Case: 18-15499, 08/15/2019, ID: 11399204, DktEntry: 163, Page 1 of 12

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

333 South Grand Avenue Los Angeles, CA 90071-3197 Tel 213.229.7000 www.gibsondunn.com

Theodore J. Boutrous, Jr. Direct: +1 213.229.7804 Fax: +1 213.229.6804 TBoutrous@gibsondunn.com

August 15, 2019

VIA ECF

Molly C. Dwyer Clerk of Court U.S. Court of Appeals for the Ninth Circuit 95 Seventh Street San Francisco, CA 94103-1526

Re: County of San Mateo v. Chevron Corp. et al., No. 18-15499, consolidated with City of Imperial Beach v. Chevron Corp. et al., No. 18-15502; County of Marin v. Chevron Corp. et al., No. 18-15503; County of Santa Cruz, et al. v. Chevron Corp. et al., No. 18-16376 – Defendant-Appellant Chevron's Response to Rule 28(j) Letter

Dear Ms. Dwyer:

I write in response to Appellees' July 17, 2019, letter regarding the Third Circuit's unpublished opinion in *Claus v. Trammell*, 2019 WL 3064601 (3d Cir. July 12, 2019), which has no relevance to the jurisdictional question at issue in this case.

In *Claus*, the defendants removed a state-court ejectment action under 28 U.S.C. §1443(1) and other statutes—but not 28 U.S.C. §1442. 2019 WL 3064601, at *1. The district court remanded, and defendants appealed pro se. *Id.* Citing *Davis v. Glanton*, 107 F.3d 1044, 1047 (3d Cir. 1997), the Third Circuit held that it had jurisdiction under §1447(d) "to review the District Court's remand order only to the extent that appellants maintain that removal was proper under §1443." *Id.*

Appellees contend that *Claus* demonstrates the Third Circuit's unwillingness to deviate from *Davis* even after the Removal Clarification Act of 2011 ("the Act"), which modified §1447(d) to allow appellate review of remand orders in cases removed under §1442. But the defendants in *Claus* removed under §1443, not §1442, so there was no occasion to revisit *Davis* in light of the Act. Nor did the pro se defendant even argue that §1447(d) authorizes review of the entire remand "order" in cases removed under §1443. In fact, defendants' briefs did not discuss §1447(d) *at all. See* Ex. A attached hereto. Accordingly, *Claus* does not suggest that the Third Circuit would be unwilling to revisit *Davis* in a case removed under §1442 and other bases where the defendant squarely presents the scope-of-review question.

Molly C. Dwyer August 15, 2019 Page 2

In any event, this Court should give *Davis* little weight because that decision failed to analyze the plain text of §1447(d), did not involve a case removed under §1442, and predated the Act's expansion of appellate review in light of the Supreme Court's decision in *Yamaha Motor Corp., U.S.A. v. Calhoun*, 516 U.S. 199 (1996), which held that when an order is certified for interlocutory review under 28 U.S.C. §1292(b), "appellate jurisdiction applies to the *order* certified to the court of appeals, and is not tied to the particular question formulated by the district court." *Id.* at 205.

Sincerely,

/s/ Theodore J. Boutrous, Jr.

Theodore J. Boutrous Jr.
GIBSON, DUNN & CRUTCHER LLP
Counsel for Defendants-Appellants
Chevron Corporation and Chevron U.S.A.

cc: All counsel of record (via ECF)

Exhibit A

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CASE No. 18 - 03800

CASE NAME; WILLIAM H. CLAUS IV., v. GEORGE K. TRAMMELL III., & STEPHANIE PARKER, .

"Special Attention"; Originally, a *FEDERAL "CIVIL RIGHT'S", *REMOVAL, - BELOW, Due To; As, is STILL, UNLAWFULLY - CONTINUING; PROHIBITED; *FEDERAL, "VIOLATIONS", of INALIENABLE, FEDERALLY ENFORCEABLE; PROCEDURAL SUBSTANTIVE, DUE PROCESS, OF LAW,. In The STATE OF; DELAWARE'S, INFERIOR, SUSSEX COUNTY, AUTOCRATIC, - SUPERIOR COURT; Captioned; Appellant's, Have INVOLUNTARILY, HEINOUSLY - SUFFERED,. The MOST, UNREAL -ISTIC, UNGODLY, INVIDIOUS, BLATANT, DELIBERATE - GROSS ABUSE, OF COLOR OF AUTHORITY, OF; The ABOVE the [LAW]; STATE OF DELAWARE SUPERIOR COURT JUDGE OF; SUSSEX COUNTY; The TYRANNICAL / AUTOCRATIC; KING, / KING - LIKE; ["DESPOT"]; This, > STATE LEVELED, SUPERIOR COURT JUDGE; E. SCOTT BRADLEY, OF WHOM HAS HAD, ABSOLUTE; LY, [NO], RESPECT, / SELF-RFESPECT; For the INHERENT, FEDERALIZED, CONSTITU-TIONAL CONGRESSIONAL, - AUTHORITY, of this FEDERAL APPEALS, COURT; Has, UNLAWFULLY, UNCONSTITUTIONALLY, PROUDLY, - MANIFESTLY, - BLATANTLY, . "SEDITIOUSLY", - "CONTINUED; His, ABSOLUTE, [N O], RESPECT; For the Initial, CONSTITUTIONAL, STATUTORY, PENDENCY; OF; THIS, FEDERAL APPEAL, is ["INDELIBLY - DOCUMENTED"]; See; JUST - SINCE; THIS VIABLE, COGNIZABLE, SELF-EXECUTING, - STATUTORY APPEAL; HAS BEEN OFFICIALLY; PENDENTE LITE / PENDING; The Inferior, U.S. District of Delaware, Has, WRONGFULLY, WILLINGLY, TURNED, Their Heads, the Other WAY; As to While, the STATE OF; DELAWARE, and it's, BEYOND, - ["RACIST"], Pre - Jim Crow - Like; SUSSEX COUNTY SUPERIOR COURT; Has Yet, MONUMENTALLY, WILLINGLY, CONTINUED; To, ["REFUSE], To, Be As a Matter of Law; a MANDATED, Not; Outdated, IMPARTIAL, "Court;

- ➤ 28 U.S.C.A Sec. 1443(1). Sec. 1331. Sec. 1343(a)(1). Sec. 1343(a)(2). Sec. 1343(a)(3). This, Did Fall Right back into Place; After, the UNCONSTITUTIONAL, UNLAWFUL, ARBITRARY and CAPRIOCIOUS; [REMAND]; The United States District Court, DID ABSOLUTELY, NOTHING BUT WASTE; APPELLANT'S, [TIME];
- ➤ ORDER BEING VEHEMENTLY APPEALED, is From; Nov. 16th 2018,. This was an UNCONSTITUTIONAL, [REMAND], ORDER; when in fact; 28 U.S.C.A Sec. 1443(1). Was Still, UNLAWFULLY, On the SURFACE; COURT, BELOW; DOES NOT CARE, if STATE COURT, UPHOLD(S), EQUAL FUNDAMENTAL RUDIMENTARY FAIRNESS, to AFRICAN AMERICAN BORN UNITED STYATES CITIZEN'S; Nor, Does it Matter, to Judge ANDREWS, if DUE PROCESS, is ABSENT; At the State Court Level,. In which is Thus, PATENTLY UNCONSTITUTIONAL;
- 01. JURISDICTION. What Order(s), of the U.S. Dist., of Del., are You Appealing
- ➤ A TOTALLY UNJUSTIFIED, INFERIOR ORDER; FOR { "R E M A N D" }; When in Fact; as of; Jan. 0 4th 2019,. State of Delaware SUPERIOR COURT JUDGE; a Proven { TYRANT } E. S C O T T B R A D L E Y, . Who Yet Again; DELIBERATELY, ILLEGALLY, ["VIOLATED"]; 28 U.S.C.A Sec. 1443(1). Yes, On that Date; Jan. 0 4th 2019,. This State Superior Court Judge; Did UNCONSTITUTIONALLY, COMMIT, a TOTALLY, ABITRARY, and ILLICIT CAPRICIOUS, UNLAWFUL ACT; State of Delaware Superior Court Judge B R A D L E Y, Did in Fact; Turn his Head the Other way; When in Fact; a Pendente Lite, / Pending;
- ➤ EMERGENCY MOTION FOR "S T A Y", was Pending up Here; This, May Be Out, Context; However; this has to be Factually, Concomitantly ["Explained"], Yes, On that date The STATE OF DELAWARE SUSSEX COUNTY SUPERIOR DESPOTIC JUDGE; From; Jan. 0 4th 2 0 1 9, Yes, De facto; Superior Court Judge; E. S C O T T B R A D L E Y, who knew that he Had the G R E E N LIGHT, of the U.S. Dist. Of Del. [Judge] and His UNLAWFUL, BLESSING; Judge E. S C O T T B R A D L E Y; DID WRONGFULLY, GROSSLY, [Abuse] his ILLEGAL, COLOR OF AUTHORITY, YET AGAIN; WHEN HE; FROM; JAN. 0 4 TH 2 0 1 9,. DEFIED, MULTIPLE; STATE OF DELAWARE LAW'S; Such as; See; State of Delaware Superior Court, C O U R T -

RULE; 6 2(a). In which Does, Exactly OFFICIALLY, PROMULGATE; An AUTOMATIC ["STAY"], And that; [NO], Execution [SHALL] ISSUE, Upon Nor; SHALL Proceedings, be TAKEN, For it's Enforcement, UNTIL the EXPIRATION OF [10]-DAY(S) After it's ENTRY; However; On that Day; From; Jan. 0 4th 2019, Not Only Did the Defacto AUTOCRATIC, State Leveled Superior Court Judge; GRANT, SUMMARY POSSESSION, to the Appellee, and his Questionable Purported Legal Counsel; Judge E.SCOTT BRADLEY. Then Went On; to GRANT THE WRIT OF EXECUTION, Yes [ALL] Within; 2 – hour(s), and Maybe a Few Minute(s); in which Easily; OFFICIALLY PROVES, YET AGAIN; that Judge ANDREWS COULD CARE LESS; ABOUT OUR, FEDERAL INALIENABLE, LIBERTIE(S) BEING UPHELD, in COURT'S OF THE STATE OF DELAWARE,. In which This High Honorable COURT, MUST [FIX], This; UNDER LAW; To Prevent; any Furtherance(s)

42 U.S.C.A. sec. 1985(3). / 28 U.S.C.A. Sec. 1343.

See; ALSO; 18 U.S.C.A Sec. 04. Sec. 241. Sec. 242.

ALSO CO – APPELLANT; TRAMMELL WRONGFULLY DELIBERATELY HEINOUSLY [DENIED];
ALSO; STATE OF DELAWARE SUPERIOR COURT RULE; 24(a)

Co -Appellant Trammell of whom has been a COLLATERAL HIER, of the Late; ESTATE OF The Late; MARIE POLK, Since when She Unfortunately Passed Away;

Co-Appellant [Trammell]; Was Not ALLOWED TO INTERVENE, in the ESTATE OF MY LATE GREAT AUNT WHEN IN FACT; TRAMMELL HAS HAD VERIFIABLE EQUITABLE INTEREST; Since; At Least; March of 2011, PLEASE SEE EXHIBIT of CO-APPELLANT'S, [Trammell's } CONSTITUTIONAL DOCUMENTED, PROPERTY LIEN No. Book # 12240 Page # 307 This is Has Been On Record; In The Confines / Archives of the SUSSEX COUNTY OFFICE OF THE RECORDER OF DEEDS;

Please Remember;

ALTHOUGH, CO – Appellant / Collateral Heir [George K. Trammell III.,] Has had Full Blown { "INCONTROVERTIBLE EQUITABLE INTEREST; in The ESTATE OF THE LATE; MARIE POLK,. For Nearly a Decade Now; Please see also;

What was the Date of the Being, - Challenged, (via) Due Process; ORDER / ORDER(S);

From; Nov. 16th 2018,. The Totally - UNCONSTITUTIONAL, REMAND;

When did you File; Your, ["NOTICE OF APPEAL,"] or Petition Fpr, REVIEW;

FACTUALLY, INITIALLY, the Notice of Appeal, was Received, (@) the U.S. Dist. Court,

On; 12/21/2018,. However; The Staff, at the U.S. Dist., of Del., Did Deliberately,

Hold On to it; For One Week,. On that Date; Cop – Appellant; [Trammell [, Felt, Very

Concerned, of Further; Invidious Discrimination, and Colluded Conspiracy, of the Court, and

Judge Below; So, Co – Appellant, [Trammell], Called (via) Telephone to this Honorable,

Court,. And An Apparent, (e – mail) or what ever; was Sent, to the Court, BELOW;

in Fact; this Court, was Very Fair; Due to Although, this Court – Staff; knew Nothing,.

Until; Dec. 28th 2018,. This Court, Did Back Date; The Actual, Initial OFFICIAL RECEIVAL,

of Our; Appellant's; NOTICE OF APPEAL; In was Received; (via) Court, Below at the Latest;

Dec. 21st 2018,. But, We the Appellant's, Pro se, Have Been, UNLAWFULLY, BIASED, A
GAINST; Due to we are Not Members, of the "Good Ole Boy's; Per se. UNCONSTITUTIONAL,.

02. STATEMENT OF THE [CASE]; Explain, the Proceeding(s), in the U.S. District,

Court; What Did the U.S. Dist., Court, Do In Deciding Your Case;

{ "A B S O L U T E L Y, - N O T H I N G" }; U.S. District Judge; Andrews, Did Yet Again;

In his, BIASED, As Common - Place; PROHIBITED, COLOR OF AUTHORITY,. FAIL, to Even

CONSTITUTIONALLY, FAIRLY / IMPARTIALLY, CONSIDER; The UNCONSTITUTIONAL, ILLICIT

Practice(s) OF; UNLAWFUL, But, ["COMMON PLACE"] - PROSCRIBED, "VIOLATION(S); OF

PROHIBITED; 42 U.S.C.A sec. 1983. Sec. 1985(3). OF the Inferior; State of

DELAWARE SUSSEX COUNTY SUPERIOR COURT;

This Whole / Entire Situation / Litigation; is SOLELY, BASED, UPON, MALICE AFORETHOUGHT,

/ PREMEDITATED, / PREORGANIZED, FELONY, ENCROACHMENT, / DEFORCEMENT,. OF THE

REAL PROPERTY/PROPERTIE(S), OF THOSE WHO ARE NOT, ABLE TO HIRE; REAL, MEANINGFUL

ADEQUATE, OUT OF THEIR, DEPRAVED / CORRUPT - Inner - CIRCLE, Real Actual, Bona fide
LEGAL COUNSEL,. That are Not Controlled, and Or / Nor Influenced,. By way of; The State

OF DELAWARE'S BIG SHOT'S, Nor the SPOT On; DEFORCING; COLOR OF AUTHORITY, IN -

CUMBENT - ADMINISTRATOR'S, of the SUSSEX COUNTY LOCAL GOVERNMENT; Now, as we

Coming Forth; as a Prose People; and African American; We are Not Suppose to be Able, To; CHALLENGE; ["PUBLIC CORRUPTION"], Especially Without Adequate Real Meaningful, Legal Counsel; as we Must Reiterate; However; we do Have INALIENABLE, CONFIDENCE; In The FACT; OF REAL INNER INTEGRITY, MORALS, ETHICS, and CANDOR; OF THIS HIGH COURT'S HERETOFORE, OFFICIALLY - ["SWORN"] IN HONORARY / HONORABLE ILLUSTRIOUS, JUSTICES, . WE THE APPELLANT'S, DO NOT ASSUME, THAT THE COLOR OF AUTHORITY, OFFICIALS OF; STATE OF DELAWARE, NOR THE COURT BELOW; WILL ADVERSELY, DEPRAVE THIS, INALIENABLE CONSTITUTIONAL, APPELLATE STATUTORY PROCESS, to Be INTERCEPTED, By way of; ILLEGAL MEANS, Nor (via), CONTINUED, - PROHIBITED [Racial Injustice]

0 3. STATEMENT OF FACT(S); Explain, the Facts, and Event(s), that Led, to the Complaint, In the UNITED STATES DISTRICT OF DELAWARE;

Since the Co – Appellant, [Trammell], Had Already, Been Previously / DELIBERATELY,;

UNLAWFULLY / UNCONSTITUTIONALLY DISENFRANCHISED; In the PRECURSOR, EXACT

/ [SAME], CIVIL ACTION; The ILLICIT, "OUTRAGEOUS", - DEFECTIVE;

"MONITION ACTION",. In which as a Matter, of Record Please See; This Court; CIVIL

DOCKET # 17 - 1164, In Which was Officially Initiated, In Court Below; As FEDERAL

"CIVIL RIGHT'S" *R E M O V A L; DOCKET No. 17 - 1448

The TOTALLY, UNCONSTITUTIONAL, PRE – STAGED, "COLOR OF LAW:, Court Room, of the ENTIRELY, BIASED / PREJUDICED STATE OF DELAWARE INFERIOR SUPERIOR COURT; NO MATTER WHAT THEY DO AND OR WHOM INALIENABLE LIBERTIES THEY VIOLATE; THE U.S. DISTRICT COURT OF DELAWARE,... WILL UPHOLD COLOR OF AUTHORITY MALFEASANCE WRONMGFUL MALVERSATIOAN L COLOR OF AUTHORITY ACTS OF ANY STATE OF DELAWRE ND OR COUNTY OFFICIIAL'

PLEASE ALSO SEE JUDGE COMLY'S COURT ORDER THAT DID AWARD SUMMARY

POSSESSION OF THIS ASAID PROPERTY TO CO - APPELLANT TRAMMELL; FROM 2013.

HOWEVER KEEPING IN MIND WHEN IT CAME TIME FOR THE ILLEGAL ULTERIOR MOTIVE

BASED; FIRST STAGE TO DEFORCE THE ESTATE; OF THE LATE MARIE POLK

CO - APPELLANT [TRAMMELL], WAS DELIBERATELY / UNLAWFULLY DISENFRAN
CHISED; AND COULD NOT DEFEND HIS INALIENABLE EQUIOTABLE INTEREST DUE TO

HIS Name WASS Intentionally DELIBERATELY, Left "Out, of the CAPTION; ALSO KEEP

IN MIND THIS PROPERTY WAS NEVER / EVER DEEDED TO anyone else Prior to Feb, 02 nd

1946 But MARIE POLH EXCLUSIVELY AND ON FILE AT GTHE RACISAT SUSSEX COUNTY

RECORDER OF DEED OFFICE;

ALSO AS CLIFFORD E. POLK NAME DID ILLEGALLY POP UP WHEN THE Late Great Aunt of [Trammell] Did Give Convey a Lot to Trammell's, Aunt Shirley who's Birthday Is Today Feb. 19th 1939 the Big { 80 } AMEN; FROM 1959 ALSO A Lot was Sold to The Late frank and ThelmA Smith from 1959. PLEASE BE LEGA;LLY ADBVISED THER NAME OF CLIFFORD E., POLK POPPING UP IS./ WAS FRAUD. AND CLIOFFORD E. POLK COULD NOT READ NOFR RIGHT FACT.

CO - APPELLANT, / COLLATERAL HEIR; [Trammell], Was VEHEMENTLY - INVOLUNTARILY, COMPELLED,. To REMOVE; The State of Delaware Sussex County Superior Court, CIVIL CASE; No. S 1 8C - 0 6 - 0 2 1, The Co – Appellant, Trammell, Had Already, Been Previously, HEINOUSLY, DELIBERATELY - EXPLOITED, While at the Same Time; BEING UNLAWFULLY;

➤ DISENFRANCHISED; In The LEAD, EXACT PRECURSOR; [CIVIL ACTION],

No. S17T - 07 - 004, Please See Also; Court Below; "CIVIL RIGHT'S", *REMOVAL;

FORMER; FEDERAL, "CIVIL RIGHT'S", U.S. DIST., OF DEL. DOCKET No. 17 - 1448,. Yes, The

COLOR OF AUTHORITY, / GROSS ABUSE OF AUTHORITY, COLOR OF LAW - OFFICIALS, of The;

- (a). STATE OF DELAWARE SUSSEX COUNTY SUPERIOR COURT; Including But Not, L imited To; State OF DELAWARE Defacto EMPEROR / AUTOCRATIC JUDGE;
 - E. S C O T T B R A D L E Y, and

```
(b). The SUSSEX COUNTY DEPARTMENT OF FINANCE, a Political Subdivision, of the STATE OF DELAWARE, C/O TODD F. LAWSON and MICHAEL H. VINCENT, AND also; [Katrina Mears], And too; BRITTANI REYNOLDS, these STILL CONTINUING,, COLOR OF LAW, DELIBERATE, ACTIVE - VIOLATOR'S, of The CONSTITUTIONAL, and FEDERAL "CIVIL RIGHT'S", of; COAPPELLANT, {Trammell}, [MUST] BE IMMEDIATELY, "CONSTITUTIONALLY, [RECTIFIED]; (VIA), The Vehement, STRONG, "OVER – DUE; INALIENABLE, - {DISMISSAL}, of the FORMER; REMAND, of the Inferior; COLOR OF LAW, DEPRAVED; FROM RULE OF LAW; UNITED STATES DISTRICT OF DELAWARE JUDGE; RICHARD G. ANDREWS. Yes, the ENTIRELY, WRONG, TOTALLY UNCONSTITUTIONAL; {"REMAND"}; Ruled On (via) The UNINDICTED; RICHARD G. ANDREWS.
```

```
04. STATEMENT OF RELATED, CASE(S); Have You, Filed, an APPEAL, in this Case -
BEFORE; If So Give Case Title / Caption; and DOCKET NUMBER;

{ "Y E S" }, . Please See This Court The Heretofore "CIVIL RIGHT'S", APPEAL DOCKET

#17-1448 Yes, This, Case as Yet Another Case as to where, the Defacto,

Judge Below; Judge [ANDREWS], UNLAWFULLY, WILLINGLY, [FACILITATED, / ASSISTED];

The Inferior, SUSSEX COUNTY, DELAWARE, [LOCAL GOVERNMENT], In the First, in PLEASE BE TOTALLY, IMPARTIAL, in this CASE; The Totally, Involuntary [ARDUOUS], "Hard" "Ship";

That, Co - Appellant, [Trammell], has Had FEDERALLY STAUTORILY, [DEMANDS]
```

```
0 5. Did the U.S. District Court; INCORRECTLY, - DECIDE - The FACT(S), OF YOUR,
- C A S E; > ["Y E S"],.
IF SO WHAT FACT(S),
```

```
0 6 . Did the U.S. District Court, APPLY, the WRONG - LAW, Either Case(s), or; Statue(s); IF, SO; What Law, Do You, WANT - APPLIED ?; 4 2 U.S.C.A. Section 2 0 0 0 H-2
```

- **07**. ARE, there Any Other Reason(s), why the U.S. District of Delaware Court'(s), > JUDGMENT / ORDER / DECISION, WAS ["W R O N G"]; If, So Briefly, State the Reason(s); [Yes], if the Inferior, U.S. District Court, Apparent, Judge; ANDREWS,. Had Been Just a Little, FAIR; and CONSTITUTIONALLY IMPARTIAL; An ABATEMENT OF ACTION, Should Have Been, SYSTEMICALLY, / AUTOMATICALLY, CONSTITUTIONALLY CONSIDERED, . Due to See; The Direct, RELEVANT / PERTINENT, ANSWER, / ANSWER(S), to Question; [# 05], .
- 0 8. What, ACTION; Do You, WANT, the Honorable; UNITED STATES THIRD

 JUDICIAL CIRCUIT OF APPEALS, to [Take], / "ENFORCE"; in this [CASE];

 This XCOURT SHALL ALLOW US TO GO HOME IOMMEDIOATELY, UNDER THE LAW;

 WE FEL THAT [4 2 U.S.C.A Sec. 2000H 2.] SHALL BE INVOKED, AGAINST ALL

 TORTFEASOR'S, / FRAUDFEASOR'S, and we the Appellant's, SHALL AT ALL DELIBERATE

 SPEED BE REINBURSED, for Our OUTRAGEOUS, UNCALLED FOR OUT OF POCKET, LIVING

 / SHELTER EXPENSES, SINCE THE ILLEGAL E J E C T I O N, FROM; JAN. 2 5 TH 2019.

 I, Mr. George K. Trammell III., the Captioned, Co Appellant, Do Amicably { D E M A N D }

 That, [A L L] of My INCONTROVERTIBLE; FEDERALLY, ENFORCEABLE, C I V I L and CONSTITU
 TIONAL RIGHT'S / LIBRTIE(S), be INSTANTLY, at [A L L] DELIBERATE S P E E D; REINSTATED,.

 Including But Not Limited to the FULL INALIENABLE CONSTITUTIONAL [REINSTATEMENT] OF;

 Co Appellant, [Trammell's], INALIENABLE, CONSTITUTIONAL RIGHT TO; ENJOY
- A. 42 U.S.C.A. sec. 1982.A. 12 Del. C. Sec. 503(4).

The OFFICE OF THE SUSSEX COUNTY SHERIFF, C/O FROBERT T. LEE and BENJAMIN BENNY GORDY, SHALL BE FOUND IN CONTEMPT OF THIS COURT;

THEY DID ON PURPOSE, Deliberately - DEFY / DENY; 28 U.S.C.A Sec. 2283. In which Could be Punishable; Under UNITED STATES CRIMINAL STATUES, HEREUNDER; TITLE 18,..........

Wherefore; We the Wrongfully, But, Heinously, / Invidiously, EXPLOITED;

APPELLANT'S, / DEFENDANT'S, - BELOW; Truly, Directly, AMICABLY - DEMAND; At [ALL],

DELIBERATE - SPEED; TRUE EQUAL, "SWIFT" - JUSTICE, UNDER LAW; This High Court,

[MUST' Make it Perfectly, PLAINLY - CLEAR; That Since the PRECURSOR; CIVIL

ACTION; The SUSSEX COUNTY DEPT. OF FINANCE v. CLIFFORD E. PLOLK HEIRS, CASE;

SINCE That Case, did intentionally Deliberately; LEAVE OUT; COLLATERAL Heir, APPELLANT

[Trammell],. OF WHOM HAS HADS NEAFRLY A DECADE OF TRUE, INDELIBLE; DIRECT

EQUITABLE INTEREST, in this REAL PROPERTY OF HIS LATE GREAT AUNT; THE ESTATE

OF THE LATE; MARIE JONES POLK,.

X Stephanie Parker

X George K. Trammell III