

---

-----Original Message-----

From: Gww1210@aol.com

Date: Tue, 22 Mar 2016 11:45:36 -0400

Subject: RE: Mark Warren Tetzlaff v. ECMC, No. 15-485: Response of Gordon Wayne Watts

To: JAtkins@SupremeCourt.gov, SHarris@SupremeCourt.gov,

MeritsBriefs@SupremeCourt.gov, Gww1210@aol.com

CC: Mark.Tetzlaff1958@gmail.com, Douglas.Hallward-Driemeier@RopesGray.com,

James.Wilton@ropesgray.com, NEness@ecmc.org, DMcNerney@SupremeCourt.gov,

EFossum@SupremeCourt.gov, gww1210@gmail.com

BCC: numerous news media contacts, including, but not limited to those listed on my online docket's high-profile press coverage of this case

**Hon. Jeff Atkins, Deputy Clerk for case initiation (202-479-3263)**

**Cc: Hon. Scott S. Harris, Clerk (202-479-3011) ; Cc: as indicated ; Bcc: file**

**c/o: Supreme Court of the United States**

**1 First Street, N.E., Washington, DC 20543**

RE: **Mark Warren Tetzlaff v. ECMC**, No. 15-485: Response of Gordon Wayne Watts

Mr. Atkins, I am in receipt of your letter to me, dated March 11, 2016, in the above-styled case. Thank you for speaking with me on the phone about our misunderstanding here - **and thank you for being honest enough to admit** that you don't know what to make of ***Newman-Green, Inc. v. Alfonzo-Larrain*, 490 U.S. 826, 832** and other current (and not overturned) Federal case law from the US Supreme Court all of which disagree with your claims that I may 'intervene' or 'join' a lawsuit at any stage of the game.

Since we last spoke, I called, wrote, and/or spoke with probably 25 or 50 attorneys barred in the US Supreme Court to try and "get a grip" on this seeming contradiction. As you might recall, I was permitted to participate in the 'Gay Marriage' case at the U.S. 11th Federal Circuit Court of Appeals in Atlanta, GA. Not only was I the **\*\*only\*\*** non-attorney allowed to participate as *Amicus Curiae*, but they even allowed me to amend my brief "out of time," when I discovered a few things that were good arguments I had overlooked. (See the PDF attachment in this email: "11th-Cir-Order-on-Citro-and-Watts-motions.pdf")

What you may not know, however, is that I made lots of friends of attorneys, both those 'for' and those 'against' gay marriage (and many on both sides submitted "letters of consent" for my *Amici Curiae* briefs), probably because I not only argued for my side (to affirm the 6th's Cir. holding of 'traditional marriage') but also because I asked the court to look into (and correct) instances in which gay citizens were mistreated - and was polite, respectful, and professional to parties on both sides. Why do I mention this, you wonder? ANSWER: When you and I disagreed about the jurisdiction to file my intervention/joiner, I called in "a lot" of favours, and made contact with **\*\*numerous\*\*** attorney friends -not to mention seeking help online at "Free Legal Advice" websites. While there was some disagreement on the exact applicability of the SCOTUS holdings cited, almost ALL of my attorney friends agreed that case law interprets statutory law, meaning you are wrong in your interpretation of the rule. They almost unanimously suggested that I contact you and ask that you consider these holdings as binding upon your Court to grant me PDP (Procedural Due Process) and file the paperwork - and let the justices make the decision about this, and not try to second-guess the justices. -- In all fairness, one lawyer seemed to agree with you, and so here is a summary of the feedback I got from my many lawyer friends, all of whom are accepted to practice before your court:

**\*\*** The 2nd attorney I called was the only one who seemed to agree with you: My friend, who (like myself) filed Amicus briefs in the 11th Cir. case in this email attachment, said that the thought that Rule 12.4 might overrule the ***Newman-Green*** holding above, since it was more recent. But, he admitted that he didn't know for sure, and either hinted or suggested that The Justices (and not the clerks) be the ones to decide this gray area of case law.

**\*\*** Both the 1st and 3rd attorneys I spoke with, yesterday (also friends of mine who litigated either in Obergefell or Brenner, the 11th Cir. case where the court let me participate), said in no uncertain terms that case law interprets statutory law and/or Rules of the Court, and that if there is a disagreement, the rules should yield to the holding - unless, of course, the Court receded from ***Newman-Green, 490 U.S. 826, 832*** and reverses itself --and further clarifies that the ***McDonald*** holding (430 F.2d 1065 (5th Cir. 1970), *McDonald* at 29-44) does not apply to this court.

**\*\*** One attorney, who is a long-time appellate attorney and barred in your court, had replied to my online question at one of those 'free legal advice' sites, and he said that, technically, I was right, but that joinder after the case is closed is rare, and that absent exceptional circumstances, he did not know if I qualified here. But, he invited me to telephone him, and I did: We

spoke at length, and he held by his views, and even said that he did not like the current US Bankruptcy Law, and that, while he would not express an opinion on whether it was Unconstitutional (as myself and Mr. Tetzlaff's attorney, Douglas Hallward-Driemeier allege), he did not feel it would be a waste of *Your Court's* time to take up my case - and overturn on the merits. (So, I asked him why he repeatedly suggested I go to a lower court and "work my way up" to your court. He replied that he felt it would be a waste of **\*\*my\*\*** time since very few cases are granted Certiorari review, as Mr. Tetzlaff had asked. But, he felt that I was on solid moral ground, probably I'm guessing, because somewhere around 100 Million Americans - about one-third of our population, are adversely affected by oppressive college loan debt, crippling our nation, in the area of Higher Ed when competing against other countries.)

Several attorneys were either unable or unwilling to offer thoughts or legal analyses, and many more were not available and/or did not return my phone calls and/or emails. -- BUT (and here's the bottom line), I was on the phone all day, yesterday, speaking with (and listening to) attorneys who are accepted to practice at the US Supreme Court, calling in a lot of favours of my friends - and the consensus was clear: Since all of the applicable Federal Case Law is on my side, if there is any ambiguity, you should probably file my requests to intervene and join. -- **\*\* I will add one thing to their collective suggestion. \*\***

Both you (the Deputy Clerk for case initiation), Hon. Denise McNerney (the merits clerk), and Hon. Scott S. Harris (the chief clerk) all have legal standing to petition the Court for clarification on Rule 12.4, since it seems to disagree with current (and undisturbed) case law at both the appellate and US Supreme Court levels on the same point of law. (My guess is that R.12.4 would prohibit me from 'joining' Tetzlaff's case, but would *not* prohibit me from 'joining' the case, itself, and allowing Tetzlaff to 'join' my joinder, if you can follow that.)

I know that you will make one side - or the other - angry no matter what you do, as there are loud voices advocating for their respective interests. Therefore, I do not envy your difficult position, and hope to do everything in my power to make your job as easy as possible. In such cases as this (where it will be impossible to please all sides), the best thing, I think, is to "do what is right," and so to that end, let me recap the legal landscape:

#### INTERVENTION:

The Rules of your court allow me to directly intervene: "A joint appendix, answer to a bill of complaint, motion for leave to intervene, and any other document not listed in subparagraph 1(g) of this Rule shall have a tan cover." (Rule 33.1(e)) Of course, since I'm filing *In Forma Pauperis* (poverty), Rule 33.2 would allow me to intervene as well.

When you and I spoke by phone, you pointed out that the federal case law that supports my view of intervention at 'any' time was appellate, not supreme, and thus persuasive (yet not legally binding):

“The only disputed question is whether the motion to intervene, filed one day after judgment, was 'timely' within the meaning of Rule 24, which provides for intervention 'upon timely application.’” **Curtis McDONALD, Plaintiff-Appellee, v. E. J. LAVINO COMPANY, Defendant-Appellee, v. UNITED STATES FIDELITY & GUARANTY COMPANY, Workmen's Compensation Carrier, Subrogee and Movant to Intervene-Appellant**, 430 F.2d 1065 (5th Cir. 1970) (McDonald, at 29)

“43 ...In the unusual situation presented by this case, even though the motion to intervene came after final judgment we can detect no valid reason to deny intervention. With little strain on the court's time and no prejudice to the litigants, the controversy can be stilled and justice completely done. 44 The judgment of the district court is reversed and the cause is remanded for further proceedings not inconsistent with this opinion.” (**McDonald**, at 43—44)

I would remind you that Mr. Chris Sevier, the "guy who wanted to marry his computer" (remember him <https://www.google.com/search?q=chiris+sevier+computer> ) was allowed to seek intervention in *Tanco*, one of the recent gay marriage cases. Observe: <http://www.supremecourt.gov/Search.aspx?FileName=/docketfiles/14-562.htm> Sevier, himself, admitted to me in a recent phone conversation that he wasn't being serious, but rather using a *Reductio Ad Absurdum* argument, here, and yet you allowed **\*\*him\*\*** to seek intervention. Why not me?

You said that I sought intervention **\*\*after\*\*** Certiorari was denied - and that this 5th Circuit holding, here, was not controlling, since that it was appellate, and not supreme. Well, that may be true, but let me remind you of a few things:

First, while, yes, it is not binding, nonetheless, the supreme court has **\*\*not\*\*** held that it is prohibited. (So, actually, it might **\*\*be\*\*** controlling, but at least, not prohibited, as you claim.)

Secondly, I filed when the case was still 'alive' by most definitions, since time had not expired for rehearing, and thus I was not late. Thus, had I been granted intervention, I would have gained party status, and my petition for rehearing would, of course, have been timely.

#### JOINER:

Here, I have an even stronger case - observe: Joinder is, indeed, permitted - at **\*\*any\*\*** time: In my Mar 04, 2016 filing, I pointed out that the case law allowing Joinder under F.R.Civ.P. 21 is even broader than Permissive Intervention under R.24(b): Rule 21 provides a court may join parties to an action "[o]n motion [of any party] or on its own... **at any time** [and] on just terms." Fed.R.Civ.P. 21; ***Newman-Green, Inc. v. Alfonso-Larrain*, 490 U.S. 826, 832 (1989) (noting the policies behind R.21 apply to appellate courts)**. Indeed, The U.S. Supreme Court frequently exercises its authority to add similarly-situated parties to avoid potential mootness or other jurisdictional problems where doing so entails no prejudice to parties, and requiring the movant "to start over in the District Court would entail needless waste and run[] counter to effective judicial administration." ***Mullaney v. Anderson*, 342 U.S. 415, 417 (1952)**.

This is current Supreme Court case law. What part of 'at any time' does This Court not understand?

Even if I had filed after the case was "final" and closed (it was not, but even if), I would be 'timely' as Rule 21 requires:

' **"Timeliness"** is not a word of exactitude or of precisely measurable dimensions. The requirement of timeliness must have accommodating flexibility...' (***McDonald*, at 41**)

"We have consistently ruled that **the interest in finality of litigation must yield** where the interests of justice would make unfair the strict application of our rules. (United States v. Ohio Power Co., 353 U.S. 98, 77 S.Ct. 652, 1 L.Ed.2d 683 (1957))

#### ONE MORE THING:

I just noticed that my brief exceeds the page limits, and while The Court may not allow me to file on this reason alone (without violating SDP - Sustentative Due Process), it is your ministerial duty to process my paperwork, forward it on, and grant me PDP (Procedural Due Process). The Supreme Court is a court of 'discretionary' jurisdiction, and thus may (and often *does*) say 'no' on the merits, but, so long as I follow the rules, it is your job (and duty) to file my pleadings (as your clerks usually do - and do quite well!).

Snce I know there is some concern about how large my brief is, let me tell you a few things that should probably offer encouragement and ally any fears on this head.

Everyone remember that I almost won the famous 'Terri Schiavo' case -- ALL BY MYSELF - on the merits - before the Florida Supreme Court. My 4-3 loss was not on some 'technical' issue, which we know since my brief was submitted, reviewed, accepted, filed, and reviewed on the merits. *Observe*:

[1] ***In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)***, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)

<http://www.floridasupremecourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

[2] ***In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO, GUARDIAN: THERESA SCHIAVO***, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court)

<http://www.floridasupremecourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

[3] ***Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo***, 403 F.3d 1223, 2005 WL 648897 (11th Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)

<http://media.ca11.uscourts.gov/opinions/pub/files/200511556.pdf>

What you may not know, however, is this: My brief (and related filings) were WELL IN EXCESS of the page limits for briefs of that sort! (Browse [http://www.floridasupremecourt.org/pub\\_info/summaries/briefs/04/04-925/index.html](http://www.floridasupremecourt.org/pub_info/summaries/briefs/04/04-925/index.html) for example, to see just a few of the filings The Florida Supreme Court docketed, like this brief, [http://www.floridasupremecourt.org/pub\\_info/summaries/briefs/04/04-925/Filed\\_07-29-2004\\_AmicusAppendixGordonWatts.pdf](http://www.floridasupremecourt.org/pub_info/summaries/briefs/04/04-925/Filed_07-29-2004_AmicusAppendixGordonWatts.pdf) which was similar to that which I filed in the court as original jurisdiction. My briefs were HUGE! Probably 2 or 3 times the page-length allowed.)

Since my Intervention and Joinder in this case, ***Tetzlaff v. ECMC, No. 15-485 (US Sup. Ct.)***, was similarly lengthy, I am sure you had some concern about whether it would be offensive or otherwise inappropriate to The Supreme Court's Justices, who already have a heavy caseload. However, two points, if I may:

**First**, even though my brief in re ***Schiavo*** was similarly lengthy, I almost won my case -- all by myself, doing far better than ALL other litigants -- combined! (Better than former Fla. Gov. Jeb Bush. Better even than Terri Schiavo's blood family.) While The Court (obviously) didn't see things my way, they surely enjoyed reading my brief: Since there were important legal issues that needed resolution of the court, I felt that I had to do the job "right." There was surely quite interesting argument among the justices in their conference, in reaching the 4-3 decision!

**Secondly**, however, since everyone knows that College Debt has become oppressive (and, as I argue, unconstitutional),

harming hundreds of millions of Americans, keeping a whole class of citizens in slavery (debt slavery), with illegal debt that hurts our competitiveness with other nations in the area of Higher Education, the additional length, in this case, is justified.

This hurts our nation - immensely! (Even to the result that, for the first time in our nation's history, College Debt has surpassed Credit card debt - and college students are committing suicide in unprecedented numbers, as our nation lags behind the rest of the world in one of the most important areas - probably second only to national security.)

**Third, I will add:** If the court denies me intervention, it will basically be ignoring the arguments elucidated in *Mullaney*, allowing Intervention - because denying Intervention would effectively be "requiring the movant "to start over in the District Court would entail needless waste and run[] counter to effective judicial administration." *Mullaney v. Anderson*, 342 U.S. 415, 417 (1952). (Joinder, of course, is warranted here for identical reasons.) You would be assuring that this matter drags on and on, and becomes a headache to all, when, instead, it could (and should) be resolved when you have a chance!

If Justice Scalia were still with us, and we asked him for his take, I am sure he would say something along the lines of:

[[**SCALIA, joined by the rest of the court:** "Look, we held in *Newman-Green*, 490 U.S. 826, 832 that Joinder is permitted at 'any' time: What part of 'any' does the dissent (and clerks) not get? And, since we have not receded from this holding, it is quite presumptuous for the clerks to second-guess us. We are big boys and girls, and we (thus Justices) are fully capable of resolving this unsettled point of law, so they should simply forward us these motions, and let us decide: And, if the clerk's office is uncertain on the proper interpretation on one rule of the court - which one clerk was honest enough to admit - the clerk's office should simply ask us. **Whether we agree or disagree, we will return an answer, rest assured.** And, with regard to **Intervention**, yes, we know that our court has not addressed the point of law that the 5th circuit addressed, but as we have not reversed them, their holding should be binding upon this point of law. but, moreover, as above, if the Scott Harris, or his clerks, are unsure, or if the rules and our court's holdings are silent, they should \*ask\* - and not presume to second-guess to know the 'mind of the court.' "Ask, and you shall receive an answer." We must do everything above-board, and leave a paper trail so that everything is documented, and, for that reason, the most appropriate way for Clerk Harris or his deputy clerks to seek clarification of the rules is to file a motion, seeking clarification from our court - and not private (and normally prohibited), *ex parte*, communications with any of the justices."]]

OK, I've made my point -- one last thing, though: Assuming you do your ministerial duty and file my pleadings (which you should be receiving in a few hours: See e.g., "23010640000133857801.pdf," which is the US Post Office signature confirmation that you received my filings), the justices may have a question about the timeliness due to the fact my filings have been sent back and forth over the last few months, so here is a time-line to help you navigate this mess:

\*\*\* On Feb 05, 2016, the last day to seek rehearing, I timely intervened - and timely sought joinder - under current (and undisturbed) FEDERAL case law, some of it from your court, no less. Then, assuming I was granted either, I would obtain party status and have standing to petition for rehearing. I included a petition for rehearing, as one document. ((Result: TIMELY))

\*\*\* On Feb 22, 2016, clerk Fossum responded, misinterpreting Federal case law on this head - returning my briefs. ((Result: That starts the 60-day limit associated with Rule 14.5 (Certiorari) and the 15-day limits in Rule 44.6 (Rehearing).))

\*\*\* On Mar 04, 2016, I timely responded, only 11 days later, showing him his error. ((Result: TIMELY))

\*\*\* On Mar 11, 2016, you responded, misinterpreting Federal case law on this head - returning my briefs. ((Result: That starts the 60-day limit associated with Rule 14.5 (Certiorari) and the 15-day limits in Rule 44.6 (Rehearing).))

\*\*\* On Mar 18, 2016, I timely responded, only 7 days later, showing you your legal error. ((Result: TIMELY))

*My point?* At every step of the way, Clerk Atkins, I was timely, and as you can verify this with your own records - and the stamp on the filings - my filings will be deemed 'timely' should you decide to follow the court's rules and file these. If the justices disagree, they can enter a written opinion receding from their older holdings - overturning them, or clarifying otherwise. Also, if you need clarification, I would suggest you file a motion for clarification of said rules, holdings, and rules of civil and appellate procedure. You have standing, and the court will not fail to answer you - one way or the other. Be assured of that. As the rules and holdings demand, PDP requires the clerk's office file my motions and intervention. You may verify the holdings, but you must comply.

\*\*\* *Today, Tuesday, 22 March 2016, I am e-filing herewith this email (with attachments) as a courtesy for two reasons:*

- a) As a courtesy to the parties and court - even tho not required at the pre-merits state (and certainly not required for non-lawyer litigants like myself).
- b) Let's say your court makes this case a 'high profile' case like it did in *Obergefell* (and this is not out of the realms of

possibility, since the UNCONSTITUTIONAL Federal Laws resulting in oppressive odious debt harm *hundreds of millions of Americans* and their families), the clerk office will need an text-searchable PDF electronic copy to post (as opposed to merely scanning in the hard copies I've sent you by US Post Office Priority Mail - and which delivery record shows that this item was delivered on [Monday] March 21, 2016 at 11:06 am in WASHINGTON, DC 20431 to J KOUROS," in other words, "John Kouros," apparently a mail-room employee).

Please find herewith enclosed my "Motion to allow filing *nisi* Clarification *contra*." It is only thirteen (13) pages long, *en toto*, a short read, and in PDF format as the following email attachment:

"15-485\_Motion-allow-filing-nisi-Clarification-contra-concurrent-expansion\_AS-FILED.pdf."

Again, a TRUE COPY of my brief (and all filings in this case) may be downloaded as from the front-page news of *The Register*, my namesake blogs: [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com) or, if you prefer a direct link:

Mirror 1: [www.GordonWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485\\_Tetzlaff-v-ECMC.html](http://www.GordonWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485_Tetzlaff-v-ECMC.html)

Mirror 2: [www.GordonWayneWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485\\_Tetzlaff-v-ECMC.html](http://www.GordonWayneWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485_Tetzlaff-v-ECMC.html)

If I can be of any further assistance, I assure you I will do my best to "pull my weight" - and make your job as easy as possible, in this headache of a controversial situation.

*With Kind Regards, I am*

*Sincerely,*

**Gordon Wayne Watts**

In a message dated 3/8/2016 7:32:23 P.M. Eastern Standard Time, [Gww1210@aol.com](mailto:Gww1210@aol.com) writes:

-----Original Message-----

From: [Gww1210@aol.com](mailto:Gww1210@aol.com)

Date: Tue, 8 Mar 2016 07:52:37 -0500

Subject: Tetzlaff v. ECMC, No. 15-485 (US Sup. Ct.): Response to Court's 2-22-2016 ruling

To: [JAtkins@SupremeCourt.gov](mailto:JAtkins@SupremeCourt.gov), [JAtkins@scus.gov](mailto:JAtkins@scus.gov), [Gww1210@aol.com](mailto:Gww1210@aol.com)

CC: [SHarris@SupremeCourt.gov](mailto:SHarris@SupremeCourt.gov), [SSHarris@SupremeCourt.gov](mailto:SSHarris@SupremeCourt.gov), [SHarris@scus.gov](mailto:SHarris@scus.gov), [SSHarris@scus.gov](mailto:SSHarris@scus.gov), [gww1210@gmail.com](mailto:gww1210@gmail.com)

Hon. Jeff Atkins, Deputy Clerk for case initiation (202-479-3263)

Cc: Hon. Scott S. Harris, Clerk (202-479-3011)

c/o: Supreme Court of the United States

1 First Street, N.E., Washington, DC 20543

Jeff, thank you for speaking with me once a while back on the phone.

I neglected to include you in my cc list when e-filing - not a requirement at the cert stage (and not required at all of us lowly pro se mortals), but, since the clerk assigned to my case misread the case law regarding intervention (when permissible), here are all the filings in that case:

- 1) The Intervention (which gives me 'party' status, allowing me to request rehearing
- 2) Notice (Correction) regarding 2 scrivener's errors and corrected certificate of service
- 3) My "In Forma Pauperis" paperwork (why you all don't require receipts is beyond me, but if you trust me, then I also trust myself! -- Trust me: If I could afford to file regularly, I would, as it makes the court's job easier to have 40 briefs, not just 10, making the justices' clerks' jobs easier)...
- 4) The "Rule 21 reconsideration" motion which shows that the clerk assigned to my case misread the relevant case law.

Additionally, I am including the tracking information, showing that W.LEE signed for my filing, and it should be headed your way shortly.

**Normally, I would not bother to include you all in my service list, but as there was one screw-up**

**already, I am hedging my bets, and keeping you all senior clerks "in the loop" -- to be "on the safe side." (Had your clerk read the case law right, I would not have had to spend loads of money to refile this, but the case-law I found, in my response, was worth its weight in gold.)**

If, however, you disagree with my reading of the Intervention case law, please let me know why; otherwise, please file my intervention. (Funny Obiter Dictum: Even though the court did not \*grant\* intervention for Chris Sevier, the "guy who wanted to marry his computer," remember him?... nonetheless, you all at least let him seek Intervention in Obergefell, et al, the gay marriage cases. - If you all filed nutty paperwork - clearly sarcastic, and not serious - then surely you all will brook my papers- and let the court review my Intervention as a matter of right.)

Thank you,

Gordon Wayne Watts

-----Original Message-----

From: Gww1210@aol.com

Date: Mon, 7 Mar 2016 04:57:56 -0500

Subject: Tetzlaff v. ECMC, No. 15-485 (US Sup. Ct.): Response to Court's 2-22-2016 ruling

To: MeritsBriefs@SupremeCourt.gov, Douglas.Hallward-Driemeier@RopesGray.com, neness@ecmc.org, DMcNerney@SupremeCourt.gov, EFossum@SupremeCourt.gov, gww1210@aol.com

CC: James.Wilton@ropesgray.com, [gww1210@gmail.com](mailto:gww1210@gmail.com)

| Hon. Erik Fossum, Associate Clerk (202-479-3392)

c/o: Supreme Court of the United States (202-479-3011)

1 First Street, N.E.

Washington, DC 20543

Thank you for processing my paperwork so far. **Pursuant to our phone conversation, I am submitting this response to The Court's 02-22-2016 ruling**, which I filed this Friday in this 'College Loan Bankruptcy' case, *Tetzlaff v. ECMC*, No. 15-485.

Please find enclosed PDF files of both this filing, as well as printing and "proof of delivery" to a 3rd-party Commercial Carrier in a timely fashion. *It is scheduled to arrive by 10:30am Eastern Time this morning.*

My apologies, once again, for the slight delay in service by email, but the Sabbath came upon me, and for religious (and health) reasons, I was delayed. (Besides, e-service is not required for cert filings, only merits briefs - and, moreover, *pro se* filers are not required to e-file *at all* -but I'm including this e-service as a courtesy, **for the convenience of The Court and Counsel.**)

Again, a TRUE COPY of my brief (and all filings in this case) may be downloaded as from the front-page news of *The Register*, my namesake blogs: [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com) or, if you prefer a direct link:

Mirror 1: [www.GordonWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485\\_Tetzlaff-v-ECMC.html](http://www.GordonWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485_Tetzlaff-v-ECMC.html)

Mirror 2: [www.GordonWayneWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485\\_Tetzlaff-v-ECMC.html](http://www.GordonWayneWatts.com/FannyDeregulation/Tetzlaff-case/DOCKET-15-485_Tetzlaff-v-ECMC.html)

Sincerely,

Gordon Wayne Watts

In a message dated 2/9/2016 5:07:54 P.M. Eastern Standard Time, [Gww1210@aol.com](mailto:Gww1210@aol.com) writes:

| Counsel and Court:

Please find enclosed a Supplemental Certificate of Service with judicial notice of 2 Scrivener's Errors. It is a 3-page PDF file and is enclosed.

**I filed this yesterday evening in *Tetzlaff v ECMC*, No15-485, in which Mr. Tetzlaff challenges his inability**

**to discharge his Student Loan in bankruptcy.**

My apologies for the delay in e-service, but it took me until now to code these filings for e-service and publication online, whereby you may download a true copy of the filings. (On another note, I think The Court should require \*all\* *pro se* litigants to effect e-service, as I am here, but that is your call, not mine.)

I accidentally used Counselor Hallward-Driemeier's old mailing address when effecting service this past Friday. My apologies; I corrected it as soon as I saw, and as The Court does not come back from vacation until 02-22-2016, I trust this will not inconvenience or prejudice anyone. My initial Friday filing, yesterday's erratum, and documentation of service for all items are enclosed.

Best regards,

Gordon W. Watts

In a message dated 2/9/2016 4:41:38 P.M. Eastern Standard Time, [Gww1210@aol.com](mailto:Gww1210@aol.com) writes:

-----Original Message-----

**From:** [Gww1210@aol.com](mailto:Gww1210@aol.com) <Gordon Wayne Watts>

**Date:** Sat, 6 Feb 2016 00:18:47 -0500

**Subject:** **Tetzlaff v ECMC, No15-485 (Intervention): motion for rehearing filed**

**To:** [MeritsBriefs@SupremeCourt.gov](mailto:MeritsBriefs@SupremeCourt.gov), [Douglas.Hallward-Driemeier@RopesGray.com](mailto:Douglas.Hallward-Driemeier@RopesGray.com),  
[neness@ecmc.org](mailto:neness@ecmc.org), [DMcNerney@SupremeCourt.gov](mailto:DMcNerney@SupremeCourt.gov),  
[EFossum@SupremeCourt.gov](mailto:EFossum@SupremeCourt.gov),  
[gww1210@aol.com](mailto:gww1210@aol.com)

**CC:** [James.Wilton@ropesgray.com](mailto:James.Wilton@ropesgray.com), [gww1210@aol.com](mailto:gww1210@aol.com), etc.

Counsel and Court:

I have filed a timely motion for rehearing in the above-captioned case, under the authority of intervention as of right. It is attached as "15-485\_MotionForRehearing-Intervention-GordonWayneWatts\_AS-FILED.pdf," as well as served by hard copy, as indicated.

Additionally, a TRUE COPY of my brief may be downloaded as from the front-page news of my namesake blogs, as listed below: [www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)

Although this email might get to you slightly after midnight, please note the proof of delivery images I am including, to verify that my filing is a timely petition for rehearing, should I be permitted to intervene as a matter of right.

I hope you have a great weekend!

Best,

**Gordon Wayne Watts, editor-in-chief, *The Register***

[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)

**BS, The Florida State University, Biological & Chemical Sciences;**

**Class of 2000, double major with honours**

**AS, United Electronics Institute, Class of 1988, Valedictorian**

**821 Alicia Road, Lakeland, FL 33801-2113**

**Home:(863)688-9880 Work: (863)686-3411 Voice&FAX:(863)687-6141 Cell:(863)409-2109**

**See also: [http://Gordon\\_Watts.Tripod.com/consumer.html](http://Gordon_Watts.Tripod.com/consumer.html)**

**[Gww1210@aol.com](mailto:Gww1210@aol.com) ; [Gww12102002@Yahoo.com](mailto:Gww12102002@Yahoo.com)**

**[Truth is the strongest, most stable force in the Universe](#)**

**Truth doesn't change because you disbelieve it**

**TRUTH doesn't bend to the will of tyrants**<http://GordonWayneWatts.com> / <http://GordonWatts.com>

## Get Truth

"First, they [Nazis] came for the Jews. I was silent. I was not a Jew. Then they came for the Communists. I was silent. I was not a Communist. Then they came for the trade unionists. I was silent. I was not a trade unionist. Then they came for me. There was no one left to speak for me."(Martin Niemöller, given credit for a quotation in The Harper Religious and Inspirational Quotation Companion, ed. Margaret Pepper(New York: Harper &Row, 1989), 429 -as cited on page 44, note 17,of Religious Cleansing in the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty, Life, and Family Publications.

Some versions have Mr. Niemöller saying: "Then they came for the Catholics, and I didn't speak up, because I was a Protestant"; other versions have him saying that they came for Socialists, Industrialists, schools, the press, and/or the Church; however, it's certain he DID say SOMETHING like this. Actually, they may not have come for the Jews first, as it's more likely they came for the prisoners, mentally handicapped, & other so-called "inferiors" first -as historians tell us-so they could get "practiced up"; however, they did come for them -due to the silence of their neighbors -and due in part to their own silence. So: *"Speak up now or forever hold your peace!"-GWW*

---

---

---