

NO.: 17 / 8000

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IN THE SUPREME COURT OF THE UNITED STATES

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Sororazam Bethune - Petitioner

vs.


MTA Long Island Bus - Respondent.

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PETITIONER'S REPLY TO DEFENDANTS

OPPOSITION BRIEF

PETITION FOR WRIT OF CERTIORARI



Sororazam Bethune, Petitioner, Prose  
YMCA-Samaritan Village, Van Siclen Shelter  
89-25 Parsons Blvd., No. 534  
Jamaica, New York 11432  
Tel. No.: 516-423-0608

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# QUESTIONS PRESENTED

- (a) Obstruction of Justice during Nov. 5, 2015 Liability Trial by Sup. Ct., NC.
- (b) Mis-Representation, Legal Malpractice; By my attorney not filing papers on time, and dismissing my case for untimely filing of: "OSC", Untimely Appeal from the 4/22/2016 Judgment.
- (c) Facts of my Permanent Irreversible Debilitating Injuries, Surgeries, Loss of Abilities, Real Estate Business and Real Estate Income; Hope and Motivation; Pain and Suffering; and
- (d) FEDERAL QUESTION: There is CONFLICT between Court of Appeal's Decision dated Sept. 8, 2016 and App. Div. 2<sup>nd</sup> J.D. Decision dated June 30, 2016; specifically the Court of Appeals Decision dated Sept. 8, 2016 stating:

"Motion, insofar as it seeks leave to appeal from the June 2016 Appellate Division Order, dismissed upon the Order does Not finally Determine the Action within the Meaning of the Constitution."
- (e) MTA did not file Answer on time in Nov. 2012; MTA filed answer TWO years later in Nov. 2014; Armienti et al. backdated it to Nov. 2012.
- (f) MTA did not produce the Latino Driver who injured, crippled me life time; affected my children detrimentally. MTA / MTA attorneys could have produced the Latino Driver who injured me, but manipulated, Mis-represented facts decided Not to, in order to dismiss my permanent injuries, surgeries and disabilities.

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E. Justice Feinman Disclosure Re MTA case when After years of Litigation Plaintiff passed away.	5
F. Mr. Paglino using Vanessa Corchia's Slandering Strategy against injured plaintiffs.	5
G. I was injured on Aug. 24, 2011 before MTA L.I. Bus Discharged MTA on Dec. 30, 2011.	6
H. Stuart A. Jackson, my attorney called me last week In April, 2016, told me that MTA had filed Money Judgment of \$1200, told me I did not have to pay, and that he was going to file appeal from the Judgment.	6

I. There is Question of Federal Law and Question of Law for this Court's Review of Petition and Motion.	7
J. Michael Paglino is making manipulative, false, misleading statements; and not disclosing my communication with the App. Div. 2 <sup>nd</sup> J. D. Regarding my attorney's Release.	7
K. My daughter was represented by same attorney in Her Injury cases at: (i) "NUMC" municipality hospital; (ii) Brunswick Hospital, both cases dismissed in Sup. Ct. N.C., and at App. Div. 2 <sup>nd</sup> J.D. due to Mis-representation.	8-9
L. Michael Paglino in his Opposition Brief, Pg.: 14 Degrading a person with disabilities: "This is simply a matter of Unsuccessful Litigant".	9
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O. Dr. Monhian's Attorney, Denise Buda stated: "Your only Remedy is to sue your attorney for legal Malpractice".	10
P. Eviction Case: Mayfield no longer funding; I offered To Court and Landlord to place a Lien against my Lawsuit for owed amount plus interest, and let me and my daughter stay for Lease Term, but Landlord did not agree.	11
Q. Defendant's attorney in his Opposition Brief: Pg.: 11, states that Court of Appeals dismissed my case on Sept. 12, 2017. However, he manipulates and does not disclose to this Court that App. Div. 2 <sup>nd</sup> J.D.'s Order dated August 17, 2017 (APPENDIX NO. 6) did not permit my Appeal to the Court of Appeals, and that Court of Appeals could not review my case 2 <sup>nd</sup> time Without Permission by App. Div. 2 <sup>nd</sup> J. D.	11

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- APPENDIX NO. 2: MARLO POLESE'S AFF. DATED DEC. 29, 2015.
- APPENDIX NO. 3: Vanessa Corchia Affirmations attached to Michael Paglino's Brief Opposition dated 04/05/2018 as APPENDIX Nos: 16 and 19.
- APPENDIX NO. 4: Stuart A. Jackson's Letter asking App. Div. 2<sup>nd</sup> J.D. for a Hearing which was rejected by the App. Div. 2<sup>nd</sup> J.D.; and letters between App. Div. 2<sup>nd</sup> J.D., myself & Stuart A. Jackson re Discharge.
- APPENDIX: NO. 5: Affs. Dated June 30, 2017 Pg: 10; and July 16, 2017 Pg: 5; asking Court to let us stay at the Apt. and place a Lien by Landlord for Months of unpaid Rent; and any future rent including Interest, but Landlord and Court did not agree.
- APPENDIX NO. 6: Appellate Division Second J.D. Dec. Dated July 17, Not Permitting Appeal to Court of Appeal

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