No. _____

In the

Supreme Court of the United States

Michael S. Freeman II,
Applicant-Petitioner,
v.
Raytheon Technologies Corporation, et al.,
Respondents.

APPLICANT'S MOTION FOR LEAVE TO SUBMIT PETITION IN EXCESS OF WORD AND PAGE LIMITATIONS

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Applicant-Petitioner

INTRODUCTION

This case pertains to manifest injustice occurring in the lower courts in reviewing my disability/genetic discrimination and constitutional violations suit against Raytheon, the U.S. Department of Defense (DoD), Secretary Lloyd Austin (in his official capacity), the U.S. Department of Health and Human Services (HHS), Secretary Xavier Becerra, and the U.S. Equal Employment Opportunity Commission (EEOC).

SUPREME COURT RULE 33

Supreme Court Rule 33 limits Petitions for Certiorari to 9,000 words and 40 pages. However, "For good cause, the Court or a Justice may grant leave to file a document in excess of the word limits, but application for such leave is not favored."

GOOD CAUSE

In support of Applicant's request for a waiver of this rule, Applicant presents the following arguments:

1) **Reciprocity:** At the Tenth Circuit, Respondents filed an eleventh-hour motion requesting an extension of time to file their response briefs. I responded to that motion asking that the court deny it and pointed out that the Tenth Circuit's own rules indicate that such relief was "not favored" among other things. Despite my protests, the Tenth Circuit granted Respondents the relief requested in full. Within a system that pretends to believe in "due process", I should be granted at least one form of relief that is "not favored", which I have not been allotted thus far.

2) **Manifest Injustice:** All parties agree that this is a very complex case. The courts are the only entities that have been trying to treat this as a simplistic case—not even bothering to hold oral argument to make sure they properly understood the case. This is akin to trying to fit a decagon into a triangle-shaped hole, therefore unsurprisingly, the decisions are littered with easily-preventable errors. Each one of these errors has necessitated a rebuttal to avoid waiver/forfeiture of the matter. There exists a great deal of issues within this case that present questions of significant public interest[1, 2, 3], however a blatant lack of regard for the fundamental facts of this case from the two lower courts has prevented us from getting anywhere near resolution of those matters. It is imperative for me to portray the extent of the insanity that I have dealt with in both lower courts that has been preventing us from getting to more relevant matters.

3) **Case Complexity:** As asserted previously, all parties agree that this is a very complex case. This case has eight (8) active claims to relief against six (6) Respondents all with different elements/theories that implicate their inclusion in this suit. Just explaining the case in a high-level overview of the most relevant facts and theories took over 3,000 words. Those 3,000 words are not the entire case, but merely enough to gain a rudimentary understanding of it. It is plainly unreasonable to expect such a complex case to utilize the same amount of words as a much simpler case.

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1) A lot of the arguments I have been making about the vaccines since this case began and *before* this case have since been made by states in their own suits against Pfizer. [See Notice of Supplemental Authority, Doc. 11048959]. See also Kansas V. Pfizer [2024]. Despite that, the Tenth Circuit just summarized all vaccine arguments as me "believ[ing]" that the policy was ineffective. I'd bet good money that the judges in those courts aren't going to summarize the States' arguments as the States merely "believed" that the vaccines were not as effective as presented to the public. The level of disregard rendered by the courts in my case thus far has been truly appalling.

2) Another argument that I have been making in this case for years that has been ignored by the courts is the inapplicability of *Jacobson v. Massachusetts (1905)* to these vaccines, due to their failure to prevent transmission of the virus in question. A Ninth Circuit Panel recently published an Opinion finding concurrence with an identical argument in that case. *Health Freedom Defense Fund, Inc. v. Carvalho, No.22-55908, D.C. No. 2:21-cv-08688-DSF-PVC (9th Cir. 2024).* If just one court were to treat my case seriously and didn't skip over arguments to reject the case, we might get to some important legal precedents.
3) Most importantly, "Does the Ninth Amendment protect against violations of the Nuremberg Code?"

4) Word/Page Limits in General are Built on a Foundation of Lies:

(a) The notion of page/word limits that exists within the courts is predicated on the idea of preserving judicial efficiency by preventing judges from reading documents of excessive length. The rulings that have been made in this case have all presented an incredibly poor comprehension of the case appearing identical to a product made by someone that never read my filings in the first place. Do you remember in elementary school there was always that one student that gives a book report about a book that they clearly didn't read? Well, that's how the rulings in this case look. No judge thus far has taken the time to properly understand this case and it has only been a massive disservice to me and the concept of Justice. It is evident that there is no requirement for judges to read or understand a party's filings before ruling against them and no higher court is going to make them. Judges skip over arguments, misrepresent arguments, assert factual falsehoods, and fabricate arguments to benefit one side without batting an eye—at least in this case they have. Therefore, the entire rationale supporting page/word limitations on court filings is void and only exists as a measure to present the *illusion* that judges must read through and understand case filings—perhaps that's the entire point. If this court were being intellectually honest, it would abolish page/word limits across the federal judiciary and acknowledge the reality that some judges are clearly not reading

case filings and there is no authentic enforcement mechanism to make them, therefore the page/word limits serve no genuine purpose.[4, 5]

(b) On a similar note to (a), in addition to not reading documents, courts are likely not checking cited evidence either. For example, if I state "The logos of Collins Aerospace and Raytheon use the same icon. [Dist. Court Doc. 46, En. 2]"[6] are you going to *actually* open up Document 46 of the district court filings and check enclosure #2? If you're being honest, *probably not*. Likewise, you will not take it at face value or google it either to see what I was referring to because it is much easier to simply ignore the argument/evidence. However, if I show you like this...

4) I was a Schedule Analyst Manager, which is a job within the field of Project Management. One of the most fundamental concepts within the Project Management field (and business/operations in general) is the concept of the "Triple Constraint". To grossly simplify this concept, it can broadly be explained as the reality that a given system can only achieve two of the three following functionalities: Cheap (low cost), Good (high quality), or Fast (efficient). Our federal judiciary is only getting one of these functionalities instead of two, and that is Cheap. High quality decisions are not attainable for the federal judiciary because the workload of many judges exceeds the amount of time needed to render high quality decisions, plus many judges are not mentally capable of rendering high quality rulings even if they had the time. Because of that, the judiciary should strive to increase efficiency. Within this Court's authority and resources, there are many ways in which efficiency can be maximized. One of the simplest ways to maximize efficiency is by establishing a limited series of non-discretionary procedural rules across the federal judiciary. When presented within

an appeal, these non-discretionary procedural rules should have a 100% chance of being reversed should a lower court disregard them and should be immediately appealable. The first of these rules should be the abolishment of page/word limits within court filings across the federal judiciary. There are many repairs needed to fix the federal judiciary, but that would be a good start.

5) Abolishing page limits also increases efficiency for the judiciary as lawyers no longer need to charge clients for the time it takes to write and file a motion requesting an exception to page/word limitations and judges no longer need to waste time reviewing such motions.

6) Argument in support of establishing a *legal standard* relevant to the intertwined nature of Collins Aerospace and Raytheon)—argued on pages 26-27 of Tenth Circuit Opening Brief (one of many arguments ignored by the courts).

It makes it far more idiot-proof and easier to understand. This might seem condescending, but if the courts were functioning with the level of due diligence and reading comprehension skills that they should be, I would not be at the highest court in the nation right now begging you to revive my case because of an extreme lack of discernment from lower courts. This failure to check citations/evidence by the courts can also be taken advantage of by unethical attorneys. I've faced a wave of misleading arguments, new arguments after a matter has been briefed, non-precedential cases being presented as if they are settled law, case law misrepresentation, etc. in this case, and I have been pointing it out as much as possible to blind eyes. If the courts actually looked through all of the filings in this case from its inception and counted all of the times I indicated a new or misleading argument from a Respondent, you would be shocked. Why do lawyers feel comfortable trying these dirty tricks in the courts? Because they know most judges are too lazy or lack the time to check. For this reason, not checking citations/evidence is a double-edged sword. To minimize this in the evidentiary realm, it is far more efficient to present evidence in-line with the arguments with nice pretty little arrows to make the arguments easily digestible and to prevent confusion. However, the

consequence of this much needed tactic is that it takes up page space very quickly (which is why page limits should be abolished).

(c) I will concede that if this weren't my case and I was trying to quickly understand it and issue a competent ruling, it would be a huge struggle. However, the difference between me and the courts is that I would have the integrity to admit that the case is incredibly complex, and I need things dumbed down for me to process it and prevent obvious errors. Although, because I also possess the moral/ethical compass to understand that there are human beings behind these cases and that these human beings have either spent dozens of hours of their lives or tens of thousands of dollars of money fighting for justice, I wouldn't rush to make rulings and I would want to focus more on rendering quality rulings and increasing efficiency so that we have more time to focus on producing quality rulings. The system as it stands is extremely inefficient and disorganized and a lot of time is wasted on absolute nonsense--for example; in this case we have wasted an obscene amount of time trying to determine whether it was a Raytheon policy that led to my termination, when the letter I was given right before my termination *literally* states that it is a Raytheon Policy, and Raytheon has never argued otherwise. This should have never been an issue up for debate, yet the courts transformed it into one by fabricating falsehoods and arguments on behalf of the Respondents and wasted dozens and dozens of hours of everyone's time in doing so. This is utterly appalling and the way the courts function in this country is absurdly inefficient and not one soul is working to fix it. Judges have

very large workloads—at least in part—because *this Court* allows the court system to exist in a chaotic, disorganized, irrational, and massively inefficient state. This court should make an active effort to increase efficiency across the judiciary, so that judges (including yourselves) have more time to properly understand a case and issue competent rulings.

CONCLUSION

It is for the foregoing reasons that good cause exists to support this Motion and this Court should accept for filing the enclosed Petition for Certiorari that is 11,637 words (minus exempt portions) and 46 pages in length. Upon receipt that this Motion has been granted, I will produce forty booklet copies of the Petition and mail them to the Court. Additionally, I request that the Court abolish page/word limits on court filings across the federal judiciary.

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