No. 24-707

In the Supreme Court of the United States

DR. LAKSHMI ARUNACHALAM,
Petitioner,
v.
INTERNATIONAL BUSINESS MACHINES CORPORATION, JPMorgan Chase & Co., SAP America, Inc., Edward L. Tulin, Kevin J. Culligan, Tharan Gregory Lanier, Apple Inc., Facebook, Inc., Alphabet Inc., Microsoft Corporation, Fiserv, Inc., Wells Fargo Bank, N.A., Fulton Financial Corporation, Samsung Electronics America, Inc., Eclipse Foundation, Inc., Claire T. Cormier, Douglas R. Nemec, Joseph M. Beauchamp, Michael Q. Lee, David Ellis Moore, Mark J. Abate, Matthew John Parker, Sasha G. Rao, Robert Scott Saunders, Jessica R. Kunz, Citigroup, Inc., Citicorp, Citibank, N.A., Ramsey M. Al-Salam, Candice Claire Decaire, Garth Winn, Michael J. Sacksteder, Alan D. Albright, Kristie Davis, Robert W. Schroeder, Iii, Caroline Craven, Ryan T. Holte, Lyft, Inc., Uber Technologies, Inc., Exxon Mobil Corporation, Intuit, Inc., John Allen Yates, John H. Barr, Jr., Andrew James Isbester, Dominick T. Gattuso, Kronos Incorporated, Scott David Bolden, Lori A. Gordon,
Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Federal Circuit

PETITION FOR A WRIT OF CERTIORARI

Dr. Lakshmi Arunachalam, October 5, 2024
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QUESTIONS PRESENTED

Preamble: The Federal Circuit affirmed the District Court's Order, overlooking the significant fact that the presiding judge was disqualified due to a conflict of interest—revealed by his late admission of common stock ownership in the defendant three years post-appeal—denying a citizen's right to appeal and the inventor's right to sue.

1. Can a Judge with stock issue a binding order in favor of the stock-issuing party?

2. Can a Judge rule on an appeal from the decision of a case or issue tried by him?

3. Can a Judge arbitrarily restrict a citizen's right to appeal and the inventor's right to sue while denying the citizen's right to be heard and to an unbiased tribunal?

4. Should a Judge disqualify himself in any proceeding in which his impartiality might reasonably be questioned?

5. Can a Judge deny or hinder access to the courts to a citizen upon the question of due process itself?

6. Can a judge arbitrarily deprive a citizen of liberty and property, from void orders by a judge with disqualifying financial interests, with no jury trial, hearing, notice of hearing, discovery, evidence nor basis in fact or the law?

RULE 29.6 STATEMENT

Pursuant to this Court's Rule 29.6, Dr. Lakshmi Arunachalam is an individual and has no parent company and no publicly held company owns 10% or more of its stock.

PARTIES TO THE PROCEEDINGS

Petitioner Dr. Lakshmi Arunachalam ("Dr. Arunachalam" or "Petitioner"), the inventor and sole assignee of the patent(s)-in-suit, was the plaintiff and appellant in the proceedings below. Dr. Lakshmi Arunachalam is the sole Petitioner in this Court.

Respondents International Business Machines Corporation, JPMorgan Chase & Co., SAP America, Inc., Edward L. Tulin, Kevin J. Culligan, Tharan Gregory Lanier, Apple Inc., Facebook, Inc., Alphabet Inc., Microsoft Corporation, Fiserv, Inc., Wells Fargo Bank, N.A., Fulton Financial Corporation, Samsung Electronics America, Inc., Eclipse Foundation, Inc., Claire T. Cormier, Douglas R. Nemec, Joseph M. Beauchamp, Michael Q. Lee, David Ellis Moore, Mark J. Abate, Matthew John Parker, Sasha G. Rao, Robert Scott Saunders, Jessica R. Kunz, Citigroup, Inc., Citicorp, Citibank, N.A., Ramsey M. Al-Salam, Candice Claire Decaire, Garth Winn, Michael J. Sacksteder, Alan D. Albright, Kristie Davis, Robert W. Schroeder, III, Caroline Craven, Ryan T. Holte, Lyft, Inc., Uber Technologies, Inc., Exxon Mobil Corporation, Intuit, Inc., John Allen Yates, John H. Barr, Jr., Andrew James Isbester, Dominick T. Gattuso, Kronos Incorporated, Scott David Bolden, Lori A. Gordon (collectively "Respondents") were defendants and appellees in the proceedings below.

PROCEEDINGS IN DISTRICT (NO TRIAL) AND APPELLATE COURTS

Lakshmi Arunachalam v. International Business Machines Corporation, et al. (Case No. 20-cv-01020-GBW) in the U. S. District Court for the District of Delaware, judgment entered June 23, 2022.

Lakshmi Arunachalam v. International Business Machines Corporation, et al. (Case No. 22-2121) in the U. S. Court of Appeals for the Federal Circuit, judgment entered May 10, 2024 and rehearing denied May 30, 2024. CAFC failed to docket Dr. Arunachalam's timely filed Combined Petition for Re-Hearing and *En Banc* Re-Hearing.

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INTRODUCTION

The Federal Circuit gives no respect to, and reaches a result inconsistent with *TXO Production Corp. v. Alliance Resources Corp.*, 509 U. S. 443, 470-471 (1993) (SCALIA, J., concurring in judgment) that "*The Due Process Clause... its whole purpose is to prevent arbitrary deprivations of liberty or property; The Due Process Clause... guarantees... process;*" *Caperton v. A. T. Massey Coal Co.*, 556 U.S. 868 (2009) and *City of Chicago v. Morales*, 527 U.S. 41 (1999). It fails to meet the requirements of the Due Process Clause of the Fifth and Fourteenth Amendments to the U.S. Constitution. Where plaintiff's request for a neutral judge is "in fact harmless and innocent," the Federal Circuit's "order itself is an unjustified impairment of liberty." It authorized the punishment of constitutionally protected conduct of requesting a neutral judge with no stock in a litigant. It violates due process by arbitrarily restricting personal liberties. Federal Circuit is silent to **28 U.S.C. §47 that disqualifies CAFC Judge Stark from ruling on the Appeal of his own ruling in the District Court Case 1:20-cv-1020 (D.Del.)**.

The Federal Circuit affirms the District Court's decision, overlooking the significant fact that the presiding Judge Andrews was disqualified due to a conflict of interest—revealed by his late admission of common stock ownership in the defendant JPMorgan Chase & Co., three years post-appeal — denying a citizen's right to appeal and the inventor's right to sue.

"Court cannot confer jurisdiction where none existed and cannot make a void proceeding valid. It is clear and well-established law that a void order can be challenged in any court." *Old Wayne Mutual Life Ass'n of Indianapolis v. McDonough,* 204 U.S. 8 (1907).

With a blind eye to *Caperton v. A. T. Massey Coal Co.*, and to *City of Chicago v. Morales*, **the Federal Circuit is silent to the Judicial Disqualification Statute demanding vacatur of judicial decisions**, screaming for attention for over a decade. The Federal Circuit is silent to the District Court Errors, propagated for a decade, into underlying Case 1:20-cv-1020, blamed unlawfully upon Dr. Arunachalam. The Federal Circuit is silent to the District Court's Order punishing Dr. Arunachalam for her lawful defense with a Filing Injunction that is contrary to Patent Statutes that allow a Patentee to sue infringers — obfuscating the District Court's own Errors.

The Federal Circuit ignored its own valuable precedential ruling on vacatur of judicial decisions when a judge has disqualifying financial interest. *Centripetal Networks, Inc. v. Cisco Sys., Inc.*, 38 F.4th 1025 (Fed. Cir. 2022). The Federal Circuit does not "take the disqualification statute seriously" and undermines "public confidence in the judiciary." The Federal Circuit ignores that Judge Andrews disclosed three years after the appeal was over that he had direct common stock in JPMorgan, Dr. Arunachalam's defendant in her very first case 12-282-RGA (D.Del.) and PTAB Judges held direct stock in Microsoft.

The Federal Circuit sidesteps the central tenet of the non-frivolous issue at hand: judge disclosing belatedly three years after the appeal was over that he was holding stock in the defendant in the very first case 12-282 (D.Del.) voids *all* orders, denying Dr. Arunachalam a neutral judge from her very first case, and has engaged in character assassination of Dr. Arunachalam without addressing the main issue of void Orders because the Judges had stock in the litigant JP Morgan Chase & Co. and made disclosure of the judge's ownership of stock in the defendant three years after the appeal was over.

The Federal Circuit overlooked points of law or fact that were overlooked by the district court. The glaring omission by the Federal Circuit to address the non-frivolous, substantive fact of the Judge's belated disclosure three years after the appeal was over, of holding stock in the defendant in her very first case 12-282 (D.Del.) voids all orders, speaks volumes. Its arguments are invalid, against the backdrop of the Judge holding stock in the defendant and not disclosing it for three years voids all orders, and invalid sanctions by the financially conflicted Judge holding stock in the defendant.

The Federal Circuit overlooked a district court error propagated for a decade that a judge holding stock in the defendant and not disclosing it for three years after the appeal voids all orders. The Clerk of the District Court should be able to reverse all Orders of the District Court related to the patents-in-suit. WSJ did an investigation in over 131 cases and reversed them all for judicial stock ownership.

Vacatur of judicial decisions by Judge Andrews and Judge Robinson and Orders in all of Dr. Arunachalam's cases, is in order.

The Federal Circuit's silence is acquiescence to Dr. Arunachalam's substantive argument of judge holding stock in the defendant voids all orders; that it has been a District Court error that has propagated forward for over a decade that Judge Andrews and PTAB Judges had direct stock in the defendant JPMorgan and Microsoft, voiding all Orders.

The Federal Circuit affirms the district court's filing injunction, contrary to patent statutes, punishing lawful defense, obfuscated district court errors for a decade into underlying case 1:20-cv-1020.

The Federal Circuit is silent to the fact that there has been **No** trial, **No** jury trial, **No** hearing, **No** Notice of Hearing, **No** Case Management Conference in over a decade, **No** Discovery, **No** Evidence allowed to be introduced — **No** basis in fact or the law — only cover up by the Federal Circuit of the fact that the Judge was disqualified from presiding over the case due to his belated disclosure three years after the appeal of his ownership of stock in the defendant.

The Federal Circuit is silent to the fact that district court and PTAB judges held undisclosed disqualifying financial interests in a litigant involving the patents-in-suit, denying plaintiff her right to a neutral judge — a material court error.

The Federal Circuit is silent to 28 U.S.C. 455 that requires the recusal of any Judge whose "impartiality might reasonably be questioned" or who "has a financial interest in a party to the proceeding." The Federal Circuit is silent to the fact that on 2/9/16, Andrews ("RGA") admitted holding common stock in a litigant three years into the case. The Federal Circuit is silent to PTAB Judges McNamara, Siu punished Plaintiff for pointing out they held common stock in a litigant.

A. THE FEDERAL CIRCUIT IS SILENT TO THE FACT THAT ON 5/8/2015, JUDGE ROBINSON ("SLR") DISQUALIFIED HERSELF FROM CASE 12-282-RGA UPON PLAINTIFF'S MOTION OF SLR'S CONFLICTS OF INTEREST—NO VACATUR TO DATE — A MATERIAL COURT ERROR.

The Federal Circuit is silent to District Court Orders that are void in Cases 12-282; 14-490; and all of Plaintiff Dr. Arunachalam's cases.

B. THE FEDERAL CIRCUIT IS SILENT TO THE FACT THAT ON 5/14/2014, SLR FAILED TO APPLY PATENT PROSECUTION HISTORY— A MATERIAL COURT ERROR.

The Federal Circuit is silent to the fact that claim terms were defined in the Patent Prosecution History and are not indefinite.

C. THE FEDERAL CIRCUIT IS SILENT TO THE DISTRICT COURT'S 6/23/22 ERRONEOUS RULING BY A RECKLESSLY MISINFORMED JUDGE NOREIKA, WITH NO EVIDENCE OF FACTS OR THE LAW, COPIED VERBATIM DISTRICT COURT JUDGE STARK'S 12/29/21 ORDER D.I.s 258/259, *WHEREAS* CAFC JUDGE STARK IS DISQUALIFIED FROM RULING ON THE APPEAL OF HIS OWN RULING IN THE DISTRICT COURT CASE 1:20-CV-1020 PER 28 U.S.C. §47, AND IS FURTHER DISQUALIFIED DUE TO HIS OWN FINANCIAL INTERESTS IN FACEBOOK, A LITIGANT IN Dr. Arunachalam's CASE.

The Timeline: 20-01020(DE)/Fed Ckt Appeal 22-2121: *Arunachalam v. IBM, et al* proves Dr. Arunachalam filed a timely NOA. The Federal Circuit is silent that filing patent lawsuits is allowed by Patent Statutes. The Federal Circuit is silent that 28 U.S.C. §47 disqualifies Judge Stark from ruling in this Appeal and voids the Federal Circuit Order.

I. THE FACTS AND THE LAW PRESENTED BY Dr. Arunachalam STAY SOLIDLY VALID IN PERPETUITY.

The Federal Circuit is silent to the fact that they silenced Dr. Arunachalam from raising the Judge's stock ownership in the defendant, a non-frivolous fact and the law, that remains solidly valid in perpetuity.

II. THE FEDERAL CIRCUIT IS SILENT THAT IN THE 6/23/22 DISTRICT COURT ORDER, JUDGE NOREIKA, COPIED VERBATIM THE 12/29/2021 ORDER OF DISTRICT COURT JUDGE STARK, AND IGNORED THAT:

A. The Federal Circuit is silent that Judges Andrews ("RGA") and Robinson ("SLR") presided over Dr. Arunachalam's cases, involving her patents-in-suit despite disqualifying undisclosed financial interests demanding vacatur of their judicial decisions, and further without considering Patent Prosecution History. The Federal Circuit is silent that RGA denied Dr. Arunachalam's Motions to Substitute as Plaintiff as the Real-Party-in-Interest as Assignee of the patents-in-suit, so as to not allow her to appeal — making all Orders void in Cases 12-282-RGA and 14-490-RGA and all of her other cases involving the patents-in-suit.

B. The Federal Circuit is silent that District and Appellate **Courts failed to consider the facts and the law**. The Federal Circuit is silent that Dr. Arunachalam filed a ***Traverse Special*** against the entire (*false*) processes and Orders of the District Court Case 1:20-cv-01020-LPS/Noreika/GBW.

> "Mr. Justice Swayne: "A **right without** a **remedy** is as **if** it **were not**. For **every beneficial purpose** it **may** be **said not** to **exist**." *Von Hoffman v City of Quincy,* 71 U.S.(4 Wall.) 535, 552, 554, 604 (1867).

The CAFC silence amounted to a proactive failure to address the totality of the record. The Federal Circuit denied rehearing *en banc* on May 30, 2024. The Federal Circuit's 11/30/2020 Order in her Appeal No. 2020-1493 requiring her to get leave of court to file a rehearing of her appeal is unconstitutional and denies Dr. Arunachalam due process, to obfuscate that the Federal Circuit and District Courts committed serious errors. Dr. Arunachalam was denied individual liberty and property outside the sanction of law and without due process of law. This Court stated that due process is violated "if a practice or rule offends some principle of justice so rooted in the traditions and conscience of our people as to be ranked as fundamental." *Snyder v. Massachusetts*, 291 U.S. 97, 105 (1934).

This Court has stated that where an individual is facing a deprivation of life, liberty, or property, procedural due process mandates that he or she is entitled to adequate notice, a hearing, and a neutral judge.

Dr. Arunachalam has been deprived these most fundamental rights that are "implicit in the concept of ordered liberty," *Palko v. Connecticut*, 302 U.S. 319 (1937); *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976); an individual's right to some kind of a hearing ("the right to support his allegations by arguments however brief and, if need be, by proof however informal."); Oliver Wendell Holmes, Jr., stated, *Baldwin v. Missouri*, 281 U.S. 586, 595 (1930): "persons holding interests protected by the due process clause are entitled to "some kind of hearing"..."

OPINIONS AND ORDERS BELOW

The Order of the United States Court of Appeals for the Federal Circuit affirming the District Court Order and Order denying re-hearing in Petitioner's Appeal Case No. 22-2121 which is an Appeal from Case No. 20-cv-01020-GBW (D. Del.) in the U.S. District Court for District of Delaware are reproduced at App. 1a and App. 2a. The Federal Circuit failed to docket Dr. Arunachalam's timely filed Combined Petition for Re-Hearing and *En Banc* Re-Hearing, to distract from its own errors.

The Order of the U.S. District Court for the District of Delaware is reproduced at App. 3a. The above Orders are not published.

JURISDICTION

The Federal Circuit entered judgment on May 10, 2024, and denied rehearing on May 30, 2024. (App. 1a and 2a). It failed to docket Dr. Arunachalam's timely filed Combined Petition for Re-Hearing and *En Banc* Re-Hearing, to cover up its own errors. Chief Justice Roberts, on July 11, 2024, extended the time within which to file a petition for a writ of certiorari to and including October 7, 2024. *See* No. 24A8. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

APPLICABLE LAWS

28 U.S.C. §47—Disqualification of Appellate Judges: "no judge shall hear or determine an appeal from the decision of a case or issue tried by him."

28 U.S.C. §455: (a) Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned. A motion to disqualify a judge under §455 must be determined by the very judge whose impartiality is being questioned.

28 U.S.C. §144: "Bias or prejudice of judge," On its terms, section 144 makes a district judge's recusal mandatory upon a timely and sufficient affidavit accompanied by a certificate from counsel that the affidavit is made in good faith.

Amend. V: "No person shall...be deprived of life, liberty, or property, without due process of law...."

Amend. VII: "In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved...."

Amend. XIV: "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."

Due Process Clause, Amends. V and XIV: "Procedural due process is the guarantee of a fair legal process when the government tries to interfere with a person's protected interests in life, liberty, or property." "...Supreme Court has held that procedural due process requires that, at a minimum, the government provide the person notice, an opportunity to be heard at an oral hearing, and a decision by a

neutral decision maker. The Court has also ruled that the Due Process Clause requires judges to recuse themselves in cases where the judge has a conflict of interest. ...*Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009). Substantive due process is the guarantee that the fundamental rights of citizens will not be encroached on by government..."

Vol. XII, Constitutional Law, Chapter 7. Sec. 140. *Erroneous and Fraudulent Decisions. Due Process and Equal Protection of Law*: Procedure. Sec. 1. *Due Process of Law*. Sec. 141. *Denying or Hindering Access to the Courts upon the Question of Due Process Itself*.

To uphold **Patent Prosecution History** is a key contract term between the inventor and the Federal Government/USPTO. The claim construction of claim terms agreed to between the inventor and the Original Examiner at the USPTO before the patent was granted is cast in stone and cannot be changed by the USPTO, Courts or the patentee. Federal Circuit's *Aqua Products, Inc. v. Matal*, Case No. 15-1177, October 4, 2017, ruled that Orders that did not consider the "entirety of the record"— Patent Prosecution History — are void and reversed.

STATEMENT

Petitioner, Dr. Lakshmi Arunachalam, ("Dr. Arunachalam") invented the Internet of Things (IoT) — Web Apps displayed on a Web browser — as significant as electricity by Edison and the telephone by Alexander Graham Bell.

Dr. Arunachalam's dozen patents have a priority date of 1995, when two-way real-time Web transactions from Web Apps were non-existent.

Respondents and the Government benefited by trillions of dollars from the patents-in-suit — exemplified in Web banking Web Apps, Apple's iPhone App Store with 2M+ Web Apps (pre-packaged in China and imported into the U.S.A.), Google Play, Uber, Lyft's ride-hailing Web Apps, Facebook's social networking Web App. JPMorgan's website states it has over 7000 Web Apps in use in just ***one*** Business Unit.

The Federal Circuit is silent to District Court Errors and disqualifying stock holding by judges in the defendant that call for vacatur of District Court rulings. The Federal Circuit ignored its own valuable precedential ruling on vacatur of judicial decisions when a judge has disqualifying financial interest. *Centripetal Networks, Inc. v. Cisco Sys. Inc.,* 38 F.4th 1025 (Fed. Cir. 2022). Dr. Arunachalam respectfully requested CAFC to vacate **all** lower Court rulings, and remand. But the Federal Circuit has chosen to hush up its own errors and deny Dr. Arunachalam due process. The Federal Circuit even failed to docket Dr. Arunachalam's timely filed combined petition for panel rehearing and for rehearing *en banc.* Federal Circuit's 11/30/2020 Order in her Appeal No. 2020-1493 requiring her to get leave of court to file a rehearing of her appeal is unconstitutional and denies Dr. Arunachalam due process, to obfuscate the Federal Circuit and District Courts' own material errors.

The Federal Circuit is silent to the fact that there has been **No** Case Management Conference in over a decade, **No** Discovery, **No** Hearing, **No** Trial — **No** basis in fact or the law — only hushing up by the Federal Circuit of the fact that the Judge was disqualified from presiding over the case due to his ownership of stock in the defendant.

The courts failed to consider that the claims of the patents-in-suit falsely alleged as invalid are ***not*** invalid, because the *JPMorgan Court* 12-282-SLR/RGA (D.Del.) failed to consider Patent Prosecution History, which had already established the claim construction of the terms alleged falsely as "indefinite" by JPMorgan, as ***not*** indefinite. Based on this fraudulent and erroneous decision by the *JPMorgan Court* procured fraudulently by JPMorgan, the *Fulton Court* 14-490-RGA (D.Del.) — and financially conflicted Judge Andrews fraudulently concealed from the Court that Patent Prosecution History was not considered by the *JPMorgan Court* or *the Fulton Court* and propagated to all tribunals a false theory of Collateral Estoppel, which is moot because:

(i) Judge Andrews is financially conflicted, by his own admission of buying direct stock in JPMorgan Chase & Co. during the pendency of the case. His Orders are void. ***There can be no collateral estoppel from void Orders***.

(ii) Patent Prosecution History estops all other estoppels, as proven *prima facie* that Petitioner has been right all along by the Federal Circuit's *Aqua Products'* reversal of Orders that failed to consider "the entirety of the record" —Patent Prosecution History (*which the District Court failed to apply in Petitioner's case*).

REASONS FOR GRANTING THE PETITION

A. The Questions Presented Are of Exceptional Importance.

This case presents an extraordinarily important issue: The decision of the Court of Appeals, if followed, will conflict with Supreme Court precedent with respect to its findings on: the denial of liberty and property without due process of law. The decision also conflicts squarely with decisions of the Federal Circuit Court of Appeals on the same subject.

Depriving citizens of jury trial by federal courts disregarding the 7th Amendment must not be allowed. This Court should review with the most exacting scrutiny and stop the issue now.

It is even a national security threat, with the Federal Circuit allowing Dr. Arunachalam's inventions to be sent to China for copying and sending infringing products into the United States.

B. The Federal Circuit Opinion Conflicts with Supreme Court Precedents.

TXO Production Corp. **v.** *Alliance Resources Corp.*, 509 U. S. 443, 470-471 (1993) (SCALIA, J., concurring in judgment); in which Justice Scalia ruled that *"The Due Process Clause... its whole purpose is to prevent arbitrary deprivations of liberty or property; The Due Process Clause... guarantees... process."*
Honda Motor Co. v. Oberg, 512 U.S. 415 (1994);
City of Chicago v. Morales, 527 U.S. 41 (1999); Justice Stevens ruled: "order itself is an unjustified impairment of liberty."
Caperton v. A. T. Massey Coal Co., 556 U.S. 868 (2009); "violates due process in that it is ... an arbitrary restriction on personal liberties."
Lanzetta v. New Jersey, 306 U.S. 451 (1939);
Coates v. City of Cincinnati, 402 U.S. 611 (1971);
United States v. Carlton, 512 US 26 (1994); "such application was rendered unduly harsh and oppressive, and therefore unconstitutional."
Trustees of Dartmouth College v. Woodward, 17 U.S. 518 (1819); and failed to uphold the Contract Clause of the Constitution, damaging Dr. Arunachalam by allowing Big-Tech to steal her patents.
The Federal Circuit Order is inconsistent with this Court's earlier decisions, its due process "fundamental rights" jurisprudence.
Griswold **v.** *Connecticut,* 381 U.S. 479, 483 (1965)
Meyer v. Nebraska, 262 U.S. 390, 399 (1923);
Pierce v. Society of Sisters, 268 U.S. 510, 535 (1925);
"The Supreme Court recognizes a constitutionally-based "liberty" which then renders laws seeking to limit said "liberty" either unenforceable or limited in scope;"
Palko v. Connecticut, 302 U.S. 319 (1937);

Ohio Bell Tel. Co. v. PUC, 301 U.S. 292 (1937);
United States v. Abilene & S.R. Co., 265 U.S. 274, 288-289 (1924);
Wichita R. & Light Co. v. PUC, 260 U.S. 48, 57-59, (1922);
In *re Murchison*, 349 U.S. 133 (1955);
Wong Yang Sung v. McGrath, 339 U.S. 33, 45-46 (1950);

C. The Federal Circuit Decision Improperly Conditioned Rehearing upon Getting Leave of Court to file a Rehearing of Appeal and failed to docket Combined Petition for Re-Hearing and *En Banc* Re-Hearing.

The Federal Circuit's 11/30/2020 Order in her Appeal No. 2020-1493 requiring her to get leave of court to file a rehearing of her appeal is unconstitutional and denies Dr. Arunachalam due process, to obfuscate that the Federal Circuit and District Courts committed serious errors. Dr. Arunachalam was denied individual liberty and property outside the sanction of law and without due process of law.

D. Federal Circuit's Order Denies Due Process.

This Court held that "[a] fair trial in a fair tribunal is a basic requirement of due process." In *re Murchison*, 349 U.S. 133, 136 (1955). "The question is I did not get a fair trial. The question is very simple." "That is an excerpt of Clarence Earl Gideon's reply to respondent's response to his petition for a writ of certiorari that was granted, and judgment reversed by this Court."

The constitutional guarantees of due process and a jury trial are no more sacred and necessary in criminal cases than in civil.

Now is the time for this Court's review. It is almost ten years after the most recent unrepresented litigant, Bobby Chen, made it to but not through this Court's review to address federal courts disregarding a Rule.

E. The Decision Below Is Unconstitutional.

Not allowing a jury trial and denying due process when the judge belatedly disclosed his common stock holding in a defendant 3 years post-appeal thus voiding his Orders are wrong and unconstitutional.

F. The Decision Below is Wrong and Manifests Injustice For Over A Decade Only This Court Can Remedy.

Most recently, this Court overturned the decades-old Chevron decision, delivering a far-reaching and potentially lucrative win to business interests of inventors against the USPTO, which did not act within its statutory authority, to which the Federal Circuit remained silent, denying Dr. Arunachalam due process.

CONCLUSION

For the foregoing reasons, this Court should grant Dr. Arunachalam's Petition for a Writ of Certiorari.

Dated: October 5, 2024

Respectfully submitted, Lakshmi Arunachalam

Lakshmi Arunachalam

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Self-Represented Petitioner
Dr. Lakshmi Arunachalam

VERIFICATION

In accordance with 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

Lakshmi Arunachalam

Lakshmi Arunachalam

Dr. Lakshmi Arunachalam, a woman
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Executed on October 5, 2024

APPENDIX