**IN THE**

**SUPREME COURT OF THE UNITED STATES**

**PETITION FOR WRIT OF CERTIORARI**

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

**ORDERS BELOW**

For cases from **state courts:**

The Order dated 11-23-15 from the Court of Appeals of Maryland to review the merits appears at Appendix A to the petition and is unpublished.

The Order dated 9-21-15 from the Court of Appeals of Maryland to review the merits appears at Appendix B to the petition and is unpublished.

**JURISDICTION**

[ X] For cases from **state courts:**

The date on which the Court of Appeals of Maryland issued their Order after the Petitioner filed her Petition for Writ of Certiorari 9-21-15. A copy of their Order appears at Appendix B

The date on which the Petitioner's Motion for Reconsideration was mailed to the Court of Appeals of Maryland is 9-24-15. A copy of the Petitioner's Motion for Reconsideration appears as Appendix C

The date on which Court of Appeals of Maryland issued their Order which denied the Petitioner's Motion for Reconsideration was 11-23-15.

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

**CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

**STATUTES**

14th Amendment

Federal Law 42 U.S.C & 1983

Federal Law 42 U.S.C & 1985

**REFERENCE TO PERTINENT MARYLAND RULES**

A-104, A-106, C-101, C-102, Rules 1.1, 1.2(a), 1.2(b), 2.2, 2.15 (a), 2.15(b),

2.15(c) and 2.15(d) of the Maryland Code of Judicial Conduct

**STATEMENT OF THE CASE**

As substantiated by page 9 of the 11-page document entry (Appendix E), the clerk entered into the record on 7-6-15 the final judgment of the panel of In Banc judges from the Circuit Court of Baltimore City regarding the Petitioner’s Motion for Reconsideration for Civil Case No. 24-C-14-000558. As evidenced in her Certificate of Service contained in her Petition for Writ of Certiorari (“Writ”) to the Court of Appeals of Maryland (Appendix C), the Petitioner mailed her Writ to on 7-31-15. The petition docket receipt from the Court of Appeals of Maryland (Appendix F) supports the material fact that the Petitioner’s Writ was filed in the record of this Court on 8-3-15. In her Writ to the Court of Appeals of Maryland (“Court of Appeals”), the Petitioner alleges that the exhibits that accompany her Writ prove that the panel of In Banc judges intentionally violated Federal Law 42 U.S.C & 1983, Federal Law 42 U.S.C & 1985, and deliberately breached the Petitioner’s 14th Amendment right as a result of intentionally committing perjury, fraud, and professional misconduct because the panel refused to correct these prejudicial errors even after the Petitioner filed her Motion for Reconsideration which referenced the evidence in the record which substantiated their prejudicial errors. The Petitioner, also, alleges in her Writ to the Court of Appeals that the panel of In Banc judges intentionally acted arbitrarily, capriciously, have deliberately abused their discretion, and have deliberately infringed upon A-104, C-101, C-102, Rules 1.1, 1.2a, 1.2b, and 2.2 of the Maryland Code of Judicial Conduct.

In her Order dated 9-21-15 (Appendix B), the Chief Judge, Judge Mary Ellen Barbera, denied the Petitioner’s Writ not because the accompanying evidence did not support the allegations against the panel of In Banc judges, but used perjury as the grounds for denying the Writ by erroneously stating in her one-sentence Order that the Petitioner’s Writ was denied due to being filed late and, thus, cited “….it is ORDERED, by the Court of Appeals of Maryland, that the petition be, and it is hereby, dismissed on the grounds of lateness.” In her Motion for Reconsideration to the Court of Appeals of (Appendix D) dated 9-24-15, the Petitioner referenced the Court of Appeals to the evidence that is in their record which substantiates that this Court had committed the egregious prejudicial error of perjury in asserting that her Writ was filed late. The Petitioner’s Writ was filed in the Court of Appeals on 8-3-15 which is within the 30 days given to file the petition, with the first of the 30 days beginning on 7-6-15 which is the date that the clerk entered on the docket the judgment of the panel of In Ban judges from the Circuit Court of Baltimore City.

Since the Petitioner has requested the Department of Justice (“DOJ”) to investigate the allegations of crimes against justice by the Court of Appeals and other Officers of the Court, the Petitioner forwarded a copy of her Writ to the Court of Appeals and the accompanying evidence, forwarded a copy of her Motion for Reconsideration to the Court of Appeals with her memo dated 9-24-14 (Appendix G), forwarded copies of the clerks docket entries, and will forward a copy of this Writ and the appendices to the DOJ as well.

In spite of the fact that the Petitioner cited in her Motion for Reconsideration to the Court of Appeals that the docket entries are part of their record which substantiate their perjury, and that such prejudicial error of perjury caused her Writ to be denied, Judge Mary Ellen Barbera still refused the correct her egregious prejudicial error but simply asserted in her Order dated 11-23-15 this one sentence, namely, that “The Court having considered the motion for reconsideration filed in the above entitled case, it is ORDERED, by the Court of Appeals of Maryland, that the motion for reconsideration be, and it is hereby, denied.” Any state judiciary who intentionally acts arbitrarily, capriciously, and deliberately abuse their discretion by intentionally committing perjury and knows that such an egregious prejudicial error changes the whole outcome of a case breaches A-104, C-101, C-102, Rules 1.1, 1.2a, 1.2b, and 2.2 of the Maryland Code of Judicial Conduct.

As a result of the Court of Appeals still refusing to correct their prejudicial error of perjury in stating that the Petitioner’s Writ was denied due to being filed late, the Petitioner filed through emailing a complaint dated 12-2-15 (Appendix H), and addendum to her complaint dated 12-17-15 (Appendix I), and a Plea dated 12-23-15 (Appendix J) to the Governor of Maryland, Honorable Governor Hogan, requesting an expeditious investigation into the allegation of intentional misconduct in office against the Court of Appeals. On 1-13-16, the Petitioner posted a public “Plea to the Governor of Maryland” (Appendix K) on the website, Change.Org, in an effort to get the public involved in pleading to the Governor to investigate the allegation against the Court of Appeals. The plea asserts that “WE, the people who represent the public, have access to read Ms. Williams’ allegation of perjury by the Court of Appeals of Maryland as cited in her Complaint dated 12-2-15, Addendum to her Complaint dated 12-17-15, and in her Plea dated 12-23-15 for an unbiased and transparent investigation by Maryland’s Chief Executive Officer, the Honorable Governor Hogan. Also, Ms. Williams is asserting that the Court of Appeals of Maryland refused to correct their perjury even after they were referenced to the evidence in their record which substantiates the alleged perjury. Since the Governor appoints judges to the State judiciary like the Court of Appeals of Maryland and it is of great public interest to know if the allegation of perjury against the Highest Court in Maryland is true, then, we, the Public, are requesting that an immediate investigation be undertaken and the outcome be made known to the public.”

**REASONS FOR GRANTING THE PETITION**

Since the evidence on page 9 of the case history supports the fact that the clerk of the Circuit Court of Baltimore City entered the final judgment of Petitioner’s Motion for Reconsideration from the panel of In Banc on 7-6-15 and mailed the copies to the parties on the same day and since the petition docket receipt substantiate that the Petitioner’s Writ was filed in the Court of Appeals of Maryland on August 3, 2015, the 30-day time limit had not expired before the Petitioner filed her Writ to the Court of Appeals. Furthermore, not one of the Respondents indicated in their responses to the Petitioner’s Writ that they were requesting denial of the Petitioner’s Writ on the grounds that the Petitioner’s Writ was filed late. Moreover, since the Court of Appeals still refuse to correct their egregious prejudicial error of perjury even after being referenced to the indisputable evidence in their record which substantiate that the Petitioner’s Writ was not filed late, Chief Judge Mary Helen Barbera and the other judges who presided over the Petitioner’s Writ, committed intentional perjury. Had the Court of Appeals not committed intentional perjury, the Petitioner’s Writ would be granted because the only reason the Court of Appeals cited for denying the Petitioner’s Writ was due to their deliberate perjury. The evidence support the fact that the Court of Appeals, also, intentionally acted arbitrarily, capriciously, and have deliberately abused their discretion and infringed upon A-104, C-101, C-102, Rules 1.1, 1.2a, 1.2b, and 2.2 of the Maryland Code of Judicial Conduct by intentionally violating the Petitioner’s 14th Amendment right as a result of deliberately committing perjury on a material fact, knowing that such an egregious prejudicial error of intentional perjury caused the Petitioner’s Writ to be denied grounded on the deliberate perjury by the Court of Appeals.

**CONCLUSION**

Therefore, for the reasons cited above, the Petitioner respectfully requests that her Petition for Writ of Certiorari be granted.

Respectfully submitted,

Diana R. Williams

No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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IN THE

SUPREME COURT OF THE UNITED STATES

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Diana R. Williams - PETITIONER

vs.

Board of Education of Baltimore County - RESPONDENT

**PROOF OF SEREVICE**

I, Diana R. Williams, do swear or declare that on this date, February 8, 2016, as required by Supreme Court Rule 29, I have served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Thomas C. Morrow Andrew W. Nussbaum, Esquire

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Attorney for Respondents Damon Felton and Counsel for Carolyn thaler, Edq., and the

Maryland State Education Association Board of Education of Baltimore County

Derek Simmonsen Mathew A. Lawrence

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Baltimore Maryland 21202 500 North Calvert St., Suite 406

Baltimore, Maryland 21202

Honorable Attorney General, Lorretta Lynch

U.S. Department of Justice

950 Pennsylvania Ave. NW

Washington, DC 20530

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 8, 2016

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Diana R. Williams