

Supreme Court, U.S.
FILED
JAN 13 2025
OFFICE OF THE CLERK

CASE NO. 24-6238 **24A711**

**IN THE
SUPREME COURT OF THE UNITED STATES**

IN RE

Daniel Felix,

**Homeless Cats Of Hatteras Island NC
(representing 87 individual Cats deceased)**

**Non-Property Animals Of Hatteras Island NC
(representing 4092 individual animals deceased)..... PETITIONER(S)**

V.

The United States Of America

US Attorney General Merrick Garland

The State Of North Carolina

Governor Roy Cooper

NC Attorney General Josh Stein

Dare County North Carolina

MOTION FOR EMERGENCY INJUNCTIVE RELIEF

Daniel Felix, 53828 NC Highway 12, PO Box 544, Frisco, NC, 27936

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Emergency Injunctive Relief Requested

1. For the speed limit in front of the residence of 53828 NC Highway 12, Frisco, NC, 27936 be lowered to 25 MPH and the highway in front of and extending one mile in each direction be made a WILDLIFE CROSSING where motorists are required by law to stop for animals on or near the roadway and stay at the scene of any animals hit by their vehicles and that very visible signs be put up that alert motorists to the decrease in speed limit and that they are required to yield to animals on this section of roadway.

2. To further protect animals crossing North Carolina Highway 12 (NC Hwy 12) from Whalebone Junction to the Hatteras Village ferry dock, most of which is the Cape Hatteras National Seashore and Pea Island National Wildlife Refuge and is an extreme area for animal run overs, all speed limits be lowered by 10 MPH to a minimum of 25 MPH and this entire length of roadway be designated as a Wildlife Crossing and this be well established with multiple very visible signs alerting motorist to stop and yield to animals on or near the roadway.

3. That all local and NC State authorities be placed under Court Order to strictly enforce the state's Animal Cruelty Laws for the protection of Homeless Cats and other Non-property Animals and for them to document as public record all acts of violence and cruelty to any animals in Dare County North Carolina and the entire state of North Carolina and this information be shared with the Court and all Federal authorities and any public entity wishing to obtain this information so that the public will be able to be aware of all acts of animal cruelty occurring in their area or throughout the state.

STATEMENT FOR THE REQUEST

Fourth Thousand Ninety Two (4092) deaths of Non-property Animals (with more having occurred while this petition was filed) and Eighty Seven (87) deaths of Homeless Cats (with many more still undocumented or not reported) have occurred due to the negligence and "deliberate indifference" of dozens of county, NC state, and federal officials in violation of both NC State and federal Animal Cruelty Laws. ALL of these deaths could have been prevented. ALL of these animal deaths occurred either in front of Daniel Felix's home or in the immediate vicinity of his home or whereabouts. All of the animals, especially every one of the 87 Homeless Cats, were known to the human petitioner by having a direct daily relationship with him. Tens of thousands of other animal deaths, some of which have been documented, were also killed on this length of North Carolina Highway 12 which is routinely littered with their dead bodies. The Court should be cautioned not to underestimate the lengths petitioner has gone prior to the filing of previous lawsuits and this petition to stop the animal deaths and receive relief from local, state, and federal authorities. The list is too extensive to list here and each authority received dozens and some hundreds of requests for help and relief which all of them ignored or treated with deliberate indifference and the animal deaths continued.

Petitioner will provide a brief list hereto make this point obvious factually:

Beginning with all of the Defendants listed in Appendix 1 and 2 which includes Sheriff Doughtie, Deputy Ruth, **ALL members** of the Dare County Board Of Commissioners including the Dare County Attorney, the Dare County District Attorneys, Jeff Cruden and Jennifer Blande, the NC District 1 District Attorney, Andrew Womble, Both NC Governors McCrory and Cooper which includes literally thousands of correspondences complete with pictures of the dead cats and animals, the NC Attorney General, Josh Stein, which includes literally hundreds more correspondences complete with pictures of the dead cats and animals, (that lawsuit filing in US Dist. Court case No. 2:21-cv-07-FL

has a partial list of other authorities in the Motion To Amend Complaint), and more recently, the previous and current Directors of the National Park Service, Jon Jarvis and Chuck Sams, the current US Secretary Of The Interior, Deb Haaland, the current Commander of the NC Highway Patrol, Colonel Freddie Johnson, the previous and current NC Secretary of Transportation, Eric Boyette and Joseph Hopkins, the NC Secretary Of Public Safety, Eddie Buffaloe, Federal Bureau Of Investigation (FBI) Director Christopher Wray, the US Attorney General Merrick Garland, US Dept. Of Justice Director of Civil Rights Division Kristen Clarke, Chairman of the NC Wildlife Commission, Monte R. Crump, the Director of the NC Wildlife Commission, the US Secretary Of Transportation, Pete Buttigeig, every member of the US Senate National Parks Subcommittee, members of the US Senate Judiciary Committee to include dozens of requests to testify before this committee to US Senator Whitehouse, Durbin and my US Senator who sits on this committee Thom Tillis, and hundreds of other officials who remained "deliberately indifferent" despite receiving literally dozens of correspondences each with pictures of the dead animals and being informed there was video to back up the deliberate animal killings. Sheriff Doughtie and NC Hwy Patrolman Libby, named in the petition, remained deliberately indifferent after being provided with video of a person running off the opposite side of the road deliberately running over a deer killing it and the description of the truck and NC license plate number. Instead of enforcing the laws, Sheriff Doughtie along with the Dare County District Attorneys and members of the Dare County Board Of Commissioners as well as a NC Superior Court Judge, Judge Jerry Tillet engaged in an obstruction of justice and cover up of the animal killings. These authorities created an impossible barrier to exposing the animal cruelty and killings and then NC State Officials, such as their co-defendants, Gov. Cooper and NC Attorney General Stein, then defended the obstruction of justice and cover up leaving petitioner nowhere to turn to to stop the animal killings and the torment it caused. The fact that NO

federal officials responded to factual evidence of the local and state conspiracy is beyond logic. The fact that NO federal officials found the animal killings "shocking to the conscience", including US District Judge Louise Flanagan and US Court Of Appeals Judges who ignored the need for and request for Emergency Injunctive Relief, is beyond disturbing. A small fraction of color pictures of the dead cats and animals is provide for public record in the US District Court lawsuit case no. 2:21-cv-07-FL as exhibits to the Motion To Amend Complaint. Every cat and animal listed here as individual petitioners has been photographed and many now have video of their killing. **This COURT should be satisfied that relief has been sought from all other areas of government and that due to the conspiracy and cover up, relief cannot be obtained from anywhere other than this Court.**

The Emergency Injunctive Relief requested will allow the animal petitioners a minimum protection crossing the roadway and provide them with the mere possibility to cross NC Hwy 12 and remain alive. It will not resolve the illegal situation of persons deliberately speeding up or going in the opposite lane to deliberately kill these innocent animals nor the total lack of law enforcement or the obstruction of justice local authorities have created. It will mitigate marginally the loss up to now of wildlife, which may be irreversible, but allow those animals that remain the opportunity to remain alive. Injunctive Relief No. 1 above will at least allow petitioner the possibility of some relief from the constant animal killings and the mental degradation it is causing. Injunctive Relief No. 2 is necessary to provide relief from the animal killings for the rest of the animals on the Cape Hatteras National Seashore and Pea Island National Wildlife Refuge. Injunctive Relief No. 3 is necessary to assure the measures of Injunctive Relief No. 1 and 2 will have any effect at all.

HOWEVER, THE CONTINUED LACK OF RESPONSE TO STOP THESE ANIMAL KILLINGS FROM THE COURT AND GOVERNMENT OFFICIALS WILL RESULT IN

**AN IRREPREABLE INJURY BY WAY OF A PERMANENT LOSS OF LIFE FOR
WILDLIFE AND AN IRREPREABLE LOSS OF THE ECO-SYSTEM ON THE CAPE
HATTERAS NATIONAL SEASHORE.**

 1/13/25

Daniel Felix, petitioner Date

53828 NC Hwy 12
PO Box 544
Frisco, NC 27936

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was sent by way of US Postal Service on Jan. 13th, 2025 to respondents counsel, United States Of America, Solicitor General Of The United States, US Dept. Of Justice, Room 5616, 950 Pennsylvania, Ave., NW, Washington DC, 20530-0001; US Attorney General Merrick Garland, 950 Pennsylvania Ave., NW, Washington DC, 20530; State Of NC and Governor Roy Cooper, Attorney Eric Fletcher, 325 N. Salisbury Street, Raleigh, NC, 27603; NC Attorney General Josh Stein, NC Department Of Justice, PO Box 629, Raleigh, NC, 27602.



Daniel Felix. petitioner