IN THE SUPREME COURT OF THE UNITED STATES
1 First Street, N.E.
Washington, DC 20543

No. ________

LISA RICHARDSON HENDERSON,
Petitioner,

v.

SHOWCASE HOME IMPROVEMENTS, INC.,
U.S. BANK TRUST NATIONAL ASSOCIATION,
AS TRUSTEE FOR PAD SERIES IV TRUST, et al.,
Respondents.

On Application Arising from the United States Court of Appeals For the Fourth Circuit

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EMERGENCY APPLICATION FOR STAY PENDING FILING AND DISPOSITION OF PETITION FOR WRIT OF CERTIORARI

SUBMITTED BY:
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v.
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U.S. BANK TRUST, N.A., et al.,
Respondents.

On Application Arising from the United States Court of Appeals
for the Fourth Circuit
Fourth Circuit No. 26-1077
District Court No. 1:25-cv-00695-ABA

EMERGENCY APPLICATION FOR STAY PENDING FILING AND DISPOSITION OF PETITION FOR WRIT OF CERTIORARI

TO THE HONORABLE JOHN G. ROBERTS, JR., CHIEF JUSTICE OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE FOURTH CIRCUIT:

Applicant Lisa Richardson Henderson, proceeding pro se, respectfully applies pursuant to Supreme Court Rules 22 and 23 and 28 U.S.C. § 2101(f) for a limited stay pending the timely filing and disposition of her Petition for a Writ of Certiorari seeking review of the judgment of the United States Court of Appeals for the Fourth Circuit.

Applicant alternatively requests a temporary administrative stay sufficient to preserve the status quo while this Application is considered.

This Application does not ask this Court to exercise direct appellate jurisdiction over an independent Maryland state-court judgment, determine criminal liability, or adjudicate the merits of a separate bankruptcy appeal pending in the Middle District of North Carolina. Applicant seeks only such interim relief as is lawfully available to preserve meaningful Supreme Court review of the federal judgment and to prevent the federal controversy from becoming practically incapable of meaningful review before the Court can act.

INTRODUCTION

This Application arises from an unusual federal procedural circumstance concerning the treatment of a substantive post-judgment motion submitted within the time period addressed by Federal Rule of Appellate Procedure 4(a)(4), but received only minutes after a Notice of Appeal.

On December 22, 2025, the United States District Court for the District of Maryland entered a Memorandum Opinion and Order denying Applicant's Motion to Reopen. On **January 19, 2026—twenty-eight days later—Applicant submitted a Notice of Appeal. Exactly seven minutes after submitting that Notice of Appeal**, Applicant submitted an Amended Motion for Reconsideration and Rebuttal expressly invoking Federal Rule of Civil Procedure 59(e) and, alternatively, Rule 60(b). The District Court received the post-judgment submission but returned it without docketing or presentation to the District Judge because the Notice of Appeal had already been filed.

The threshold procedural question concerns **Federal Rule of Appellate Procedure 4(a)(4)**. Rule 4(a)(4)(A) addresses specified timely post-judgment motions, including a motion to alter or amend the judgment under Rule 59 and a Rule 60 motion filed within the time allowed for filing a Rule 59 motion. Rule 4(a)(4)(B)(i), in turn, addresses the effectiveness of a Notice of Appeal filed before disposition of such a qualifying motion.

Accordingly, the fact that Applicant submitted her Notice of Appeal **seven minutes before** the post-judgment motion did not, standing alone, resolve the jurisdictional question. A judicial determination was necessary concerning the character and timeliness of the January 19 submission and whether it qualified under Rule 4(a)(4). If it did, Rule 4(a)(4)(B)(i) governed the effectiveness of the previously submitted Notice of Appeal.

Returning the motion without docketing prevented that threshold determination from being made.

The record presents an additional chronological concern. The District Court's December 22, 2025, Order adjudicated Applicant's earlier Motion to Reopen. Applicant's Amended Motion for Reconsideration and Rebuttal did not exist until January 19, 2026. Nevertheless, the District Court's subsequent return of the January 19 submission stated that the Motion for Reconsideration had been denied in the December 22, 2025, Order. Thus, a post-judgment motion submitted twenty-eight days after the December 22 Order was treated as though it had already been adjudicated by that earlier Order.

Alternatively, if Federal Rule of Appellate Procedure 4(a)(4) did not govern the January 19 submission and the Notice of Appeal had already become effective, the existence of the appeal still did not necessarily require the post-judgment submission to be returned without judicial consideration. Federal Rule of Civil Procedure 62.1 establishes a procedure for addressing a motion that the District Court lacks authority to grant because an appeal is pending. The District Court may defer consideration, deny the motion, or state that it would grant the motion upon remand or that the motion raises a substantial issue. Federal Rule of Appellate Procedure 12.1 supplies the corresponding appellate procedure following such an indicative ruling.

Applicant thereafter brought the District Court's treatment of the January 19 submission to the Fourth Circuit's attention through a Motion for Clarification, Abeyance, and Limited Remand. In its June 30, 2026, [App. A] unpublished opinion, the Fourth Circuit expressly described that request as relating to **"the district court's refusal to docket a motion to reconsider the denial of her motion to reopen."**

The Court of Appeals denied clarification, abeyance, and limited remand. It separately affirmed the December 22, 2025, [App. D] denial of Applicant's earlier Motion to Reopen and expressly stated that the District Court's underlying dismissal of Applicant's amended complaint was not before it.

Applicant subsequently sought emergency preservation relief in both federal courts below. Following issuance of the Fourth Circuit's mandate on August 5, 2026, [App. C]. Applicant sought a stay and preservation of the status quo from the District Court. That filing was returned on August 13, 2026. [App. F]. Applicant then sought recall and stay of the mandate and temporary administrative relief from the Fourth Circuit. On **August 18, 2026**, the Court of Appeals denied that relief. Applicant has therefore sought interim relief in both federal courts below before presenting this Application to the Circuit Justice.

Accordingly, Applicant's forthcoming Petition for a Writ of Certiorari will present a federal procedural question concerning **whether the January 19, 2026, post-judgment submission required judicial determination of its character, timeliness, and effect under Federal Rule of Appellate Procedure 4(a)(4), and, alternatively, whether Federal Rule of Civil Procedure 62.1 and Federal Rule of Appellate Procedure 12.1 supplied the appropriate procedure if appellate jurisdiction prevented the District Court from granting relief.**

Applicant does not ask the Circuit Justice through this emergency Application to adjudicate the merits of her underlying RICO, fraud, fraud-on-the-court, or Trust-related allegations; exercise direct appellate jurisdiction over an independent Maryland state-court judgment; determine criminal liability; or adjudicate the separate bankruptcy appeal pending in the Middle District of North Carolina. Applicant seeks only such interim relief as is lawfully available to preserve the practical effectiveness of Supreme Court review while her Petition for a Writ of Certiorari is filed and considered.

I. JUDGMENTS AND ORDERS AT ISSUE

The federal judgment for which Applicant seeks Supreme Court review arises from the United States District Court for the District of Maryland, Civil Action No. 1:25-cv-00695-ABA. [App. D].

On December 22, 2025, the District Court entered a Memorandum Opinion and Order denying Applicant's Motion to Reopen and denying as moot her request for issuance of summons.

Applicant sought appellate review in the United States Court of Appeals for the Fourth Circuit. On June 30, 2026, the Fourth Circuit affirmed the December 22, 2025, order. Applicant sought rehearing and rehearing en banc; that relief was denied on July 28, 2026. [App. B]. The Fourth Circuit issued its mandate on August 5, 2026. [App. C]. Applicant intends timely to seek a writ of certiorari.

I.A. RELATED BANKRUPTCY APPEAL

Applicant respectfully advises the Court that issues concerning the June 2, 2023, [App. J and App. J-1]. Order Annulling the Automatic Stay entered in In re Lisa Richardson Henderson, Bankr. No. 17-11389 (Bankr. M.D.N.C.), and subsequent orders denying relief from that order, are presently being pursued through a separate bankruptcy appeal in the United States District Court for the Middle District of North Carolina, Case No. 1:26-cv-00460.

Applicant does not seek through this Application review, reversal, or modification of those bankruptcy orders. The June 2, 2023, order is identified only to explain the procedural history and continuing property consequences relevant to irreparable harm. Applicant expressly preserves all challenges to the Bankruptcy Court's orders for adjudication in the pending North Carolina bankruptcy appeal and any appellate review arising from it. Nothing requested here is intended to interfere with that court's jurisdiction.

I.B. FEDERAL CLAIMS FOR WHICH PRESERVATION IS SOUGHT

The underlying Greenbelt federal action included Applicant's civil allegations concerning RICO, fraud, fraud on the court, and alleged interference with property and rights associated with a private Trust. Applicant does not ask the Circuit Justice to adjudicate the merits of those claims through this emergency Application.

The Fourth Circuit expressly stated that the District Court's underlying dismissal of the amended complaint was not before it in Appeal No. 26-1077. Applicant therefore relies on the underlying claims only to explain the practical significance of the returned post-judgment filing and the threatened property consequences. The relief requested is preservation-oriented: it seeks to prevent the federal controversy from becoming practically ineffectual before this Court determines whether the procedural judgment warrants review.

I.C. PRE-JUDGMENT REPORTING OF ALLEGED MISCONDUCT

Applicant's allegations concerning the underlying conduct did not originate after the adverse state-court judgment. On December 9, 2022, before the February 17, 2023, judgment affecting Applicant's residence and property interests, Applicant reported alleged misconduct involving Showcase Home Improvements, Inc., Kenneth Ferber, and Dolores Ferber to the Office of the State's Attorney for Howard County, Maryland. [App. K].

In a February 21, 2023, letter, Deputy State's Attorney Joshua J. Felsen stated that the office had reviewed Applicant's voluminous submissions and follow-up emails, had concluded its investigation concerning Showcase Home Improvements and the Ferber's, and had determined that further investigation and/or prosecution was not warranted.

Applicant does not claim a right to compel prosecution and does not ask this Court to review prosecutorial discretion or determine criminal liability. The chronology is offered only to show that the factual allegations later advanced in the federal civil litigation predated the adverse judgment and were not first formulated in response to it. The prosecutorial decision did not adjudicate Applicant's distinct federal civil claims.

II. APPLICANT SOUGHT EMERGENCY RELIEF IN THE COURTS BELOW

Applicant has sought preservation-oriented relief in both the District Court and the Court of Appeals before presenting this Application to the Circuit Justice.

Following issuance of the Fourth Circuit's mandate on August 5, 2026, Applicant submitted an **Expedited Motion to Stay and Preserve the Status Quo Pending Petition for Writ of Certiorari** to the United States District Court for the District of Maryland on August 10, 2026. [App. E]. Applicant expressly limited the requested relief to matters within that court's lawful jurisdiction and alternatively requested temporary administrative relief.

On August 13, 2026, the District Court returned that filing without granting either the requested stay or temporary administrative relief. [App. F].

Applicant thereafter sought emergency relief directly from the Fourth Circuit. Applicant filed an **Emergency Motion to Recall and Stay Mandate Pending Filing and Disposition of Petition for Writ of Certiorari and Request for Temporary Administrative Relief** in Appeal No. 26-1077. [App. G].

On **August 18, 2026**, the Fourth Circuit entered an order stating that, "[u]pon consideration of submissions relative to the motion to stay and recall the mandate and for temporary administrative relief, the court denies the motion." The Court of Appeals supplied no further reasoning for its denial. [App. G.]

Applicant has therefore sought emergency preservation relief in both federal courts below. Neither court afforded the requested interim relief. Relief is consequently unavailable from the courts below, and Applicant now seeks relief from the Circuit Justice pursuant to Supreme Court Rules 22 and 23 and 28 U.S.C. § 2101(f).

III. AUTHORITY AND GOVERNING STANDARD

A stay pending the filing and disposition of a petition for a writ of certiorari is appropriate where the applicant demonstrates "(1) a reasonable probability that four Justices will consider the issue sufficiently meritorious to grant certiorari; (2) a fair prospect that a majority of the Court will vote to reverse the judgment below; and (3) a likelihood that irreparable harm will result from the denial of a stay." *Hollingsworth v. Perry*, 558 U.S. 183, 190 (2010) (per curiam). In close cases, the Circuit Justice or Court balances the equities and relative harms. *Id.*

Under 28 U.S.C. § 2101(f), execution and enforcement of a final judgment subject to review by this Court on writ of certiorari may be stayed for a reasonable time to permit the aggrieved party to seek certiorari. Supreme Court Rule 23 likewise permits an application to a Justice for a stay of enforcement of a judgment sought to be reviewed.

A stay pending certiorari requires, in substance, a reasonable probability that four Justices will vote to grant certiorari, a fair prospect that a majority of the Court will conclude that the judgment below was erroneous, and a likelihood of irreparable harm absent interim relief; the balance of equities is also relevant. Applicant addresses each consideration below.

Because the federal judgment itself denied relief rather than directing a sale or transfer of property, Applicant does not ask this Court to transform § 2101(f) into direct appellate control over a separate state-court judgment. Applicant instead requests only relief within this Court's lawful authority sufficient to preserve the effectiveness of review of the federal judgment and, alternatively, a temporary administrative stay while the Court determines the proper scope of relief.

IV. THERE IS A REASONABLE PROBABILITY THAT FOUR JUSTICES WILL VOTE TO GRANT CERTIORARI AND A FAIR PROSPECT OF REVERSAL OR VACATUR

A. The Petition Presents a Substantial Federal Procedural Question

Whether a district court may refuse to docket and return a substantive post-judgment motion invoking Rules 59(e) and 60(b), filed twenty-eight days after the challenged order and seven minutes after a notice of appeal, without judicially determining whether the motion qualified under Federal Rule of Appellate Procedure 4(a)(4) and affected the effectiveness of the notice of appeal, or alternatively whether the procedures established by Federal Rule of Civil Procedure 62.1 and Federal Rule of Appellate Procedure 12.1 applied.

The chronology makes the procedural question particularly concrete. Applicant's Notice of Appeal and her substantive post-judgment motion were submitted on the **same day—January 19, 2026—and only seven minutes apart**, with the Notice of Appeal submitted first. The issue therefore is not whether Applicant attempted to reopen the case months after appellate jurisdiction had attached. The post-judgment submission followed the Notice of Appeal by only seven minutes, yet it was returned without docketing or a judicial determination of its procedural effect. [App. H-1 and App. H-2].

The record also reflects a material chronological inconsistency concerning the treatment of Applicant's January 19, 2026, submission. The District Court's December 22, 2025, Order adjudicated Applicant's earlier Motion to Reopen. Applicant's subsequent Amended Motion for Reconsideration and Rebuttal invoking Rules 59(e) and 60(b) was not submitted until January 19, 2026. Accordingly, the December 22, 2025, Order could not have adjudicated a motion that had not yet been submitted.

The District Court's subsequent return of Applicant's January 19 submission stated that the Motion for Reconsideration had been denied in the December 22, 2025, Order. That statement presents an apparent chronological impossibility: Applicant did not submit the Amended Motion for Reconsideration and Rebuttal until January 19, 2026—twenty-eight days after entry of the order said to have denied it. [App. H-3 and H-4].

This distinction is material because the January 19 submission was not merely a duplicate of the earlier Motion to Reopen. It expressly invoked Rules 59(e) and 60(b) and sought reconsideration of the December 22 disposition. Whether that submission was timely, what rule governed it, what effect it had upon the Notice of Appeal submitted seven minutes earlier, and whether the District Court retained authority to adjudicate it or employ the indicative-ruling procedure were questions requiring judicial determination—not resolution by treating the later filing as having already been denied by the earlier order.

This procedural circumstance is not merely Applicant's characterization. The Fourth Circuit's June 30, 2026, opinion expressly described Applicant's request for clarification, abeyance, and limited remand as relating to "the district court's refusal to docket a motion to reconsider the denial of her motion to reopen." The Court of Appeals nevertheless denied the requested clarification, abeyance, and limited remand. [App. A].

Federal Rule of Civil Procedure 62.1 addresses a motion for relief that a district court lacks authority to grant because an appeal is pending. It permits the district court to defer consideration, deny the motion, or state that it would grant the motion upon remand or that the motion raises a substantial issue. Federal Rule of Appellate Procedure 12.1 supplies the corresponding appellate procedure following an indicative ruling.

The Advisory Committee confirms that Rule 62.1 was designed to formalize the procedure traditionally employed when a Rule 60(b) motion is presented while an appeal is pending. Fed. R. Civ. P. 62.1 advisory committee's note to 2009 adoption. Although the district court may lack authority to grant relief without remand, it may entertain the motion, deny it, defer consideration, or issue an indicative ruling.

The timing also implicates Federal Rule of Appellate Procedure 4(a)(4). The December 22, 2025, Order and Applicant's January 19, 2026 post-judgment submission were twenty-eight days apart. Rule 4(a)(4)(A) provides that specified timely post-judgment motions—including a motion to alter or amend under Rule 59 and a Rule 60 motion filed within the time allowed for filing a Rule 59 motion—affect the time and effectiveness of an appeal. And where a notice of appeal is filed after entry of judgment but before disposition of such a qualifying motion, Rule 4(a)(4)(B)(i) provides that the notice becomes effective when the order disposing of the last such remaining motion is entered.

Thus, the mere fact that Applicant submitted her Notice of Appeal seven minutes before submitting the post-judgment motion did not itself resolve the jurisdictional question. Whether the January 19 filing qualified under Rule 4(a)(4), and what effect it consequently had upon the previously submitted Notice of Appeal, depended upon the character and timeliness of the post-judgment filing. Returning the motion without docketing prevented a judicial determination of those threshold questions.

The question therefore concerns the administration of federal jurisdiction and the operation of coordinated district-court and appellate procedures, rather than merely disagreement with an individualized merits ruling.

The question has significance beyond this case. Post-judgment motions and notices of appeal frequently arise within the same jurisdictional period. If a substantive post-judgment motion may be returned solely because a notice of appeal was submitted moments earlier, without judicial determination whether Rule 4(a)(4) affects the notice's effectiveness or whether Rules 62.1 and 12.1 provide the appropriate procedure, similarly situated litigants may be deprived of the very judicial determination necessary to establish which court possesses authority to act. Guidance is therefore warranted to ensure predictable administration of the coordinated district-court and appellate procedures established by the Federal Rules.

B. There Is a Fair Prospect of Reversal or Vacatur

Applicant has a fair prospect of demonstrating error because the challenged procedure prevented judicial determination of the character and effect of the post-judgment filing.

Griggs v. Provident Consumer Discount Co., 459 U.S. 56, 58 (1982), establishes the general principle that an effective notice of appeal transfers authority over matters involved in the appeal to the court of appeals. Applicant does not contend that Griggs left the District Court free to grant relief inconsistent with appellate jurisdiction. The narrower question is whether the existence of the appeal justified refusing to docket and returning a substantive post-judgment submission without judicial consideration at all.

Rules 62.1 and 12.1 provide a mechanism for addressing requests for relief that a district court cannot grant because an appeal is pending. By returning Applicant's submission rather than docketing it for judicial treatment, the procedure challenged here prevented a determination whether the filing was timely or cognizable under Rule 59(e), warranted consideration under Rule 60(b), implicated Rule 62.1, or otherwise affected the respective jurisdiction of the District Court and Court of Appeals. It likewise prevented development of an indicative ruling that could have activated Appellate Rule 12.1.

The Fourth Circuit's opinion confirms both sides of the procedural posture: it acknowledged the District Court's refusal to docket the later motion, yet it affirmed only the December 22, 2025, denial of the earlier Motion to Reopen and stated that the underlying dismissal of the amended complaint was not before it. Applicant therefore does not ask the Circuit Justice to adjudicate the merits of claims the Court of Appeals did not reach. The asserted error is that the treatment of the post-judgment submission allegedly prevented operation of the procedures through which those matters could have received further judicial consideration. [App. D].

V. APPLICANT WILL SUFFER IRREPARABLE HARM ABSENT INTERIM RELIEF

The threatened property injury is further demonstrated by materially different findings in the Maryland mechanics-lien proceedings. In an October 28, 2022, Order, the Circuit Court identified Showcase's signed contracts as totaling $104,069.62 and separately stated that Showcase's Exhibit #2 appeared to allege "an additional work order for $32,988.43 which there is no proof of." The court also recognized Applicant's payment of $60,310.36, noted that electrical work had failed inspection, questioned whether the work Showcase claimed to have completed was in fact complete, concluded that the amount actually owed was unclear, and denied Showcase's request for a mechanic's lien without prejudice. [App. L].

In the subsequent proceeding, however, a different judge entered discovery sanctions and a default judgment. The later Order found that Showcase's total work, "including extras approved by Defendant," was $136,583.05; found $91,145.90 due after credits; entered judgment for $91,145.90 plus 10% post-judgment interest; established a final mechanics lien against Applicant's residence in that amount; and directed that the property be sold unless the judgment was paid. [App. M.] The same Order prohibited Applicant from introducing evidence opposing Showcase's complaint, judgment, or mechanics lien, and from introducing or referencing documents, expert testimony, or witness testimony. [App. M.]

Of particular relevance to preservation, **the figures appearing in the two orders present a notable numerical correspondence.** The later Order's $136,583.05 figure equals the $104,069.62 in signed contracts identified in the earlier Order, less the separately identified $475.00 extra-work order, plus the $32,988.43 alleged additional work order that the earlier court stated had "no proof of":

$104,069.62 - $475.00 + $32,988.43 = $136,583.05. [App. M].

Applicant does not contend that this numerical correspondence, standing alone, establishes how the later court calculated its award. Nor does Applicant ask this Court to determine through this Application whether the later judgment improperly included the disputed $32,988.43 amount. The correspondence is identified solely to demonstrate the concrete and documented nature of the dispute underlying enforcement against Applicant's residence and the importance of preserving meaningful review.

Applicant's current Chapter 13 proceeding does not eliminate the need for interim relief. Although the automatic stay presently provides statutory protection against certain enforcement activity, that protection is temporary and does not itself adjudicate or extinguish the underlying Maryland judgment, mechanics lien, asserted property rights, or the federal claims concerning the circumstances through which those interests were allegedly obtained or enforced. The existence of the bankruptcy stay therefore postpones certain enforcement consequences; it does not resolve the underlying controversy that gives rise to them.

Nor does the present Chapter 13 proceeding guarantee that the existing protection will remain in place throughout the period necessary for Supreme Court review. Bankruptcy protection is subject to the continued administration of the case and to relief that may be sought under the Bankruptcy Code. Applicant's prior bankruptcy history demonstrates the significance of that distinction: in the earlier North Carolina proceeding, the Bankruptcy Court ultimately annulled the automatic stay retroactively, permitting the Maryland proceeding to continue "from its inception." Applicant challenges matters relating to that order in the separate North Carolina bankruptcy appeal and does not ask this Court to adjudicate that challenge here.

The present Chapter 13 proceeding does not eliminate the threatened irreparable injury. Applicant's current bankruptcy obligations materially increase over the life of the plan. In approximately one year, the required monthly payment is scheduled to increase to approximately **$2,800**, followed thereafter by payments exceeding **$4,208.53 per month**. Applicant cannot sustain payments at those levels. [App. I]. Unless the underlying property controversy can receive meaningful judicial review before those obligations become unaffordable, Applicant faces a substantial risk that the Chapter 13 case will no longer provide effective protection and that enforcement consequences affecting her residence will resume.

The resulting harm is not merely monetary. If Applicant is unable to maintain the required Chapter 13 payments, she faces the potential loss of the bankruptcy protection that presently stands between her residence and enforcement of the Maryland judgment and mechanics lien. That judgment directs sale of the property unless satisfied. Loss of the residence, alteration of title, or disposition of the property before this Court can act would constitute an injury that could not readily be undone by a later ruling on the federal procedural question.

Accordingly, the current bankruptcy does not eliminate the emergency; it temporarily delays the threatened consequences while imposing an escalating payment structure that Applicant contends she cannot sustain. The relevant question is therefore not whether an automatic stay exists today, but whether meaningful Supreme Court review can occur before that temporary protection becomes ineffective and the threatened property consequences become irreversible.

Applicant does not contend that the financial burden of the Chapter 13 payments, standing alone, constitutes irreparable injury. Rather, the escalating and ultimately unaffordable payment obligations demonstrate the limited duration of the protection presently preventing enforcement against the residence. The irreparable injury is the resulting substantial risk of alteration or loss of Applicant's property rights before the federal procedural question presented for certiorari can receive meaningful review.

VI. THE BALANCE OF EQUITIES FAVORS LIMITED, PRESERVATION-ORIENTED RELIEF

The requested relief is designed to preserve rather than finally alter existing legal relationships. Applicant faces potentially irreversible consequences involving her residence and property interests while seeking Supreme Court review.

By contrast, limited interim relief would not adjudicate ownership of property, invalidate an independent state-court judgment, determine criminal liability, resolve the merits of Applicant's underlying civil claims, or decide the separate North Carolina bankruptcy appeal.

The equities therefore favor only such narrow relief as the Circuit Justice concludes is legally available and necessary to keep Supreme Court review meaningful.

VII. THE PUBLIC INTEREST FAVORS PRESERVING MEANINGFUL SUPREME COURT REVIEW

The public has an interest in orderly federal appellate procedure and in ensuring that jurisdictional rules governing post-judgment motions operate predictably. The question presented concerns the interaction among district-court authority, appellate jurisdiction, Rules 59(e) and 60(b), Rule 62.1, and Appellate Rule 12.1.

A narrowly tailored stay would preserve the respective jurisdiction of the federal, state, bankruptcy, and appellate courts while permitting this Court to determine whether the federal procedural question warrants review.

VIII. THE REQUESTED RELIEF IS NARROWLY TAILORED

Applicant respectfully requests a stay, to the extent authorized by 28 U.S.C. § 2101(f), Supreme Court Rule 23, and this Court's lawful authority, sufficient to preserve meaningful Supreme Court review of the federal judgment and to prevent the federal controversy from becoming practically incapable of meaningful relief while the Petition for a Writ of Certiorari is filed and considered.

Applicant does not request through this Application that the Circuit Justice exercise direct appellate jurisdiction over the Maryland state court, vacate or stay the June 2, 2023, bankruptcy order, adjudicate the pending North Carolina bankruptcy appeal, compel criminal prosecution, or decide the merits of the RICO, fraud, fraud-on-the-court, or Trust-related allegations.

If the Court concludes that § 2101(f) does not authorize the broader preservation Applicant seeks because the federal judgment itself does not command execution against the property, Applicant requests whatever narrower interim relief is lawfully available to preserve this Court's jurisdiction and the practical effectiveness of certiorari review.

IX. ALTERNATIVE REQUEST FOR A TEMPORARY ADMINISTRATIVE STAY

If the Circuit Justice determines that additional briefing or consideration is appropriate before ruling on the requested stay, Applicant respectfully requests a temporary administrative stay sufficient to preserve the status quo while this Application is considered.

An administrative stay would not resolve the merits. It would provide a brief period in which the Court can determine the lawful scope of interim relief without allowing the request for Supreme Court review to become practically ineffective in the meantime.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that the Circuit Justice:

1. stay, to the extent authorized by 28 U.S.C. § 2101(f), Supreme Court Rule 23, or other lawful authority, the effect and enforcement of the federal judgment sought to be reviewed, and grant such preservation-oriented interim relief necessarily incident to preserving this Court's ability to afford meaningful relief upon certiorari review;
2. grant such additional, narrowly tailored preservation-oriented relief as is within this Court's lawful authority and necessary to preserve the practical effectiveness of Supreme Court review;
3. maintain any stay through disposition of the Petition for a Writ of Certiorari and, if certiorari is granted, until further order of this Court;

4. alternatively, enter a temporary administrative stay while this Application is considered; and

5. grant such other relief as the Circuit Justice or Court deems just and appropriate.

Respectfully submitted,

By: [illegible]

Lisa Richardson-Henderson
Applicant, Pro Se
8753 Hayshed Lane
Columbia, Maryland 21045

Date: August 26, 2026

APPENDIX

Appendix A — Opinion of the United States Court of Appeals for the Fourth Circuit, No. 26-1077, decided June 30, 2026.

Appendix B — Order of the United States Court of Appeals for the Fourth Circuit Denying Petition for Rehearing and Rehearing En Banc, No. 26-1077, July 28, 2026.

Appendix C — Mandate of the United States Court of Appeals for the Fourth Circuit, No. 26-1077, issued August 5, 2026.

Appendix D — Memorandum Opinion and Order of the United States District Court for the District of Maryland, Case No. 1:25-cv-00695-ABA, entered December 22, 2025.

Appendix E — Applicant's Expedited Motion to Stay and Preserve the Status Quo Pending Petition for Writ of Certiorari, submitted to the United States District Court for the District of Maryland on August 10, 2026.

Appendix F — District Court Return of Applicant's Expedited Motion to Stay and Preserve the Status Quo, dated August 13, 2026.

Appendix G — Order of the United States Court of Appeals for the Fourth Circuit Denying Applicant's Motion to Stay and Recall the Mandate and for Temporary Administrative Relief, No. 26-1077, August 18, 2026.

Appendix H — January 19, 2026 Post-Judgment Filing Materials.

H-1 Filing/receipt record for Applicant's January 19, 2026, Notice of Appeal,

H-2 Filing/receipt record for Applicant's January 19, 2026, Amended Motion for Reconsideration and Rebuttal.

H-3 Applicant's Amended Motion for Reconsideration and Rebuttal Invoking Federal Rules of Civil Procedure 59(e) and 60(b),

H-4 District Court Return Document concerning the January 19, 2026, Amended Motion for Reconsideration and Rebuttal

Appendix I — Limited Materials Concerning Applicant's Current Chapter 13 Proceeding

Appendix J —. June 2, 2023 Order Annulling the Automatic Stay, In re Lisa Richardson Henderson, Bankruptcy No. 17-11389, United States Bankruptcy Court for the Middle District of North Carolina.

J-1 June 2, 2023 Order Denying Any Further Relief From The Automatic Stay, In re Lisa Richardson Henderson, Bankruptcy No. 17-11389, United States Bankruptcy Court for the Middle District of North Carolina.

Appendix K — Letter from the Office of the State's Attorney for Howard County, Maryland, dated February 21, 2023.

Appendix L — Order Denying Plaintiff Showcase Home Improvements, Inc.'s Request for Mechanics Lien, Circuit Court for Howard County, Maryland, dated October 28, 2022.

Appendix M — Order Establishing Final Mechanics' Lien and Entering Judgment, Circuit Court for Howard County, Maryland, arising from the February 17, 2023, hearing, signed March 1, 2023, and entered April 4, 2023.

APPENDIX A

Opinion of the United States Court of Appeals for the Fourth Circuit, No. 26-1077, decided June 30, 2026

Unpublished per curiam opinion affirming the District Court's December 22, 2025, denial of Applicant's Motion to Reopen. The opinion also acknowledges Applicant's Motion for Clarification, Abeyance, and Limited Remand "relating to the district court's refusal to docket a motion to reconsider the denial of her motion to reopen," and states that the underlying dismissal of the amended complaint was not before the Court of Appeals.

UNPUBLISHED

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077

LISA RICHARDSON HENDERSON,

Plaintiff - Appellant,

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust,

Defendants - Appellees.

Appeal from the United States District Court for the District of Maryland, at Baltimore. Adam B. Abelson, District Judge. (1:25-cv-00695-ABA)

Submitted: June 25, 2026 Decided: June 30, 2026

Before BENJAMIN and BERNER, Circuit Judges, and TRAXLER, Senior Circuit Judge.

Affirmed by unpublished per curiam opinion.

Lisa Richardson Henderson, Appellant Pro Se.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

Lisa Richardson Henderson appeals the district court's order denying her motion to reopen, in which she sought to file a second amended complaint following the district court's dismissal of her amended complaint pursuant to 28 U.S.C. § 1915(e)(2)(B).[1] Because Richardson Henderson filed the motion to reopen more than 28 days after entry of the dismissal order, it is properly considered a Fed. R. Civ. P. 60(b) motion.[2] *See In re Burnley*, 988 F.2d 1, 2-3 (4th Cir. 1992). When "a plaintiff seeks to reopen a case under Rule 60(b) in order to file an amended complaint, she must satisfy one of the Rule 60(b) grounds before a court may consider her motion to amend." *Daulatzai*, 97 F.4th at 178 (emphasis omitted). Upon review, we conclude that the district court did not abuse its discretion by denying this motion. *See Aikens v. Ingram*, 652 F.3d 496, 501 (4th Cir. 2011) (en banc) (stating standard of review). Accordingly, we affirm the district court's order. *Richardson-Henderson v. Showcase Home Improvements, Inc.*, No. 1:25-cv-00695-ABA (D. Md. Dec. 22, 2025). We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

AFFIRMED

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[1] Richardson Henderson has also filed a motion for clarification, abeyance, and a limited remand, relating to the district court's refusal to docket a motion to reconsider the denial of her motion to reopen. We deny this motion.

[2] For this reason, the district court's order dismissing the amended complaint is not before us in this appeal. *See Daulatzai v. Maryland*, 97 F.4th 166, 178 (4th Cir. 2024); Fed. R. App. P. 4(a)(4).

APPENDIX B

Order of the United States Court of Appeals for the Fourth Circuit Denying Petition for Rehearing and Rehearing En Banc, No. 26-1077, July 28, 2026

The Fourth Circuit denied Applicant's petition for panel rehearing and rehearing en banc on July 28, 2026.

FILED: July 28, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077
(1:25-cv-00695-ABA)

LISA RICHARDSON HENDERSON

Plaintiff - Appellant

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust

Defendants - Appellees

O R D E R

The court denies the petition for rehearing and rehearing en banc. No judge requested a poll under Fed. R. App. P. 40 on the petition for rehearing en banc.

Entered at the direction of the panel: Judge Benjamin, Judge Berner, and Senior Judge Traxler.

For the Court

/s/ Nwamaka Anowi, Clerk

APPENDIX C

Mandate of the United States Court of Appeals for the Fourth Circuit, No. 26-1077, issued August 5, 2026

The mandate states that the Fourth Circuit's June 30, 2026 judgment took effect on August 5, 2026 pursuant to Federal Rule of Appellate Procedure 41.

FILED: August 5, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077
(1:25-cv-00695-ABA)

LISA RICHARDSON HENDERSON

Plaintiff - Appellant

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust

Defendants - Appellees

M A N D A T E

The judgment of this court, entered 06/30/2026, takes effect today.

This constitutes the formal mandate of this court issued pursuant to Rule 41(a) of the Federal Rules of Appellate Procedure.

/s/Nwamaka Anowi, Clerk

APPENDIX D

Memorandum Opinion and Order of the United States District Court for the District of Maryland, Case No. 1:25-cv-00695-ABA, entered December 22, 2025

Memorandum Opinion and Order denying Applicant's Motion to Reopen and addressing the request for issuance of summons.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LISA RICHARDSON-HENDERSON, *Plaintiff,* v. SHOWCASE HOME IMPROVEMENTS, INC., *d/b/a* KENNETH FERBER *et al.*, *Defendants*	Civil Action No. 1:25-cv-00695-ABA

MEMORANDUM OPINION AND ORDER

On April 24, 2025, the Court dismissed Plaintiff's complaint for failure to state a claim upon which relief can be granted. ECF No. 10; *see* 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b); *see also Lomax v. Ortiz-Marquez*, 590 U.S. ___, 140 S. Ct. 1721 (2020). In that opinion, the Court explained that to comply with the Federal Rules of Civil Procedure, a complaint must contain at a minimum a short and plain statement of the claim that shows the plaintiff is entitled to relief and a request for relief. *See* Fed. R. Civ. P. 8(a). Additionally, under Rule 8(a), a pleading must "give the defendant fair notice of what the plaintiff's claim is and the grounds upon which it rests." *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506, 512 (2002) (quoting *Conley v. Gibson*, 355 U.S. 41, 47 (1957)). Under Rule 8(d)(1), each allegation in a complaint should be "simple, concise, and direct." A pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action does not satisfy Rule 8's basic pleading requirements. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)).

In the amended complaint, Plaintiff alleged a RICO claim under 18 U.S.C. § 1962(c) against Defendants. ECF No. 7 at 3. Specifically, Plaintiff alleged that she owned real property at 8753 Hayshed Lane, Columbia, Maryland 21045, that Defendant U.S. Bank Trust National Association served as a trustee during a bankruptcy proceeding from October 2017 to March 2023 "but failed to record a Deed of Trust as required," and Defendant Showcase Home Improvements, Inc. "submitted a fraudulent claim seeking ownership interest or compensation in connection to the property." *Id.* at 2-3.

In its prior opinion, the Court explained that RICO claims are subjected to a heightened pleading standard and held that Plaintiff's amended complaint had not met that standard. Specifically, "[i]n alleging fraud or mistake, a party must state with particularity the circumstances constituting fraud or mistake. Malice, intent, knowledge, and other conditions of a person's mind may be alleged generally." Fed. R. Civ. P. 9(b). "When mail and wire fraud are asserted as the predicate acts in a civil RICO claim, each must be pled with particularity, pursuant to Rule 9(b)." *Proctor v. Metropolitan Money Store Corp.*, 645 F. Supp. 2d 464, 473 (D. Md. 2009). "Both mail and wire fraud have similar core elements that must be proven: (1) defendant's knowing participation in a scheme to defraud; and (2) the mails or interstate wire facilities were used in the furtherance of the scheme, but they need not be an essential element of the scheme." *Id.*

Following the Court's decision, Plaintiff filed a Motion to Reopen including a proposed "Refiled Complaint for Fraud, RICO, and Estoppel Tactics." ECF No. 11; ECF No. 11-2. In the proposed complaint, she realleges the RICO claim and adds fraud and promissory estoppel claims. ECF No. 11-2 at 3, 5–6. She also adds as an additional defendant, the State's Attorney's Office for Howard County, Maryland, for failure to

impose criminal charges against the President of Showcase Home Improvements, Inc., Kenneth Ferber. *Id.* ¶ 5.

First, Plaintiff has failed again to properly plead her RICO claim after amending her complaint. Plaintiff only makes the conclusory allegation that "The Circuit Court, State's Attorney Office, court appointed unauthorized Trustee, US Bank Trust National Association, and Showcase's attorneys worked together to facilitate an elaborate fraudulent scheme to steal real property, to "eliminate/deprive" Plaintiff of her Constitutional rights and equal protections under the Fifth and Fourteenth Amendment. . . . in violation of 18 U.S.C. 96, 1962–1968, Title 18 Sections 1341 and 1343 mail and wire fraud . . ." with no further factual context. *Id.* ¶ 11. This amended claim, like the prior claim, does not state a RICO claim upon which relief can be granted.

Second, to the extent that Plaintiff is attempting to sue the State's Attorney's Office for failure to prosecute Showcase, this claim is further barred by prosecutorial immunity. Prosecutors are absolutely immune from damages liability when they act as advocates for the State. *Imbler v. Pachtman*, 424 U.S. 409, 430–32 (1976); *Savage v. Maryland*, 896 F.3d 260, 268 (4th Cir. 2018). A prosecutor's decision not to prosecute a case is intimately tied to the prosecutor's role as advocate for the State and thus, the State's Attorney's Office is absolutely immune from Plaintiff's claims regarding its decision not to prosecute Showcase. *See Savage*, 896 F.3d at 271 (citing *Roe v. City and Cnty. Of San Francisco*, 109 F.3d 578, 583 (1997)).

Finally, the Court lacks jurisdiction over Plaintiff's remaining state law claims of fraud and promissory estoppel. ECF No. 11-2 at 5–6. The federal district court has jurisdiction over a case in one of three ways: federal question (28 U.S.C. § 1331), diversity (28 U.S.C. § 1332), and supplemental (28 U.S.C. § 1367). Given that the Court

has dismissed the RICO claim and there are no remaining claims arising under the Constitution, federal laws, or treatises, the Court does not have federal question jurisdiction. Given that Plaintiff alleges that both she and all Defendants are domiciled in Maryland, the Court lacks diversity jurisdiction. *See* 28 U.S.C. § 1332(a)(1). Finally, pursuant to 28 U.S.C. § 1367(c)(3), given that the Court has dismissed the only claim over which it would have had original jurisdiction (the RICO claim), the Court will decline to exercise supplemental jurisdiction over the state law claims. Accordingly, the motion to reopen will be denied.

ORDER

For the reasons stated above, Ms. Richardson-Henderson's motion to reopen the case (ECF No. 11) is DENIED and her motion to request the process of summons (ECF No. 12) is DENIED AS MOOT.

Date: December 22, 2025

/s/
Adam B. Abelson
United States District Judge

APPENDIX E

Applicant's Expedited Motion to Stay and Preserve the Status Quo Pending Petition for Writ of Certiorari, submitted to the United States District Court for the District of Maryland on August 10, 2026

The motion sought limited preservation-oriented relief following issuance of the Fourth Circuit mandate and pending Applicant's intended Petition for a Writ of Certiorari.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

LISA RICHARDSON HENDERSON,
Plaintiff, Pro Se,

v. Civil Action No. **1:25-cv-00695-ABA**

SHOWCASE HOME IMPROVEMENTS, INC., et al.,
Defendants.

PLAINTIFF'S EXPEDITED MOTION TO STAY AND PRESERVE THE STATUS QUO PENDING PETITION FOR WRIT OF CERTIORARI

Plaintiff Lisa Richardson Henderson ("Plaintiff"), proceeding pro se, respectfully moves this Court for limited interim relief preserving the status quo pending her Petition for a Writ of Certiorari to the Supreme Court of the United States.

Plaintiff does **not** request that this Court exercise appellate jurisdiction over the Circuit Court for Howard County or adjudicate criminal liability through this Motion. Rather, Plaintiff requests that this Court preserve the status quo within the scope of its jurisdiction while the Supreme Court determines whether to review substantial federal procedural questions arising from this action.

The requested relief is necessary because the federal action concerned allegations of fraud and other serious misconduct affecting Plaintiff's property interests; the underlying enforcement consequences remain substantial; Plaintiff has been required to seek Chapter 13 bankruptcy protection for a second time; and irreversible legal consequences may occur before Supreme Court review can be meaningfully obtained.

I. PROCEDURAL HISTORY

On December 22, 2025, this Court entered a Memorandum Opinion and Order disposing of Plaintiff's federal action.

Plaintiff thereafter submitted an Amended Motion for Reconsideration and Rebuttal pursuant to Federal Rules of Civil Procedure 59(e) and, alternatively, 60(b). Plaintiff contends that the submission was received through the District of Maryland's Electronic Document Submission System but was returned without docketing or presentation to the District Judge because a notice of appeal had been filed.

Plaintiff subsequently sought review in the United States Court of Appeals for the Fourth Circuit and specifically notified that court of the unresolved post-judgment filing. Plaintiff sought clarification, abeyance, and a limited remand to permit the District Court to address the post-judgment motion through the procedures contemplated by Federal Rule of Civil Procedure 62.1 and Federal Rule of Appellate Procedure 12.1.

The Fourth Circuit ultimately entered judgment, denied rehearing and rehearing en banc, and issued its mandate.

Plaintiff is now seeking review in the Supreme Court of the United States through a Petition for a Writ of Certiorari presenting questions concerning the treatment of a substantive post-judgment motion received after a notice of appeal and the interaction among Rules 59(e), 60(b), and 62.1 and Federal Rules of Appellate Procedure 4(a)(4) and 12.1.

Plaintiff brings this Motion promptly to preserve the status quo while that review is pursued.

II. THE FEDERAL ACTION INVOLVES SUBSTANTIAL ALLEGATIONS OF FRAUD AND MISCONDUCT AFFECTING PLAINTIFF'S PROPERTY RIGHTS

The federal action was not merely a collateral disagreement with a state-court judgment. Plaintiff alleged independent federal claims arising from conduct by Showcase Home Improvements, Inc., U.S. Bank Trust, N.A., and other Defendants that Plaintiff contends contributed to the deprivation and continuing impairment of her property rights.

Among other things, Plaintiff alleged fraudulent representations and conduct associated with the underlying home-improvement transaction, the use of interstate communications and judicial proceedings, conduct occurring in connection with bankruptcy proceedings, and actions ultimately affecting Plaintiff's residence and property interests.

Plaintiff further alleged violations involving federal fraud and racketeering statutes and asserted that Defendants' conduct contributed to the judgment and enforcement circumstances affecting her property.

Those allegations are particularly significant for purposes of interim relief because Plaintiff contends that the federal action provided the forum in which the legality of Defendants' conduct could be examined independently of the underlying state proceedings.

Plaintiff does not ask this Court through the present Motion to find that any Defendant committed a criminal offense. References to potentially criminal conduct concern allegations underlying the federal civil action and the federal statutes invoked therein. Criminal liability, if any, is not for determination through this Motion.

The limited question now is whether circumstances should be preserved long enough to permit Supreme Court review before irreversible consequences undermine the availability of meaningful judicial relief.

III. PLAINTIFF IS SUFFERING CONCRETE AND CONTINUING HARM

The consequences are neither theoretical nor remote.

Plaintiff has been required to seek protection under **Chapter 13 of the Bankruptcy Code for a second time** in connection with the continuing obligations and property consequences arising from the underlying proceedings.

Plaintiff's current Chapter 13 obligations require payments of approximately **$999.35 per month through June 2027**. The required payment is thereafter scheduled to increase to approximately **$2,800 per month for one year**, followed by approximately **$4,208.53 per month for the succeeding two years**.

These escalating obligations demonstrate that the consequences affecting Plaintiff's property are concrete, substantial, and continuing.

Plaintiff recognizes that monetary expense alone ordinarily does not establish irreparable injury. The harm here, however, extends beyond monthly payments. Plaintiff's Chapter 13 proceeding is the mechanism presently being used to protect her residence and property interests from enforcement consequences. Failure to maintain the required obligations may therefore carry consequences affecting property, title, possession, or other legal rights that cannot necessarily be restored through a subsequent award of money damages.

The requested stay is accordingly directed toward **preserving the status quo and preventing irreversible legal consequences affecting Plaintiff's property**, rather than merely postponing a financial obligation.

IV. THE PETITION FOR CERTIORARI PRESENTS SUBSTANTIAL FEDERAL QUESTIONS

Plaintiff's forthcoming Petition for a Writ of Certiorari presents a discrete question of federal procedure capable of resolution independently of the ultimate merits of Plaintiff's underlying fraud and other claims.

The Supreme Court has recognized that an effective notice of appeal ordinarily transfers authority over matters involved in the appeal from the district court to the court of appeals. *Griggs v. Provident Consumer Discount Co.*, 459 U.S. 56, 58 (1982).

At the same time, the Supreme Court has recognized a continuing role for the district court in considering requests for Rule 60 relief while an appeal is pending. *Standard Oil Co. of California v. United States*, 429 U.S. 17 (1976).

Federal Rule of Civil Procedure 62.1 and Federal Rule of Appellate Procedure 12.1 provide the modern procedural mechanism for coordinating district-court consideration of certain motions with pending appellate jurisdiction.

The certiorari petition therefore asks, among other things, whether a substantive post-judgment motion received by a district court after a notice of appeal may be returned without docketing and judicial consideration, or whether it must first be docketed and its procedural status judicially determined so that the mechanisms established by Rules 62.1 and 12.1 can operate.

That question affects the integrity of appellate review because an undocketed filing does not become part of the ordinary district-court record and cannot readily receive the judicial classification necessary to determine what effect, if any, it has upon appellate proceedings.

Plaintiff therefore presents more than disagreement with the outcome below. The Petition presents a substantial question concerning the administration of nationwide federal procedural rules.

V. IRREPARABLE HARM FAVORS PRESERVATION OF THE STATUS QUO

Without temporary relief, Plaintiff faces the possibility that legal consequences affecting her property will continue or become irreversible while the Supreme Court considers whether to review the federal judgment.

Once property rights have been transferred, extinguished, materially altered, or subjected to completed enforcement, subsequent judicial relief may not adequately restore the circumstances that existed before enforcement.

The ongoing Chapter 13 obligations demonstrate the present nature of the burden. The progressively increasing payment schedule further demonstrates that the consequences will continue during the period in which Supreme Court review is pursued.

A stay would preserve, rather than alter, existing circumstances.

VI. THE BALANCE OF EQUITIES FAVORS LIMITED INTERIM RELIEF

The balance of equities favors maintaining the status quo.

Plaintiff faces ongoing bankruptcy obligations and potentially irreversible consequences affecting her residence and property interests.

By contrast, a limited stay pending Supreme Court review would not adjudicate ownership of the property, invalidate the Howard County judgment, determine criminal liability, or finally resolve Plaintiff's substantive federal claims.

It would merely preserve the ability of the courts to provide meaningful relief should the Supreme Court grant certiorari and ultimately determine that further proceedings are required.

The requested relief is therefore limited to what is necessary to prevent the federal proceedings from becoming effectively incapable of providing meaningful relief.

VII. THE PUBLIC INTEREST SUPPORTS MEANINGFUL APPELLATE REVIEW

The public interest favors orderly administration of the federal judicial system and preservation of meaningful appellate review.

Federal Rule of Civil Procedure 1 directs that the Federal Rules be construed, administered, and employed to secure the just, speedy, and inexpensive determination of every action and proceeding.

Preserving the status quo for the limited period necessary to seek Supreme Court review promotes those interests where irreversible consequences could otherwise occur before the reviewing court determines whether certiorari should be granted.

VIII. THE REQUESTED RELIEF IS NARROWLY TAILORED

Plaintiff recognizes the limitations on this Court's authority concerning independent state-court proceedings.

Accordingly, Plaintiff does **not** request through this Motion that the Court exercise appellate authority over the Circuit Court for Howard County, vacate that court's judgment, determine the validity of the state judgment, or adjudicate criminal liability.

Instead, Plaintiff asks this Court to:

(1) stay enforcement or implementation of its own December 22, 2025 judgment to the extent legally permissible;

(2) preserve the status quo concerning matters within this Court's jurisdiction while Plaintiff timely pursues Supreme Court review;

(3) refrain from taking action that would render Plaintiff's forthcoming Petition for a Writ of Certiorari or requested post-judgment review ineffective; and

(4) alternatively, grant a short administrative stay sufficient to permit Plaintiff to seek additional stay relief from the appropriate court or from the Supreme Court of the United States.

This formulation preserves the respective jurisdiction of the federal, state, bankruptcy, and appellate courts while protecting Plaintiff's ability to pursue meaningful Supreme Court review.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that this Court enter an Order:

1. **Staying enforcement or implementation of the December 22, 2025 judgment to the extent within this Court's authority pending Plaintiff's timely Petition for a Writ of Certiorari;**
2. **Preserving the status quo concerning matters within this Court's jurisdiction so that Plaintiff's property interests and ability to obtain meaningful Supreme Court review are not irreversibly impaired;**

3. **Maintaining such relief through disposition of the Petition for Writ of Certiorari or for a reasonable period sufficient for Plaintiff to seek further stay relief from the Supreme Court;**
4. Alternatively, **granting a temporary administrative stay sufficient to permit Plaintiff to present a stay application to the Supreme Court;** and
5. Granting such other relief as this Court deems just and appropriate.

Respectfully submitted,

By: Lisa R. Henderson

Lisa Richardson Henderson
Plaintiff, Pro Se
8753 Hayshed Lane
Columbia, Maryland 21045
Phone: (443) 820=6573
Email: LHenders@gmail.com

Date: August 10, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 10 day of August 2026, a true and correct copy of the foregoing **Plaintiff's Expedited Motion to Stay and Preserve the Status Quo Pending Petition for Writ of Certiorari**, together with all attachments, was served upon all counsel of record by [CM/ECF / first-class United States Mail / other authorized method].

By: Lisa R. Henderson

Lisa Richardson Henderson
Plaintiff, Pro Se

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

LISA RICHARDSON HENDERSON,
Plaintiff, Pro Se,

v. Civil Action No. **1:25-cv-00695-ABA**

SHOWCASE HOME IMPROVEMENTS, INC., et al.,

Defendants.

[PROPOSED] ORDER GRANTING MOTION TO STAY AND PRESERVE THE STATUS QUO PENDING PETITION FOR WRIT OF CERTIORARI

Upon consideration of Plaintiff Lisa Richardson Henderson's **Expedited Motion to Stay and Preserve the Status Quo Pending Petition for Writ of Certiorari**, any responses thereto, the record in this action, and for good cause shown, it is this ___ day of ____________, 2026, by the United States District Court for the District of Maryland,

ORDERED that Plaintiff's Motion is **GRANTED** to the extent set forth herein; and it is further

ORDERED that, to the extent within this Court's jurisdiction and authority, enforcement or implementation of this Court's December 22, 2025, judgment is

STAYED for the purpose of preserving the status quo while Plaintiff timely seeks review in the Supreme Court of the United States; and it is further

ORDERED that the stay shall preserve the status quo concerning matters within this Court's jurisdiction so that actions arising from or dependent upon the federal judgment do not render Plaintiff's request for Supreme Court review ineffective before the Supreme Court has an opportunity to consider the Petition for a Writ of Certiorari; and it is further

ORDERED that this stay is limited to matters within the jurisdiction and lawful authority of this Court and shall not be construed as an adjudication of the validity of any independent state-court judgment, an adjudication of criminal liability, or an exercise of appellate jurisdiction over the Circuit Court for Howard County, Maryland; and it is further

ORDERED that nothing in this Order shall be construed to modify, terminate, or otherwise interfere with the automatic stay, any confirmed or proposed Chapter 13 plan, or any order entered by the United States Bankruptcy Court having jurisdiction over Plaintiff's pending Chapter 13 proceeding; and it is further

ORDERED that this stay shall remain in effect for a reasonable period sufficient to permit Plaintiff to file her Petition for a Writ of Certiorari and seek appropriate relief from the Supreme Court of the United States, unless otherwise ordered by this Court or a court of competent appellate jurisdiction; and it is further

ORDERED that, should further relief be necessary to prevent irreparable consequences before the Supreme Court can act, Plaintiff may promptly seek such relief from the appropriate court in accordance with applicable law and the Rules of the Supreme Court of the United States.

ALTERNATIVELY, should the Court determine that it lacks authority to grant the foregoing stay in whole or in part, Plaintiff is **GRANTED a temporary administrative stay** of matters within this Court's authority for **fourteen (14) days** from entry of this **Order** for the limited purpose of permitting Plaintiff to present **an application for stay to the Supreme Court of the United States or other** court having jurisdiction to grant such relief.

SO ORDERED.

Date: ____________________, 2026

____

THE HONORABLE ADAM B. ABELSON
United States District Judge
United States District Court
District of Maryland

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LISA RICHARDSON-HENDERSON, *Plaintiff*, v. SHOWCASE HOME IMPROVEMENTS, INC., *d/b/a* KENNETH FERBER *et al.*, *Defendants*	Civil Action No. 1:25-cv-00695-ABA

MEMORANDUM OPINION AND ORDER

On April 24, 2025, the Court dismissed Plaintiff's complaint for failure to state a claim upon which relief can be granted. ECF No. 10; *see* 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b); *see also Lomax v. Ortiz-Marquez*, 590 U.S. ___, 140 S. Ct. 1721 (2020). In that opinion, the Court explained that to comply with the Federal Rules of Civil Procedure, a complaint must contain at a minimum a short and plain statement of the claim that shows the plaintiff is entitled to relief and a request for relief. *See* Fed. R. Civ. P. 8(a). Additionally, under Rule 8(a), a pleading must "give the defendant fair notice of what the plaintiff's claim is and the grounds upon which it rests." *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506, 512 (2002) (quoting *Conley v. Gibson*, 355 U.S. 41, 47 (1957)). Under Rule 8(d)(1), each allegation in a complaint should be "simple, concise, and direct." A pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action does not satisfy Rule 8's basic pleading requirements. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)).

In the amended complaint, Plaintiff alleged a RICO claim under 18 U.S.C. § 1962(c) against Defendants. ECF No. 7 at 3. Specifically, Plaintiff alleged that she owned real property at 8753 Hayshed Lane, Columbia, Maryland 21045, that Defendant U.S. Bank Trust National Association served as a trustee during a bankruptcy proceeding from October 2017 to March 2023 "but failed to record a Deed of Trust as required," and Defendant Showcase Home Improvements, Inc. "submitted a fraudulent claim seeking ownership interest or compensation in connection to the property." *Id.* at 2-3.

In its prior opinion, the Court explained that RICO claims are subjected to a heightened pleading standard and held that Plaintiff's amended complaint had not met that standard. Specifically, "[i]n alleging fraud or mistake, a party must state with particularity the circumstances constituting fraud or mistake. Malice, intent, knowledge, and other conditions of a person's mind may be alleged generally." Fed. R. Civ. P. 9(b). "When mail and wire fraud are asserted as the predicate acts in a civil RICO claim, each must be pled with particularity, pursuant to Rule 9(b)." *Proctor v. Metropolitan Money Store Corp.*, 645 F. Supp. 2d 464, 473 (D. Md. 2009). "Both mail and wire fraud have similar core elements that must be proven: (1) defendant's knowing participation in a scheme to defraud; and (2) the mails or interstate wire facilities were used in the furtherance of the scheme, but they need not be an essential element of the scheme." *Id.*

Following the Court's decision, Plaintiff filed a Motion to Reopen including a proposed "Refiled Complaint for Fraud, RICO, and Estoppel Tactics." ECF No. 11; ECF No. 11-2. In the proposed complaint, she realleges the RICO claim and adds fraud and promissory estoppel claims. ECF No. 11-2 at 3, 5–6. She also adds as an additional defendant, the State's Attorney's Office for Howard County, Maryland, for failure to

impose criminal charges against the President of Showcase Home Improvements, Inc., Kenneth Ferber. *Id.* ¶ 5.

First, Plaintiff has failed again to properly plead her RICO claim after amending her complaint. Plaintiff only makes the conclusory allegation that "The Circuit Court, State's Attorney Office, court appointed unauthorized Trustee, US Bank Trust National Association, and Showcase's attorneys worked together to facilitate an elaborate fraudulent scheme to steal real property, to "eliminate/deprive" Plaintiff of her Constitutional rights and equal protections under the Fifth and Fourteenth Amendment. . . . in violation of 18 U.S.C. 96, 1962–1968, Title 18 Sections 1341 and 1343 mail and wire fraud . . ." with no further factual context. *Id.* ¶ 11. This amended claim, like the prior claim, does not state a RICO claim upon which relief can be granted.

Second, to the extent that Plaintiff is attempting to sue the State's Attorney's Office for failure to prosecute Showcase, this claim is further barred by prosecutorial immunity. Prosecutors are absolutely immune from damages liability when they act as advocates for the State. *Imbler v. Pachtman*, 424 U.S. 409, 430–32 (1976); *Savage v. Maryland*, 896 F.3d 260, 268 (4th Cir. 2018). A prosecutor's decision not to prosecute a case is intimately tied to the prosecutor's role as advocate for the State and thus, the State's Attorney's Office is absolutely immune from Plaintiff's claims regarding its decision not to prosecute Showcase. *See Savage*, 896 F.3d at 271 (citing *Roe v. City and Cnty. Of San Francisco*, 109 F.3d 578, 583 (1997)).

Finally, the Court lacks jurisdiction over Plaintiff's remaining state law claims of fraud and promissory estoppel. ECF No. 11-2 at 5–6. The federal district court has jurisdiction over a case in one of three ways: federal question (28 U.S.C. § 1331), diversity (28 U.S.C. § 1332), and supplemental (28 U.S.C. § 1367). Given that the Court

has dismissed the RICO claim and there are no remaining claims arising under the Constitution, federal laws, or treatises, the Court does not have federal question jurisdiction. Given that Plaintiff alleges that both she and all Defendants are domiciled in Maryland, the Court lacks diversity jurisdiction. *See* 28 U.S.C. § 1332(a)(1). Finally, pursuant to 28 U.S.C. § 1367(c)(3), given that the Court has dismissed the only claim over which it would have had original jurisdiction (the RICO claim), the Court will decline to exercise supplemental jurisdiction over the state law claims. Accordingly, the motion to reopen will be denied.

ORDER

For the reasons stated above, Ms. Richardson-Henderson's motion to reopen the case (ECF No. 11) is DENIED and her motion to request the process of summons (ECF No. 12) is DENIED AS MOOT.

Date: December 22, 2025

/s/
Adam B. Abelson
United States District Judge

EXHIBIT 2

United States Bankruptcy Court
Middle District of North Carolina

In re:
Lisa Richardson Henderson
Debtor

Case No. 17-11389-bak
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0418-2
Date Rcvd: Apr 29, 2026

User: admin
Form ID: pdf014

Page 1 of 2
Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 01, 2026:

Recip ID	**Recipient Name and Address**
db	Lisa Richardson Henderson, 8753 Hayshed Lane, Columbia, MD 21045-2864

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 01, 2026 Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 29, 2026 at the address(es) listed below:

Name	**Email Address**
Anita Jo Kinlaw Troxler	on behalf of Trustee Anita Jo Kinlaw Troxler office4@chapter13gboro.com, office5@chapter13gboro.com
Anita Jo Kinlaw Troxler,	office@chapter13gboro.com office5@chapter13gboro.com
Clint Shepperd Morse	on behalf of Witness Amica Insurance cmorse@brookspierce.com chill@brookspierce.com;courtmail@brookspierce.com
Jimmy Chang	on behalf of Witness Amica Insurance jchang@brookspierce.com
Jo Farmer	on behalf of Creditor Branch Banking and Trust DefaultBankruptcyManagement@Truist.com
John M. Sperati	on behalf of Creditor Congressional Federal Credit Union jsperati@smithdebnamlaw.com cmeghee@smithdebnamlaw.com
John Paul Hughes Cournoyer	Robert_e_price@ncmba.uscourts.gov jp_cournoyer@ncmba.uscourts.gov
John W. Fletcher, III	on behalf of Creditor U.S. Bank Trust National Association as Trustee of the Bungalow Series IV Trust (HNFT) kahhoy@fletchertydings.com

Ronald J Drescher

on behalf of Creditor Showcase Home Improvements Inc rondrescher@drescherlaw.com

TOTAL: 9

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)

LISA R. RICHARDSON-HENDERSON,
Plaintiff,

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a KENNETH FERBER *et al.*,
Defendant(s).

Civil Action No.: **1:25-cv-00695-ABA**

PLAINTIFF'S AMENDED MOTION FOR RECONSIDERATION AND REBUTTAL OF THE COURT'S DECEMBER 22, 2025 ORDER

Plaintiff Lisa R. Richardson-Henderson ("Plaintiff"), proceeding **pro se**, respectfully moves this Court for reconsideration of its Order dated December 22, 2025, pursuant to **Federal Rule of Civil Procedure 59(e)** and, in the alternative, **Rule 60(b)**. This Amended Motion is submitted to directly address the grounds relied upon by the Court for dismissal, to clarify Plaintiff's civil RICO allegations, and to demonstrate that dismissal—rather than amendment—constituted clear error and manifest injustice.

I. CONTROLLING LEGAL STANDARDS

A motion for reconsideration is appropriate where the Court has committed a clear error of law, overlooked material facts or controlling authority, or where relief is necessary to prevent manifest injustice. **Fed. R. Civ. P. 59(e); Rule 60(b)(1), (3), (6).**

Additionally, it is well settled that:

- **Pro se pleadings must be liberally construed;**
- Dismissal at the pleading stage is disfavored where amendment may cure deficiencies; and
- Civil RICO claims, while subject to Rule 9(b), may not be dismissed where allegations plausibly state the elements of the statute.

II. THE COURT'S DECEMBER 22, 2025 ORDER MISAPPREHENDED PLAINTIFF'S CLAIMS

The Court dismissed Plaintiff's action on the basis that the pleadings allegedly failed to state a federal claim and did not adequately plead a RICO violation. Respectfully, the Order overlooks material allegations already before the Court and applies an unduly rigid pleading standard inconsistent with Fourth Circuit precedent.

III. PLAINTIFF HAS ADEQUATELY PLED A CIVIL RICO CLAIM

Plaintiff's pleadings, exhibits, affidavits, and incorporated filings plausibly allege each element required under **18 U.S.C. §§ 1962(c) and (d).**

A. RICO Enterprise (Association-in-Fact)

Plaintiff alleged an **association-in-fact enterprise** consisting of corporate and individual defendants who:

- Shared a **common purpose** to obtain financial and legal advantage through fraudulent contracting, false court filings, and abuse of judicial process;
- Maintained **ongoing relationships**, including coordinated litigation conduct; and
- Exhibited **longevity sufficient** to pursue the enterprise's objectives over multiple proceedings and time periods.

These allegations satisfy the enterprise element at the pleading stage.

B. Conduct or Participation in the Enterprise

Plaintiff alleged that Defendants **conducted or participated**, directly and indirectly, in the enterprise's affairs by:

- Submitting and relying upon false affidavits of service;
- Using mail and interstate communications to further fraudulent litigation conduct;
- Initiating and enforcing void judgments; and
- Coordinating actions to deprive Plaintiff of property and due process.

Such conduct satisfies the participation requirement under **Reves v. Ernst & Young**.

C. Pattern of Racketeering Activity

Plaintiff alleged multiple **predicate acts**, including:

- **Mail fraud (18 U.S.C. § 1341);**
- **Wire fraud (18 U.S.C. § 1343)**; and
- **Fraud upon the court**, including false sworn statements.

These acts are **related** and demonstrate both **closed-ended continuity** (repeated acts over a defined period) and **open-ended continuity** (a scheme posing a threat of continued criminal conduct).

D. Proximate Injury and Damages

Plaintiff alleged concrete injuries directly caused by Defendants' racketeering acts, including:

- Financial loss;
- Loss of property rights;
- Costs associated with defending void proceedings; and
- Ongoing legal and reputational harm.

At the pleading stage, these allegations sufficiently establish **RICO standing and proximate cause.**

IV. FRAUDULENT SERVICE OF PROCESS RENDERS PRIOR PROCEEDINGS VOID

Plaintiff specifically alleged that service of process was fraudulent and supported by a false affidavit. Fraud upon the court and lack of proper service deprive courts of personal jurisdiction, rendering resulting judgments **void ab initio**. The December 22, 2025 Order does not address these jurisdictional defects, constituting clear error.

V. DENIAL OF LEAVE TO AMEND CONSTITUTES MANIFEST INJUSTICE

Even assuming arguendo that additional specificity were required, dismissal without leave to amend violates **Fed. R. Civ. P. 15(a)** and Fourth Circuit precedent—particularly in complex statutory cases such as RICO and where the plaintiff proceeds pro se.

VI. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. Grant this Amended Motion for Reconsideration;
2. Vacate the December 22, 2025 Order;
3. Permit Plaintiff to file an Amended Complaint within a time certain; **or**, in the alternative,
4. Issue findings sufficient to permit meaningful appellate review.

VII. CONCLUSION

This Court's December 22, 2025 dismissal resulted from a misapprehension of Plaintiff's pleadings and an overly restrictive application of RICO pleading standards. Reconsideration is warranted to prevent manifest injustice and to ensure that alleged fraud and abuse of process are adjudicated on the merits.

Respectfully submitted,

By:

Lisa R. Richardson-Henderson
Plaintiff, Pro Se
8753 Hayshed Lane
Columbia, MD 21045
Telephone: (443) 820-6573
Email: LHenders@gmail.com

Date: January 19, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2026, a true and correct copy of the foregoing **Amended Motion for Reconsideration and Rebuttal** was served via the Court's CM/ECF system and/or by U.S. Mail upon all parties of record.

By:

Lisa R. Richardson-Henderson

Gmail

Lisa Henderson <lhenders@gmail.com>

EDSS Submission: HENDERSON, LISA

1 message

District of Maryland via District of Maryland <DO_NOT_REPLY@mdd.uscourts.gov> Mon, Jan 19, 2026 at 3:29 PM

Reply-To: District of Maryland <DO_NOT_REPLY@mdd.uscourts.gov>
To: LHENDERS@gmail.com

EDSS SUBMISSION - The U.S. District Court for the District of Maryland

Submitted on Monday, January 19, 2026 - 15:29
Submitted values are:

Filer's First Name: LISA
Filer's Last Name: HENDERSON
Filer's Phone Number: 4438206573
Filer's Email Address: LHENDERS@GMAIL.COM
Filer's Email Address Confirm: LHENDERS@GMAIL.COM
Case Number (example: 22-CV-12345): 25-CV-00695
Document 1 Description: Plaintiffs Amended Motion for Reconsideration ...
==More Documents==
Document 2 Description:
Document 3 Description:
Document 4 Description:
Document 5 Description:

By entering my name in the box below, I affirm that I have read, understood, and agree with the statements above.: LISA RICHARDSON HENDERSON

Documents are only deemed filed once the filer receives a Notice of Electronic Filing (NEF) that reflects the document has been assigned a docket number. Do not assume that your documents have been received as filed. It is the responsibility of the filer to contact the Clerk's Office if you do receive a Notice of Electronic Filing within 48 hours.

Gmail

Lisa Henderson <lhenders@gmail.com>

EDSS Submission: Richardson Henderson, Lisa

1 message

District of Maryland via District of Maryland <DO_NOT_REPLY@mdd.uscourts.gov> Mon, Jan 19, 2026 at 3:22 PM

Reply-To: District of Maryland <DO_NOT_REPLY@mdd.uscourts.gov>
To: LHENDERS@gmail.com

EDSS SUBMISSION - The U.S. District Court for the District of Maryland

Submitted on Monday, January 19, 2026 - 15:22
Submitted values are:

Filer's First Name: Lisa
Filer's Last Name: Richardson Henderson
Filer's Phone Number: 4438206573
Filer's Email Address: LHENDERS@GMAIL.COM
Filer's Email Address Confirm: LHENDERS@GMAIL.COM
Case Number (example: 22-CV-12345): 25-CV-00695
Document 1 Description: NOTICE OF APPEAL
==More Documents==
Document 2 Description:
Document 3 Description:
Document 4 Description:
Document 5 Description:

By entering my name in the box below, I affirm that I have read, understood, and agree with the statements above.: LISA RICHARDSON HENDERSON

Documents are only deemed filed once the filer receives a Notice of Electronic Filing (NEF) that reflects the document has been assigned a docket number. Do not assume that your documents have been received as filed. It is the responsibility of the filer to contact the Clerk's Office if you do receive a Notice of Electronic Filing within 48 hours.

EXHIBIT 3

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

LISA R. RICHARDSON-HENDERSON,
Plaintiff–Appellant,

[DEFENDANT(S)],
Defendant(s)–Appellee.

Appeal No.: **26-1077**
Originating Case: U.S. District Court for the District of Maryland (Greenbelt Division)
Case No.: 1:25-cv-00695 / Richardson Henderson v Showcase Home Improvements, Inc. *et al.*

APPELLANT'S MOTION FOR CLARIFICATION, TO HOLD APPEAL IN ABEYANCE, AND FOR REMAND OR LIMITED ADMINISTRATIVE RELIEF DUE TO FAILURE TO DOCKET PENDING MOTION FOR RECONSIDERATION

Appellant Lisa R. Richardson-Henderson ("Appellant"), proceeding **pro se**, respectfully moves this Court for relief due to a material procedural irregularity in the proceedings below. Specifically, the U.S. District Court for the District of Maryland transmitted this appeal while Appellant's **Amended Motion for Reconsideration and Rebuttal of the Court's December 22, 2025 Order** remained pending and was not docketed or considered.

This Motion is submitted to preserve jurisdictional clarity, protect Appellant's appellate rights, and ensure the integrity of the record transmitted to this Court.

I. RELEVANT BACKGROUND

1. On **December 22, 2025**, the U.S. District Court for the District of Maryland entered an Order dismissing Appellant's action.
2. Appellant timely prepared and submitted an **Amended Motion for Reconsideration and Rebuttal**, addressing the grounds relied upon by the District Court and clarifying federal and RICO-based claims.
3. Before the District Court docketed or ruled upon that motion, Appellant filed a **Notice of Appeal** solely to preserve appellate deadlines.

4. The appeal was transmitted to this Court while the post-judgment motion remained pending and without docketing or consideration of that filing.
5. As a result, the record before this Court is incomplete and does not reflect all filings material to jurisdiction and appellate review.

II. JURISDICTIONAL AND PROCEDURAL CONCERNS

Under **Federal Rule of Appellate Procedure 4(a)(4),** a timely post-judgment motion under **Fed. R. Civ. P. 59(e)** tolls the time for appeal and suspends appellate jurisdiction until the district court disposes of the motion. Transmission of the appeal under these circumstances creates uncertainty as to jurisdiction and deprives Appellant of full consideration of her post-judgment motion.

This Motion does not seek merits review by this Court at this time, but rather requests administrative or procedural relief to ensure that the District Court first addresses the pending motion and that the appellate record is complete.

III. REQUESTED RELIEF

Appellant respectfully requests that this Court:

1. **Hold this appeal in abeyance** pending resolution of Appellant's Amended Motion for Reconsideration in the District Court; **or**, in the alternative,
2. **Issue a limited remand or administrative directive** to permit the District Court to docket and rule upon the pending motion; **or**, in the further alternative,
3. **Direct clarification of jurisdiction** and supplementation of the record to reflect all filings submitted by Appellant prior to transmission of the appeal.

This request is made to protect the orderly administration of justice and does not waive any appellate arguments.

IV. CONCLUSION

Because the appeal was transmitted while a material post-judgment motion remained pending and undocketed, Appellant respectfully requests that this Court grant appropriate procedural relief to ensure a complete record and proper jurisdictional posture.

Respectfully submitted,

Lisa R. Richardson-Henderson
Plaintiff–Appellant, Pro Se
8753 Hayshed Lane
Columbia, MD 21045
Telephone: (443) 820-6573
Email: LHENDERS@GMAIL.COM

Date: January 22, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January, 2026, a true and correct copy of the foregoing Motion was served upon all parties of record via the Fourth Circuit's CM/ECF system and/or by U.S. Mail.

By:

Lisa R. Richardson-Henderson

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)

LISA R. RICHARDSON-HENDERSON,
Plaintiff,

SHOWCASE HOME IMPROVEMENTS, INC.,
d/b/a KENNETH FERBER *et al.*,
Defendant(s).

Civil Action No.: **1:25-cv-00695-ABA**

PLAINTIFF'S AMENDED MOTION FOR RECONSIDERATION AND REBUTTAL OF THE COURT'S DECEMBER 22, 2025 ORDER

Plaintiff Lisa R. Richardson-Henderson ("Plaintiff"), proceeding **pro se**, respectfully moves this Court for reconsideration of its Order dated December 22, 2025, pursuant to **Federal Rule of Civil Procedure 59(e)** and, in the alternative, **Rule 60(b)**. This Amended Motion is submitted to directly address the grounds relied upon by the Court for dismissal, to clarify Plaintiff's civil RICO allegations, and to demonstrate that dismissal—rather than amendment—constituted clear error and manifest injustice.

I. CONTROLLING LEGAL STANDARDS

A motion for reconsideration is appropriate where the Court has committed a clear error of law, overlooked material facts or controlling authority, or where relief is necessary to prevent manifest injustice. **Fed. R. Civ. P. 59(e); Rule 60(b)(1), (3), (6).**

Additionally, it is well settled that:

- **Pro se pleadings must be liberally construed;**
- Dismissal at the pleading stage is disfavored where amendment may cure deficiencies; and
- Civil RICO claims, while subject to Rule 9(b), may not be dismissed where allegations plausibly state the elements of the statute.

II. THE COURT'S DECEMBER 22, 2025 ORDER MISAPPREHENDED PLAINTIFF'S CLAIMS

The Court dismissed Plaintiff's action on the basis that the pleadings allegedly failed to state a federal claim and did not adequately plead a RICO violation. Respectfully, the Order overlooks material allegations already before the Court and applies an unduly rigid pleading standard inconsistent with Fourth Circuit precedent.

III. PLAINTIFF HAS ADEQUATELY PLED A CIVIL RICO CLAIM

Plaintiff's pleadings, exhibits, affidavits, and incorporated filings plausibly allege each element required under **18 U.S.C. §§ 1962(c) and (d)**.

A. RICO Enterprise (Association-in-Fact)

Plaintiff alleged an **association-in-fact enterprise** consisting of corporate and individual defendants who:

- Shared a **common purpose** to obtain financial and legal advantage through fraudulent contracting, false court filings, and abuse of judicial process;
- Maintained **ongoing relationships**, including coordinated litigation conduct; and
- Exhibited **longevity sufficient** to pursue the enterprise's objectives over multiple proceedings and time periods.

These allegations satisfy the enterprise element at the pleading stage.

B. Conduct or Participation in the Enterprise

Plaintiff alleged that Defendants **conducted or participated**, directly and indirectly, in the enterprise's affairs by:

- Submitting and relying upon false affidavits of service;
- Using mail and interstate communications to further fraudulent litigation conduct;
- Initiating and enforcing void judgments; and
- Coordinating actions to deprive Plaintiff of property and due process.

Such conduct satisfies the participation requirement under **Reves v. Ernst & Young**.

C. Pattern of Racketeering Activity

Plaintiff alleged multiple **predicate acts**, including:

- **Mail fraud (18 U.S.C. § 1341)**;
- **Wire fraud (18 U.S.C. § 1343)**; and
- **Fraud upon the court**, including false sworn statements.

These acts are **related** and demonstrate both **closed-ended continuity** (repeated acts over a defined period) and **open-ended continuity** (a scheme posing a threat of continued criminal conduct).

D. Proximate Injury and Damages

Plaintiff alleged concrete injuries directly caused by Defendants' racketeering acts, including:

- Financial loss;
- Loss of property rights;
- Costs associated with defending void proceedings; and
- Ongoing legal and reputational harm.

At the pleading stage, these allegations sufficiently establish **RICO standing and proximate cause.**

IV. FRAUDULENT SERVICE OF PROCESS RENDERS PRIOR PROCEEDINGS VOID

Plaintiff specifically alleged that service of process was fraudulent and supported by a false affidavit. Fraud upon the court and lack of proper service deprive courts of personal jurisdiction, rendering resulting judgments **void ab initio**. The December 22, 2025 Order does not address these jurisdictional defects, constituting clear error.

V. DENIAL OF LEAVE TO AMEND CONSTITUTES MANIFEST INJUSTICE

Even assuming arguendo that additional specificity were required, dismissal without leave to amend violates **Fed. R. Civ. P. 15(a)** and Fourth Circuit precedent—particularly in complex statutory cases such as RICO and where the plaintiff proceeds pro se.

VI. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. Grant this Amended Motion for Reconsideration;
2. Vacate the December 22, 2025 Order;
3. Permit Plaintiff to file an Amended Complaint within a time certain; **or**, in the alternative,
4. Issue findings sufficient to permit meaningful appellate review.

VII. CONCLUSION

This Court's December 22, 2025 dismissal resulted from a misapprehension of Plaintiff's pleadings and an overly restrictive application of RICO pleading standards. Reconsideration is warranted to prevent manifest injustice and to ensure that alleged fraud and abuse of process are adjudicated on the merits.

Respectfully submitted,

By: [signature]

Lisa R. Richardson-Henderson
Plaintiff, Pro Se
8753 Hayshed Lane
Columbia, MD 21045
Telephone: (443) 820-6573
Email: LHenders@gmail.com

Date: January 19, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2026, a true and correct copy of the foregoing **Amended Motion for Reconsideration and Rebuttal** was served via the Court's CM/ECF system and/or by U.S. Mail upon all parties of record.

By: [signature]
Lisa R. Richardson-Henderson

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LISA RICHARDSON-HENDERSON, *Plaintiff,* v. SHOWCASE HOME IMPROVEMENTS, INC., *d/b/a* KENNETH FERBER *et al.*, *Defendants*	Civil Action No. 1:25-cv-00695-ABA

MEMORANDUM OPINION AND ORDER

On April 24, 2025, the Court dismissed Plaintiff's complaint for failure to state a claim upon which relief can be granted. ECF No. 10; *see* 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b); *see also Lomax v. Ortiz-Marquez*, 590 U.S. ___, 140 S. Ct. 1721 (2020). In that opinion, the Court explained that to comply with the Federal Rules of Civil Procedure, a complaint must contain at a minimum a short and plain statement of the claim that shows the plaintiff is entitled to relief and a request for relief. *See* Fed. R. Civ. P. 8(a). Additionally, under Rule 8(a), a pleading must "give the defendant fair notice of what the plaintiff's claim is and the grounds upon which it rests." *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506, 512 (2002) (quoting *Conley v. Gibson*, 355 U.S. 41, 47 (1957)). Under Rule 8(d)(1), each allegation in a complaint should be "simple, concise, and direct." A pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action does not satisfy Rule 8's basic pleading requirements. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)).

In the amended complaint, Plaintiff alleged a RICO claim under 18 U.S.C. § 1962(c) against Defendants. ECF No. 7 at 3. Specifically, Plaintiff alleged that she owned real property at 8753 Hayshed Lane, Columbia, Maryland 21045, that Defendant U.S. Bank Trust National Association served as a trustee during a bankruptcy proceeding from October 2017 to March 2023 "but failed to record a Deed of Trust as required," and Defendant Showcase Home Improvements, Inc. "submitted a fraudulent claim seeking ownership interest or compensation in connection to the property." *Id.* at 2-3.

In its prior opinion, the Court explained that RICO claims are subjected to a heightened pleading standard and held that Plaintiff's amended complaint had not met that standard. Specifically, "[i]n alleging fraud or mistake, a party must state with particularity the circumstances constituting fraud or mistake. Malice, intent, knowledge, and other conditions of a person's mind may be alleged generally." Fed. R. Civ. P. 9(b). "When mail and wire fraud are asserted as the predicate acts in a civil RICO claim, each must be pled with particularity, pursuant to Rule 9(b)." *Proctor v. Metropolitan Money Store Corp.*, 645 F. Supp. 2d 464, 473 (D. Md. 2009). "Both mail and wire fraud have similar core elements that must be proven: (1) defendant's knowing participation in a scheme to defraud; and (2) the mails or interstate wire facilities were used in the furtherance of the scheme, but they need not be an essential element of the scheme." *Id.*

Following the Court's decision, Plaintiff filed a Motion to Reopen including a proposed "Refiled Complaint for Fraud, RICO, and Estoppel Tactics." ECF No. 11; ECF No. 11-2. In the proposed complaint, she realleges the RICO claim and adds fraud and promissory estoppel claims. ECF No. 11-2 at 3, 5–6. She also adds as an additional defendant, the State's Attorney's Office for Howard County, Maryland, for failure to

impose criminal charges against the President of Showcase Home Improvements, Inc., Kenneth Ferber. *Id.* ¶ 5.

First, Plaintiff has failed again to properly plead her RICO claim after amending her complaint. Plaintiff only makes the conclusory allegation that "The Circuit Court, State's Attorney Office, court appointed unauthorized Trustee, US Bank Trust National Association, and Showcase's attorneys worked together to facilitate an elaborate fraudulent scheme to steal real property, to "eliminate/deprive" Plaintiff of her Constitutional rights and equal protections under the Fifth and Fourteenth Amendment. . . . in violation of 18 U.S.C. 96, 1962–1968, Title 18 Sections 1341 and 1343 mail and wire fraud . . ." with no further factual context. *Id.* ¶ 11. This amended claim, like the prior claim, does not state a RICO claim upon which relief can be granted.

Second, to the extent that Plaintiff is attempting to sue the State's Attorney's Office for failure to prosecute Showcase, this claim is further barred by prosecutorial immunity. Prosecutors are absolutely immune from damages liability when they act as advocates for the State. *Imbler v. Pachtman*, 424 U.S. 409, 430–32 (1976); *Savage v. Maryland*, 896 F.3d 260, 268 (4th Cir. 2018). A prosecutor's decision not to prosecute a case is intimately tied to the prosecutor's role as advocate for the State and thus, the State's Attorney's Office is absolutely immune from Plaintiff's claims regarding its decision not to prosecute Showcase. *See Savage*, 896 F.3d at 271 (citing *Roe v. City and Cnty. Of San Francisco*, 109 F.3d 578, 583 (1997)).

Finally, the Court lacks jurisdiction over Plaintiff's remaining state law claims of fraud and promissory estoppel. ECF No. 11-2 at 5–6. The federal district court has jurisdiction over a case in one of three ways: federal question (28 U.S.C. § 1331), diversity (28 U.S.C. § 1332), and supplemental (28 U.S.C. § 1367). Given that the Court

has dismissed the RICO claim and there are no remaining claims arising under the Constitution, federal laws, or treatises, the Court does not have federal question jurisdiction. Given that Plaintiff alleges that both she and all Defendants are domiciled in Maryland, the Court lacks diversity jurisdiction. *See* 28 U.S.C. § 1332(a)(1). Finally, pursuant to 28 U.S.C. § 1367(c)(3), given that the Court has dismissed the only claim over which it would have had original jurisdiction (the RICO claim), the Court will decline to exercise supplemental jurisdiction over the state law claims. Accordingly, the motion to reopen will be denied.

ORDER

For the reasons stated above, Ms. Richardson-Henderson's motion to reopen the case (ECF No. 11) is DENIED and her motion to request the process of summons (ECF No. 12) is DENIED AS MOOT.

Date: December 22, 2025

/s/
Adam B. Abelson
United States District Judge

EXHIBIT 2

Gmail **Lisa Henderson <lhenders@gmail.com>**

EDSS Submission: HENDERSON, LISA

1 message

District of Maryland via District of Maryland <DO_NOT_REPLY@mdd.uscourts.gov> Mon, Jan 19, 2026 at 3:29 PM

Reply-To: District of Maryland <DO_NOT_REPLY@mdd.uscourts.gov>
To: LHENDERS@gmail.com

EDSS SUBMISSION - The U.S. District Court for the District of Maryland

Submitted on Monday, January 19, 2026 - 15:29
Submitted values are:

Filer's First Name: LISA
Filer's Last Name: HENDERSON
Filer's Phone Number: 4438206573
Filer's Email Address: LHENDERS@GMAIL.COM
Filer's Email Address Confirm: LHENDERS@GMAIL.COM
Case Number (example: 22-CV-12345): 25-CV-00695
Document 1 Description: Plaintiffs Amended Motion for Reconsideration ...
==More Documents==
Document 2 Description:
Document 3 Description:
Document 4 Description:
Document 5 Description:

By entering my name in the box below, I affirm that I have read, understood, and agree with the statements above.: LISA RICHARDSON HENDERSON

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EXHIBIT 3

APPEAL,CLOSED,NP,PROSE-NEF

U.S. District Court
District of Maryland (Baltimore)
CIVIL DOCKET FOR CASE #: 1:25-cv-00695-ABA

Richardson-Henderson v. Showcase Home Improvements, Inc.
Assigned to: Judge Adam B Abelson
Demand: $1,500,000
Case in other court: USCA, 26-01077
Cause: 28:1345 Foreclosure

Date Filed: 03/03/2025
Date Terminated: 12/22/2025
Jury Demand: None
Nature of Suit: 220 Real Property: Foreclosure
Jurisdiction: Federal Question

Plaintiff

Lisa: Richardson-Henderson

represented by **Lisa: Richardson-Henderson**
8753 Hayshed Lane
Columbia, MD 21045
Email: LHENDERS@gmail.com
PRO SE

V.

Defendant

Showcase Home Improvements, Inc.
doing business as
Kenneth Ferber

Defendant

U.S. Bank Trust National Association
as Trustee for Pad Series IV Trust

Date Filed	#	Docket Text
03/03/2025	1	EMERGENCY MOTION for Temporary Restraining Order and Preliminary Injunction by Lisa: Richardson-Henderson (Attachments: # 1 Civil Cover Sheet, # 2 Exhibit 1, # 3 Exhibit 1a, # 4 Exhibit 1b, # 5 Exhibit 2, # 6 Exhibit 3, # 7 Exhibit 4, # 8 Summons) (ols, Deputy Clerk) (Entered: 03/03/2025)
03/03/2025		Filing fee: $ 405.00, receipt number 2696 (ols, Deputy Clerk) (Entered: 03/03/2025)
03/03/2025	2	New Case Notification Letter sent to Lisa: Richardson-Henderson. (c/m p 3/3/25 ols, Deputy Clerk) (Entered: 03/03/2025)
03/04/2025	3	ORDER TO SHOW CAUSE. Signed by Judge Adam B Abelson on 3/4/2025. (c/m p 3/4/25 ols, Deputy Clerk) (Entered: 03/04/2025)
03/06/2025	4	Errata to 1 MOTION for Temporary Restraining Order MOTION for Preliminary Injunction filed by Lisa: Richardson-Henderson (Attachments: # 1 Cover Letter, # 2 Envelope) (ols, Deputy Clerk) (Entered: 03/07/2025)
03/11/2025		Documents submitted via EDSS. Lisa: Richardson-Henderson consents to receive notice and service electronically. The Court recommends that all documents received electronically be printed or saved for future reference. (ols, Deputy Clerk) (Entered: 03/11/2025)
03/11/2025	5	COMPLAINT against Showcase Home Improvements, Inc., filed by Lisa: Richardson-Henderson. (Attachments: # 1 Text of Proposed Order) (ols, Deputy Clerk) (Entered: 03/11/2025)

		(Entered: 03/11/2025)
03/12/2025	7	AMENDED COMPLAINT against Showcase Home Improvements, Inc., U.S. Bank Trust National Association, filed by Lisa: Richardson-Henderson. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2) (ols, Deputy Clerk) (Entered: 03/13/2025)
03/19/2025	8	URGENT MOTION to Vacate Circuit Court's Order, Stay Further Transactions, and Request for Investigation into Suspected Fraud and Misconduct by Lisa: Richardson-Henderson (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3) (ols, Deputy Clerk) (Entered: 03/20/2025)
03/21/2025	9	Correspondence to Judge Abelson from Lisa: Richardson-Henderson (ols, Deputy Clerk) (Entered: 03/21/2025)
04/24/2025	10	MEMORANDUM AND ORDER denying Plaintiff's 8 Motion to Vacate; denying Plaintiff's 1 Motion for TRO and Preliminary Injunction; dismissing complaint; closing case. Signed by Judge Adam B Abelson on 4/24/2025. (dass, Deputy Clerk) (c/nef to Plaintiff 4/24/25) (Entered: 04/24/2025)
05/23/2025	11	MOTION to Reopen Case by Lisa: Richardson-Henderson. (Attachments: # 1 Copy of Memorandum and Order, # 2 Proposed Refiled Complaint, # 3 Proposed Show Cause Order) (dass, Deputy Clerk) (Entered: 05/27/2025)
06/04/2025	12	MOTION to Request the Process of Summons in a Civil Action by Lisa: Richardson-Henderson. (Attachments: # 1 Proposed Summons) (dass, Deputy Clerk) (Entered: 06/04/2025)
12/22/2025	13	MEMORANDUM OPINION AND ORDER Denying 11 Motion to Reopen Case; Denying as Moot 12 Motion to Request the Process of Summons. Signed by Judge Adam B Abelson on 12/22/2025. (c/m 12/22/2025 bas, Deputy Clerk) (Entered: 12/22/2025)
01/19/2026	14	NOTICE OF APPEAL (Fee not paid) by Lisa: Richardson-Henderson. (av4s, Deputy Clerk) (Entered: 01/20/2026)
01/20/2026	15	Transmission of Notice of Appeal and Docket Sheet to US Court of Appeals re 14 Notice of Appeal. IMPORTANT NOTICE: To access forms which you are required to file with the United States Court of Appeals for the Fourth Circuit please go to http://www.ca4.uscourts.gov and click on Forms & Notices. (av4s, Deputy Clerk) (Entered: 01/20/2026)
01/21/2026	16	USCA Case Number 26-1077 for 14 Notice of Appeal filed by Lisa: Richardson-Henderson. Case Manager - J. Neal (jh6s, Deputy Clerk) (Entered: 01/22/2026)
01/22/2026		Assembled Electronic Record Transmitted to Fourth Circuit -- Initial(jh6s, Deputy Clerk) (Entered: 01/22/2026)

EXHIBIT 4

UNPUBLISHED

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077

LISA RICHARDSON HENDERSON,

Plaintiff - Appellant,

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust,

Defendants - Appellees.

Appeal from the United States District Court for the District of Maryland, at Baltimore. Adam B. Abelson, District Judge. (1:25-cv-00695-ABA)

Submitted: June 25, 2026 Decided: June 30, 2026

Before BENJAMIN and BERNER, Circuit Judges, and TRAXLER, Senior Circuit Judge.

Affirmed by unpublished per curiam opinion.

Lisa Richardson Henderson, Appellant Pro Se.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

Lisa Richardson Henderson appeals the district court's order denying her motion to reopen, in which she sought to file a second amended complaint following the district court's dismissal of her amended complaint pursuant to 28 U.S.C. § 1915(e)(2)(B).[1] Because Richardson Henderson filed the motion to reopen more than 28 days after entry of the dismissal order, it is properly considered a Fed. R. Civ. P. 60(b) motion.[2] *See In re Burnley*, 988 F.2d 1, 2-3 (4th Cir. 1992). When "a plaintiff seeks to reopen a case under Rule 60(b) in order to file an amended complaint, she must satisfy one of the Rule 60(b) grounds before a court may consider her motion to amend." *Daulatzai*, 97 F.4th at 178 (emphasis omitted). Upon review, we conclude that the district court did not abuse its discretion by denying this motion. *See Aikens v. Ingram*, 652 F.3d 496, 501 (4th Cir. 2011) (en banc) (stating standard of review). Accordingly, we affirm the district court's order. *Richardson-Henderson v. Showcase Home Improvements, Inc.*, No. 1:25-cv-00695-ABA (D. Md. Dec. 22, 2025). We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

AFFIRMED

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[1] Richardson Henderson has also filed a motion for clarification, abeyance, and a limited remand, relating to the district court's refusal to docket a motion to reconsider the denial of her motion to reopen. We deny this motion.

[2] For this reason, the district court's order dismissing the amended complaint is not before us in this appeal. *See Daulatzai v. Maryland*, 97 F.4th 166, 178 (4th Cir. 2024); Fed. R. App. P. 4(a)(4).

EXHIBIT 5

FILED: June 30, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077
(1:25-cv-00695-ABA)

LISA RICHARDSON HENDERSON

Plaintiff - Appellant

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust

Defendants - Appellees

J U D G M E N T

In accordance with the decision of this court, the judgment of the district court is affirmed.

This judgment shall take effect upon issuance of this court's mandate in accordance with Fed. R. App. P. 41.

/s/ NWAMAKA ANOWI, CLERK

FILED: June 30, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077, Lisa Richardson-Henderson v. Showcase Home Improvements, Inc.
1:25-cv-00695-ABA

NOTICE OF JUDGMENT

Judgment was entered on this date in accordance with Fed. R. App. P. 36. Please be advised of the following time periods:

PETITION FOR WRIT OF CERTIORARI: The time to file a petition for writ of certiorari runs from the date of entry of the judgment sought to be reviewed, and not from the date of issuance of the mandate. If a petition for rehearing is timely filed in the court of appeals, the time to file the petition for writ of certiorari for all parties runs from the date of the denial of the petition for rehearing or, if the petition for rehearing is granted, the subsequent entry of judgment. See Rule 13 of the Rules of the Supreme Court of the United States; www.supremecourt.gov.

VOUCHERS FOR PAYMENT OF APPOINTED OR ASSIGNED COUNSEL: Vouchers must be submitted within 60 days of entry of judgment or denial of rehearing, whichever is later. If counsel files a petition for certiorari, the 60-day period runs from filing the certiorari petition. (Loc. R. 46(d)). If payment is being made from CJA funds, counsel should submit the CJA 20 or CJA 30 Voucher through the CJA eVoucher system. In cases not covered by the Criminal Justice Act, counsel should submit the Assigned Counsel Voucher to the clerk's office for payment from the Attorney Admission Fund. An Assigned Counsel Voucher will be sent to counsel shortly after entry of judgment. Forms and instructions are also available on the court's website, www.ca4.uscourts.gov, or from the clerk's office.

BILL OF COSTS: A party to whom costs are allowable, who desires taxation of costs, shall file a Bill of Costs within 14 calendar days of entry of judgment. (FRAP 39, Loc. R. 39(b)).

PETITION FOR REHEARING AND PETITION FOR REHEARING EN BANC: A petition for rehearing must be filed within 14 calendar days after entry of judgment, except that in civil cases in which the United States or its officer or agency is a party, the petition must be filed within 45 days after entry of judgment. A petition for rehearing en banc must be filed within the same time limits and in the same document as the petition for rehearing and must be clearly identified in the title. The only grounds for an extension of time to file a petition for rehearing are the death or serious illness of counsel or a family member (or of a party or family member in pro se cases) or an extraordinary circumstance wholly beyond the control of counsel or a party proceeding without counsel.

Each case number to which the petition applies must be listed on the petition and included in the docket entry to identify the cases to which the petition applies. A timely filed petition for rehearing or petition for rehearing en banc stays the mandate and tolls the running of time for filing a petition for writ of certiorari. In consolidated criminal appeals, the filing of a petition for rehearing does not stay the mandate as to co-defendants not joining in the petition for rehearing. In consolidated civil appeals arising from the same civil action, the court's mandate will issue at the same time in all appeals.

A petition for rehearing must contain an introduction stating that, in counsel's judgment, one or more of the following situations exist: (1) a material factual or legal matter was overlooked; (2) a change in the law occurred after submission of the case and was overlooked; (3) the opinion conflicts with a decision of the U.S. Supreme Court, this court, or another court of appeals, and the conflict was not addressed; or (4) the case involves one or more questions of exceptional importance. A petition for rehearing, with or without a petition for rehearing en banc, may not exceed 3900 words if prepared by computer and may not exceed 15 pages if handwritten or prepared on a typewriter. Copies are not required unless requested by the court. (FRAP 40, Loc. R. 40(c)).

MANDATE: In original proceedings before this court, there is no mandate. Unless the court shortens or extends the time, in all other cases, the mandate issues 7 days after the expiration of the time for filing a petition for rehearing. A timely petition for rehearing, petition for rehearing en banc, or motion to stay the mandate will stay issuance of the mandate. If the petition or motion is denied, the mandate will issue 7 days later. A motion to stay the mandate will ordinarily be denied, unless the motion presents a substantial question or otherwise sets forth good or probable cause for a stay. (FRAP 41, Loc. R. 41).

U.S. COURT OF APPEAL FOR THE FOURTH CIRCUIT BILL OF COSTS FORM
(Civil Cases)

Directions: Under FRAP 39(a), the costs of appeal in a civil action are generally taxed against appellant if a judgment is affirmed or the appeal is dismissed. Costs are generally taxed against appellee if a judgment is reversed. If a judgment is affirmed in part, reversed in part, modified, or vacated, costs are taxed as the court orders. A party who wants costs taxed must, within 14 days after entry of judgment, file an itemized and verified bill of costs, as follows:

• Itemize any fee paid for docketing the appeal. The fee for docketing a case in the court of appeals is $600 (effective 12/1/2023). The $5 fee for filing a notice of appeal is recoverable as a cost in the district court.

• Itemize the costs (not to exceed $.15 per page) for copying the necessary number of formal briefs and appendices. (The court typically orders 4 copies when tentatively calendared; 0 copies for service unless brief/appendix is sealed.). The court bases the cost award on the page count of the electronic brief/appendix. Costs for briefs filed under an informal briefing order are not recoverable.

• Cite the statutory authority for an award of costs if costs are sought for or against the United States. See 28 U.S.C. § 2412 (limiting costs to civil actions); 28 U.S.C. § 1915(f)(1) (prohibiting award of costs against the United States in cases proceeding without prepayment of fees).

Any objections to the bill of costs must be filed within 14 days of service of the bill of costs. Costs are paid directly to the prevailing party or counsel, not to the clerk's office.

Case Number & Caption: ______________________________

Prevailing Party Requesting Taxation of Costs: ______________________________

Appellate Docketing Fee (prevailing appellants):			**Amount Requested:** ______			**Amount Allowed:** _____	
Document	**No. of Pages**		**No. of Copies**		**Page Cost (≤$.15)**	**Total Cost**	
	Requested	**Allowed** (court use only)	**Requested**	**Allowed** (court use only)		**Requested**	**Allowed** (court use only)
TOTAL BILL OF COSTS:						$0.00	$0.00

1. If copying was done commercially, I have attached itemized bills. If copying was done in-house, I certify that my standard billing amount is not less than $.15 per copy or, if less, I have reduced the amount charged to the lesser rate.
2. If costs are sought for or against the United States, I further certify that 28 U.S.C. § 2412 permits an award of costs.
3. I declare under penalty of perjury that these costs are true and correct and were necessarily incurred in this action.

Signature: ______________________________ **Date:** ______________________

Certificate of Service

I certify that on this date I served this document as follows:

Signature: ______________________________ **Date:** ______________________

FILED: July 28, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077
(1:25-cv-00695-ABA)

LISA RICHARDSON HENDERSON

Plaintiff - Appellant

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust

Defendants - Appellees

O R D E R

The court denies the petition for rehearing and rehearing en banc. No judge requested a poll under Fed. R. App. P. 40 on the petition for rehearing en banc.

Entered at the direction of the panel: Judge Benjamin, Judge Berner, and Senior Judge Traxler.

For the Court

/s/ Nwamaka Anowi, Clerk

EXHIBIT 6

FILED: August 5, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077
(1:25-cv-00695-ABA)

LISA RICHARDSON HENDERSON

Plaintiff - Appellant

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust

Defendants - Appellees

M A N D A T E

The judgment of this court, entered 06/30/2026, takes effect today.

This constitutes the formal mandate of this court issued pursuant to Rule 41(a) of the Federal Rules of Appellate Procedure.

<u>/s/Nwamaka Anowi, Clerk</u>

EXHIBIT 7

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
at Baltimore

In re: **Lisa Richardson-Henderson**, **Debtor.**	**Case Number: 25-13977** **Chapter 13**

CHAPTER 13 PLAN

☐ Original Plan ☒ Amended Plan ☐ Modified Plan

1. GENERAL PLAN PROVISIONS.

The debtor proposes the following Chapter 13 plan and makes the following declarations (mark one of the following boxes that apply for each of 1.1, 1.2, and 1.3. below). ***If a box is marked as "does not ..." or if more than one box is marked in each section, the provision will be ineffective if set out later in the plan.***

1.1 Declaration as to Nonstandard Provisions.
This plan: ☒ does not contain nonstandard provisions.
OR ☐ contains nonstandard provisions set out in Section 9 below.

1.2 Declaration as to Limiting Secured Claims.
This plan: ☒ does not limit the amount of a secured claim.
OR ☐ limits the amount of a secured claim based on the value of the collateral securing the claim as set out in Sections 5.1 through 5.4 below.

1.3 Declaration as to Avoiding Security Interests.
This plan: ☒ does not avoid a security interest or lien.
OR ☐ avoids a security interest or lien as set out in Section 5.1 through 5.4 below.

2. NOTICES.

You should read this plan carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

2.1. Notices to Creditors.
Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. ***The declarations set out in Section 1 above may be of particular importance.*** If you oppose the plan's treatment of your claim or any provision of this plan, you or your attorney

must file an objection to confirmation at least 7 days before the date set for the hearing on confirmation, unless otherwise ordered by the Bankruptcy Court. The Court may confirm this plan without further notice if no objection to confirmation is filed. *See* Federal Bankruptcy Rule 3015. In addition, you may need to file a timely proof of claim in order to be paid under the plan.

2.2. Notices to Debtor.

This form lists options that may be appropriate in some cases, but not all cases. Just because an option is listed on the form does not mean that it is appropriate for you. Plans contrary to the Court's Local Bankruptcy Rules and rulings may not be confirmed.

3. PLAN TERMS.

The debtor's future earnings are submitted to the supervision and control of the trustee, and the debtor will pay such future earnings as set forth in this Section 3 (mark and complete one of 3.1, 3.2, or 3.3 and/or 3.4 below; and, optionally, 3.5 as applicable).

☐ **3.1 Even Monthly Payments.**

$ __________ per month for a term of __________ months.

OR

☒ **3.2 Varying Monthly Payments.**

$ **999.35** per month for **24** month(s),

$ **2,800.00** per month for **12** month(s),and

$ **4,208.53** per month for **24** month(s), for a total term of **60** months.

OR

☐ **3.3 Varying Monthly Payments Before and After Confirmation.**

$ __________ per month before confirmation of this plan (use Section 4.6.1 below to list the adequate protection payments to be made before confirmation), and $ _______ per month after confirmation of this plan, for a total term of ________ months.

AND/OR

☐ **3.4 Additional Payments.**

In addition to monthly plan payments under 3.1, 3.2, or 3.3, above, the debtor will make the payments listed below.

Amount	Date	Source of Payment

☐ **3.5 Additional Payment of Tax Refunds.**

The debtor will provide the trustee with copies of state and federal tax returns for the years listed below within 15 days of filing the returns (and must timely file the returns on or before April 15 of each year). Not later than June 1 of each year, the debtor will pay into the plan the amount of refunds exceeding $ __________ (the amount already pro-rated on Schedule I, if any) for each of the listed years unless otherwise ordered by the Court. The tax refund payments are in addition to, and not a credit against, the other payments required to be paid under the plan. The debtor will not make any change to the number of any federal and state tax withholding allowances claimed as of the petition date without 30 days prior notice to the trustee. This commitment covers tax years (list): ________________________________.

4. DISTRIBUTION OF PLAN PAYMENTS.

From the payments made, the trustee will make distributions in the order listed below.

4.1 Trustee's Commission.

The trustee will receive the allowed trustee commission under 11 U.S.C. § 1326(b)(2).

4.2 Administrative Claims.

Next to be paid, except as provided in Section 4.3 below, are administrative claims under 11 U.S.C. § 507(a)(2), including debtor's attorney fee balance of $ 3,500 due and payable pursuant to a fee arrangement made under Subparagraphs 2.A, B, or C of Appendix F to the Local Bankruptcy Rules.

4.3 Domestic Support Obligations and Non-Appendix F Attorney Fees.

Next to be paid, at the same time and pro rata, are allowed unsecured claims for: (i) domestic support obligations under 11 U.S.C. § 507(a)(1); and (ii) any debtor's attorney fee allowed under 11 U.S.C. § 507(a)(2) by Bankruptcy Court order following an application pursuant to a fee arrangement under Paragraph 7 of Appendix F to the Local Bankruptcy Rules. Debtor's attorney fee balance to be paid through the plan is expected to be in the amount of $ _______________.

4.4 Former Chapter 7 Trustee Claims.

Next to be paid are any claims payable to the former Chapter 7 trustee under 11 U.S.C. § 1326(b)(3). List the monthly payment: $ ______________.

4.5 Priority Claims.

Next to be paid are other priority claims defined by 11 U.S.C. § 507(a)(3) - (10). List the expected claims below.

Priority Creditor	Expected Claim Amount

4.6 Secured Claims.

Next to be paid, at the same time and pro rata with payments on priority claims under Section 4.5 above, are secured claims as set forth below. The holder of an allowed secured claim retains its lien under 11 U.S.C. § 1325(a)(5)(B)(i). Any allowed secured claim listed in the plan to be paid by the trustee will be deemed provided for under the plan. Any allowed secured claim not listed in the plan to be paid by the trustee, or not stated to be paid outside of or otherwise addressed in the plan, will be deemed not provided for under the plan and will not be discharged.

4.6.1. Adequate Protection Payments for Claims Secured by or Subject to a Lease of Personal Property

Beginning not later than 30 days after the petition date and until the plan is confirmed, the debtor will directly pay adequate protection payments for claims secured by or subject to a lease of personal property for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). After confirmation of the plan, the claims will be paid under Section 4.6.3. Make sure to list the amount of the monthly payment the debtor will pay before confirmation, and list the last 4 digits only of the account number, if any, the lienholder uses to identify the claim.

Lessor or Lienholder	Property or Collateral	Acct. No (last 4 numbers).	Monthly Payment

4.6.2. Pre-petition Arrears on Secured Claims.

Pre-petition arrears on secured claims will be paid through the plan in equal monthly amounts while the debtor directly pays post-petition payments beginning with the first payment due after filing the petition for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). The claims listed below include: *Claims Secured by the Debtor's Principal Residence* [ ] and/or *Claims Secured by Other Property* [ ].

Lienholder	Collateral	Arrears	Monthly Payment	No. of. Months

4.6.3. Secured Claims Paid Through the Plan.

The following secured claims will be paid through the plan in equal monthly amounts for: *None* [ ] or the *Claims Listed Below* [x] (mark one box only). Such secured claims include secured claims altered under Sections 5.1 through 5.5 below. Make sure to list the interest rates to be paid.

Lienholder	Collateral	Amount	% Rate	Monthly Payment	No. of. Months
Showcase Home Improvements, Inc.	**8753 Hayshed Ln Columbia, MD 21045**	**$112,474.56**	**10**	**$2,257.67**	**55**

4.6.4. Surrender Collateral to the Lienholder.

The debtor will surrender collateral to the lienholder for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). Describe the collateral securing the claim. Any allowed claim for an unsecured deficiency will be paid pro rata with general unsecured creditors. Unless the Court orders otherwise, a claimant may amend a timely filed proof of claim for an unsecured deficiency after entry of the confirmation order as follows: (a) the amended proof of claim asserting an unsecured deficiency claim for real property shall be filed within __________ days (no less than 180 days) after entry of the confirmation order; and (b) the amended proof of claim asserting an unsecured deficiency claim for personal property shall be filed within ____________ days (no less than 60 days) after entry of the confirmation order. Upon plan confirmation, the automatic stays imposed by 11 U.S.C. §§ 362 and 1301 terminate, if not terminated earlier, as to the collateral listed.

Lienholder Collateral to be Surrendered

4.6.5. Secured Claims Outside of the Plan.

The debtor will directly pay the secured claims outside of the plan for: *None* ☐ or the *Claims Listed Below* ☒ (mark one box only). Such claims are deemed provided for by the plan. The debtor will also directly pay outside of the plan the unsecured portion of a claim that is only partially secured, and any such unsecured claim is deemed provided for by the plan.

Lienholder	Collateral to be Paid for Outside of the Plan
SN Servicing Corporation	**8753 Hayshed Lane, Columbia, MD 21045**

4.6.6. Secured Claim Not Listed in the Plan.

The debtor will directly pay any allowed secured claim not listed in the plan outside of the plan. Any such claim will not be discharged.

4.6.7. Additional Payments on Secured Claims.

If the trustee is holding more funds than those needed to make the payments under the plan for any month, the trustee may pay amounts larger than those listed in Sections 4.6.2 and 4.6.3 pro rata.

4.7. Unsecured Claims.

After payment of all other claims, the remaining funds will be paid on allowed general unsecured claims as follows (mark one box only):

☐ Pro Rata ☒ 100% ☐ 100% Plus _______% Interest.

If there is more than one class of unsecured claims, list each class and how it is to be treated.

Class of Unsecured Creditors Treatment

5. THE AMOUNT AND VALUATION OF CLAIMS.

Secured creditors holding claims treated under Section 5 retain their liens until the earlier of (i) the payment of the underlying debt determined under nonbankruptcy law; (ii) discharge under 11 U.S.C. § 1328; or (iii) if the debtor cannot receive a discharge as provided in 11 U.S.C. § 1328(f), the notice of plan completion. If the case is dismissed or converted without completion of the plan, liens shall also be retained by the holders to the extent recognized under applicable nonbankruptcy law.

5.1. Valuing a Claim or Avoiding a Lien Under 11 U.S.C. § 506 Through the Plan.

The debtor seeks to value a claim or avoid a lien under 11 U.S.C. § 506 through the plan for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). The claims listed below include: *Claims Secured by the Debtor's Principal Residence* [ ] and/or *Claims Secured by Other Property* [ ]. Make sure to list the value of the collateral proposed to be paid through the plan plus any interest below and in Section 4.6.3 above, as appropriate. Separately file evidence of (i) the collateral's value; (ii) the existence of any superior lien; (iii) the exemption claimed; and (iv) the name, address, and nature of ownership of any non-debtor owner of the property. If the lienholder has not filed a proof of claim, also separately file evidence of the amount of the debt secured by the collateral. The amount and interest rate of the claim is set as listed below or by superseding Court order. A proof of claim must be filed before the trustee makes payments. Any undersecured portion of such claim shall be treated as unsecured.

Lienholder	Collateral	Value	% Rate	Monthly Payment	No. of. Months

5.2. Valuing a Claim or Avoiding a Lien Under 11 U.S.C. § 506 by Separate Motion or an Adversary Proceeding.

The debtor seeks to value a claim or avoid a lien under 11 U.S.C. § 506 by separate motion or an adversary proceeding for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). The amount and interest rate of the claim will be set by Court order. Make sure to list the value of the collateral proposed to be paid through the plan plus any interest as determined by the Court in Section 4.6.3 above, as appropriate. A proof of claim must be filed before the trustee makes payments. Any undersecured portion of such claim shall be treated as unsecured.

Lienholder	Collateral

5.3. Valuing a Claim or Avoiding a Lien Under 11 U.S.C. § 522(f)* Through the Plan.

The debtor seeks to value a claim or avoid a lien under 11 U.S.C. § 522(f)* through the plan for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). Make sure to list the value of the collateral proposed to be paid through the plan plus any interest below and in Section 4.6.3 above, as appropriate. Separately file evidence of (i) the collateral's value; (ii) the existence of any superior lien; (iii) the exemption claimed; and (iv) the name, address, and nature of ownership of any non-debtor owner of the property. If the lienholder has not filed a proof of claim, also separately file evidence of the amount of the debt secured by the collateral. The amount and interest rate of the claim is set as listed below or by superseding Court order. A proof of claim must be filed before the trustee makes payments. Any undersecured portion of such claim shall be treated as unsecured.

Lienholder	Collateral	Value	% Rate	Monthly Payment	No. of. Months

**Under 11 U.S.C. § 522(f), the debtor may avoid a lien to the extent it impairs an exemption if the lien is a judicial lien or a nonpossessory, non-purchase money security interest in certain property.*

5.4. Valuing a Claim or Avoiding a Lien Under 11 U.S.C. § 522(f)* by Separate Motion or an Adversary Proceeding.

The debtor seeks to value a claim or avoid a lien under 11 U.S.C. § 522(f)* by separate motion or an adversary proceeding for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). The amount and interest rate of the claim will be set by Court order. Make sure to list the value of the collateral proposed to be paid through the plan plus any interest as determined by the Court in Section 4.6.3 above, as appropriate. A proof of claim must be filed before the trustee makes payments. Any undersecured portion of such claim shall be treated as unsecured.

Lienholder	Collateral

**Under 11 U.S.C. § 522(f) the debtor may avoid a lien to the extent it impairs an exemption if the lien is a judicial lien or a nonpossessory, non-purchase money security interest in certain property.*

5.5. Claims Excluded from 11 U.S.C. § 506.**

The debtor will pay through the plan the following claims excluded from 11 U.S.C. § 506** in full plus any interest for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). Make sure to list the amount proposed to be paid through the plan plus any interest below and in Section 4.6.3 above, as appropriate. The amount of each claim to be paid will be established by the lienholder's proof of claim or Court order. The interest rate of the claim is set as listed below or by superseding Court order. A proof of claim must be filed before the trustee makes payments.

Lienholder	Collateral	Amount to Be Paid	% Rate	Monthly Payment	No. of. Months

***Claims excluded from 11 U.S.C. § 506 include claims where the lienholder has a purchase money security interest securing a debt incurred within the 910-day period preceding the petition date and the collateral consists of a motor vehicle acquired for the personal use of the debtor and also claims where the collateral consists of any other thing of value if the debt was incurred during the 1-year period preceding the petition date.*

6. APPLICATION OF PAYMENTS ON ACCOUNT OF SECURED CLAIMS.

Payments made by the Chapter 13 trustee on account of arrearages on pre-petition secured claims may be applied only to the portion of the claim pertaining to pre-petition arrears so that, upon completion of all payments under the plan, the loan will be deemed current through the petition date.

7. EXECUTORY CONTRACTS AND UNEXPIRED LEASES.

Any unexpired lease with respect to personal property that has not previously been assumed during the case and is not assumed in the plan, is deemed rejected and the automatic stays imposed by 11 U.S.C. §§ 362 and 1301 are automatically terminated, if not terminated earlier, with respect to such property. The following executory contracts and/or unexpired leases are assumed or rejected for: *None* [x] or the *Claims Listed Below* [ ] (mark one box only). Any claim for rejection damages must be filed within 60 days from entry of the order confirming this plan.

Lessor or Contract Holder	Subject of Lease or Contract	Assumed	Rejected

8. REVESTING PROPERTY OF THE ESTATE.

Title to the debtor's property shall revest in the debtor (i) when the debtor is granted a discharge pursuant to 11 U.S.C. § 1328; (ii) if the debtor cannot receive a discharge as provided in 11 U.S.C. § 1328(f), upon the notice of plan completion; or (iii) upon dismissal of the case.

9. NON-STANDARD PROVISIONS.

Any non-standard provision placed elsewhere in the plan may be void. Any and all non-standard provisions are: *None* [x] or *Listed Below* [ ] (mark one box only).

Non-Standard Plan Provisions

10. SIGNATURES.

The debtor's signature below certifies that the plan provisions above are all the terms proposed by the debtor and that the debtor has read all the terms and understands them. The signature below of the debtor and debtor's attorney, if any, also certifies that the plan contains no non-standard provision other than those set out in Section 9 above.

Date: **10/7/2025**

/s/ Lisa Richardson-Henderson
Debtor

/s/ Laurie D. Pulliam
Attorney for Debtor

____
Joint Debtor

EXHIBIT 8

E-FILED; Howard Circuit Court
Docket: 2/27/2023 2:55 PM; Submission: 2/27/2023 2:55 PM

SHOWCASE HOME IMPROVEMENTS, INC. T/A SHOWCASE RESTORATION	*	IN THE
Plaintiff	*	CIRCUIT COURT
v.	*	FOR
LISA R. HENDERSON	*	HOWARD COUNTY
Defendant	*	Case No. C-13-CV-22-000686

* * * * * * * * * * * * *

ORDER ESTABLISHING FINAL MECHANICS' LIEN AND ENTERING JUDGMENT

This matter comes before the Court upon consideration of the Verified Motion for Discovery Sanctions filed by the Plaintiff, **SHOWCASE HOME IMPROVEMENTS, INC.** on December 5, 2022; the Plaintiff's Second Verified Motion for Discovery Sanctions filed on February 13, 2023 and the Defendant's Responses thereto. A hearing on the Plaintiff's subject Motions was held before this Court on February 17, 2023.

The Court finds the following:

A. on October 13, 2022, the Honorable Stephanie P. Porter entered an order GRANTING the Plaintiff's Motion for Order Compelling Discovery;

B. following entry of Judge Porter's Order, the Defendant, **LISA R. HENDERSON** provided completely inadequate, deficient and non-responsive responses to Plaintiff's Interrogatory Nos. 1 through 12, 14 through 16, 18, through 20 and 22 through 27 on multiple occasions;

C. the parties entered into a written Contract regarding repairs to Defendant's Columbia, Maryland residence generally designated or briefly described as a single family townhome located at **8753 HAYSHED LANE, COLUMBIA (Howard County) MARYLAND 21045-2864**;

D. the aforesaid improvement is located on land which is situated in Howard County, Maryland, which land is more particularly described in a Deed dated July 31, 1998, and recorded among the Land Records of Howard County, Maryland, in Liber No. 4438, folio 0134 and described as follows (the "Property"):

> **BEING KNOWN AND DESIGNATED As Unit No. 2-2, Parcel III, in the Horizontal Property Regime known as "Heatherstone, a Condominium" and being part of all the property more particularly described in the Declaration and By-Laws dated August 13, 1979 and recorded among the Land Records of Howard County in Liber 957, folio 446, et. seq. and First Amendment of Declaration dated September 26, 1979 and recorded as aforesaid in Liber 964, folio 734, et. seq., and Second Amendment of Declaration dated November 15, 1979 and recorded as aforesaid in Liber 974, folio 651, et. seq., and Third Amendment of Declaration dated January 8, 1980 and recorded as aforesaid in Liber 994, folio 312, et. seq., and also as shown on the Record Plats entitled, "Condominium Plat Heatherstone, a Condominium, Columbia, Village of Longreach, Section 1, Area 4" recorded among the Land Records of Howard County in Plat CMP Nos. 4362 through 4365, inclusive; and First Expansion plat recorded as aforesaid in Plat CMP Nos. 4396 through 4399, inclusive, and Second Expansion Plat recorded as aforesaid in Plat CMP Nos. 4452 through 4455 inclusive, and Amended First Expansion Plat recorded as aforesaid in Plat CMP Nos. 4497 through 4500, inclusive, and Third Expansion Plat recorded as aforesaid in Plat CMP Nos. 4505 through 4509, inclusive. Together with an undivided percentage interest in the common elements as defined and more fully described in the aforementioned Declaration and By-Laws.**

E. Plaintiff furnished labor, equipment, materials and supervision to Defendant's Property under the Contract, including extras approved by Defendant (the "Work");

F. the total sum due to Plaintiff for the Work including the extras is $136,583.05;

G. Plaintiff performed all Work in a timely and workmanlike manner in accordance with the Contract terms;

H. the Work is free from material defects;

I. the expense of the Work was covered by Defendant's insurance company, Amica Mutual Insurance Company ("Amica");

J. Amica inspected, approved and issued payment to Defendant in the amount of $136,583.05 for the Work;

K. Plaintiff repaired, rebuilt, or improved Defendant's Property to the extent of 15 percent of its value;

L. after all credits, Defendant currently owes Plaintiff the amount of $91,145.90 for the Work (the "Principal Sum");

M. in addition to the Principal Sum, Plaintiff is entitled to recover interest "*at the maximum legal permissible rate*" on all sums unpaid by Defendant 3 or more days after payment request;

N. Plaintiff did not breach the Contract: and

O. Defendant breached the Contract by failing to pay Plaintiff the Principal Sum.

Accordingly, it is this 03/01/2023 by the Circuit Court for Howard County,

ORDERED, that the Plaintiff's Verified Motion for Discovery Sanctions and Second Verified Motion for Discovery Sanctions be and the same are each hereby **GRANTED**; and it is further

ORDERED, that Judgment is hereby entered by default against the Defendant, **LISA R. HENDERSON** in the amount of **$91,145.90** PLUS post-judgment interest at 10% in favor of the Plaintiff, **SHOWCASE HOME IMPROVEMENTS, INC.** effective and accruing from February 17, 2023; and it is further

ORDERED. that a final Mechanics' Lien is hereby established by default in the amount of **$91,145.90** in favor of the Plaintiff, **SHOWCASE HOME IMPROVEMENTS, INC.** against Defendant's within described Columbia, Maryland Property effective and accruing from February 17, 2023; and it is further

ORDERED, that the above described Property be sold unless the amount of the Mechanics' Lien herein established, **$91,145.90** PLUS post-Judgment interest at 10% effective and accruing from February 17, 2023 is paid by the Defendant to the Plaintiff on or before

5/4/23 ; and it is further

ORDERED, that Lauren Leffler, Esquire be and is hereby appointed Trustee to make such sale. and the course and manner of his/her proceeding shall be as follows:

A. he/she shall first file with the Clerk of this Court a bond to the State of Maryland executed by himself/herself and a surety or sureties to be approved by this Court in the penalty sum of **$91,145.90** conditioned upon the faithful performance of the Trust imposed upon him by any further decree or Order upon the premises;

B. he/she shall then proceed to sell said property at either public or private sale: if at public sale, he/she he shall give notice at least once in each week for three (3) successive weeks, the first such publication to be not less than fifteen (15) days prior to sale and the last such publication to be not more than one (1) week prior to sale, said notice by advertisement in such daily newspaper or newspapers published or generally circulated in Howard County as he/she shall deem proper of the time, place, manner and terms of the sale; or the Trustee may report to this Court for approval of any offer or offers which he/she may receive at private sale, which to him/her may seem reasonable, and as soon as may be convenient after said sale, the Trustee shall return to this Court a full and particular accounting of his/her proceeding relative to such sale, with an annexed affidavit of the truth thereof and the fairness of said sale; and

C. on obtaining the Court's ratification of this sale, and on a payment of the whole purchase money and not before, the said Trustee, shall, by a good and sufficient deed to be executed and acknowledged and recorded according to law, convey to the purchaser or purchasers, his, her or their heirs and assigns, the property and estate to him, her or them sold free, clear and discharged from all claims of the parties hereto, Plaintiff and Defendant and those claiming by, from or under them, or any of them, and the said Trustee, shall bring into this Court the monies arising from said sale, and after first deducting the cost of the proceeding, including such commission to the said Trustee that this Court shall think proper to allow in consideration of the skill, attention and fidelity wherewith, said Trustee shall appear to have discharged his/her trust; and it is further

ORDERED, that the Defendant's Counterclaim filed on January 17, 2023 be and is hereby **STRICKEN** with prejudice and without leave to amend; and it is further

ORDERED, that at any trial or hearing in this matter the Defendant shall be prohibited from:

A. introducing evidence in opposition to Plaintiff's Complaint

B. introducing evidence in opposition to the entry of a Judgment against Defendant on Plaintiff's Complaint

C. introducing evidence in opposition to the entry of a final Mechanics' lien against Defendant's Property

D. introducing evidence in support of her Counterclaim

E. introducing or referencing any documents or information; and

F. introducing expert or witness testimony

03/01/2023 2:09:30 PM

Timothy J. McCrone

Timothy J. McCrone, Judge
Circuit Court for Howard County

Entered: Clerk, Circuit Court for
Howard County, MD
April 4, 2023

APPENDIX F

District Court Return of Applicant's Expedited Motion to Stay and Preserve the Status Quo, dated August 13, 2026

The District Court returned Applicant's request for stay/status-quo relief without granting the requested stay or temporary administrative relief.

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
OFFICE OF THE CLERK

Catherine M. Stavlas, Clerk of Court
David E. Ciambruschini, Chief Deputy

Reply to Northern Division Address

August 10, 2026

Lisa Richardson-Henderson
8753 Hayshed Lane
Columbia, MD 21045

Re: Case No. 1:25-cv-00695-ABA

Dear Counsel/Party:

The Clerk received your Expedited Motion to Stay (with Exhibits) and Preserve the Status Quo Pending Petition for Writ of Certiorari on August 10, 2026; however, it is deficient in the area(s) checked below and is being returned to you.

Noncompliance with L.R. 101 or 102

- ☐ Member of bar has not signed the document.
- ☐ Business entities other than sole proprietorships must be represented by counsel.

Noncompliance with L.R. 102 and FRCivP 5

- ☐ Certificate of service not affixed to document.
- ☐ Certificate of service not dated and/or not signed.

Noncompliance with L.R. 104 or 105

- ☐ Discovery materials should not be filed unless in support of a motion or by court order.
- ☐ Discovery motion filed contrary to L.R. 104.7.
- ☐ Motion to compel filed contrary to L.R. 104.8.

Miscellaneous

- ☐ Document does not contain original signature.
- ☐ Document relates to more than one file. Original and appropriate copies are required for each file unless the cases have been consolidated for all purposes.
- ☐ Offer of judgment should not be filed with the Court until it has been accepted. Fed. R. Civ. P. 68.
- ☐ Other: Case was closed 4/24/25. Motion to Reconsider was denied 12/22/25. Court of Appeals affirmed the District Court Judgment 6/30/26. Court of Appeals denied motion for rehearing 7/28/26. Mandate was entered 8/5/26.

/s/ August 13, 2026

Adam B. Abelson Date
United States District Judge

cc: Other counsel/party
Return pleading letter (Rev. 02/2011)

APPENDIX G

Order of the United States Court of Appeals for the Fourth Circuit Denying Applicant's Motion to Stay and Recall the Mandate and for Temporary Administrative Relief, No. 26-1077, August 18, 2026

Upon consideration of submissions relative to the motion to stay and recall the mandate and for temporary administrative relief, the court denies the motion.

FILED: August 18, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 26-1077
(1:25-cv-00695-ABA)

LISA RICHARDSON HENDERSON

Plaintiff - Appellant

v.

SHOWCASE HOME IMPROVEMENTS, INC., d/b/a Kenneth Ferber; U. S. BANK TRUST NATIONAL ASSOCIATION, as Trustee for Pad Series IV Trust

Defendants - Appellees

O R D E R

Upon consideration of submissions relative to the motion to stay and recall the mandate and for temporary administrative relief, the court denies the motion.

For the Court--By Direction

/s/ Nwamaka Anowi, Clerk

Additional material from this filing is available in the Clerk's Office.