ORIGINAL

IN THE SUPREME COURT OF THE STATE OF MISSISSIPPI

NO. 2018-CC-00959

ZUNDRIA D. CRAWFORD **APPELLANT**

v.

THE MISSISSIPPI BOARD OF BAR ADMISSIONS **APPELLEE**

MOTION FOR RECONSIDERATION of Appellant's Motion to Show Cause filed Sept. 3, 2020, AND to STAY OR SUSPEND the briefing deadline set by this Court's Order entered on Oct. 12, 2020 or to Set Aside the Order overall
(*Hearing Requested to Perfect Record for Appeal[1])

COMES NOW, APPELLANT ZUNDRIA D. CRAWFORD (hereinafter "Crawford"), in the above styled and numbered cause and files this dual ***MOTION FOR RECONSIDERATION of Appellant's Motion to Show Cause filed Sept. 3, 2020, AND to STAY OR SUSPEND the briefing deadline set by this Court's Order entered on Oct. 12, 2020 or to Set Aside the Order overall*** (hereinafter "*Motion for Reconsideration*") pursuant to Appellant 11(a), Appellate Rule 27(h)(6), Appellate Rule 27(h)(8), Appellate Rule 31(e), Appellate Rule 2(b), and Appellate Rule 2(c) of the MISSISSIPPI RULES OF APPELLATE PROCEDURE (2020) ("M.R.A.P.") among other binding state and federal precedents, and Crawford shows the following, to-wit:

1. This Court is demanded to follow the GOT DAMN LAW!!!!!!! [2]

2. **MISSISSIPPI LAW** requires by law that this Court must file a Motion to Dismiss pursuant to M.R.A.P. 2(a)(2) to carry out a discretionary dismissal of this appeal. M.R.A.P. 2(a)(b).

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[1] M.R.A.P. 27(e) ("(e) Oral Argument Not Permitted. Unless otherwise ordered by the court to which the case is assigned, no motion shall be orally argued. If the appropriate court requests oral argument, the matter will be heard at such time as the court may designate with reasonable notice to the parties.").

[2] ***Cohen v. California***, 403 U.S. 15 (1971) (The U.S. Supreme Court found that the word "**fuck**" within the phrase "**Fuck** the Draft" is constitutionally protected speech.) (emphasis added); U.S. Const. amend. XIV, § 1; U.S. Const. amend I (as it applies to the *State of Mississippi* through the Fourteenth Amendment's Due Process Clause); U.S. Const. art. VI, § 1, cl. 2 (Supremacy Clause); Miss. Const. of 1890, art. 3, §§ 11, 13, 14, 24, 25, and 32; *Harrah's Vicksburg Corp. v. Pennebaker*, 812 So. 2d 163, 171 (¶ 29) (Miss. 2001).

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3. Ironically, Donald Trump was just talking about "dumb bastards" just last week.

4. This Court's "En Banc Order" entered on Oct. 12, 2020 that is at issue in this matter at bar and that threatens to unlawfully dismiss this pending appeal in violation of M.R.A.P. 2(a)(2) is "void" and unenforceable against Crawford. ***Overbey v. Murray***, 569 So. 2d 303, 306 (Miss. 1990) (quoting *Bryant, Inc. v. Walters*, 493 So. 2d 933, 938 (Miss. 1986)); *see* ***Adams v. Miss. State Oil & Gas Bd.***, 80 So. 3d 869, 872-73 (¶¶ 12-15) (Miss. Ct. App. 2012).

5. For the Justices of this Court to knowingly and willingly abuse their discretion and power with bias and unfair prejudice to enforce its "void" and unenforceable "En Banc Order" entered on Oct. 12, 2020 upon Crawford in violation of **MISSISSIPPI LAW** with the "corrupt purpose" to cause the ultimate and irreparable harm to Crawford of unlawfully dismissing this pending appeal and without full compliance with M.R.A.P. 2(a)(2) ("Discretionary Dismissal" procedure) does nothing but further **substantiate** *probable cause* to investigate and to ultimately bring criminal charges or indictments for EVERY Justice currently sitting on the bench of this Court for racketeering, abuse of power, obstruction of justice, or organized public corruption in violation of state and federal RICO law among other things! ***Overbey***, 569 So. 2d at 306; ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15); **§ 97-43-3**; **18 U.S.C. §§ 1961-1968**; *see* ***U.S. v. Whitfield***, 590 F.3d 325 (5th Cir. 2009) (A Mississippi trial attorney and two (2) Mississippi judges were convicted for racketeering under RICO and federal honest services fraud among other things).

6. It is *foreseeable* that the Justices of this Court acting in their *official* capacities "En Banc" (All Justices Agreed) to enforce an otherwise unlawful, "void," and unenforceable "En Banc Order" (i.e. evidence) entered on Oct. 12, 2020 with the "corrupt purpose" to unlawfully dismiss this pending appeal would constitute as substantial evidence and a demonstration that all of the Justices are also all conspiring to commit certain crimes and are acting *in concert* in the

commission of certain criminal offenses including but not limited to racketeering, obstruction of justice, criminal/felony fraud, abuse of power, breach of sworn oaths, and organized public corruption — which would warrant that the Justices of this Court in addition to other defendants to be further investigated by certain state and federal authorities and charged or indicted by a grand jury for conspiracy to commit certain crimes and for the commission of these aforementioned state and federal criminal offenses. ***Overbey***, 569 So. 2d at 306; ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15); **§ 97-43-3**; **18 U.S.C. §§ 1961-1968**; *see* ***U.S. v. Whitfield***, 590 F.3d 325.

7. **THEREFORE**, this *Motion for Reconsideration* at bar must be **GRANTED** as a *matter of law* and a *matter of due process of law*. And, if this Court wants to seek a "discretionary dismissal," then it is required to respect Crawford's entitlement to due process of law and her constitutionally protected rights and to follow **MISSISSIPPI LAW** pursuant to M.R.A.P. 2(a)(2) and M.R.A.P. 27(a)!

8. A motion to dismiss an appeal cannot be substituted for an official notice of deficiencies from this Court's Clerk or an order that violates M.R.A.P. 2(a)(2); even where this Court or the Appellee the MISSISSIPPI BOARD OF BAR ADMISSIONS ("Board") has moved to dismiss, the plain language of M.R.A.P. 2(a)(2) requires a notice from the Clerk of the deficiency and a 14-day opportunity to cure the deficiency. ***Cascio v. Alfa Mut. Ins. Co.***, 164 So. 3d 452 (Miss. Ct. App. 2013) (Griffis, P.J.), *reh'g denied* Dec. 9, 2014, *cert. dismissed* May 21, 2015.

9. In due season, the public will find out what **REALLY** has been going on behind the scenes in this case which is that Crawford discovered substantial evidence and the Appellee the MISSISSIPPI BOARD OF BAR ADMISSIONS ("Board") made certain incriminating *party-admissions* during a hearing that was held below over four (4) years ago on Sept. 12, 2016 that the Board not only cheated on Crawford's *July 2015 MS Bar Exam* but that they cheated in a manner

that proves that the "Board" has been unlawfully and deliberately "failing" unsuspecting MS bar applicants including but not limited to Crawford by secretly executing *state-licensing cheating schemes* and the substantial evidence further proves that the Board entered into an unlawful agreement in violation of § 73-3-2(6) and colluded with a private bar-exam drafting company called the NATIONAL CONFERENCE OF BAR EXAMINERS ("NCBE") to do it — Crawford just so happened to be the one applicant that caught them in the act. *See* ***Schware v. Board of Bar Exam. of State of N.M.***, 353 U.S. 232, 238-39, 77 S.Ct. 752, 756, 1 L.Ed.2d 288 (1957); **§ 97-43-3**; **18 U.S.C. §§ 1961-1968**; *see* ***U.S. v. Whitfield***, 590 F.3d 325 (5th Cir. 2009) (A Mississippi trial attorney and two (2) Mississippi judges were convicted for racketeering under RICO and federal honest services fraud among other things); ***Cotman v. The State***, No. A14A1287, 328 Ga. App. 822 (2014) (convicted for racketeering involving a state-test cheating scandal where State educators were artificially inflating test scores); ***United States v. Harper***, 2015 WL 6029530 (Oct. 15, 2015) (Defendants found guilty of conspiracy to a cheating scheme regarding commercial driver's license exams in violation of 18 U.S.C. § 1028(A)(1), and conspiracy to commit honest-service mail fraud, in violation of 18 U.S.C. §§ 1341 and 1346.

10. **THEREFORE**, Crawford comes by FORCE to bring **ORDER** out of chaos!!! Starting with this demand herein and at bar that this Court (which is composed of nine (9) proven tyrants, hypocrites, criminals, and tortfeasors out of the 2,989,260[3] citizens in the *State of Mississippi*) is going to FOLLOW THE GOT DAMN LAW!!!!!!! (*And* ***I mean*** *you disgusting muthafuckas are going to follow the got damn law in THIS CASE if you have never followed the law in yo GOT DAMN LIFE!!!! And, if you know what's best for YOU, you would be sure to read every single, solitary word of the pleadings herein because there is ALWAYS a method to my*

[3] See the 2020 UNITED STATES CENSUS.

madness! And any researcher, journalist, or reporter has the professional responsibility to be thorough and diligent in doing the same.). ***Cohen v. California***, 403 U.S. 15.

11. The FIRST AMENDMENT's freedom of speech, severe emotional distress, and PTSD and *pissed da fuck off* are front and center!!! (*Let's do this shit!*). ***Cohen v. California***, 403 U.S. 15.

12. But, first, let's be clear.

13. No man is above the law, and — yes, not even a person sitting on the bench as a Supreme Court Justice, *e.g.*, **MISSISSIPPI LAW** even has a criminal statute that applies to "judges" acting in their official capacities:

> If any judge, justice court judge, constable, member of the board of supervisors, sheriff, or other peace officer, shall wilfully neglect or refuse to return any person committing any offense against the laws, committed in his view or knowledge, or of which he has any notice, or shall wilfully absent himself when such offense is being or is about to be committed, for the purpose of avoiding a knowledge of the same, he shall, on conviction, be fined not less than One Hundred Dollars ($100.00) nor more than Five Hundred Dollars ($500.00), and may, in the discretion of the court, be removed from office.
>
> **§ 97-11-35**.

14. In the **Opinion of the Attorney General, No. 93-0701, O'Brien, Oct. 13, 1993**, the term "return" is defined. With regard to judges, the word "return" as used in Section 97-11-35 means to file charges or an affidavit against such person in the proper court. Of course, it would be best for the judge to file the charges in a court other than his own.

15. **MOREOVER**, laymen or the public generally think that a judge can do whatever he wants so long as he sits on the bench, but professionals in law know that this is not true by a long shot otherwise you wouldn't have judges going to prison for abusing their power. ***U.S. v. Whitfield***, 590 F.3d 325, 353 (5th Cir. 2009) (A Mississippi trial attorney and two (2) Mississippi

judges were convicted for racketeering under RICO and federal honest services fraud among other things).

16. In matters before a *court of law*, adverse decisions (when a judge rules against you) are generally remedied by appealing to a higher court if the party still feels aggrieved. *See* ***Sanderson v. Sanderson***, 824 So. 2d 623, 625-26 (Miss. 2002).

17. A judge may also abuse his discretion by entering an order in "bad faith" which simply means that he "knowingly and deliberately" failed to recognize or comply with clear directives or guidance set by a statute or exceedingly clear court rules and the "due-process" rights of the party that is being harmed when entering an order in favor of a certain party. ***Miss. Comm'n on Judicial Performance v. Roberts***, 227 So. 3d 938 (Miss. 2017); ***Miss. Comm'n on Judicial Performance v. Justice Court Judge T.T.***, 922 So. 2d 781, 784 (Miss. 2006) (quoting *Miss. Comm'n on Judicial Performance v. Franklin*, 704 So. 2d 89, 92 (Miss. 1997) ("'A specific intent to use the powers of the judicial office to accomplish a purpose which the judge knew or should have known was beyond the legitimate exercise of his authority constitutes bad faith....'"); ***Miss. Comm'n on Judicial Performance v. Thompson***, 169 So. 3d 857, 872-73 (¶¶ 56-57) (Miss. 2015).

18. But allegations of organized public corruption where judges are allegedly abusing their power by entering orders in bad faith "with corrupt purposes" are an entirely different animal. ***Whitfield***, 590 F.3d 325. Fraud, willful misconduct, deception, corruption, and the commission of crimes are aggravating factors as bad-faith orders already violate clear law or binding precedents. ***Id.***; ***Roberts***, 227 So. 3d 938; ***Thompson***, 169 So. 3d at 872-73 (¶¶ 56-57).

19. The FIFTH CIRCUIT has held the following in relevant part in its decision in ***Whitfield*** regarding the jury instruction of a criminal trial where a Mississippi trial attorney and

two (2) Mississippi judges were convicted for racketeering under RICO and federal honest services fraud among other things:

> [T]he jury was instructed to consider whether "the rulings were accomplished by the judges' *honest belief in the law and facts* of a particular case rather than a *corrupt purpose*." (emphasis added) ...
> The law only requires that the Government prove the "specific intent to give or receive something of value *in exchange* for an official act' to be performed sometime in the future. ...
> This was satisfied by the portion of the jury charge requiring the Government to prove that appellants entered into a "corrupt agreement" and that the judges' rulings were based upon "a corrupt purpose" rather than an "honest belief in the law and facts." Despite the district court's failure to include the actual phrase *quid pro quo* in the jury charge, in the instant context the instructions sufficiently conveyed the "essential idea of give-and-take." ...
> Under the undisputed facts here, the jury finding that there was a corrupt agreement necessarily entailed a finding of an *exchange* of things of value for favorable rulings in the judges' courts. Therefore, to the extent that a *quid pro quo* instruction may have been required in this case, the district court adequately delivered one.

Whitfield, 590 F.3d at 353 (citations omitted).

20. For this pending appeal at bar, enough time has passed since this pending appeal was filed over two (2) years ago on **July 2, 2018** that the dockets of this Court and the appellate-chancery court below now show a substantial manifestation of a pattern that demonstrates, *inter alia*, that it is the Justices of this Court that are not only the *interested*, opposing parties that Crawford is fighting against for this pending appeal — and **not** the Appellee the Mississippi Board of Bar Admissions ("Board") — but also that there is a plethora of substantial evidence of record as well as a manifestation of a substantial pattern of racketeering activities and a massive organization of public corruption within the Mississippi Judiciary. *See* **§ 73-3-2(3)**; *see* ***Caperton***, 556 U.S. 868, 129 S.Ct. 2252; *see also* ***Whitfield***, 590 F.3d 325.

21. Pursuant to the standard recognized by ***Whitfield***, the Justice of this Court among others have already been reported to the Federal Bureau of Investigations ("FBI") by Crawford for racketeering and organized public corruption and Crawford has legitimate criminal charges that

were filed in the HINDS COUNTY JUSTICE COURT (Jackson, Mississippi) on Feb. 24, 2020 which are currently pending and demonstrate "predicate acts" or "predicate" criminal offenses that were committed that also constitute as further evidence of crimes that were committed in violation of state and federal RICO laws among other things. **§ 97-43-3**; **18 U.S.C. §§ 1961-1968**; ***Whitfield***, 590 F.3d 325.

22. **THE JUSTICES** *OF THIS COURT*: The docket reflects and the substantial evidence proves that the Justices of this Court are ***effectively***, strategically, and deliberately abusing their discretion and power with actual bias and unfair prejudice and have been knowingly and willingly acting *in concert* and conspiring in the commission of abuse of power, racketeering activities, and organized public corruption among other things that included the corrupt motives of unlawfully concealing the substantial evidence of record in this case of the Board's *state-licensing bar-exam cheating schemes* by illegally ***fixing*** this pending appeal via intentionally falsifying the Record-evidence and/or by finding a way to construct an unlawful dismissal overall under the guise of an "official act." ***Whitfield***, 590 F.3d at 353; ***Cotman v. The State***, No. A14A1287, 328 Ga. App. 822 (2014); ***United States v. Harper***, 2015 WL 6029530 (Oct. 15, 2015).

23. And the Justices of this Court can save or spare Crawford of any crying or whining about your *honor* and *respect* when the docket reflects and the substantial evidence of record proves that you all have obviously *laid that down by the riverside* in this case years ago; you have forfeited those privileges and alienated yourselves for honorable positions as a "Justices" and this Honorable Mississippi Supreme Court and reduced yourselves to common criminals. ***Whitfield***, 590 F.3d at 353.

24. In this matter at bar, Crawford RECOGNIZES that no man is above the LAW!!!

25. In ***Schmidt v. Bermudez***, 5 So. 3d 1064, 1073-74 (¶ 18) (Miss. 2009), the Mississippi Supreme Court has held the following in relevant part:

> Ultimately, it is this Court's constitutional duty to separate honest errors of a judge from willful misconduct, wrongful use of power, corruption, dishonesty, or acts of moral turpitude which negatively reflect upon the judicial branch of government.
>
> ***Id.*** at 1073-74 (¶ 18) (quoting *Miss. Comm'n on Judicial Performance v. Judy Case Martin*, 921 So. 1258, 1263 (Miss. 2005)); *see also* **MISS. CONST. OF 1890, art. 6, § 155** (Judicial oath of office.).

26. Therefore, all nine (9) of the Justices of this Court knew exactly what they were doing when they repeatedly abused their discretion and power with bias and unfair prejudice in bad faith with corrupt purposes by repeatedly entering orders in bad faith and abusing the power of this Court by doing so while acting "En Banc" (i.e. *in concert*) which represents acting in the official capacity as the entire Mississippi Supreme Court to violate state and federal law in the furtherance of crimes (i.e. racketeering and organized public corruption) with intent to repeatedly deprive Crawford of her statutory and constitutionally protected rights regarding her application seeking admission to the MS Bar and the fair and impartial grading of her *July 2015 MS Bar Exam*. ***Id.***; ***Whitfield***, 590 F.3d at 353; ***Schware***, 353 U.S. at 238-39, 77 S.Ct. at 756; **42 U.S.C. § 1983**.

27. Why Crawford won't just take the test again? Because why take a high-stakes, expensive licensing bar-exam again when the overwhelming evidence proves that Crawford passed her *July 2015 MS Bar Exam* in the first place and that the Board did not have any good faith intent to fairly grade Crawford's exam or pass you in good faith anyways — besides, laymen don't readily know that Crawford has to *stay the course* in this litigation even if it has to be appealed and heard before the United States Supreme Court upon grant of writ of certiorari in order to prevail in court and to recover the substantial monetary damages that are at stack and that Crawford is entitled to. **42 U.S.C. § 1983**.

28. If wrongfully convicted criminals can recover, *e.g.*, "$24 million" and "$100 million" in damages because they were intentionally deprived of their constitutionally protected rights and suffered substantial harm and monetary damages as a result, what do you think when Crawford stands to recover over **$80 million** in damages (and counting) which requires her to stay the course of this litigation (even when corrupt judges have been unlawfully keeping the matter tied up in court). **MISSISSIPPI TORTS CLAIMS ACT § 11-46-9(1)(h) and § 11-46-15(1)(c); 42 U.S.C. § 1983; § 11-1-65** (Punitive damages); James Ford, *Man wrongfully convicted in 1996 murder sues NY for $100 million*, WWW.PIX11.COM, (Feb. 20, 2020 at 12:48 PM and last updated 8:13 PM); Gregory Pratt, *Cook County Board approves $24 million settlement in wrongful conviction case*, WWW.CHICAGOTRIBUNE, (Jan. 24, 2019 at 3:15 PM); Joaquin Sapien, *Millions for New York Man Wrongfully Convicted of Murder*, (May 9, 2017 at 3:34 PM); Frances Burns, *NYC to pay $17M for wrongful convictions of 3 brothers*, WWW.UPI.COM, (Jan. 12, 2015 at 12:04 PM).

29. The *Big Boys* in the practice of law like Attorney Willie Gary (The Giant Killer) and Butler & Snow (Ridgeland, Mississippi) know how to add up the total net worth of ALL of the potential defendants that Crawford **will** sue (including all of the judges upon criminal convictions) for claims arising out of this matter and knows how to skillfully plead and litigate claims of negligence, intentional spoliation, fraud, and intentional deprivation of Crawford's constitutionally protected rights (in a manner that governmental immunity can't touch) and that understands what are (i) economic and noneconomic damages and (ii) **future** economic and noneconomic damages and (iii) actual and punitive damages knows that this case is worth at least **$80 million** or more easy. **Mississippi Torts Claims Act § 11-46-9(1)(h) and § 11-46-15(1)(c); 42 U.S.C. § 1983; § 11-1-65**; *see also* **§ 97-11-1** (criminal statute) (Upon conviction for falsifying

court records among other criminal convictions, those convicted is statutorily "liable to the action of the party aggrieved.").

30. **Future economic damages?** Well, let's not forget that though the overwhelming evidence of record proves that Crawford passed the *July 2015 MS Bar Exam* in the first place, the fact is that she still does not have her license — which means that it is worth future damages for as long as she does not have it — and Crawford has demonstrated that she can practice law that would usually cost $1,500 to $2,000 per hour and lawyers are known for working, i.e., 80 hours or more per week — and, speaking of a calculation based on longevity, the *late* Honorable United States Supreme Court Justice Ruth Bader Ginsburg (God rest her sweet soul) has just passed at the age of 87 while still employed as a U.S. Supreme Court Justice — this Court might want to reconsider mitigating the damages by granting Crawford the professional Mississippi law licenses that she earned over five (5) years ago under § 73-3-2(1).

31. And you got real trouble if Crawford can find an applicable treble-damages statute that would automatically cause that **$80 mil** to triple by law. *Think it's a game!*

32. If wrongfully convicted criminals can win lawsuits and get "$24 million" in damages, how do you think a case like this would add up for a lawyer (unlicensed) like Crawford that can practice law the type or area of law that would cost a client $1,500 to $2,000 per hour or more?

33. Lilly Ledbetter fought her case for over 10 years and lost before the United States Supreme Court on a technicality. But she ultimately prevailed when the former U.S. President Barack Obama signed the LILLY LEDBETTER FAIR PAY ACT of 2009 into law.

34. This pending appeal is on course where Crawford is destined to recover substantial monetary damages in the end. But if all else fails and the Justices of this Court still manage to

successfully and illegally fix and throw this case, there is ALWAYS an alternative provided upon conviction of the Justices of this Court and anybody else that acts *in concert* or conspires with them to further and accomplish a pattern of racketeering activities and organized public corruption. *See* **§ 97-11-1**.

35. "En Banc;" acting *in concert* in the commission of criminal offenses; same thing when one is being investigated for conspiracy to commit certain crimes including but not limited to racketeering, obstruction of justice, criminal/felony fraud, abuse of power, breach of sworn oaths, and organized public corruption. (*Crawford laughs and laughs and laughs since these "dumb bastards" had the* ***audacity*** *TO CHEAT on Crawford's July 2015 MS Bar Exam and question Crawford's "qualifications" to practice law. § 97-11-1; § 73-3-2(2)(b)*).

36. **Get it???** (*Crawford laughs.*) Where Crawford's "claims" for liability and damages arising out of this pending appeal are worth an estimated **$80 million**, a conviction of the "Justices" and the other judges and defendants for criminal offenses committed against Crawford that arose out of this pending appeal including but not limited to the intentional falsification of "court records" means that Crawford will be able to sue these same people upon conviction for the same $80 million that her case is worth had they just left it alone and proceeded to follow the law in the civil matter. **§ 97-11-1**.

37. Hence, these ***geniuses*** including but not limited to the Justices of this Court did nothing but spared the original tortfeasors (i.e. the Board and the NATIONAL CONFERENCE OF BAR EXAMINERS ("NCBE")) in or affiliated with this ***civil*** pending appeal and, instead, effectively assumed liability for damages upon their own criminal convictions and ***just picked up the tab***:

> If any clerk of any court, or public officer or any other person, shall wittingly make any false entry, or erase any work or letter, or change any record belonging to any court or public office, whether in his keeping or not, he shall, on conviction thereof,

be imprisoned in the penitentiary for a term not exceeding ten years, **and be liable to the action of the party aggrieved.**

(emphasis added)

§ 97-11-1.

38. According to § 97-11-1, upon conviction, the Justices of this Court will be statutorily and automatically "liable" to Crawford for that same estimated $80 million in monetary damages that Crawford is entitled to that they were illegally blocking by trying to illegally ***fix*** this pending appeal in the furtherance of organized public corruption and to accomplish their substantial pattern of racketeering activities. **§ 97-11-1**; **42 U.S.C. § 1983**; ***Whitfield***, 590 F.3d 325. (*Crawford laughs and laughs and laughs. It ain't no fun when da rabbit got da gun!*).

39. So, after over 200 years since Mississippi became a part of the Union on **December 10, 1817**, time to pay the piper!

Argument

40. Again, ironically, Donald Trump was just talking about "dumb bastards" last week.

41. Under **MISSISSIPPI LAW**, this Court's "En Banc Order" entered October 12, 2020 is "**void**" — a nullity — and **unenforceable** against Crawford and must be "set aside" because **(i)** it threatens and orders an unlawful "dismissal" that is conditioned upon, disregards, and violates M.R.A.P. 2(a)(2); **(ii)** it intentionally deprives Crawford of her constitutionally protected rights to *due process of law*; and **(iii)** it is entered in bad faith with bias and unfair prejudice with intent to cause Crawford "immeasurable" and irreparable harm.[4]

[4] ***Overbey v. Murray***, 569 So. 2d 303, 306 (Miss. 1990) (quoting *Bryant, Inc. v. Walters*, 493 So. 2d 933, 938 (Miss. 1986)) ("'[A] judgment is void only if the court that rendered it lacked jurisdiction of the subject matter, or of the parties, or if it acted in a manner inconsistent with due process of law."); ***Miss. Comm'n on Judicial Performance v. Littlejohn***, 172 So. 3d 1157, 1162 (Miss. 2015) (quoting *Miss. Comm'n on Judicial Performance v. Littlejohn*, 62 So. 3d 968, 972 (Miss. 2011) (quoting *Miss. Comm'n on Judicial Performance v. Britton*, 936 So. 2d 898, 906 (Miss. 2006))); *see also* **42 U.S.C. § 1983**.

42. Specifically, "failure to comply with [M.R.A.P. 2(a)(2)]" renders this Court's "En Banc Order" entered on Oct. 12, 2020 threatening the unlawful "dismissal" of this pending appeal "void" and intentionally deprives Crawford of her *due-process* rights. **42 U.S.C. § 1983**; ***Adams***, 80 So. 3d 869, 872-73 (¶¶ 12-15). Therefore, this *Motion for Reconsideration* must be GRANTED to either "correct" or "amend" the said "En Banc Order" entered on Oct. 12, 2020 by excluding the *order* by this Court regarding a 14-day briefing schedule and threat of "dismissal" or "set aside" this order all together because it is "void" and unenforceable against Crawford *as is*. **M.R.A.P. 27(h)(6)**; **42 U.S.C. § 1983**; ***Overbey***, 569 So. 2d at 306; ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15).

43. Out of a population of **2,989,260** citizens in the *State of Mississippi*, it's always a just handful of "dumb bastards" that causes Mississippi to become a national embarrassment and the laughing stock of the Nation.

44. See, for an example, Joe Patrice, *This State Has Some Of The Worst Bar Exam Results We've Ever Seen*, www.abovethelaw.com, (Apr. 18, 2017 at 12:24pm) which is an article that he wrote about Mississippi's *February 2017 MS Bar Exam* results (i.e. bar-exam passage rates) concluding that "Mississippi will find a way to be worse at everything":

> Last week, we reported on the positively abysmal Florida bar passage rates. We all had a good laugh at Florida's expense, because Florida is a ridiculous place, but — as is so often the case in what passes for modernity in a world where the "Cash Me Outside" girl is famous — this only inspired another state to sink to even greater depths to steal the spotlight of negative attention. If "hold my beer" weren't such a played-out meme at this point, we could say this was a "hold my beer" moment. Instead, we'll label this, oh I don't know, a "pass the spittoon" moment.
>
> *Few things are certain in this life, but one of them is that* ***Mississippi will find a way to be worse at everything.*** *After Florida posted a 57.7 percent passage rate for the February exam,* ***Mississippi pulled up and delivered a glorious 36 percent passage rate.*** *[UPDATE: Some readers have noted that Florida's "February 2017 Examination Overall Passing Method Statistics," despite having that title, reflect only first-time test takers, which means the 57.7 percent rate shouldn't be compared to Mississippi's literal overall 36 percent passage rate. Fair enough.* The rest of this article beyond these two intro paragraphs deals in apples-to-apples

comparisons of Mississippi overall passage rates over the years so this fact has no bearing at all on the article's conclusions.]

Well, I do declare!

To put this failure in context, the 2016 February exam yielded a passage rate of 63 percent, which is not great, but at least respectable for a population of students, presumably, mostly taking the exam a second time. But when you consider the February exam passage rate in 2014 was a whopping 81 percent, it's clear that hard times have fallen on Mississippi. James Mullen of Bar Exam Stats put it this way:

Mississippi's February Bar Exam pass rate was 36%, approximately a 27% decline from last year. Not only that, but they also saw continued decline in the overall number of people taking the exam as well. This is a major departure from the average 67% pass rate in recent years. ***I am honestly baffled why it declined so much as I have not seen any major changes to their exam format, nor did they adopt the UBE.***

Could we blame declining standards designed to keep students in the seats paying tuition? Hmmm. Who knew that years of brutal cuts to public education might yield an underperforming populace? **Oh, right, f**king everybody.**

And it's a serious problem. Mississippi is a state that desperately needs attorneys. According to the Mississippi Access To Justice Commission, almost 700,000 people in Mississippi live below the poverty line, and the state has only "one legal services lawyer per every 21,000 eligible individuals." Poor, rural, with a heavy African-American population and civil rights problems that curiously seem to persist despite what Chief Justice Roberts wrote in Shelby, the state needs more competent attorneys, and that's not something that gets fixed by lowering standards — it's something that's fixed by investing two decades into growing students more prepared to enter law school.

But in the meantime, declining standards have played hell with bar passage rates at schools across the country. While many have begun the process of course correction — bringing in smaller, more credentialed classes — we've still got a few more years of this trend ahead of us. As we've noted before, there are laudable justifications for loosening admission standards, but all too often those are cynical fig leafs to justify taking money from students that the school "knew or should have known" would struggle to pass the bar and earn the license required to pay off their debt. Bottom line, no matter how a state got to this point, when states see bar exam struggles, it's usually the fault of admissions moves.

I mean, I'd say *res ipsa loquitur*, but I'm not sure Mississippi students would know what I meant.

(emphasis added; emphasis included)

Joe Patrice, *This State Has Some Of The Worst Bar Exam Results We've Ever Seen*, www.abovethelaw.com, (Apr. 18, 2017 at 12:24pm).

45. This Court's "En Banc Order" ("All Justices [Agreed]") at issue herein that was entered on Oct. 12, 2020 is **the SECOND TIME** during this pending appeal that this Court has threatened to unlawfully dismiss Crawford's pending appeal in violation of M.R.A.P. 2(a)(2) which would require the deliberate and intentional violation of Mississippi law under threat of an unlawful dismissal. ***Overbey***, 569 So. 2d at 306; ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15).

46. The docket reflects that **the First time** was just a few weeks after Crawford filed this pending appeal on July 2, 2018 when this Court's new Clerk was instructed or directed to send Crawford an unauthorized 14-day notice on Aug. 10, 2018 which was in violation of M.R.A.P. 2(a)(2) (*in the absence of the requisite "motion" to dismiss*) as it was an unauthorized 14-day notice that demanded Crawford to prepay almost **$8,000.00** for the cost bond in less than 2 weeks under threat of an unlawful dismissal with prejudice. *See* ***Cascio v. Alfa Mut. Ins. Co.***, 164 So. 3d 452.

47. In addition to violating **MISSISSIPPI LAW**, this said unauthorized 14-day notice that the Clerk sent to Crawford on or about Aug. 10, 2018 was sent with the bad-faith intent to intentionally inflict emotional and financial distress upon Crawford by unlawfully ***accelerating*** the time for Crawford to prepay **$8,000.00** (just after they all had just received *notice* via Crawford's *Motion to Proceed In Forma Pauperis* with attached affidavit filed on or about July 16, 2018 as reflected on the docket where Crawford sought to have this $8,000.00 cost bond waived because Crawford could not afford to pay anything at that time). ***Id.***

48. In response, the docket reflects that Crawford wrote a scathing letter to the Clerk that she filed on Aug. 13, 2018 demanding that the Clerk retract the unauthorized 14-day notices

while giving the Clerk *notice* that he was violating M.R.A.P. 2(a)(2) and further demanding that the Clerk follow the law! But to no avail, though the docket reflects that Crawford made the prepayment of the "$7,706.00" transcript-preparation fee on or about Aug. 23, 2018 to avoid any unlawful harm to this pending appeal.

49. Feeling aggrieved and that she was unfairly prejudiced and intentionally deprived of certain constitutionally protected rights, Crawford timely filed a Motion for the Recusal of the Justices of this Court which included Crawford's grievances regarding the Clerk and his unauthorized 14-day notice that he sent to Crawford on Aug. 10, 2018 threatening to unlawfully dismiss this pending appeal.

50. However, the docket reflects that this Court entered an "En Banc Order" on or about Oct. 29, 2018 denying Crawford's Motion for Recusal with bias and unfair prejudice in bad faith while boasting that all of the Justices read all of the applicable law and binding precedent as well as Crawford's letter to the Clerk filed on Aug. 13, 2018 (which revealed that their Clerk had committed criminal offenses in violation of § 97-11-37).

51. Now, this *Motion for Reconsideration* at bar takes issue with this Court's "En Banc Order" entered on Oct. 12, 2020 that threatens to unlawfully dismiss this pending appeal in violation of M.R.A.P. 2(a)(2).

52. But, in this case, there is yet another ***catch-22*** that is incriminating directly against the nine (9) people that are currently holding the titles as "Justices" of this Court. In the event that this Court proceeds to enforce the "void" "En Banc Order" entered on Oct. 12, 2020 and subsequently enters an order to unlawfully dismiss this pending appeal in a blatant demonstration of abuse of discretion and power with bias so as to cause immeasurable and irreparable harm and unfair prejudice against Crawford and a gross injustice in this Court, such an act would not only

result in yet another "void" order that must also be "set aside" but this will also create substantial evidence that would substantiate probable cause that the Justices of this Court should be further investigated, charged, or indicted for major criminal offenses including but not limited to charges or indictments under state and federal RICO laws. ***U.S. v. Whitfield***, 590 F.3d 325 (5th Cir. 2009) (A Mississippi trial attorney and two (2) Mississippi judges were convicted for racketeering under RICO and federal honest services fraud among other things).

53. And, by entering their "En Banc Order" on Oct. 12, 2020, the Justices of this Court demonstrates their abuse of discretion and power with bias and unfair prejudice and their bad-faith intent to cause Crawford immeasurable and irreparable harm including but not limited to severe emotional and financial distress as well as the intent to deprive Crawford of certain constitutionally protected rights. **M.R.A.P. 2(a)(2)**; **M.R.A.P. 27(a)**; **42 U.S.C. § 1983**; ***Miss. Comm'n on Judicial Performance v. Littlejohn***, 172 So. 3d 1157, 1162 (Miss. 2015) (quoting *Miss. Comm'n on Judicial Performance v. Littlejohn*, 62 So. 3d 968, 972 (Miss. 2011) (quoting *Miss. Comm'n on Judicial Performance v. Britton*, 936 So. 2d 898, 906 (Miss. 2006))).

54. This Court and the Justices of this Court already **know** that they are literally abusing their discretion and power with bias and unfair prejudice and deliberately causing Crawford "the most severe forms of harm [they can]" when this Court refuses to apply and respect the "exceedingly clear rule[s] of appellate procedure and disregard[] decades-old precedent." Look at your caselaw:

> "'Immeasurable harm occurs when a judge who is trusted as the gatekeeper to justice for all our citizens, fails to learn and apply fundamental tenets of the law.'"[] Here, [the judge] failed to apply an exceedingly clear rule of appellate procedure and disregarded decades-old precedent. Further, by doing so, [the judge] created one of the most severe forms of harm he could. . . .
>
> ***Littlejohn***, 172 So. 3d at 1162 (quoting *Littlejohn*, 62 So. 3d at 972 (quoting *Britton*, 936 So. 2d at 906)).

55. This Court and the Justices of this Court already know that they are literally abusing their discretion and power with bias and unfair prejudice and intentionally depriving Crawford of her constitutionally protected rights to *due process* and *equal protection of law* when this Court refuses to apply and respect clear, black-letter Mississippi law including but not limited to the "exceedingly clear rule[s] of appellate procedure and disregard[] decades-old precedent." Look at your caselaw. ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15) (Failure to comply with applicable court rules deprives an appellant's due-process rights.); *see* ***Littlejohn***, 172 So. 3d at 1162 (quoting *Littlejohn*, 62 So. 3d at 972 (quoting *Britton*, 936 So. 2d at 906)); *see also* **42 U.S.C. § 1983**.

56. **THEREFORE**, this *Motion for Reconsideration* at bar must be GRANTED.

57. So, if this Court wants to seek a "discretionary dismissal," THEN DO THAT! But, what you are going to do is you are going to follow **MISSISSIPPI LAW** is what you are going to do — especially when you have taken Crawford through five (5) years of unnecessary litigation and emotional and financial distress and embarrassment questioning her "qualifications" to practice law. **§ 73-3-2(2)(b)**.

58. As it relates to this matter at bar, **MISSISSIPPI LAW** provides in relevant part as follows:

> (2) *Discretionary Dismissal.* An appeal may be dismissed upon motion of a party or on motion of the appropriate appellate court (i) when the court determines that there is an obvious failure to prosecute an appeal; or (ii) when a party fails to comply substantially with these rules. When either court, on its own motion or on motion of a party, determines that dismissal maybe warranted under this Rule 2(a)(2), the clerk of the Supreme Court shall give written notice to the party in default, apprising the party of the nature of the deficiency. If the party in default fails to correct the deficiency within fourteen (14) days after notification, the appeal shall be dismissed by the clerk of the Supreme Court. The attorney for the party in default has the burden to correct promptly any deficiency or to see that the default is corrected by the appropriate official. Motions for additional time in which to file briefs will not be entertained after the notice of the deficiency has issued.

(emphasis included)

M.R.A.P. 2(a)(2);

> **(a) Content of Motions; Response.** Unless another form is elsewhere prescribed by these rules, an application for an order or other relief shall be made by filing a motion for such order or relief with proof of service on all other parties. The motion shall contain or be accompanied by any matter required by a specific provision of these rules governing such a motion, shall state with particularity the grounds on which it is based, and shall set forth the order or relief sought. If a motion is supported by briefs, affidavits, or other papers, they shall be served and filed with the motion. Any party may file a response in opposition to a motion other than one for a procedural order within seven (7) days after service of the motion, but motions authorized by Rules 8, 9, and 41 may be acted upon after reasonable notice, and the court may shorten or extend the time for responding to any motion.

(emphasis included)

M.R.A.P. 27(a);

> Many motions seek relief of a sort which is ordinarily unopposed, or which is granted as of course. The provision of subdivision (a), which permits any party to file a response in opposition to a motion within seven days after its service, assumes that the motion is one of substance which ought not be acted upon without affording affected parties an opportunity to reply. ***A motion to dismiss or otherwise determine an appeal is clearly such a motion.*** Motions authorized by Rules 8, 9, and 41 are likewise motions of substance, but, in the nature of the relief sought, to afford an adversary an automatic delay of at least seven days is undesirable; thus, such motions may be acted upon after notice which is reasonable under the circumstances.

(emphasis added)

M.R.A.P. 27, Comment.

59. Thus, **MISSISSIPPI LAW** requires that, in order for this Court to lawfully cause the "discretionary dismiss[al]" of this pending appeal is that it must first file a "motion" to dismiss under **M.R.A.P. 2(a)(2)** after which Crawford is entitled to respond in opposition "within seven (7) days after service of the motion" after which this Court must enter an order of a "discretionary dismissal" and, finally, the Clerk of this Court must send Crawford a 14-day "notice" to give her a reasonable opportunity to correct the deficiency and, if she fails to do so, then the appeal is

dismissed — this is the *process* of which Crawford is *DUE* (i.e. due process of law) — this is the *process* that Crawford is entitled to! ***Belmont Holding, LLC v. Davis Monuments, LLC***, 253 So. 3d 323, 331 (¶¶ 32-33) (Miss. 2018); ***Littlejohn***, 172 So. 3d at 1162 (quoting *Littlejohn*, 62 So. 3d at 972 (quoting *Britton*, 936 So. 2d at 906)); *see* ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15); *see* ***Cascio v. Alfa Mut. Ins. Co.***, 164 So. 3d 452; *see also* **42 U.S.C. § 1983**.

60. **THUS, GOOD CAUSE** IS SHOWN that *Motion for Reconsideration* at bar should be GRANTED because — as a *matter of law* and a *matter of due process of law* — this Court's "En Banc Order" entered on or about Oct. 12, 2020 is entered in "bad faith"[5] in violation of M.R.A.P. 10 – 11 and M.R.A.P. 2(a)(2) with the "corrupt purpose" to unlawfully dismiss this pending appeal — and its "void" and unenforceable anyways!!! ***Overbey***, 569 So. 2d at 306; ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15); ***Whitfield***, 590 F.3d 325.

61. **THEREFORE**, Crawford demands that this Court and the Justices of this Court to follow the GOT DAMN LAW! And you can start by GRANTING this *Motion for Reconsideration* at bar! After five (5) years of this BULLSHIT, Crawford's patience with all of this incredible ignorance, incompetence, arrogance, and corruption is long GONE!

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[5] ***Miss. Comm'n on Judicial Performance v. Skinner II***, 119 So. 3d 294, (¶ 8) (Miss. 2013) ("Willful misconduct in office includes 'the improper or wrongful use of power of his office by a judge acting intentionally, or with gross unconcern for his conduct and generally in bad faith. Necessarily, the term would encompass conduct involving moral turpitude, **dishonesty**, or **corruption**, and also any knowing misuse of the office, whatever the motive.' *Miss. Comm'n on Judicial Performance v. Boykin*, 763 So.2d 872, 874 (Miss.2000) (quoting In re Quick, 553 So.2d 522, 524-25 (Miss.1989)). **Bad faith** may also be found when this Court finds '[a] specific intent to use the powers of the judicial office to accomplish a purpose which the judge knew or should have known was beyond the legitimate exercise of his authority.' *Boykin*, 763 So.2d at 874-75 (quoting In re Quick, 553 So.2d at 524-25). Furthermore, '[w]illful misconduct in office of necessity is conduct prejudicial to the administration of justice that brings the judicial office into disrepute.' *Boykin*, 763 So.2d at 874-75. A judge may also bring the judicial office into disrepute through negligence, ignorance, or incompetence not amounting to bad faith. Id. at 875. '[T]his Court can generally recognize examples of such conduct when presented before the Court.' Id.") (emphasis added); *see also* ***Miss. Comm'n on Judicial Performance v. Thompson***, 169 So. 3d 857, 872-73 (¶¶ 56-57) (Miss. 2015).

62. Moving right along — one of the effects of the emotional and financial distress and PTSD and the anxiety of being a repeated **victim**-litigant in a *court of law* before a bunch of corrupt judges for long periods of time is that you go from writing extremely structured pleadings using commonly used words in the practice of law like 'dubious' and 'it appears' to becoming extremely frank while incorporating words or phrases known as slang or Ebonics or *code-switching* while exercising the full extent of one's entitlement of freedom of speech and expression as it relates to the *totality of the circumstances* — in other words, speech is speech while the burden shifts to you with the question of whether or not you have the ability to comprehend the communication. ***Cohen v. California***, 403 U.S. 15 (1971) (The U.S. Supreme Court found that the word "**fuck**" within the phrase "**Fuck** the Draft" is constitutionally protected speech.) (emphasis added).

63. Grievances are not always filled with pretty words — especially when its grown folks talking. ***Id.***

64. But be not deceived as the Board can confirm via its inhouse records that Crawford has a very unique skillset as Crawford (who has been litigating this case, involving complex constitutional questions and full appellate practice, *pro se*) achieved all A's in every legal-writing course in law school including but not limited to Scholarly Writing; Crawford was an Associate Editor in Law Journal after a unanimous vote and was offered the promoted position as Articles Editor by the Managing Editor of the Law Journal after recommendations that were made by Law-Journal peers; and, Crawford's favorite courses were Secured Transactions, Constitutional Law, Insurance Law, and Products Liability. Other law grads, law professors, and lawyers that find these facts about Crawford *know what time it is*.

65. In other words, Crawford ain't no *play-pretty*. In Mississippi, the practice of law is a hybrid of chess and dirty poker. And, in this case, *underestimation* has been the joker in the deck (*as there is ALWAYS a method to my madness*).

66. But for NOW, the demand is squarely upon YOU to FOLLOW THE GOT DAMN LAW starting with GRANTING this *Motion for Reconsideration* at bar because the docket and the record reflects that you were supposed to have recused or disqualified yourselves years ago which is a legal requirement in place meant to protect against the disaster and the bias, unfair prejudice, and undue delays and wastes of time that has been made of this case. ***Caperton v. A.T. Massey Coal Co., Inc.***, 556 U.S. 868, 129 S.Ct. 2252, 173 L.Ed.2d 1208 (2009); ***Miss. Comm'n on Judicial Performance v. Hartzog***, 32 So. 3d 1188 (Miss. 2010); ***Collins v. Joshi***, 611 So. 2d 898, 901 (Miss. 1992).

67. Might as well concede that your (i.e. the Justices of this Court and their "Board") corrupt stunts of attempting to sabotage this pending appeal by intentionally falsifying the Record for this pending appeal and making multiple attempts to illegally ***fix*** this pending appeal or to unlawfully champion a gross injustice by unlawfully "dismissing" this pending appeal have failed you and will inevitably get you state and federal prison convictions. ***Whitfield***, 590 F.3d 325.

68. **FREEDOM OF SPEECH**: Crawford is entitled to freedom of speech and expression in this matter at bar to show just how pissed off she is and rightfully so when she has been unlawfully harassed and harmed and damaged by a bunch of jackasses that can't take their ass-whippings like a man! **MISS. CONST. OF 1890, art. 3, §§ 11, 13, 14, 24, and 25**.

69. As it relates to Crawford's freedom of speech in this *Motion for Reconsideration* herein, take the AMERICAN BAR ASSOCIATION ("ABA") for an example and their article in the ABA Journal entitled "Joe Jamail" by Mark Curriden which is an interview with the famous

Houston, Texas personal injury lawyer, the *late* Trial Attorney Joe Jamail, who was famous for his $10.5 billion judgment against Texaco in 1985 and beloved and admired by many (including Crawford) and known as the King of Torts:

> Joe Jamail settled into his chair at home to map out his closing argument for the next morning. The case was a highly complicated business dispute between two of the largest corporations in the world—a multibillion-dollar merger gone awry. Just as Jamail picked up his pen, he heard a car horn blowing outside.
>
> Jamail's buddies—singer Willie Nelson and former University of Texas football coach Darrell Royal—were in a white limo, begging him to go out for a drink or two.
>
> "I tried telling them that this was the biggest damn case of my life—hell, of anybody's life—and that I needed to prepare," says Jamail. "But they weren't having any part of it. They kept me up **all fucking night** drinking. I could barely see straight the next morning."
>
> Jamail did just fine. He kept his closing argument simple. The case was about people keeping their word and being honest—or, in the case of the defendants, about not keeping their word.
>
> The result: On Nov. 20, 1985, a Texas jury returned a $10.53 billion verdict for Jamail's client, Pennzoil Co., against Texaco Inc. It remains the largest verdict upheld on appeal in legal history. The case later settled for $3.3 billion. Jamail's personal take topped $400 million, according to reports. ...
>
> Despite having more money than he ever dreamed of and being 83 years old, Jamail says he plans to continue trying cases for another decade or so, and then slow down a bit. He's been hired by three Fortune 200 companies in the past six months that are involved in bet-the-farm lawsuits.
>
> "The corporate boardroom mentality and structure encourages companies and their executives **to fuck each other**," he says. "So, there's always going to be a need for good lawyers."
>
> Jamail pauses to clarify. "By good lawyers, I mean good trial lawyers," he says. "They've invented this new term, *litigator*. **What the fuck is a litigator**? I'm a trial lawyer. I try cases. There are some lawyers who do nothing but **this mediation bullshit**. Do you know what the root of mediation is? Mediocrity!"
>
> The move to replace jury trials with mediation and arbitration, he says, is actually an effort by elitists in our society to control how disputes are decided.

"I don't think the trial practice is dead," says Jamail. "But it is very ill. There are some days you could throw a hand grenade down the hall of the Harris County Courthouse and not hit anybody."

Jamail says young lawyers at big firms today don't have the opportunity to cut their teeth on small cases, which would help develop their trial techniques.

"By not trying the small cases, the lawyers don't get the courtroom experience," he says. "So when the huge, bet-the-company cases come along, there are only a handful of trial lawyers who can handle it. That's why these big corporations still call us old-timers every day." ...

In a television debate over tort reform with a physician, the medical doctor was slamming lawyers as a drain on society. "I would like to remind the doctor that while his professional ancestors were putting leeches on George Washington to bleed him, my ancestors were writing the Declaration of Independence and the United States Constitution," Jamail responded.

"**I never heard any more shit from him**."

Jamail didn't always want to be a lawyer. In fact, he initially enrolled at the University of Texas as a pre-med student. But the first semester in 1942 didn't go so well. He failed to show up for his final exams and received five F's. So he forged his father's name on enlistment documents and joined the Marines.

Jamail returned home after the war and received his liberal arts degree from UT. Then he decided to go to law school, sort of.

"**I was so damn naive** that I didn't know that there was a test you had to take before you got into law school, so I just started showing up for classes without even enrolling," he says.

No one at the UT School of Law noticed Jamail wasn't officially enrolled either, until the time came three years later for the law dean to sign his diploma.
On a $100 bet from a classmate, he took the bar exam in 1952, a year before he graduated. The passing mark was 75. Jamail scored 76.

"**Shit, I'm overeducated**," he told his friends. "We used the $100 to buy a lot of beer and got drunk by the lake." ...

In the early 1980s, Jamail represented his courtroom idol, Houston criminal defense attorney Percy Foreman, whose neck was injured when his car was rear-ended by a commercial truck. On direct examination, Foreman testified that he had not experienced any neck problems before the accident, and that he was entitled to $75,000 for lost income due to the injury.

But on cross-examination, the defense revealed that Foreman had been hospitalized nine times for neck problems prior to this accident.

"The jury looked at me, expecting me to give them an answer," says Jamail. "So I told them that Percy had been a great lawyer throughout his life, but that he was now just an old man and was growing senile."

At that moment, Foreman jumped up and yelled out across the courtroom, "You goddamned son of a bitch!"

"See what I mean," Jamail immediately told jurors. "He doesn't even know where he is right now."

The jury awarded Foreman the sum of $75,004. Jamail says he never figured out why the extra $4.

"Today's law schools teach students how not to get emotionally involved in their cases," he says. "**That's bullshit.** If you are not emotionally involved, your client is not getting your best effort."

While Jamail's tongue has swayed many juries and judges, it has also gotten him into trouble. In November 1993, Jamail was defending his friend and client, Pennzoil Corp. Chairman J. Hugh Liedtke, in a lawsuit regarding the takeover of Paramount Communications Inc., of which Liedtke was an outside director. **During the deposition, Jamail called a lawyer representing QVC Network Inc. an "asshole" and said his deposition skills could "gag a maggot off a meat wagon."**

(emphasis added)

Mark Curriden, *Joe Jamail*, THE ABA JOURNAL, (Mar. 2, 2009, 5:30 AM CST).

70. Crawford's point here is that, anytime our U.S. President can talk about grabbing women by the "pussy" and talk about "shithole countries" and call people that literally are more educated than he could *ever* be to the degree as being experts "dumb bastards" and "idiots" on national television, this demonstrates to Crawford that she can say whatever in the "FUCK" SHE WANTS — ESPECIALLY against some proven "dumb bastards" (as Trump would say) whose shown that they don't know deer shit from wild honey while having the **AUDACITY** to question Crawford's "qualifications" to practice law — and ESPECIALLY when Crawford has grown sick and tired of this BULLSHIT — **unless** someone has failed to inform Crawford that the standard

that is set by the AMERICAN BAR ASSOCIATION ("ABA") and the United States President is that Crawford must be an old White man to be permitted to say what she wants and to exercise her entitlement to free speech! **§ 73-3-2(2)(b)**; ***Cohen v. California***, 403 U.S. 15; **MISS. CONST. OF 1890, art. 3, §§ 11, 13, 14, 24, and 25**; ***Harrah's Vicksburg Corp. v. Pennebaker***, 812 So. 2d at 171 (¶ 29).

71. And neither the Board nor this Court cannot come trying to chastise Crawford with *unclean hands* either.[6] You can't demand that Crawford demonstrate that she can fight in a *court of law* via passing a MS Bar Exam (*filed with fictitious legal scenarios*) and, then, get mad because Crawford had to fight you directly in an actual bout in a real *court of law* and repeatedly whipped your asses unconscious and out-lawyered all of y'all, instead. **§ 73-3-2(4)**; **§ 73-3-2(2)(b)**.

72. You asked if Crawford is "qualified" to fight in court, didn't you? **§ 73-3-2(2)(b)**.

73. You gave Crawford the "burden" to prove her "qualifications," didn't you? **§ 73-3-2(2)(b)**.

74. Well then!

75. You shove all of this aristocratic bullshit all up in everybody else's face and you don't even follow the law ya damn self! Crawford shall proceed to beat y'all's asses unconscious, kick your asses in court, and then kick your asses again and shake your hands when she's done. And when we get through, ain't gonn' be no hard feelings either. (Movie: Harlem Nights, 1989).

76. No wonder Mississippi is always the national embarrassment! John Grisham will NEVER lose his job — while there is enough scandal and corruption in this case that would make John Grisham blush!

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[6] BLACK'S LAW DICTIONARY 268 (8th ed. 2004) ("[C]lean-hands doctrine. The principle that a party cannot seek equitable relief or assert an equitable defense if that party has violated an equitable principle, such as good faith. • Such a party is described as having 'unclean hands.'").

77. To wake up with the idea to cheat means that you were a *bona fide* loser the moment you came up with that bright idea.

78. Crawford's grand demonstration of the *practice of law* in this case demonstrates the threat of a "Zundria D. Crawford" as being an example of the reason why they killed slaves for reading because that '*knowledge*' is a muthafucka and Crawford is a beast that's just bad and *formidable* enough to bring it and to *come see* yo ass on the courtroom floor!

79. Somebody que up that scene in the movie, A TIME TO KILL: *Now, close your eyes and imagine that Crawford is* ***a Black male.*** Scared the shit out of ya, didn't it?

80. Disclaimer: Pleased by advised that the pleadings herein of this *Motion for Reconsideration* at bar simultaneously demonstrates an exercise of Crawford's FIRST AMENDMENT rights to *freedom of speech* in petitioning this Court and the repercussions of severe emotional and financial distress and PTSD ALL AT THE SAME GOT DAMN TIME!!! OUGHT TO BE SHAME OF YOUR GOT DAMNED SELVES!!! You got folks that commit suicide just because they did not pass the bar exam (while the overwhelming evidence or record in this case proves that Crawford DID pass her *July 2015 MS Bar Exam*) which provides a measure of the level of loss of enjoyment of life and emotional and financial distress that has been repeatedly and intentionally inflicted upon Crawford for the last FIVE (5) GOT DAMN YEARS!!!!!!! *See* **Staci Zaretsky, *Law School Graduates 'Fairly Certain' They'll Fail the July 2018 Bar Exam: Is this how the majority of law school graduates really feel about the July 2018 bar exam?***, www.abovethelaw.com, (July 3, **2018** at 11:17 am). (**All 50 States**).

81. **THUS**, Crawford so moves this Court to follow the GOT.....DAMN.....LAW!!!!!!![7]

[7] ***Cohen v. California***, 403 U.S. 15 (1971) (The U.S. Supreme Court found that the word "**fuck**" within the phrase "**Fuck** the Draft" is constitutionally protected speech.) (emphasis added); U.S. Const. amend. XIV, § 1; U.S. Const. amend I (as it applies to the *State of Mississippi* through the Fourteenth Amendment's Due

82. **THEREFORE**, this *Motion for Reconsideration* must be GRANTED as a *matter of law* and a *matter of due process and equal protection* of the law because this Court's "En Banc Order" entered on Oct. 12, 2020 is legally "void" and cannot be enforced against Crawford any damn way! ***Overbey***, 569 So. 2d at 306; ***Adams***, 80 So. 3d at 872-73 (¶¶ 12-15).

83. And unjust law is no law at all!

WHEREFORE PREMISES CONSIDERED, this *Motion for Reconsideration* at bar should be GRANTED and for any other relief equitable and appropriate under the circumstances.

SO SUBMITTED, this the 26th day of October, 2020.

So Submitted,

ZUNDRIA D. CRAWFORD,
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Process Clause); U.S. Const. art. VI, § 1, cl. 2 (Supremacy Clause); Miss. Const. of 1890, art. 3, §§ 11, 13, 14, 24, 25, and 32; *Harrah's Vicksburg Corp. v. Pennebaker*, 812 So. 2d 163, 171 (¶ 29) (Miss. 2001).

CERTIFICATE OF SERVICE

I, Zundria D. Crawford, Appellant, do hereby certify that I have this day emailed and/or mailed, postage prepaid, a true and correct copy of Appellant's "*MOTION FOR RECONSIDERATION of Appellant's Motion to Show Cause filed Sept. 3, 2020, AND to STAY OR SUSPEND the briefing deadline set by this Court's Order entered on Oct. 12, 2020 or to Set Aside the Order overall*" to the following:

Office of the Mississippi Attorney General
Attention: Hon. Harold Pizzetta,
Assistant Attorney General
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Office of the Mississippi Attorney General
Attention: Hon. Mary Jo Woods,
Special Assistant Attorney General
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CERTIFIED, this the 26th day of October, 2020.

Zundria D. Crawford,
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10-26-20
2315 HL
LH MJ-CA

MISSISSIPPI STATE CAPITOL POLICE
Woolfolk Building
501 North West Street Suite 30001-A
Jackson, Mississippi 39201

To: Clerk of the Mississippi Supreme Court

From: Mississippi State Capitol Police

Date: 10-26-20

Subject: After Hours Filings of Court Brief

Greetings:

On the above date at 2315 hrs hours this Court Brief was delivered at our office at the New Capitol building by Zondra Crawford and then delivered to your office on the first floor of the Justice Facility.

Signature of Receiving Officer: [signature]

Motion for Reconsideration of Appellant's Motion to Show Cause filed Sept. 3, 2020....

[signature] 10/26/20