2020).....16, 17, 18

Felder v. Casey, 487 U.S. 131 (1988).....14, 19

Holland v. Florida, 560 U.S. 631 (2010).....15, 16

Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership, 507 U.S. 380 (1993).....5, 10, 11, 12

Constitutional Provisions:

U.S. Const. art. VI, cl. 2.....3, 13

U.S. Const. amend. XIV, § 1.....3, 6, 15, 17, 19, 20

Federal Statutes:

28 U.S.C. § 1257(a).....2

28 U.S.C. § 2201(a).....4

42 U.S.C. § 1983.....4, 5, 13, 20

42 U.S.C. § 2000e-2(a).....13

State Rules of Appellate Procedure:

Mass. R. App. P. 3.....4

Mass. R. App. P. 10.....4

Mass. R. App. P. 10(a)(1).....9, 12, 13

IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR A WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

The notice and order of the highest state court to review the merits, the Supreme Judicial Court for the Commonwealth of Massachusetts, denying the Application for Further Appellate Review (Docket No. FAR-30961), is unpublished and appears in Appendix B to this petition at page App. 10. The memorandum and order of the lower appellate court, the Massachusetts Appeals Court full panel (Docket No. 2025-P-0719), is unpublished, is reported at 2026 Mass. App. Unpub. LEXIS 358, and appears in Appendix A to this petition at page App. 2.

The initial notice of docket entry and order of the single justice of the Massachusetts Appeals Court (Docket No. 2025-J-0325) denying leave to docket the appeal late appears in Appendix C to this petition at page App. 13. The subsequent notice of docket entry and order of the single justice denying the motion for reconsideration appears in Appendix D to this petition at page App. 16. The underlying judgment of dismissal by the trial court, the Suffolk Superior Court (Docket No. 2184CV00771), appears in Appendix E to this petition at page App. 19.

JURISDICTION

The judgment and order of the highest state court, the Supreme Judicial Court for the Commonwealth of Massachusetts, denying the Application for Further Appellate Review was entered on July 31, 2026. A copy of that order appears in Appendix B to this petition at page App. 10. This Petition for a Writ of Certiorari is filed within 90 days of the entry of the Supreme Judicial Court's order, satisfying the jurisdictional time limits established under Supreme Court Rule 13.1. The statutory jurisdiction of this Court to review the final judgment of the highest court of the Commonwealth of Massachusetts is invoked pursuant to 28 U.S.C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Supremacy Clause of the United States Constitution, Article VI, Clause 2, provides in relevant part:

> *"This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding."*

The verbatim text of the Supremacy Clause is reproduced in the Appendix as Appendix P at App. 194.

Section 1 of the Fourteenth Amendment to the United States Constitution provides in relevant part:

> *"No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."*

The verbatim text of the Fourteenth Amendment is reproduced in the Appendix as Appendix Q at App. 201.

The pertinent federal civil rights statute, 42 U.S.C. § 1983, provides in relevant part:

> *"Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State... subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress..."*

The verbatim text of 42 U.S.C. § 1983 is reproduced in the Appendix as Appendix R at App. 204.

The federal statutory provision governing the Declaratory Judgment Act, 28 U.S.C. § 2201(a), is implicated in this matter and its pertinent text is reproduced in the Appendix as Appendix U at App. 240.

The pertinent state procedural rules, Massachusetts Rules of Appellate Procedure 3 and 10, govern the taking and docketing of civil appeals. The full verbatim text of Massachusetts Rule of Appellate Procedure 3 is reproduced in the Appendix as Appendix T at App. 220. The full verbatim text of Massachusetts Rule of Appellate Procedure 10 is reproduced in the Appendix as Appendix S at App. 206.

STATEMENT OF THE CASE

I. Nature of the Case and Origin of the Underlying Dispute

This petition arises from Petitioner Larry Inoa's attempt to obtain federal appellate review of a dismissal with prejudice of a civil rights action originally filed in the Massachusetts Superior Court. In that underlying action, Petitioner sought essential judicial relief and damages pursuant to 42 U.S.C. § 1983 concerning severe, ongoing violations of fundamental rights secured to him by federal statutory law and the United States Constitution. The core of the controversy centers on the state courts' mechanical, unyielding application of procedural rules to deny a merits appeal, which directly insulated structural due process defects from any meaningful form of appellate oversight.

This mechanical approach stands in direct, irreconcilable conflict with the landmark precedent of this Court in Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership, 507 U.S. 380 (1993), which mandates an elastic, equitable assessment of filing delays rather than a summary, fatal forfeiture of an individual's right to be heard.

The underlying controversy originally originated in long-running domestic relations proceedings before the Essex Division of the Massachusetts Probate and Family

Court. Those intensive trial-level proceedings involved deeply contested matters of parentage, child custody, parenting time allocations, child-support obligations, and related administrative enforcement actions. The state court proceedings across several years included a complex web of interrelated matters docketed under Docket Nos. ES17W1382WD, ES17W1383WD, ES16W1611WD, and ES16W1613WD (App. 191).

Throughout those extensive actions, Petitioner maintained rigorous objections to the methods employed by the state trial court and the cross-agency coordinators operating within the Massachusetts Department of Revenue, Child Support Enforcement Division. Petitioner maintains that actions arising directly from those local administrative proceedings raised immediate, substantial concerns regarding a systematic lack of notice, a total deprivation of a meaningful opportunity to be heard, severe procedural due process violations, and an outright failure to enforce parent-child protections guaranteed under the Fourteenth Amendment. These underlying actions form an essential, indispensable part of the factual and procedural history of this case because they explain the direct origin of Petitioner's subsequent Superior Court civil rights action and illuminate the precise federal constitutional rights he sought to vindicate in an independent forum.

While Petitioner explicitly maintains his fundamental constitutional objections concerning the underlying Probate and Family Court actions, he identifies those

specific domestic relations proceedings as the historical foundation of the civil action, rather than as the separate final judgments independently presented for review in this petition. The final judgment presently challenged before this Court concerns the Massachusetts appellate courts' absolute refusal to permit Petitioner's appeal from the Superior Court dismissal to proceed through late docketing avenues. The threshold constitutional issue is whether the strict, mathematical enforcement of a state appellate docketing deadline can be used to permanently extinguish an individual's ability to challenge a structural deprivation of due process, consistent with the mandates of the federal Constitution and the equitable balancing tests established by this Court.

II. Proceedings in the Massachusetts Superior Court

Seeking an independent forum to remedy these state-agent actions, Petitioner commenced a separate civil rights action in the Massachusetts Superior Court. This independent civil suit was docketed as No. 2184CV00771, housing claims against Pamela Casey O'Brien and other collaborative state actors as defendants. The complaint arose directly from Petitioner's extensive, documented challenges to governmental conduct associated with the underlying domestic proceedings, the administrative handling of child-support calculations, and the summary enforcement mechanisms executed against him. Petitioner sought formal judicial relief and standard civil damages for explicit violations of rights secured by federal statutory law, including cross-references to the federal Child Support Enforcement Act guidelines, and the United States Constitution (App. 24).

The defendants responded to the civil rights complaint by moving for a total dismissal of all claims, asserting absolute immunity, qualified immunity, and procedural deficiencies under state pleading rules. On January 27, 2022, the Superior Court conducted a formal evidentiary and motion hearing on the defendants' motion to dismiss pursuant to Mass. R. Civ. P. 12, before the Honorable Christine M. Roach. During that crucial proceeding, counsel for the defendants challenged the underlying propriety of Petitioner's civil claims, arguing that the Superior Court lacked proper subject-matter jurisdiction to review actions intersecting with active Probate and Family Court orders (App. 78).

On January 31, 2022, the Superior Court issued a brief order dismissing Petitioner's civil rights action with prejudice, thereby cutting off all discovery and preventing a trial on the merits (App. 19). The order adopted the defendants' positions, effectively closing the forum to Petitioner's federal claims. Recognizing the profound legal errors inherent in a dismissal with prejudice at the bare pleading stage, Petitioner immediately moved to seek formal appellate review of that final judgment within the state appellate system.

III. Notice of Appeal and Subsequent Docketing Proceedings

On March 3, 2022, well within the mandatory statutory time limits prescribed by state law, Petitioner successfully filed a timely notice of appeal from the Superior Court's final judgment of dismissal (App. 104). Following the successful filing of the notice of appeal, the subsequent procedural history involved the lengthy, technical

assembly of the lower court record. This process included an April 13, 2022 notice concerning the ordering and preparation of official hearing transcripts, followed later by a June 7, 2022 formal notice of assembly of the record issued to the parties (App. 129).

Under the Massachusetts Rules of Appellate Procedure, the assembly of the record triggers a strict, brief window during which an appellant must pay a docket fee or request a formal waiver to officially enter the appeal on the docket of the reviewing court. Due to severe, unrectified institutional delays, clerical communication breakdowns, and the physical constraints of managing voluminous underlying paper transcripts from separate court files, a critical docketing gap occurred. On July 8, 2022, a formal Notice of Failure to Enter Appeal Timely was issued automatically by the clerk of the court pursuant to the operational mandates of Mass. R. App. P. 10(a)(1) (App. 140).

The filing of Petitioner's initial notice of appeal and the subsequent failure to execute the secondary appellate docketing requirement constituted entirely distinct procedural events. The procedural controversy that ultimately reached the higher state courts did not look at the underlying merits of the civil rights violations; instead, it focused exclusively on whether Petitioner should be permitted to docket his appeal out of time due to mitigating circumstances. On May 6, 2025, following a prolonged period of transcript clarification and attempts to resolve the record's

gaps, Petitioner moved for formal permission to docket his appeal late, seeking equitable relief from the strict appellate docketing requirements (App. 143).

Petitioner's motion for late docketing squarely implicated the core holding of Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership, 507 U.S. 380 (1993). In Pioneer, this Court established that an individual's or attorney's inadvertent failure to file a document or claim by a specified deadline can legally constitute "excusable neglect." This Court established that "excusable neglect" is an elastic concept that requires a flexible, multi-factor balancing test, factoring in the danger of prejudice to the opposing party, the length of the delay and its potential impact on active judicial proceedings, the reason for the delay (including whether it was within the reasonable control of the movant), and whether the movant acted entirely in good faith. Petitioner's motion detailed exhaustive mitigating factors—including systemic delays in transcript assembly and communication breakdowns completely beyond his personal control—that easily satisfied the federal Pioneer threshold.

However, on May 9, 2025, a single justice of the Massachusetts Appeals Court summarily denied Petitioner's motion, concluding without an extensive equitable analysis that Petitioner had failed to establish a sufficient legal basis warranting permission to docket the appeal out of time (App. 13). On May 28, 2025, the single justice denied a timely motion for reconsideration, determining under a rigid,

narrow state standard that Petitioner had failed to establish the criteria of "excusable neglect," thereby completely ignoring the federal balancing parameters mandated by Pioneer and leaving the initial May 9 preclusion order in full effect (App. 16). These isolated single justice proceedings were independently docketed on the interlocutory track as No. 2025-J-0325.

IV. Review by the Massachusetts Appeals Court

Petitioner sought immediate panel review of the single justice's orders, arguing that the summary preclusion of his appeal constituted an abuse of discretion that permanently buried review of his federal constitutional claims. The matter proceeded before a full panel of the Massachusetts Appeals Court under Docket No. 2025-P-0719. On May 18, 2026, a panel consisting of Justices Massing, Ditkoff, and Hand issued a summary memorandum and order pursuant to Mass. App. Ct. R. 23.0, affirming the single justice's preclusion orders (Inoa v. O'Brien, No. 2025-P-0719; App. 2).

The structural barriers embedded within state court reviews make access to justice particularly difficult for a pro se litigant. Even though an appeal involves a different judge (or judges), it is not an opportunity for Petitioner to retry the case. The role of the appellate courts is to review the trial court's decision in light of the evidence presented in the court below. No new evidence is accepted and an appellant has no

opportunity to argue the facts of the case again.

The appellate courts look at the documents submitted for review and decide whether the judge who heard the case either made a clear error of law or abused his or her discretion in making the decision. Both of these things have special meaning in the law and both are difficult to prove.

In the proceedings below, this narrow standard of review functioned as an absolute dead end because it was applied in a vacuum completely detached from federal equitable doctrines. The Appeals Court panel concluded that the single justice had acted within the bounds of her authority and determined that Petitioner had failed adequately to explain the precise physical and logistical circumstances preventing timely docketing under Mass. R. App. P. 10(a)(1).

By prioritizing a mechanical, hyper-technical adherence to procedural timelines over the protection of core federal rights, the panel's standard of review operated as an absolute bar. Rather than applying the flexible, multi-factor analysis required by Pioneer to see if the transcript and clerical delays constituted excusable neglect, the state appellate court looked only to see if the strict text of the state rule had been broken. This narrow application insulated the underlying procedural errors, directly penalized Petitioner for institutional delays beyond his control, and ensured

that the dismissal of Petitioner's underlying Superior Court civil rights action remained permanently locked away from any form of merits-based review.

REASONS FOR GRANTING THE PETITION

I. THIS COURT POSSESSES INHERENT ARTICLE III JURISDICTION TO INTERVENE WHEN RIGID STATE PROCEDURAL MECHANICAL BARRIERS ARE UTILIZED AS AN ABSOLUTE SHIELD TO EVADE FEDERAL CIVIL RIGHTS SCRUTINY.

This Court should grant a writ of certiorari because the decision of the Massachusetts Appeals Court represents a dangerous expansion of state court procedural absolutism. Under the Supremacy Clause of Article VI, Clause 2 of the United States Constitution, the federal Constitution and the laws of the United States are the supreme law of the land. State court judges are bound thereby, anything in the Constitution or laws of any state to the contrary notwithstanding. When a state appellate tribunal constructs or mechanically enforces local procedural rules—such as the 14-day docketing deadline found in Massachusetts Rules of Appellate Procedure, Rule 10(a)(1)—to permanently block review of active civil rights claims under 42 U.S.C. § 1983 and Title VII of the Civil Rights Act of 1964, the local rule ceases to operate as a mere administrative tool. Instead, it

becomes an unconstitutional mechanism used to insulate state administrative actors and local judicial officers from federal oversight.

As this Court declared in Brown v. Mississippi, 297 U.S. 278, 285 (1936), while a State possesses broad, unquestioned freedom to regulate the structure and procedures of its own judicial systems, that procedural autonomy is strictly "regulated and limited by the Due Process Clause of the Fourteenth Amendment." A state court cannot hide behind localized filing mechanics to allow a clear breakdown of fundamental justice to stand uncorrected. The independent authority of the federal judiciary under Article III exists precisely to investigate such breakdowns and protect litigants from structural exclusions.

Furthermore, under the long-standing "Adequate and Independent State Ground" doctrine, this Court will generally decline to review state decisions that rest purely on state law mechanics. However, a major constitutional exception arises when a state procedural barrier is applied in an arbitrary, unyielding, or discriminatorily harsh manner that effectively defeats the enforcement of federal statutory rights. In Felder v. Casey, 487 U.S. 131 (1988), this Court explicitly ruled that state procedural hurdles are fundamentally inadequate to bar federal review if their enforcement alters the outcome of a federal civil rights remedy based solely on the choice of a state forum. By utilizing a local deadline to permanently extinguish a pro se plaintiff's right to appeal actions involving the state's child support enforcement machinery, the lower court enforced an inadequate state ground. This

Court must exercise its constitutional authority to intervene, investigate the record, and overrule this barrier to federal rights.

II. THE LOWER COURT'S RIGID "EMERGENCY-ONLY" STANDARD DIRECTLY CONFLICTS WITH SUPREME FEDERAL EQUITABLE TOLLING DOCTRINES ESTABLISHED IN HOLLAND V. FLORIDA.

The Single Justice below denied the petitioner's late appeal by employing an exceptionally narrow definition of "excusable neglect," ruling that the standard is meant to accommodate "emergency situations only." This unyielding standard directly conflicts with the supreme federal equitable principles set forth by this Court in Holland v. Florida, 560 U.S. 631 (2010). In Holland, this Court firmly established that filing deadlines are not absolute mathematical bars. Instead, federal equity mandates that filing timelines must be flexibly tolled when a litigant demonstrates that they have been pursuing their rights diligently, yet extraordinary institutional barriers actively prevented a timely filing. The Fourteenth Amendment's guarantee of procedural due process and meaningful access to the courts requires a holistic balancing test, not a mechanical trap. When a self-represented litigant faces profound, compounding institutional disruptions—including complex, ongoing proceedings with state administrative bodies like the Department of Revenue Child Support Enforcement division—the enforcement of a strict mathematical timeline without considering these unique external realities is an abuse of discretion. By applying an "emergency-only" standard, the state court completely bypassed the flexible equity required under

federal law. It ignored the reality of structural barriers that impede a pro se individual's operational capacity. This Court needs to grant certiorari to resolve this split between rigid state court practice and the supreme equitable standards mandated by Holland.

III. THE APPELLATE COURT SYSTEM CANNOT WEAPONIZE LOCAL DEADLINES TO EVADE AN INDEPENDENT CONSTITUTIONAL DUTY TO SAFEGUARD PRO SE LITIGANTS UNDER THE DUE PROCESS MANDATES OF GRULLON.

The state court's failure to grant a late appeal allowed a structural breakdown of due process to stand completely unexamined, ignoring binding legal standards that govern self-represented individuals facing state administrative actions. In Department of Revenue Child Support Enforcement v. Grullon, 485 Mass. 129 (2020), the Massachusetts Supreme Judicial Court clearly recognized that both the trial court and the Department of Revenue carry an independent, mandatory obligation to afford a pro se father specific procedural safeguards under federal and state due process provisions. The Grullon framework establishes that when the complex machinery of state child support services is brought to bear against a self-represented individual, the court system cannot remain passive. It must actively ensure that the litigant's right to a fair hearing, proper notice, and an equal opportunity to present a defense is protected.

By weaponizing a local, minor filing deadline to block the petitioner's appeal, the appellate court below insulated the state administrative apparatus from accountability. It effectively wiped away the constitutional mandates set forth in Grullon. When state courts use localized rules to evade their independent duty to investigate structural constitutional violations, they undermine the integrity of the judicial system. This Court must exercise its power to review and correct the decision below, ensuring that state procedural traps are not permitted to bypass the foundational guarantees of the Fourteenth Amendment.

IV. THE SYSTEMIC PATTERN OF PROCEDURAL AND STRUCTURAL BIAS: THE DIRECT INVOLVEMENT OF THE GRULLON PRECEDENT JUDICIAL ACTOR IN WILFUL DISREGARD OF MANDATORY SAFEGUARDS.

The constitutional injury in the present matter is not merely theoretical; it directly mirrors the structural violations denounced by the Massachusetts Supreme Judicial Court in Department of Revenue Child Support Enforcement v. Grullon, 485 Mass. 129 (2020). Crucially, this case features a compounding element of systemic bias: the identical judicial authority from the Salem Family and Probate Court, who was previously bound by the Grullon mandate, actively orchestrated and coerced the identical statutory scheme alongside administrative officers

of the court. Rather than implementing the lessons of prior corrections, the lower court willfully neglected every mandatory safeguard established to protect self-represented litigants.

In Grullon, the court established that when the state brings its formidable administrative machinery—specifically the Department of Revenue's Child Support Enforcement division—against a pro se individual, the court has an absolute, non-delegable duty to ensure fundamental fairness. This includes ensuring proper notice, access to records, a meaningful opportunity to be heard, and structural protection against coercive administrative actions. In the petitioner's case, these safeguards were completely cast aside. The Salem Family and Probate Court, acting in concert with court administrative officers, weaponized the statutory enforcement scheme. They actively coerced compliance, denied basic procedural protections, and ignored the petitioner's clear expressions of hardship.

When a pro se litigant faces a closed administrative loop where the presiding judge and the enforcement officers operate outside the boundaries of established constitutional precedents, a structural breakdown occurs. For the state appellate court to subsequently utilize

a minor, localized 14-day docketing deadline to seal the record and insulate this specific judicial overreach from review is a severe violation of the Fourteenth Amendment. Under Brown v. Mississippi and Felder v. Casey, local rules cannot be used to lock the courtroom door when a litigant seeks to expose a systematic evasion of federal rights. This Court must exercise its Article III power to intervene, investigate the direct institutional links to the Grullon breakdown, and reaffirm that no judge or administrative officer is permitted to operate a statutory scheme in willful disregard of the United States Constitution.

V. THE STRUCTURAL DEFECT IN THE APPELLATE MECHANISM REQUIRES RESOLUTION TO PREVENT A SYSTEMIC FORFEITURE OF CONSTITUTIONAL GUARANTEES BY SELF-REPRESENTED LITIGANTS.

The localized procedural barrier deployed below does not merely affect the immediate parties; it sets a highly dangerous precedent for all *pro se* civil rights litigants seeking redress against state administrative overreach. When a state appellate framework prioritizes absolute mathematical adherence to minor docketing timelines over the investigation of deep-rooted constitutional failures, it fractures the public's confidence in the administration of justice.

The U.S. Supreme Court's oversight is urgently required to resolve this systemic conflict. The state court must not be allowed to employ local administrative rules to systematically immunize its own judicial officers and the Department of Revenue from federal scrutiny under 42 U.S.C. § 1983. Equity, due process, and the core structural protections of the Fourteenth Amendment demand that this Court exercise its power to review, intervene, and correct the clear errors above in this Writ of Certiorari

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Larry Inoa

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Date: October 28, 2026