DIANA R. WILLIAMS \* IN THE

Petitioner, \* COURT OF APPEALS

v. \* OF MARYLAND

THE LAW FIRM OF TURNBULL, \* No. 289

NICHOLSON & SANDERS,

P.A., et al.

\* September Term 2015

Respondents

\* (No. 24-C-14-000558 Circuit

Court for Baltimore City)

\* \* \* \* \* \* \* \* \* \* \* \*

**MOTION FOR RECONSIDERATION**

I, Diana R. Williams, the Petitioner, who is being represented Pro Se, hereby requests that this Motion for Reconsideration be granted based on the grounds and authorities cited below:

1. **This Honorable Court of Appeals has erred as a result of an unlawful procedure and as a matter of law in departing from the accepted and usual course of judicial proceedings which gives the Petitioner 30 days from the date that the final judgment or order was “entered” in the case to file a Petition for a Writ of Certiorari (“Writ”). According to A Guide the Self Representation from the Maryland Court of Special Appeals, the entry date is the date the clerk of the circuit court recorded the judgment or order on the case docket.** As evidenced by the Exhibit 1 that accompanied the Petitioner’s Writ, namely, page 9 of the 11-page Case History, the Memorandum Order of the Court denying the Petitioner’s Motions for Reconsideration or a New Trial was entered on the docket by the clerk of the Circuit Court for Baltimore City on July 6, 2015 and was, also, mailed to the parties on the same date. Although the Petitioner received the mailing on July 11, 2015, she still was able to mail her Writ to the Court of Appeals on July 31, 2015 as indicated on her Certificate of Service that accompanied her Writ. The Petition Docket Receipt issued by the Clerk of the Court of Appeals of Maryland cites that the case was filed on August 3, 2015. Furthermore, not one of the Respondents claimed in their response to the Petitioner’s Writ that they were requesting dismissal of her Writ on the grounds of the Petitioner filing her Writ after the 30-day time limit.

**Argument**

The evidence of the case history supports the fact that the clerk of the Circuit Court of Baltimore City entered or recorded the judgment or order on the case docket and mailed the copies to the parties on July 6, 2015. The Petition Docket Receipt substantiate that the Petitioner’s Writ was filed in the Court of Appeals of Maryland on August 3, 2015, which indicates that the Writ was filed before the 30-day time limit. Furthermore, not one of the Respondents’ responses to the Petitioner’s Writ indicate that they were requesting denial of her Writ on the grounds that the Petitioner didn’t file her Writ prior to the 30-day time limit due to the fact that the Petitioner’s Writ was filed within the 30-day time frame. Thus, the Court of Appeals of Maryland has erred as a result of an unlawful procedure and as a matter of law in departing from the accepted and usual course of judicial proceedings in dismissing the Petitioner’s Writ on the grounds of lateness because the Petitioner’s Writ was filed with this Court in a timely fashion.

**Conclusion**

Thus, in conclusion, the Petitioner is requesting that this Honorable Court

grant her Motion for Reconsideration.

Respectfully submitted,

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Diana R. Williams, Pro Se

**Certificate of Service**

I HEREBY CERTIFY that on this 24th day of September 2015, a copy of the foregoing Motion for Reconsideration was served by first-class mail, postage paid upon:

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Diana R. Williams