

26 **A375**

IN THE SUPREME COURT OF THE UNITED STATES

ADERONKE ADEREMI

Applicant

VS

MASSANDRA KV VINEYARDS OWNER LLC,
as Successor in Interest to Pac Vineyards LLC

Respondent

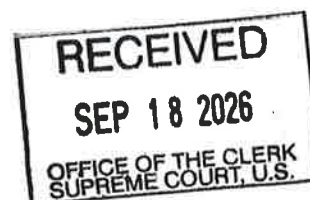
**To the Honorable Samuel A. Alito, Jr., Associate Justice, of the
United States Supreme Court**

EMERGENCY APPLICATION TO STAY

**All unconstitutional Judgments and Orders entered by the First Court of
Appeals In Houston Texas, and the Supreme Court of Texas**
and for an administrative relief for a Re-entry under the exceptional rules due to
unconstitutional, **Egregious conduct, fraud upon the court actions to obtain
enforcement of a Forcible detainer action executed against Applicant** from
21550 Provincial Blvd Katy, Tx 77450 that had been suspended by law, without
jurisdiction, absence procedural and substantial laws granted by the Fourteenth
Amendment and Equal Rights Protection under the United States Constitution

Aderonke Aderemi Pro se

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PARTIES TO THE PROCEEDINGS

Applicant: Pro Se

Aderonke Aderemi

Respondent:

Massandra KV Vineyards Owner LLC as Successor In interest to PAC Vineyards LLC,

Counsel for Respondent

Brice Barrett Beale

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Refiled Second Eviction before the disposition of the First Eviction: See *Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC, Harris County Court at Law No. 1224685*

See *Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC Writ of Mandamus Appellate Case Number 01-24-00295CV*

Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC 01-24-00600CV

Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC, Supreme Court of Texas No. 26-0767

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- 1 Supreme Court of Texas Order entered denying Emergency Writ of Mandamus on August 28th 2026. See Exhibit H
- 2 *Supreme Court of Texas Denying Emergency Motion for relief August 28th 2026. See Exhibit H*
- 1 *Supreme Court of Texas denying Motion for Expedited Ruling August 28th 2026 See Exhibit H*
- 2 *Supreme Court of Texas Denying Second Motion for Emergency Relief August 28th 2026. See Exhibit H*

- 3 *Supreme Court of Texas denying Supplement Motion for relief August 28th 2026. See Exhibit H*

First Court of Appeals, Houston Texas Order and Judgment entered denying relief sought

- 4 *The First District Court of Appeals Memorandum Opinion denied Applicant's Petition for Mandamus on June 18th, 2024, on Trial Court assuming jurisdiction. See Exhibit A (3)*
- 5 *The First District Court of Appeals Memorandum Opinion on July 16th 2026 See Exhibit C*
- 6 *August 11th, 2026, First District Court of Appeals Order denying Applicant's Motion for Emergency Relief of the Trial Court's Order signed on July 22nd 2026 and respondent's Request for Writ of Possession. See Exhibit D*
- 7 *Denied Motion for rehearing enbanc August 25th 2026 See Exhibit G*
- 8 *First Court of Appeals Order (CORRECTED JUDGMENT due to Applicant statement of error in it motion for rehearing enbanc, corrected judgment without enbanc) August 25th 2026 Exhibit G*

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- 9 *Harris County Court at Law #1, Second Order July 22nd 2026. See Exhibit (C 1)*
- 10 *Harris County Court at Law #1 Default Judgment signed on (May 10th, 2024. See Exhibit B*

11 Harris County Court at Law Order denying Motion for lack of jurisdiction. See Exhibit A (4) see Harris County Trial Court number:1224685

Application to Stay Received by the United States Supreme Court

On August 19th 2026 Applicant's Emergency Application for an Emergency Stay was received in the United States Supreme Court. Returned back to Applicant on August 24th, 2026

SEE ATTACHED 2 COPIES

Stamped 1 of 44 pages

Clerk Notice Dated August 24th 2026

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**To the Honorable Samuel A. Alito, Jr., Associate Justice, of the
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**All unconstitutional Judgments and Orders entered by the First Court of
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and for an administrative relief for a Re-entry under the exceptional rules due to
unconstitutional, **Egregious conduct, fraud upon the court actions to obtain
enforcement of a Forcible detainer action executed against Applicant** from
21550 Provincial Blvd Katy, Tx 77450 that had been suspended by law, without
jurisdiction, absence procedural and substantial laws granted by the Fourteenth
Amendment and Equal Rights Protection under the United States Constitution

Applicant seeks and requests this Court to Stay all unconstitutional
Judgments and Orders entered by the First Court of Appeals **on July 16th, 2026,**
affirming the lower Court's judgment entered without **Authority and Jurisdiction,**
absence procedural and substantial laws, judgment derived by FRAUD UPON
THE COURT FLLING BY RESPONDENT and Egregious conduct by respondent

Attorney Brice Barrett Beale (Bar Card Number 24031855) and Attorney Angeline Vachris Kell (Bar Card Number 24040009) illegally requesting and obtaining a forcible detainer action unauthorized by the Fourteenth Amendment, executed without due process and due course of law by the State. Applicant respectfully request this Court to **STAY** the Supreme Court of Texas Order signed on **August 28th, 2026**, dismissing as Moot Applicant's Emergency Petition and to Stay the First Court of Appeals Judgement signed on July 16th 2026 affirming the lower Court's judgment entered on May 10th, 2024, awarding Writ of Possession to **Respondent and Monetary damages without jurisdiction** and further Stay the issuance of ANY Mandate to be issued without Jurisdiction.

Applicant respectfully Request for an Order of **RE-ENTRY** under the Exceptional Circumstances of the ALL Writ ACT into Applicant's residence located in 21550 Provincial Blvd Katy Texas 77450 #921 and its 4 rented garages G22, G803, G804, and G903 of the Writ of Possession judgment signed on May 10th 2024 executed against Applicant on August 19th 2026, issued under the seal of the State of Texas that **had been legally STAYED BY LAW due to supersedeas CASH BOND OF \$12,480.00 posted on June 3rd 2024** and recalled on June 7th 2024, same judgment for Possession signed on May 10th 2024 **WAS REPOSTED AND EXECUTED MORE THAN TWO YEARS LATER WITHOUT DUE**

PROCESS prohibited under the Fourteenth amendment procedural and substantial law,

Statement

This is a second refiled Eviction Case by Respondent Massandra KV Vineyards Owner LLC Successor In interest to PAC Vineyards LLC filed before the final disposition of the first eviction pending in the First Court of Appeals, In the First discriminatory Eviction lawsuit for alleged Conduct seeking Possession Only concurrently with the pending eviction applicant had been constructively evicted, Applicant posted a Supersedeas Cash Bond of \$12,480.00 within 24hrs after the Judgement for Possession was signed on April 5th 2022 to Stay the enforcement of the judgment for Possession to be executed on April 7th 2022 (less than 48hrs), Applicant was denied a Notice and the 10 days opportunity to respond to the judgment, Despite the Writ of Possession Judgment being Stayed by Applicant Bond, respondent filed a fraudulent request for a Writ of Possession with the Trial Court on June 28th 2022, was granted by the Trial Court on July 15th 2022, even after the First Court of Appeals Justice April Farris signed an Order on July 15th 2022 Staying the enforcement of the Writ of Possession. Applicant received a 24hrs Vacate Notice posted on Applicant's door on July 19th, 2022, due to respondent Attorney Brice Beale's Egregious conduct for the law, the First Court of Appeals was compelled to sign a second Order on July 20th 2022 to Stay

any effort to execute the Writ of Possession pending the final resolution of the Appeal in the first eviction. *See Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC, Harris County Court at Law No. 01-22-00525, 01-22-00520. Also see additional attached Exhibit 5*

First Court of Appeal Order signed July 15th 2022, staying the Writ of possession due to supersedeas bond posted by Applicant in the first eviction EXHIBIT 5

July 19th 2022 order of the court disregarded a 24hrs Writ of Possession posted on Applicant Apartment unit EXHIBIT 5 10F 1

July 20th 2022, First Court compelled to sign a Second Order to Stay any effort to execute a Writ of possession pending appeal in the first eviction EXHIBIT 5

On October 31st the First Court of Appeals entered its Final Judgment, reversed the Trial Court's Final Judgment signed April 5th, 2022, **ruled in favor of Applicant**, granted to Applicant Superior Right of Possession of the subject Apartment located at 21550 Provincial Blvd Katy Texas 77450 further released all funds deposited in the Harris County registry to Applicant. ***Panel consisting of Justices Kelly, Landau and Farris, see Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as successor interest to PAC Vineyards LLC 01-22-00525cv and 01-22-00520cv***

Respondent refiled a second eviction on the same claim before the final disposition of the first eviction pending

On Jan 8th, 2024, before the final disposition of the first eviction *rather* than Respondent file post judgment remedies, Respondent refiled a second discriminatory eviction lawsuit on the same claim for Possession Only as in the first eviction **“Exhibit A page 3”**, concurrently with its ongoing constructive eviction against Applicant **“see attached Exhibit I” denied Order for injunctive relief in the first and second eviction.**

The second refiled eviction was filed in the Justice of the Peace Precinct 5 Place 2 who ruled in favor of Respondent, Applicant filed an appeal to the Harris County Court at Law.

On March 25th, 2024, Applicant received a Notice from Harris County Clerk (Tenesha Hudspeth) that Applicant’s appeal has been received and docketed in Harris County Court at Law #2.

Exhibit A Trial Court Stamp eviction case in Court #2

Exhibit A (1), Notice Dated March 25th, 2024, from Harris County Clerk case docketed in Court #2

The Second refiled eviction Case legally assigned and docketed in Harris County Court at law 2 with Judge Jim Kovach was illegally removed to Harris County Court at law # 1 to former Judge Audrie Lawton Evans without **any** documentation on the record of **ANY** transfer. Pursuant to *Harris County Local Rules Civ Ct. 3.1.1* once a case is assigned to one of the Courts a case will remain

in the docket of that Court for all purposes **UNLESS TRANSFERRED.**

According to the rules of transferred actions, pursuant to **Tex Gov Code 74.164**, the threshold requirement must be met to establish the authority and jurisdiction of a judge to preside over a transferred action and **Texas Government Code § 51.403 (a)** sets out the mandatory procedures for transferring cases between county courts, district courts, statutory county courts, or between counties, and specifies what the clerks of the transferring and receiving courts must do **§ 51.403 (e) states that the provisions of Section 51.403 apply regardless of whether the transferee court and the transferring court are in the same county or in different counties.**

Exhibit A (2) Appellate Table of Content Clerk's Record and Supplemental Record (NO RECORD OF TRANSFER)

Applicant affirmatively raised and demonstrated the issue of jurisdiction with the Trial Court in an Oral hearing on Applicant's Motion for lack of jurisdiction held on April 9th 2024, 20days before the date of the eviction Trial. **further** filed a Writ of Mandamus with the First Court of Appeals before the date set for Trial on the Merit, both Courts bypassed the threshold issue of jurisdiction and ruled after the Eviction Trial of April 29th 2024, denying Applicant's right to jurisdiction in attending the eviction Trial in the Original Court it had been docketed in Court #2. The Trial Court without Authority entered a default Judgment on May 10th, 2024, awarding possession to Respondent, **AWARDED**

ZERO alleged NON-PAYMENT OF RENT, attorney fees 1500, \$12480.00

supersedeas bond, and 21,000.00 court cost if appealed

On July 18th, 2024, Applicant Writ of Mandamus to the first Court of appeal was denied *Aderonke Aderemi Vs Massandra KV Vineyards Owner LLC 01-24-00295-CV*, Panel consist of Justices Hightower, Rivas-Molloy and Farris. Also see EXHIBIT A (4) July 18th, 2024, Petition denied on the Trial Courts assuming jurisdiction

- Exhibit B Harris County Court at Law #1 Default Judgment signed on (May 10th 2024)
- Exhibit B (1) Writ of Possession issued **May 31th 2024**
- Exhibit B (2) Applicant Posted a Supersedeas Bond Cash Payment of \$12,480.00 (**June 3rd, 2024**), to suspend Writ of Possession of the default judgment entered on May 10th 2024
- Exhibit B (3) Writ of Possession Returned June 7th, 2024, due to supersedeas bond payment

The jurisdictional defect was not hidden or newly raised. The Appeals Court bypassed the serious jurisdiction defect in Applicant's brief submitted on January 13th 2026, 6 months after submission on July 16th 2026 affirmed the default judgment of the Trial Court signed on May 10th 2024 but the mandate has not issued, however 5 days after the First Court of Appeals signed Judgment the Trial Court without authority and Jurisdiction entered an Order that Applicant must Post an additional **Bond Rent amount of \$44,928 within 10 days** into the Harris County Court Registry. Whereas alleged Non-payment of Rent was never awarded

on May 10th 2024 signed default Judgment, including the trial court lacked jurisdiction from the beginning to hear the case,, also Appellate Court has entered its Judgment July 16th 2026 and no evidence for the increase of bond was ever submitted by respondent

Exhibit C *First District Court of Appeals Memorandum Opinion judgment of July 16th 2026 entered after 6 months of the Brief submission*

Exhibit C (1) Harris County Court at Law #1, July 22nd, 2026, second Order signed without Authority and Jurisdiction

Applicant filed with the First Court of Appeals an Emergency Motion to Stay and Vacate the Trial Court's Order signed on July 22nd 2026 and to Vacate the May 10th 2024 Judgment for Possession for filed by respondent's Attorney Brice Barrett Beale , including the fact that Mandate has not been issued, the Motion was denied .under this circumstances Applicant does not have any other remedy in an appeal but sought an Emergency Writ of Mandamus and an Emergency Motion to Stay with the Supreme Court of Texas to grant relief under the "**ALL WRIT ACT**" **28 USC 1651** "in aid of their respective jurisdictions and agreeable to the usages and principles of law codified" **UNDER THE GOV CODE Sec.**

22.002..(a), to issue a Writs of Mandamus to **STAY** ultra Vires act of its unlawful Orders entered by the First Court of Appeals affirming the trial Court's void judgment and Order without the basic guarding principle of the law governing Jurisdiction but the supreme Court denied Applicant due course of law, Applicant

submitted to the supreme Court of Texas evidence that Judgment for possession signed on May 10th 2024 will issued if not STAYED WITHIN 10DAYS due to respondent request for a writ of possession submitted. The Supreme Court of Texas delayed ruling on Applicant's Emergency pleadings and dismissed as Moot after the execution of the illegal Writ of Possession had occurred *Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC, Supreme Court of Texas No. 26-0767*

AN INVALID JUDGMENT FOR POSSESSION SIGNED ON MAY 10TH 2024 BY THE LOWER COURT WAS EXECUTED THAT WAS SUSPENDED AND STAYED BY LAW

On August 12th 2026 the Judgment for Possession signed on May 10th 2024 was reposted by the Harris County Constable on Applicant's Apartment Unit demanding a 24hrs Notice to Vacate the Premises, Applicant informed the Writ division that the judgment for Writ of Possession signed on May 10th 2024 had been recalled over 2 years back June 7th 2024 due to Supersedeas Bond Exhibit B(3), PLUS IT IS prohibited from been executed f signed Judgment for Possession is more than 60days except for a good cause the court may extend **no more than 90days Pursuant to Tex R. Civ Pro 510.18 (g) 1 A writ of possession may not issue more than 60 days after a judgment for possession is signed. For good cause, the court may extend the deadline for issuance to 90 days after a judgment for possession is signed.**

**“See Attached Exhibit E” 24hrs Writ of Possession of a
Judgment entered on May 10th 2024. Also see same posted
on May 31st 2024 Exhibit (B1) and Exhibit (B2) Payment**

The Writ division paused execution for 7 days, Applicant was under the belief that the Writ division would follow the Mandatory duty to provide **IF ANY** a valid possession judgment. Appellants and their child J.O were unduly surprised that the Writ division disregarded the law, illegally enforced a Writ of Possession not recognized by law **Pursuant to Tex. R. Civ Pro 510.18 (g) 2 A writ of possession may not be executed after the 90th day after a judgment for possession is signed**

During the illegal eviction Applicant and family were tortured, handcuffed and detained for several hours without a cause, traumatized by Harris County Constable (Deputy **B. McGuire 85W30**) who made a forceful entry into Applicants' apartment Unit by breaking down Applicants' door with a sledge hammer, pulled a Gun on Applicant's family, physically and forcefully removed Applicant's entire family, and personal valuables from its place of residence including valuables from 4 rented garages in the premises without a legal Court Order from an unconstitutional Possession judgment signed May 10th 2024 submitted by Massandra Attorney Brice Barrett Beale who affixed its signature to a judgment that was superseded over 2 years ago . ***Pursuant to Texas R. App Pro***

24.1 (f) an enforcement of a judgment MUST be suspended If the Judgment is superseded. Same Attorney Brice Barrett Beale on behalf of respondent without filling a Written Notice as the replacement substitute in the First Eviction also filed fraudulent filing to evict Applicant after payment of supersedeas bond had been posted. See Exhibit 5

Massandra attorney Angeline Vachris Kell **CRIMINALLY TRESPASSED** Applicants using the Sheriff Police Officers intentionally depriving Applicant's right to retrieve its belongings from the Parking lots in the premises

Exhibit D Writ of Possession Judgment dated May 10th 2024 Requested by Respondent and First Court of Appeal signed Order denying Emergency Motion for relief to Stay

Exhibit E On August 12th, 2026, 24hrs Vacate Notice posted on Applicant Apartment unit of the Judgment signed by Harris County Court at Law #1 Judgment signed on May 10th 2024

Exhibit F Writ of Possession executed August 19th, 2026, same day Applicant Application to Stay was received in this court

On August 19th, 2026, the Clerk of the United States Supreme Court received Applicant's Emergency Application to Stay and a request for administrative relief to STAY THE ENFORCEMENT OF AN ILLEGAL WRIT OF POSSESSION WITHOUT JURISDICTION. suspended by law in accordance with **Tex. R. App. Pro Rule 24.1(f) and unauthorized in accordance to Tex R. App Pro R 51.1 (b) AND TEX. R. CIV P 510.18 g 2**

Applicant's Emergency Application filed with this Court was returned because the Clerk stated that the Supreme Court of Texas Order had not been issued at the time although it had been denied by operation of law under the due

course of law at the time the Application was received, **SEE ATTACHED 2 COPY** one stamped page and the Clerk Notice Dated August 24th 2026

On August 28th 2026 the Supreme Court of Texas entered it's Order dismissing as Moot the emergency relief to Stay and Writ of Mandamus sought after delaying a meaningful review under due course of law when it received Applicant's, Emergency Petition, Motions for relief on **July 20th 2026, July 24th, July 28th, August 3rd 2026** but remained completely silent until after the harm had occurred. **See Attached Exhibit H Supreme Court of Texas Order entered August 28th 2026**

Applicant Aderonke Aderemi respectfully request for an immediate administrative relief under the Exceptional Circumstances of the ALL WRIT ACT (28 USC 1651) including Supreme Court Rule 20 for an Order, of re-entry into its place of residence and its 4 rented garages at 21550 Provincial Blvd Katy Texas 77450 Apt #921 and 4 Garages rented G22, G803, G804, G903 due to the unauthorized, unconstitutional and unlawful forcible detainer action executed against Applicant from its place of residence without due process of the law on August 19th 2026 based on Egregious conduct by respondent **Attorney Brice Barrett Beale and Attorney Angeline Vachris Kell** FRAUD UPON THE COURT filling, without Authority and jurisdiction by the State Court, in violation of the Fourteenth Amendment due process and Equal Rights Protection of the FAIR HOUSING ACT . Furthermore, **Pursuant to Rule 23 of the Rules of this Court and 28 U.S.C. § 2101(f)** allows a Court or Supreme Court Justice to Stay the execution or enforcement of a final judgment to enable a party to seek review by a Writ of Certiorari. Section 2101(f) addresses situations where a final judgment or decree of **ANY COURT** is subject to review by the Supreme Court through a writ of certiorari. It provides a mechanism to temporarily halt enforcement or

execution of the judgment, ensuring that the aggrieved party has a reasonable opportunity to petition the Supreme Court without immediate adverse consequences. pending the timely filing and disposition of a petition for a writ of certiorari and any further proceedings in this Court. would respectfully show the Court the following Constitutional violations without the basic guarding principles guaranteed in the Fourteenth Amendment and equal rights protection under the Fair Housing Act 42 USC 3610 et al.

iii

UNDISPUTED FACTUAL BACKGROUND OF DUE PROCESS VIOLATIONS

- I In the First Eviction Applicant due process was violated due to Fraud upon the Court filling by respondent. The judgment entered to Post supersedeas bond in less than 48hrs was unconstitutional, Applicant Posted Cash supersedeas Bond of \$12480.00 within 24hrs the Writ of possession Judgement was issued after the law had suspended the Trial Court Judgment by a Bond and an Order of the First Cour of appeals on July 15th 2022 *First Eviction Case: See Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC, Harris County Court at Law #1 No. 1176890 (Harris County Court at Law) See also the Texas First District Courts of Appeals, No: 01-22-00520CV, and 01-22-00525CV. See Attached*
 - i. *Exhibit 5 First Court of Appeal July 15th 2022 Stay Order due to supersedeas cash bond posted*
 - ii. *July 19th 2022 writ of possession posted on Applicant apartment unit*

iii. *July 20th 2022 First Court of appeal compelled to sign a second Order staying any effort to execute a writ of possession pending appeal*

- 2 The First Eviction was ruled in favor of Applicant on October 31st 2023
Applicant was Granted Superior Right of Possession of the Subject Apartment *See Aderonke Aderemi Vs. Massandra KV Vineyards Owner LLC as Successor in Interest to PAC Vineyards LLC, Harris County Court at Law #1 No. 1176890 (Harris County Court at Law) See also the Texas First District Courts of Appeals, No: 01-22-00520CV,*
- 3 The First Eviction had not deposed of the Parties pending in the Appellate Court when respondent refiled a second eviction on the same claim request “Possession Only”
- 4 The second Eviction Case was assigned and docketed in Harris County Court #2 with Judge Jim Kovach and without procedural requirement the Case was unlawfully and illegally switched to Harris County Court at law #1. See attached Clerk’s record **see Exhibit A (2)**
- 5 Applicant Posted a Supersedeas Cash Bond of \$12,480.00 to Stay the Enforcement of the Trial Court’s judgment signed on May 10th, 2024, without jurisdiction. **Exhibit B (2)**

- 6 Applicant filed emergency relief on Respondent's ongoing constructive eviction in the first and second refiled eviction but was denied. See

Exhibit I SIGNED ORDERS

The **U.S. Supreme Court in Keystone Driller Co. v. General Excavator Co** stated "The clean hands doctrine is based on the maxim of equity which states that one "who comes into equity must come with clean hands." This doctrine requires the court to deny equitable relief to a party who has violated good faith with respect to the subject of the claim . The purpose of the doctrine, is to prevent a party from obtaining relief when that party's own wrongful conduct has made it such that granting the relief would be against equity and good conscience., **see** Colby Furniture Company, Inc. v. Belinda J. Overton However, as noted by the **U.S. Supreme Court in Keystone Driller Co. v. General Excavator Co.** such a wrongful act must have an immediate and necessary relation to the equity that is being sought

- 7 The First Court of Appeals bypassed Jurisdiction to affirm the Trial Court's Judgment entered without jurisdiction on May 10th, 2024.

Exhibit C July 16th, 2026, First Court of Appeal signed Judgment,

- 8 The Trial Court without jurisdiction sign an Order on July 22nd 2026 to increase Bond after the Judgment of the Appellate Court was signed on July 16th, 2026 **Exhibit C (1) July 22nd 2026 Order**

- 9 The Judgment of the Trial Court signed to increase rent bond to \$44,928.00 after the judgment of the First Court of Appeals has no language that a Writ of possession will be executed but respondent filed a letter and a request for a Writ of possession

i. **Exhibit C (1) July 22nd 2026 Trial Court Order, Exhibit D,**

Respondent request for a Writ

- 10 The Writ of Possession Judgment signed on May 10th, 2024, **STAYED BY LAW pursuant to Tex R. App Pro 24.1(f) and Prohibited in accordance to Tex R. Civ Pro 510.18 g (1)** was executed on August 19th, 2026, a clear violation of the Fourteenth Amendment due process.

EXHIBIT F WRIT EXECUTED

- 11 The Writ of Possession **EXECUTED ON AUGUST 19TH 2026 OF THE** Judgment signed on May 10th, 2024, by the trial Court's was recalled two years ago on June 3rd, 2024, due to Applicant supersedeas bond posted.
See Attached Exhibit B (3)

- 12 **Jurisdiction is not a waivable right. The Doctrine of the Supremacy Clause**

- 13 Respondent filling a Writ of Possession request on a judgment for possession signed on May 10th, 2024, is fraudulent and in violation of **Texas Rule of Civil Procedure 510.18 g (2) . see Attached Exhibit D**

- 14 The Mandate has not issued to enforce a Writ of Possession even if there was jurisdiction **pursuant to Texas R. App Pro 51.1 (b)** the Trial Court is mandated not to Make any further Order and Only upon the receipt of

the Mandate by the trial court clerk can the Appellate judgment be enforced

- 15 **The second refiled eviction was not transferred from Harris County Court at law #2 to Harris County Court at Law #1 Pursuant to Harris County Local Rules 3.1.1 once a Case is randomly assigned and docketed in one of the courts the case will remain in that Court for all purposes UNLESS TRANSFERRED. Pursuant to the Harris Cnty. L. R. Civ. Ct 3.2.5 Any case may be transferred from one court to another court by written order of the Administrative Judge of the County Civil Courts at Law division or by written order of the judge of the court from which the case is transferred; provided, however, that in the latter instance, the transfer must be with the written consent of the court to which the case is being transferred. Applicant's Eviction Case was unlawfully switched from Harris County Court at Law #2 with Judge Jim Kovach to Harris County Court at Law 1 with former Judge Andrie Lawton-Evans. In accordance to The Mandatory and non-discretionary statutory transfer requirement under the Texas Government Code § 74.164 governs the Authority and Jurisdiction of a Judge to preside over a transferred Action. MUST be transferred with recorded documentation under Texas Government Code GOV'T §**

51.403a. rule (e) **This section applies regardless of whether the transferee court and the transferring court are in the same or different counties. Also the electronic requirement is governed by Gov Code Section 72.031**

- 16 Applicant pointed out 2 points of error in its Motion for Rehearing Enbanc that rendered the 1st Court of Appeals Judgment signed on July 16th 2026 **VOID BY LAW**, that Ordered Applicant to pay Court Cost. The Court without Enbanc Hearing corrected its Judgment on Aug 25th 2026 and **BYPASSED THE MOST IMPORTANT ISSUE OF JURISDICTION** and denied Applicant's Motion as Moot same day August 25th 2026. "See Exhibit G"

ARGUMENTS

- A Whether the Supremacy Clause permits a State Trial Court and Appellate Court to bypass Jurisdiction, substantial and Procedural laws, plain errors, invalidate all procedural and substantive laws, enter several judgments depriving Applicant its liberty, life and personal property Granted by the Fourteenth Amendment due process and equal rights protection of the United States Constitution

JURISDICTION IS NOT A WAVIABLE RIGHT UNDER THE SUPREMACY CLAUSE FOUND IN ARTICLE VI, CLAUSE 2 OF THE U.S.

This is a foundational principle of appellate procedure, rooted in the idea that a court cannot decide the substance of a dispute if it lacks the authority to hear it. *Under Steel Co. v. Citizens for a Better Environment*, 523 U.S. 83 (1998), the Supreme Court held that federal courts must satisfy themselves of jurisdiction before deciding the merits. This ensures that only cases properly before the court are adjudicated on their merits.

The law is clear that jurisdiction is not a waivable right, it cannot be consented to and it forbids a Court from hearing a Case when it lacks jurisdiction. Applicant could not attend the eviction trial on April 29th 2024 due to it jurisdictional right. The Court of Appeals bypassed the jurisdictional transfer procedural requirements and substantial right, affirmed the Trial Court's judgment WITHOUT JURSDICTION Invalidated and bypassed All Mandatory Transfer Statutory Rules in direct violation of due process. Supremacy Clause establishes that **federal laws takes precedence over State laws** when there is a conflict.

State laws, state constitutions, and state court decisions are subordinate to the U.S. Constitution, federal statutes, and treaties. Federal courts have the authority to **preempt** state laws that conflict with federal laws through judicial review.

This rule prevents States from undermining federal authority and ensures uniformity in applying the Constitution and federal statutes across all States.

"Jurisdiction is the power to declare the law," the U.S. Supreme Court has said, "and when it ceases to exist, the only function remaining to the court is

that of announcing the fact and dismissing the cause.” Ex parte McCardle, 7 Wall. 506, 514 (1868); see also Fin. Comm’n of Tex. v. Norwood, 418 S.W.3d 566, 578 (Tex. 2013) (quoting Sinochem, 549 U.S. at 431). While the Supremacy Clause itself does not define the Supreme Court’s jurisdiction, it underpins the Court’s power to hear cases involving federal laws. When a State law conflicts with federal laws, the Supremacy Clause gives the federal judiciary the authority to resolve such conflicts,

Jurisdiction is not a waivable right under the Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and **the Judges in every State shall be bound thereby**, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.

ARGUMENT 2

B Whether a State Court is granted discretionary authority to assume jurisdiction under **Supremacy Clause** found in **Article VI, Clause 2** of the United States Constitution. To enforce a forcible detainer action STAYED AND SUSPENDED when the record undisputedly reveals the Court lacks jurisdiction to enter any judgment absence substantial and procedural due process laws

Jurisdiction is prerequisite to Suits, it may not be waived, and it may be raised for the first time on appeal. Heckman v. Williamson Cnty., 369 S.W.3d 137, 150 (Tex. 2012); Tex. Ass’n of Bus. v. Tex. Air Control Bd., 852 S.W.2d 440, 445–46 (Tex. 1993)

“Courts always have jurisdiction to determine their own jurisdiction.” *Hous. Mun. Emps. Pension Sys. v. Ferrell*, 248 S.W.3d 151, 158 (Tex. 2007) (*emphasis added*). And that principle goes further for an appellate court, which “always has jurisdiction to determine its own, and the lower courts’, jurisdiction.” *Abbott v. Mexican Am. Legis. Caucus*, 647 S.W.3d 681, 699 (Tex. 2022) (*emphasis added*). That foundational premise of judicial authority means that a court—especially an appellate court—is never right to think that it is empowered to reach a merit question but forbidden from resolving an antecedent jurisdictional dispute

Argument 3

- C Whether equal rights protection permits a State to contradict its own laws, local rules, Texas Constitution and without the basic guarding principles completely violates Applicant’s fair housing rights Granted under the Civil Rights Act of 1968

THE CONSTITUTION Guarantees Equal Right Protection

The U.S. Constitution, states that no one shall be "deprived of life, liberty or property without due process of law" by the federal government. The Fourteenth Amendment, ratified in 1868, uses the same eleven words, called the Due Process Clause, to extend this obligation to States

Under Section 1 of the Fourteenth Amendment, ratified in 1868

"No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws" " is a constitutional restriction from the Fourteenth Amendment that prohibits States from infringing on the privileges, immunities, life, liberty, or property of U.S. citizens without due process of the law

Supreme Court of Texas and the First Court of Appeals denied Applicant's right to equal protection in respect to jurisdiction, transfer rules, Texas law and local rules granted by the Constitution. The Supreme Court of Texas in its most recent ruling in **THE STATE OF TEXAS v. CITY OF MCALLEN, ET AL.**; from Travis County; 3rd Court of Appeals District (03-22-00524-CV, 706 SW3d 503, 11-15-24 stated that 9 years of Litigation on a Case that lacked Jurisdiction did not absolve the Jurisdictional defect that was discovered and resulted in a dismissal and Vacated the lower Court's Judgment despite 9 years of litigation

The Supreme Court of Texas stated

"Jurisdiction Comes First, and Vacatur Is Mandatory Once It Is Absent

"courts must always dismiss a case to which the judicial power does not extend, no matter the stage of the litigation at which the defect is discovered. See, e.g., *Rattray v. City of Brownsville*, 662 S.W.3d 860, 868–69 (Tex. 2023); *Fin. Comm'n of Tex. v. Norwood*, 418 S.W.3d 566, 578 (Tex. 2013). The judgments of the lower courts are vacated, and the case is dismissed for lack of jurisdiction"

"For the foregoing reasons, this Case must be dismissed for lack of jurisdiction. Perhaps, if the case is revived in a justiciable posture, some of the time

and effort expended over the last nine years will not have gone entirely to waste. Wasteful or not, courts must always dismiss a case to which the judicial power does not extend, no matter the stage of the litigation at which the defect is discovered.⁶See, e.g., *Rattray v. City of Brownsville*, 662 S.W.3d 860, 868–69 (Tex. 2023); *Fin. Comm’n of Tex. v. Norwood*, 418 S.W.3d 566, 578 (Tex. 2013). The judgments of the lower courts are vacated, and the case is dismissed for lack of jurisdiction *THE STATE OF TEXAS v. CITY OF MCALLEN, ET AL.; from Travis County; 3rd Court of Appeals District (03-22-00524-CV, 706 SW3d 503, 11-15-24) 24-1060 it states:*

”. There is no evidence of transfer in the Harris County clerk’s record that the eviction case was transferred to Harris County at law Court #1 from Harris County Court at Law #2. There is no documentation of ANY TRANSFER OF APPLICANT’S CASE INSTEAD EVIDENCE SHOWS CASE WAS FRAUDULENTLY SWITCHED FROM HARRIS COUNTY COURT AT LAW 2 TO HARRIS COUNTY COURT AT LAW 1 . **SEE ATTACHED EXHIBIT A (2)**

ARGUMENT 4

D Whether due process guarantees meaningful appellate review when a State Court’s System provides proceedings that produce zero relief or delayed response to several requests for relief to preserve federal civil rights and equal rights protection of the law Granted under the Constitution after harm has occurred

THE CONSTITUTION GUARANTEES EQUALL RIGHTS PROTECTION

The Supreme Court's of Texas actions contradict all transfer rules and its own ruling by delaying ruling on Applicant's Emergency Petition and Motion to Stay until after the harm had occurred in violation of due course of law and then proceeded to deny as Moot without regards to Applicant's life, liberty and Property Granted under the 14th Amendment before a Person can be deprived of those rights

The transfer rule bypassed in this Case conflicts with all transfer statutory rules to establish jurisdiction and authority governing all courts.

Applicant asserts that the Supreme Court of Texas are obligated to follow transfer rules of an appeal in accordance to **Gov Code sec 73.001-73.002** The supreme court shall adopt rules for **transferring an appeal inappropriately filed in the Fifteenth Court of Appeals to a court of appeals with jurisdiction over the appeal; and** transferring to the Fifteenth Court of Appeals from another court of appeals the appeals over which the Fifteenth Court of Appeals has exclusive intermediate appellate jurisdiction under Section 22.220 (Civil Jurisdiction)(d)

The Court Noted

"We have jurisdiction only if the court of appeals decision conflicts with a prior decision of this Court or of another court of appeals. TEX. GOV'T CODE §§ 22.001(a)(1), (2). Decisions conflict for jurisdictional purposes "when there is inconsistency in their respective decisions that should be clarified to remove unnecessary uncertainty in the law and unfairness to litigants." *Id.* § 22.001(e). As we explain below, the trial court erred in denying the State's plea to the jurisdiction because the State was acting

under color of contract in utilizing the treatment process that the '653 patent covers. Because Holland's claim does not arise as a taking under the constitution but sounds in contract, the court of appeals' decision conflicts with our decision in General Services Commission v. Little-Tex Insulation Co., 39 S.W.3d 591 (Tex.2001), and we have jurisdiction to resolve the conflict.

However the Supreme Court of Texas denied Applicant's equal protection under the law when it received the Trial Court's and the Appellate Court's rulings that clearly lacked Jurisdiction, conflicted with Transfer rules and entered Judgment.

Supreme Court of Texas denied Applicant its Right to Jurisdiction under the equal right protection

The Supreme Court of Texas delayed due course of law to review Applicant's Emergency Petition and Motion to Stay that it received on July 20th 2026 , delayed its ruling and denied as Moot until after the Egregious harm and fraud upon the Court had occurred

VOID JUDGMENT HAS NO LEGAL EFFECT SO THE CASE IS NOT MOOT UNDER EQUAL RIGHT PROTECTION

Applicant argues that Monetary damages awarded to Respondent without Jurisdiction is a live Controversy including the fact that the Judgment entered against Applicant without Jurisdiction is **VOID AND UNENFORCEABLE**

"When the record shows a lack of jurisdiction in the lower court, the appropriate action on the part of the Appellate Court is to arrest judgment or vacate any Order

entered without authority. Id. at 176, 273 S.E.2d at 711.

Vacatur is Mandatory when Jurisdiction is Absent or Defective,

In federal courts, jurisdiction is the foundation of all proceedings. Without it, a court cannot validly adjudicate a case, regardless of the merits. This principle was reaffirmed in **Hain Celestial Group, Inc. v. Palmquist (2026)**, Federal courts have a time-of-filing baseline for jurisdiction—once a case is removed to federal court, the jurisdictional requirements must be met at that moment. If they are not, the case is not properly within federal jurisdiction.

The U.S. Constitution, states that no one shall be "deprived of life, liberty or property without due process of law" by the federal government. The Fourteenth Amendment, ratified in 1868, uses the same eleven words, called the Due Process Clause, to extend this obligation to States

AGRUMENT 5

- E Whether Supreme Clause permits the Court Judges to enter judgments based on Fraud upon the Court in order to enforce an illegal fraudulent forcible detainer action in the process trespassed Applicant from retrieving everything Applicant's family has ever worked for in the past 20 years including irreplaceable valuables was taken, stolen

THE SUPREME COURT OF TEXAS, FIRST COURT OF APPEALS, HARRIS COUNTY COURT AT LAW #1 COLLECTIVELY WENT AGAINST EQUAL RIGHTS PROTECTION, FOURTEENTH AMENDMENT DUE PROCESS, TEXAS STATE LAWS AND THE UNTIED STATE CONSTITUTION,INCLUDING LOCAL RULES TO ISSUE JUDGMENTS AND ORDERS BASED ON FRAUD UPON THE COURT INCLUDING

FRIVOLOUS FILINGS COMMITTED BY RESPONDENT MASSANDRA KV
VINEYARDS OWNER LLC TO EXECUTE AN UNCONSTITUTIONAL ILLEGAL
FORCIBLE DETAINER ACTION AGAINST APPLICANT WHO WAS GRANTED
SUPERIOR RIGHT OF POSSESSION IN THE FIRST EVICTION LAWSUIT FULLY
ADJUDICATED ON THE MERITS BY THE APPELLATE COURT CONCLUSIVELY
AS A MATTER OF LAW

The First Court of Appeals lacked jurisdiction to affirm the lower court's
judgment signed on May 10th 2024 and an Order signed on July 22nd, 2026, its duty
was to dismiss the eviction and Vacate the lower Court's judgment. **The Appellate
jurisdiction does not extend beyond the jurisdictional limit of the lower courts.**

The appellate jurisdiction of a statutory county court is confined to the
jurisdictional limit of the county court *Crumpton v. Stevens*, 936 S.W.2d 473, 476
(Tex.App.-Fort Worth 1996, no writ); *Goggins v. Leo*, 849 S.W.2d 373, 375
(Tex.App.-Houston [14th Dist.] 1993, no writ); *Standard Inv. Co. v. Dowdy*, 122
S.W.2d 1107, 1109 (Tex.Civ.App.-Dallas 1938, writ dismissed).

**THE TRIAL COURT JUDGMENT ENTERED AFTER THE APPELLATE
COURT JUDGMENT SIGNED ON JULY 16TH 2026 WAS
UNCONSTITUTIONAL AND 20DAYS WAS DENIED TO APPLICANT TO
POST ADDITIONAL BOND IF VALID**

The trial court had no authority to enter any further order entered on July
22nd 2022 after the judgment of the first court of appeals entered on July 16th 2026.
Pursuant to *TEX. R. APP. P 51.1 (b)* the trial court has no jurisdiction to enforce or

enter any further order unless it has received a mandate. *TRAP 51.1 (b)* states when the trial court clerk receives the mandate, the appellate court's judgment must be enforced. **THE TRIAL COURT NEED NOT MAKE ANY FURTHER ORDER IN THE CASE,**

Due to this unconstitutional Enforcement Applicant lost EVERYTHING its Family had worked for and owned for over 20 Years. **APPLICANT'S HUSBAND** was unlawfully rough-handled, put in handcuffs threatened to be sent to Jail and placed in a Police Vehicle for over 3 hours. Applicant was also detained in a Police Vehicle because it raised the issue that the Trial Court's Judgment was prohibited by law to be enforced Pursuant to Texas Rules of Civil Procedure 510.18 (g) 1

A writ of possession may not issue more than 60 days after a **judgment for possession is signed**. For good cause, the court may extend the deadline for issuance to 90 days after a judgment for possession is signed. **See Attached Exhibit E 24hrs Writ of Possession of a Judgment entered on May 10th 2024**

Furthermore, even if the Trial Court Order signed on July 22nd, 2026, to increase rent bond was valid, which in this case is not Applicant was still entitled to **20 days opportunity to respond** to the First Court of Appeal Order signed on August 11th, 2026, **see Exhibit D** denying Motion to Stay Trial Court Order signed

July 22nd, 2026, for an additional increase of rent bond to \$44,928.00, **Exhibit (C**

1) Pursuant to Tex R. App. Pro. 24.4 (e)

Effect of Ruling. If the appellate court orders additional or other security to supersede the judgment, enforcement will be suspended for **20 DAYS** after the appellate court order, if the judgment debtor does not comply within that period, the judgment may be enforced. When any additional bond, deposit, or security has been filed, the trial court clerk must notify the appellate court. The posting of additional security will not release the previously posted security or affect any alternative security arrangements that the judgment debtor previously made unless specifically ordered by the appellate court

Respondent discriminatory Eviction was for Possession Only, did not state a claim for ANY ALLEDGED rent amount IN ITS REFILED EVICTION PETITION,

Pursuant to **Tex. R. Civ Pro 510.6(a) 10**: A petition in an eviction case must be sworn to by the plaintiff and must contain: **the total amount of rent due and unpaid at the time of filing, if any; “see Attached Exhibit A” page 3 Eviction**

Citation

Also, the Trial Court’s Judgment entered on May 10th, 2026, did not award any alleged Non-payment of RENT.

The Remaining Factors Favor a Stay and for Re-entry

- 1 Applicant Adèronke Aderemi is likely to succeed on the Merits because the execution of the forcible detainer action was without jurisdiction, in direct violation of the Fourteenth Amendment due process and Equal Rights Protection, WRIT OF POSSESSION WAS ILLEGALLY acquired by FRAUD UPON THE COURT

The Judgment for forcible detainer action against Applicant is fraudulent, prohibited by law unenforceable, in violation of Fourteenth Amendment due process, without law. And Void Judgment

- 1 The State Failed to comply with the constitution that no state shall deprive any Citizens life liberty and property without due process
- 2 The State Violated All federal law, State laws and Local Law to enforce a Writ of Possession judgment entered without Jurisdiction! suspended and unenforceable by Law
- 3 The State lack jurisdiction to enforce an illegal forcible detainer against Applicant from it place of residence at 21550 Provincial Blvd Katy Texas 77450 Apartment 921 and from it Rented Garages G22, G803, G804 and G903 without due process grantee under the fourteenth amendment.
- 4 The State failed to follow its own transfer rules and State law governing transfers procedural and substantial law
- 5 Judgment entered without Authority and Jurisdiction are void and unenforced.
- 6 Egregious conduct and fraud practices by Respondent was also in the FIRST EVICTION it took Justice April Farris in the First Court of Appeal to signed Twice to Stay the Enforcement of a Writ of possession against Applicant despite signed unlawfully Judgment signed on April 5th 2022 to be Executed April 7th 2022 supersedeas within 24hrs April 6th 2022 . **See Exhibit 5**

Respondents' attorney Angeline Vachris Kell trespassed Applicant from retrieving its belongings after Applicant had rented a 26 inch UHAUL, she used the Police Sheriff department to **CRIMINALLY TRESPASS** Applicant on August 21st 2026, proceeded to send out a Memo to the surrounding area to come and steal Applicant personal belonging after been removed from its 4 rented garages full of valuable and its rented 2 bedroom apartment tossed out in the parking lots in the premises People came and started looting Applicants' belongings including

Respondent employees, Applicant Vehicle parked in front of one of its rented garage G903 gone, this was observed by other Residents in the Premises. The looting of Applicant's valuable belongings was ongoing not stop. Thereafter 6 days later Attorney Angeline Kell had the **nerve** to state in an email dated August 26th 2026 that Applicant had 24hrs from the date of email to retrieve its belongings from the Apt Premises.

The unconstitutional May 10th, 2024, Trial Court judgment submitted by Respondent Attorney Brice Barrett Beale, and Angeline Vachris Kell who had not made any written Notice as the substitute attorney in the Trial Court's oral hearing held on July 21st 2026 affixed their signature on behalf of Respondent, to Request for a fraudulently Writ of Possession on a Judgment superseded over 2 years ago and prohibited by law. ***Pursuant to Texas R. App Pro 24.1 (f) an enforcement of a judgment MUST be suspended If the Judgment is superseded and pursuant to Tex. R. Civ Pro 510.18 (g) 2*** A writ of possession may not be executed after the 90th day after a judgment for possession is signed

Judgment Order entered without Jurisdiction is void and can be raised in any Court at any time

An Order that exceeds the jurisdiction of the court is void, and can be attacked in any proceeding in any court where the validity of the judgment comes into issue. (See **Rose v. Himely (1808) 4 Cranch 241, 2 L ed 608; Pennoyer v. Neff (1877) 95 US 714, 24 L ed 565; Thompson v. Whitman (1873) 18 Wall 457, 21 L ED 897; Windsor v. McVeigh (1876) 93 US 274, 23 L ed 914; McDonald v. Mabee (1917) 243 US 90, 37 Sct 343, 61 L ed 608**

The Judgments of both the Trial Court and Appeals Court is Void

A **void judgment** is one that is invalid from the outset because the court lacked jurisdiction over the parties or subject matter, or because the process violated fundamental due process rights. The limitations inherent in the requirements of due process and equal protection of the law extend to judicial as well as political branches of government, so that a judgment may not be rendered in violation of those constitutional limitations and guarantees. *Hanson v Denckla*, 357 US 235, 2 L Ed 2d 1283, 78 S Ct 1228.

CONCLUSION

No State shall deprive any person of life, liberty, or property, without due process of law.” Ratified in 1868, it extends the protections of the Fifth Amendment to the states, ensuring that state actions cannot arbitrarily take away fundamental rights.

Codified in **Art. I, § 19, Texas Constitution (1876)**: *No citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disfranchised, except by the due course of the law of the land*

Applicant assert that due to the extra-ordinary circumstance of the nature of this illegal forcible detainer action enforced without any guarding principle of law THE UNITED STATES SUPREME COURT HAS JURISDICTION UNDER THE EXCEPTIONNAL CIRCUMSTANCES RULE and the ALL WRIT ACT including 28 USC 2283 TO ENJOIN STATE COURTS VACATE ALL JUDGMENTS AND ORDEER ENTERED WITHOUT JURISDICTION, ISSUED AN ORDER OF RE-ENTRY BECAUSE THE WRIT OF POSSESSON AGAINST APPLICANT WAS FRAUD UPON THE COURT orchestrated between State officials, respondent Massandra KV Vineyards Owner LLC and its Managing Company Knightvest LLC to cause irreparable harm without regards to the law

PRAYER

WHEREFORE PREMISES CONSIDERED DUE TO THE CONSTITUTIONAL VIOLATION IN THIS CASE AND WITHOUT REGARD TO THE LAW, Applicant Prays and Requests For An Administrative Relief For A STAY OF ALL JUDGMENTS AND ORDERS SIGNED WITHOUT JURISDICTION AND GRANT APPLICANT Re-Entry into its place of residence at 21550 PROVINCIAL BLVD KATY TEXAS 77450 APARTMENT #921 INCLUDING ITS RENTED Garages G22, G803, G804 AND G903, Applicant respectfully requests this court to issue an EXECUTIVE Order Under The Exceptional Circumstance Rules and The All-Writs Act, 28 U.S.C. § 1651 and Supreme Court rule 20, To Stay All VOID and ILLEGAL Judgments signed to Enforced an illegal forcible detainer action with complete disregard to The Constitution, State Laws, Local laws, Without Jurisdiction. Absence Procedural And Substantial Laws. to further stay ANY Mandate in direct VIOLATION of the Fourteenth Amendment Applicant requests this Court to issue an EXECUTIVE ORDER FOR AN immediate Writ of Re-entry into Applicant's Residence and its 4 Garages pending the final disposition of a Writ of Certiorari that would be filed in this Court. Applicant requests for any other Exceptional Order in equity that the law will allow. Including a request for this Court to sanction Respondent and its Attorneys' Brice Barrett Beale and Angeline Vachris Kell due to Fraud and be reported to the appropriate department


Respectfully Submitted

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IN THE SUPREME COURT OF THE UNITED STATES

ADERONKE ADEREMI

Applicant

VS

MASSANDRA KV VINEYARDS OWNER LLC,
as Successor in Interest to Pac Vineyards LLC

Respondent

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Emergency Application to Stay in the above-referenced case contains 7077 words, excluding the parts of the exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on September 14th 2026

Aderonke Aderemi

P.O.BOX 5044

KATY TEXAS 77491

YINKAOFE2017@YAHOO.COM



IN THE SUPREME COURT OF THE UNITED STATES

ADERONKE ADEREMI

Applicant

VS

MASSANDRA KV VINEYARDS OWNER LLC,
as Successor in Interest to Pac Vineyards LLC

Respondent

CERTIFICATE OF SERVICE

I hereby Certify that all parties required to be served have been served with copies of the Application for a Stay and a Request for administrative for a Re-entry

Aderonke Aderemi

P.O.BOX 5044

KATY TEXAS 77491

YINKAOFE2017@YAHOO.COM



See attached SERVICE LIST

Brice Beale

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Attorneys for the Appellees

IN THE SUPREME COURT OF THE UNITED STATES

ADERONKE ADEREMI

Applicant

VS

**MASSANDRA KV VINEYARDS OWNER LLC,
as Successor in Interest to Pac Vineyards LLC**

Respondent

**To the Honorable Samuel A. Alito, Jr., Associate Justice, of the
United States Supreme Court**

EMERGENCY APPLICATION TO STAY

**all unconstitutional Judgments and Orders entered by the First Court of
Appeals, Houston Texas, and the Supreme Court of Texas**

and request a Re-entry for administrative relief from the unconstitutional, Egregious conduct, fraud upon the court to obtain enforcement of a Forcible detainer action executed against Applicant from 21550 Provincial Blvd Katy, TX 77450 that had been suspended by law, without jurisdiction, absence procedural and substantial laws granted by the Fourteenth Amendment and Equal Rights Protection under the United States Constitution

APPENDIX

- | | |
|---------------|--|
| Exhibit A | Court stamp of Eviction case docketed in Harris County Court at Law 2 with Presiding Judge Jim Kovach |
| Exhibit A (1) | Notice dated March 25th 2024 from Harris County Clerk case docketed in Court 2 |

- Exhibit A (2) **Appellate Clerk Record and Supplemental Record (Table of contents)**
- Exhibit A (3) June 18th, 2024, *The First District Court of Appeals*
Memorandum Opinion denied Applicant's Petition for Mandamus on June 18th, 2024, on Trial Court assuming jurisdiction
- Exhibit A (4) Harris County Court at Law Order denying Applicant Motion for Lack of Jurisdiction and Objection based on fraudulent switch of the eviction Case from Harris County Court at Law #2 to Harris County Court at Law #1
- Exhibit B Harris County Court at Law #1 Default Judgment signed on (May 10th 2024)
- Exhibit B (1) Writ of Possession issued **May 31th 2024**
- Exhibit B (2) Applicant Posted a Supersedeas Bond Cash Payment of \$12,480.00 (**June 3rd, 2024**), to suspend Writ of Possession of the default judgment entered on May 10th 2024
- Exhibit B (3) Writ of Possession Returned June 7th 2024 due to supersedeas bond payment
- Exhibit C ***First District Court of Appeals*** Memorandum Opinion judgment of ***July 16th 2026 entered after 6 months of the Brief submission***
- Exhibit C (1) ***Harris County Court at Law #1, July 22nd, 2026, second Order signed without Authority and Jurisdiction***
- Exhibit D ***August 12th 2026 First District Court of Appeals***
Memorandum Opinion Order denying Applicant Emergency Motion for relief in the enforcement of A writ of possession on the Trial Court default Judgment of May 10th 2024 and it second order entered on July 22nd 2026 for an additional Bond increase to \$44, 928.00 without authority, jurisdiction. Respondent fraudulent Request for Writ of Possession

- Exhibit E** *On August 12th, 2026, 24hrs Vacate Notice issued for a Writ of Possession of the Harris County Court at Law #1 Judgment signed on May 10th 2024*
- Exhibit F** *Writ of Possession executed August 19th, 2026, same day Applicant Application to Stay was received in this court*
- Exhibit G** *First Court of Appeal Corrected Judgment on Applicant Motion for rehearing Enbanc signed by Only 3 justices without the enbanc and (Denied as Moot)*
- Exhibit H** *Supreme Court Order denying Applicant's Petition for Writ of Mandamus and Motion for Emergency relief*

Continued Appendix

- Exhibit I** *First Court of Appeal Order dated Sep 20th 2022 denied injunctive relief on constructive eviction by respondent Massandra KV and requested relief denied in the second eviction on May 8th 2024 denied relief on going constructive eviction by respondent*

Additional Exhibit for the First Eviction

EXHIBIT 5

First Court of Appeal Order signed July 15th 2022, staying the Writ of possession due to supersedeas bond posted by Applicant

July 19th 2022 order of the court disregarded a 24hrs Writ of Possession posted on Applicant Apartment unit

July 20th 2022, First Court compelled to sign a Second Order to Stay any effort to execute a Writ of possession pending appeal in the first eviction

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