

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No. 15-10295

CARI SEARCY, et al., Plaintiffs-Appellees,

v.

**LUTHER STRANGE, ATTORNEY GENERAL,
STATE OF ALABAMA, Defendant-Appellant.**

**Appeal from the U.S. District Court, Southern District of Alabama
Civil Action No. 1:14-cv-0208-CG-N, before Hon. Callie V.S. Granade**

***Time-Sensitive* Motion for leave to file *Amicus Curiae* Brief of Gordon
Wayne Watts in support of Atty. General's motion for stay, but offering a
Compromise to redress legitimate grievances of Plaintiffs, Searcy & McKeand
(RULING REQUESTED BEFORE FEB. 9, 2015)**

The name, office address, and telephone number of counsel[*]
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[*] *Mr. Watts, acting as his own counsel, is not a lawyer.*

U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Searcy, et al v. Strange, Appeal No: 15-10295

Amicus, Gordon Wayne Watts, pursuant to 11th Cir. R. 26.1-1, hereby certifies that the following is a list of trial judge(s), and all attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, including subsidiaries, conglomerates, affiliates and parent corporations, including any publicly held corporation that owns 10% or more of the party's stock, and other identifiable legal entities related to a party those who have an interest in the outcome of this case and/or appeal:

- 1. Agricola, Jr., Algert Swanson, Attorney for Alabama Probate Judges Association (“APJA”) & Gov. Robert J. Bentley**
- 2. Alabama Probate Judges Association**
- 3. Allen, Wes, Probate Judge, Pike County, Alabama, APJA Treasurer**
- 4. Bentley, Robert J., Governor of Alabama**
- 5. Brasher, Andrew Lynn, Solicitor General**
- 6. Byrne, Jr., David B., Attorney for Governor Robert J. Bentley**
- 7. Davis, James W., Assistant Attorney General**
- 8. English, Bill, Probate Judge, Lee County, Alabama, APJA Vice President**
- 9. Granade, Hon. Callie V. S., United States District Judge**
- 10. Hernandez, Christine Cassie, attorney for plaintiffs**
- 11. Howell, Laura Elizabeth, Assistant Attorney General**

12. Kennedy, David Graham, attorney for plaintiffs
13. McKeand, Kimberly, plaintiff
14. Mitchell, Terry, Probate Judge, Coosa County, Alabama, APJA President Emeritus
15. Norris, Greg, Probate Judge, Monroe County, Alabama, APJA President
16. Paluzzi, John Earl, Probate Judge, Pickens County, Alabama, APJA Secretary
17. Reinert, Jeff, Clerk of the Court, U.S. Dist. Court, S.D. of Alabama
18. Ryals, Joseph Lenn, Attorney for Alabama Probate Judges Association
19. Searcy, Cari D., plaintiff
20. Strange, Luther, Attorney General
21. Watts, Gordon Wayne, *Amicus Curiae*

No counsel for any party authored this brief in whole or part, nor did anyone make any monetary contribution intended to subsidise/fund preparation/submission of this brief. I, Gordon Wayne Watts, alone, both wrote & funded it. *Amicus*, Gordon Wayne Watts, is an individual, not a corporation, and accordingly does not issue any stock and does not have any parent corporations or any publicly held corporations that own 10 percent or more of stock of that nonexistent parent corporation.

/s/ _____ Date: _____

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821 ALICIA RD
LAKELAND, FL 33801-2113

Time-Sensitive Motion for leave to file Amicus Curiae Brief of Gordon Wayne Watts in support of Atty. General's motion for stay, but offering a Compromise to redress legitimate grievances of Plaintiffs, Searcy & McKeand
(RULING REQUESTED BEFORE FEB. 9, 2015)

Pursuant to Federal Rule of Appellate Procedure 29, Gordon Wayne Watts moves for leave to file an *amicus* brief in support of Defendant-Appellant, Atty. Gen. Luther Strange's motion to stay pending appeal, *but also* in support of key complaints of the Appellees-Plaintiffs, Searcy, *et al.*, in the above-captioned case. The Defendant has consented to the filing of the *amicus* brief, but the Appellees withheld their consent, thus requiring this Motion. In support of this Motion, Proposed *Amicus* states as follows:

1) Although I'm not an attorney, I was successfully able to make strong arguments, and follow the proper protocol, Rules of Appellate Procedure, & local rules, in an attempt to submit an *Amicus Curiae* brief in *Brenner v. Armstrong*, 14-14061, and its consolidated case, *Grimsley v. Armstrong*, 14-14066, two other 'Gay Marriage' cases before This Court –and that, in a timely fashion. This Court was also generous enough to grant me leave to submit an amended brief out-of-time, to correct errors/omissions I had made in my original *amicus*, and said brief is currently the most recent item on both dockets.

2) Since I posted every single merits brief on my blog, and did news coverage of *each* and *every* brief, I was able to get a much-stronger grasp on the

issues surrounding the 'Gay Marriage' debate.

3) When I heard on the news that Hon. Judge Callie Granade refused to issue a stay pending appeal in a 'Gay Marriage' case within the 11th U.S. District, and, now knowing what the 4-prong test requires, it dawned on me that she had overlooked a new legal development which would “tip the balance” of prong-1, regarding the likelihood of success on the merits, and thus mandate a “Stay Pending Appeal,” and so I endeavored to timely move the district court –and This Honourable Court –if necessary –to review some facts of law which the Defendant had also overlooked in his motions before the court below –and before This Court.

4) Besides the legitimate grievances of Defendant, Luther Strange, I also noticed that the plaintiffs had some legitimate gripes, which were being addressed in a far-more destructive way than actually was necessary to solve the problem and redress what looked, to me, to be genuine torts.

5) The proper, but limited, function of an *amicus* brief is described by U.S. Supreme Court Rule 37.1 as follows: “1. An *amicus curiae* brief that brings to the attention of the Court relevant matter not already brought to its attention by the parties may be of considerable help to the Court.”

6) While this is not the SCOTUS, nonetheless, that maxim applies, and I shall endeavor to bring to This Court's attention several matters which have perennially been ignored or overlooked, probably by human error.

7) Pursuant to Fed.R.App.P., 29(b), I am filing the proposed amicus along with the motion, and hereby state my interests: my interests are both altruistic and personal, as I elucidated in my *amicus* filed in the *Brenner/Grimsley* cases, and, for the reasons which shall become apparent in this rather short memorandum, the matters asserted are relevant to the disposition of the case.

For all these reasons, I respectfully request that The Court grant this motion and countenance this rather short *Friend of the Court* brief.

Date: _____

Respectfully submitted,

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Certificates of Service

In accordance with Rule 25(c)(4), Manner of Service, "Service by mail or by commercial carrier is complete on mailing or delivery to the carrier," which I hereby certify that I am doing today, _____, 2015, to the following parties (below), by _____ –and by Electronic Mail, when/where possible. Additionally, I hope to post a TRUE COPY of these filings on my Open Source online docket, for free download, at the following two (2) URL's, as soon as practically possible:

<http://www.GordonWatts.com/DOCKET-GayMarriageCase.html>

and:

<http://www.GordonWayneWatts.com/DOCKET-GayMarriageCase.html>

/s/ _____
Gordon Wayne Watts, *Amicus*

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LAYMAN OF THE LAW:

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18. Ryals, Joseph Lenn, Attorney for Alabama Probate Judges Association
19. Searcy, Cari D., plaintiff
20. Strange, Luther, Attorney General
21. Watts, Gordon Wayne, *Amicus Curiae*

No counsel for any party authored this brief in whole or part, nor did anyone make any monetary contribution intended to subsidise/fund preparation/submission of this brief. I, Gordon Wayne Watts, alone, both wrote & funded it. *Amicus*, Gordon Wayne Watts, is an individual, not a corporation, and accordingly does not issue any stock and does not have any parent corporations or any publicly held corporations that own 10 percent or more of stock of that nonexistent parent corporation.

/s/ _____ Date: _____

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Argument I. New developments require a Stay Pending Appeal

The court below found against the defendant, claiming he wasn't likely to succeed on the merits, but entered a stay pending appeal anyway, for a period of 14 days, which is set to expire circa Feb. 09, 2015. **Well-settled case-law (and Order of the court below) state the 4-prong test governing 'Stays Pending Appeal':** (1) *whether the stay applicant has made a strong showing that he is likely to succeed on the merits;* (2) *whether the applicant will be irreparably injured absent a stay;* (3) *whether issuance of the stay will substantially injure the other parties interested in the proceeding;* and (4) *where the public interest lies.* The defendant made a 'balance of equities' argument, citing *Garcia-Mir v. Meese*, 781 F.2d 1450, 1453 (11th Cir. 1986), and *amicus*, Alabama Probate Judges Assn., made a good 'public interests' argument (citing the “substantial confusion” that would result if SCOTUS reversed). Although defendant's motion for a stay pending appeal cited the U.S. 6th Circuit's recent ruling in *DeBoer*, et al. (upholding a 'Gay Marriage' ban), *and* the recent grant of Certiorari by the U.S. Supreme Court of these cases, supporting his prong-4 argument (public interest), he altogether *failed* to make an argument that he's likely to succeed on the merits (prong-1). Based on the *amicus* brief by Gordon Wayne Watts, in the *Brenner* (14-14061) and *Grimsley* (14-14066) cases, lodged before This Court, there is one argument that all but guarantees defendant will likely succeed on the merits. Said brief makes an argument that has

never heretofore been advanced: even though polygamy has been invoked as either *obiter dictum* or for 'slippery slope' arguments, it has never been properly used as an 'Equal Protection' argument -until, that is, here: However, now that the Watts amicus is lodged before This Court, there is absolutely no way that 'Gay Marriage' can remain legal at all “[U]nless, of course, polygamists for some reason have fewer constitutional rights than homosexuals.” *Romer v. Evans*, 517 U.S. 620, at 648 (1996). Since polygamy has a much stronger legal and historical precedent (see Watts brief, *supra*), than Gay Marriage, it would perforce, via Equal Protection, be impossible to grant 'Gay Marriage' any greater legal status; **and**, since polygamy is very unlikely to become legal in the near future, then Gay Marriage is even more certain to fail, and thus defendant, Luther Strange, has made a strong showing that he is likely to succeed on the merits, even if it was by proxy (by the instant memorandum of law), thus fully satisfying prong-1 and requiring a stay pending appeal in the case at bar. These facts, when added to the point *supra*, only clinch what is already a certain legal justification for granting a stay pending appeal. Furthermore, a stay pending appeal is typically mandatory in many state courts, implying that, absent “extreme” circumstances (life-or-death jeopardy), a stay pending appeal is appropriate. Even if the court below fails to issue a stay pending appeal, This Court has “oversight” responsibility (see: Fed.R.App.P., RULE 8(a)(1)(A)), and, so, as the old saying goes: “The buck stops here.”

Argument II: Plaintiffs have legitimate complaints too

Even though plaintiffs are certain to lose on the merits, with regard to the definition of 'marriage,' they do have legitimate grievances, namely, the right to adopt: while not a guaranteed certainty to all people (for example: even “legally” married couples who are child-abusers will be refused adoption), so-called “Gay Adoption” bans are no more legal than, say, an outright ban on singles or the elderly adopting. For example: a Florida State Appeals Court found that found a Florida statute prohibiting adoption by homosexuals had “no rational basis” and thus violated their equal protection rights. (*Fla. Dept. of Children and Families v. In re: Matter of Adoption of X.X.G. and N.R.G.*, Fla. 3d DCA, No. 3D08-3044, Opinion filed September 22, 2010) This is good case law, and a Federal Court would be correct in upholding that: while opinions differ as to whether homosexual couples are “better than” or “worse than” families with a man-woman marriage, homosexuals are, in many cases, fine parents, and thus such a ban is unreasonable. Indeed, I attest that I occasionally hear reports that Alabama has a 'Gay Marriage' ban, and, if this is true, then This Court would be more appropriate in simply striking down Alabama Laws for such a Gay Marriage ban, instead of changing the definition of marriage (the latter being overkill -and also running afoul of Equal Protection, as I argue in my amicus brief lodged in Brenner/Grimsley, *supra*). If, however, my reading of Alabama Law is correct, then both plaintiffs, defendants,

amici (probate judges), the court below, *and* This Honourable Court, have all missed the obvious problem –and the obvious solution: While plaintiffs complain that **Ala. Code §26-10A-27 (1975)** is a problem (“Any person may adopt his or her spouse's child...”), they miss the obvious: **Ala. Code §26-10A-5(a) (1975)** (Who may adopt.) states: “Who may adopt. (a) Any adult person or husband and wife jointly who are adults may petition the court to adopt a minor.” Furthermore, **§26-10A-5(a)(2) states:** “(2) No rule or regulation of the Department of Human Resources or any agency shall prevent an adoption by a single person solely because such person is single or shall prevent an adoption solely because such person is of a certain age.” Since Alabama doesn't recognise Searcy and McKeand as legally-married, they're legally 'single,' and thus protected by this statute, and thus legally permitted to adopt. If, however, the judge denied adoption, then This Court can enter a ruling affirming in part (their rights of adoption), reversing in part (the ruling of the court below that struck Ala. Code §30-1-19, the so-called “Marriage Protection Act”) and remanding to the state court for orders consistent with this court, namely that This Court would issue an order of 'Show Cause' to the state court demanding to know by what legal standard it denied defendants the right to adopt. Perhaps the state court was justified, but only if it found on independent grounds (such as the welfare of the child), but not if it found solely on

the grounds that the couple was homosexual. Thus, This Honorable Court now has a solution to defendant's problem that does not violate Equal Protection viz. Polygamy. This solution should satisfy plaintiffs (who can get a “fair shake” in adoption) as well as defendants (who defined marriage as it has been defined for tens of thousands of years, in all societies, cultures, and countries, since the very beginning of time, and that, for compelling state interests in promoting traditional marriage).

Since I have provided a solution to defendants' problem, then any complaint about **Ala. Code §30-1-19** (the so-called “Marriage Protection Act”) is unfounded, and clearly used as a “straw man” argument to strike a good law: **RULE 3 of the Fed.R.Civ.P.**, clearly state that “A civil action is commenced by filing a complaint with the court,” and so with a proper solution to redress grievances (that I provided above), no complaint may legally issue: no foul, no harm, is a legal standard. **Now that this case has been appealed, This Court has “subject matter” jurisdiction,** and the solution I offer could, legally, work; **I hope that my solution is an acceptable compromise to both sides,** to help my fellow-man (and woman) come to a truce –and reduce arguments and strife. – I hope to be helpful to the goodwill of several parties in getting a solution acceptable to all.

Additionally, there are many, many more unfair laws, which target both straights and gays and single adults, and, in my brief, *supra*, I strongly oppose the

mistreatment of Sloan Grimsley, a homosexual firefighter, who can not name her homosexual spouse as a beneficiary of her life-insurance policy (Brief, p.14) or, for example, the “Marriage Penalty,” which penalises straight people, based solely on marital “status,” in things such as disability, retirement, and even higher taxes required from some married couples that would not be required by two otherwise identical single people with exactly the same income. (A straight friend of mine would see his disability 'go down' if he married his girlfriend.) So, prejudice exists in law against both straights and gays, but it is not due to the Alabama Law defining marriage as 1-man and 1-woman, and thus an attack on that law is misplaced. **I add this paragraph solely to be respectful and courteous -and show plaintiffs that I am not prejudiced, and, indeed, most 'conservatives' are strongly opposed to gays to be mistreated in any form or fashion.**

III. 'EQUAL PROTECTION' ADOPTION COMPLAINTS & SOLUTIONS:

While I have satisfied the 'traditional' role of an *Amicus Curiae* (to show the court/parties something they missed), one more point needs to be mentioned with connection to adoption. At first, it would seem that the Alabama Law defining marriage solely as 1-man and 1-woman would be prejudiced, since, in adoption, gays are disfavoured, while traditional marriages are given 'preferential' treatment. *But, is this really prejudiced?* Well, we remember that singles can adopt, but, all

things being equal, preference is given the married couples, and yet no one cries foul here. Likewise, it would not be prejudice here: Indeed, see “DECLARATION OF LOREN MARKS, PH.D.,” page 20, lodged on docket in the court below, where a small, but statistically-significant, group of children were compared, and all things being equal, married couples had the best development from objective teacher reports (and not biased parental reporting), and next, singles, and lastly, homosexual rearing. In fact, many studies have been done on child-rearing, and it is this author's recollection that most (but not all) support those findings of Dr. Marks, which begs the question of diversity. To see some of these studies, both pro and con, see the many *Amici Curium* briefs in *Brenner v. Armstrong* or *Grimsley v. Armstrong*, lodged before This Court.

Even though this *amicus* is a 'conservative,' I admit that the 'liberals' are correct to assert and promote “diversity”: Racial diversity (Blacks, Whites, Hispanics, and Asians), and gender-diversity (men and women) in the workplace. How, then, is it wrong to promote “gender-diversity” in the family? While this is merely a liberal cliché, nonetheless, I mention it to show that it is a *true* cliché: Dr. Marks' research is “right on mark” with its implicit claims that gender diversity is beneficial, and thus the State has an interest in promoting it, as shown by peer-reviewed scientific research. **Therefore, this is a sound legal argument which I am including in my brief, as it is often overlooked.**

IV. Inferior Federal Courts don't even have jurisdiction to address 'Gay Marriage' dispute

On it's face, it would seem that the Supremacy Clause would allow a Federal District Court, such as here, to 'strike down' any state law or state Constitutional provision, such as has been happening in the 'Gay Marriage' dispute, nationwide.

But, is this so?

Doe v. Pryor, 344 F.3d. 1282, 1286 (11th Cir. 2003), held that: "The only federal court whose decisions bind state courts is the United States Supreme Court." Their advisory opinion on this head evokes the Rooker-Feldman doctrine, which, in essence, holds that lower United States federal courts may not sit in direct review of state court decisions. This would give a strong support to Federalism, and 10th Amendment State's rights, that is, that "powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States." Accord: *Arizonans for official English and Robert D. Park, Petitioners v. ARIZONA et al.*, 520 U.S. 43, at Syllabus 23, note 11, in which the U.S. Supreme Court held: "(Supremacy Clause does not require state courts to follow rulings by federal courts of appeals on questions of federal law)." In other words, lower Federal Courts (including the Circuit Courts of Appeals) may not sit in appellate review of state court decisions; this court may only address these issues through original jurisdiction (which, apparently, the plaintiffs allege, insofar

as they claim that the state laws in question are unconstitutional).

While this case law seems counter-intuitive, let me illustrate why this, if taken to its logical end, is not unreasonable: What if, for example, residents from 49 U.S. states appeared in one single Federal District Court (of the 50th state), demanding that their states' laws, recognising marriage one way or the other, should yield to the State Law of the 50th State, where the case is being heard, and demand The Court enter a ruling that the laws of these 49 states are unconstitutionally-restrictive, and ask The Court to exercise "Long Arm Jurisdiction" to enforce such an order against these 49 states? Well, what if, then, *another* U.S. District Court entered a ruling just the opposite? Can you not see the mayhem and confusion that would surely ensue? (And, as it stands, the nation-wide 'patchwork' of Gay Marriage Laws has effectively made my prophecy, here, come true!) So, the case law that holds that the Supremacy Clause is restricted in this regard is 'good' case law: **Only The U.S. Supreme Court may exercise jurisdiction in this regard**, and most other courts, while well-meaning and well-intentioned, have exceeded their authority. Lastly, I don't know what significance this may be, but I ask This Court to take Judicial Notice of the court below, which appears to have issued an informal edict (APPENDIX-A) outright refusing to grant Due Process/Redress to a short *pro se* amicus memorandum of law when considering difficult & time-sensitive issues, such as this stay. See also my response (APPENDIX-B) to the Due Process/Constitutional issues implicated.

V. CONCLUSION: I believe that the court below acted with good intentions in trying to help the gay couple adopt, but not only was the solution an unconstitutional over-reach, wholly_unnecessary when a simpler (less invasive) solution was available, but Inferiour Federal Courts probably don't even have the authority to address the merits of this type of tort, as I show above. Regardless, however, of whatever authority This Court may have **This Court may (and, I think, should) still enter a Stay Pending Appeal, and let the SCOTUS deal with it, if the stay was inappropriate.** For further clarification and supporting case-law, you may see the rough draft of a proposed filing to the U.S. Supreme Court (an inferiour version of which is already filed with that court) at this link below, and take note of how I take fellow-conservatives to task, proving, once again, that I am not prejudiced or_baised: “Argument V. Correcting common errors of 'Traditional Marriage' advocates.” LINKS:

http://GordonWatts.com/14-571_ac_GordonWayneWatts_REPRINT.pdf

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I'm greatly grieved by the hate and discontent that has been generated by the differences and arguments in the Gay Marriage case here, and elsewhere, and I do not like the toxic atmosphere that results, and, as a result, am hoping that a compromise amenable to all sides can be reached, where each side “walks away a winner,” and get something of value, which is appropriate, because both sides (plaintiffs & defendants) have some legitimate grievances.

Dated: --day, XX Month 20145–

Respectfully submitted,

s/ _____

Gordon Wayne Watts, Amicus

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CERTIFICATE OF COMPLIANCE

In accordance with Rule 29, Brief of an Amicus Curiae (c), Contents and Form, Fed.R.App.P., I hereby certify the following:

The instant amicus brief complies with Rule 32: see *infra*.

The cover identifies the party or parties supported and indicate whether the brief supports affirmance or reversal: This brief supports defendant, **LUTHER STRANGE**, regarding his motion for a “State Pending Appeal” –and affirmance of the Alabama Law in question, and on many other points, but supports many elements of the plaintiffs, including (but not limited to) fair and just treatment of all people, including homosexual citizens. In addition, I certify that I complied with the disclosure requirement in the CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT, *supra*.

In accordance with Rule 32(a)(7), Length., Fed.R.App.P., I hereby certify the following:

Rules 32(a)(7)(A), Page limitation, 32(a)(7)(B) Type-volume limitation, and 32(a)(7)(C)(i) Certificate of compliance [e.g., “A brief submitted under Rules 28.1(e)(2) or 32(a)(7)(B)”] do not apply: **This brief is neither a principal nor reply brief.**

Regarding Rule 32(a)(7)(C)(ii), which states in succinct part that “Use of Form 6 must be regarded as sufficient to meet the requirements of Rules 28.1(e)(3) and 32(a)(7)(C)(i),” I am hereby following this standard to be safe:

Form 6. Certificate of Compliance With Rule 32(a)

Certificate of Compliance With Type-Volume Limitation, Typeface Requirements, and Type Style Requirements

1. This brief complies with the type-volume limitation of Fed. R. App. P. 32(a)(7)(B) because:

*** this brief contains [state the number of] words, excluding the parts of the brief exempted by Fed. R. App. P. 32(a)(7)(B)(iii), or
[[[it contains no more than 14,000 words— **5,526** Words in total, to be exact; Headings, footnotes, and quotations count toward the word and line limitations. The corporate disclosure statement, table of contents, table of citations, statement with respect to oral argument, any addendum containing statutes, rules or regulations, and any certificates of counsel do not count toward the limitation.]]]

2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because:

*** this brief has been prepared in a proportionally spaced typeface using [state name and version of word processing program: OpenOffice version 3.1.0] in [state font size: 14, and name of type style: Times New Roman],
[[[A proportionally spaced face must include serifs, but sans-serif type may be used in headings and captions. A proportionally spaced face must be 14-point or larger.]]]

I believe, in good faith, that I am also in compliance with Rule 29. Brief of an Amicus Curiae, (d) Length, since I met the Rule 32 requirements above.

s/ _____
Gordon Wayne Watts, Amicus

CERTIFICATE OF SERVICE

In accordance with Rule 25(c)(4), Manner of Service, “Service by mail or by commercial carrier is complete on mailing or delivery to the carrier,” which I hereby certify that I am doing today, _____, 2015, to the following parties (below), by _____ –and by Electronic Mail, when/where possible. Additionally, I hope to post a TRUE COPY of these filings on my Open Source online docket, for free download, at the following two (2) URL's, as soon as practically possible:

<http://www.GordonWatts.com/DOCKET-GayMarriageCase.html>

and:

<http://www.GordonWayneWatts.com/DOCKET-GayMarriageCase.html>

/s/ _____
Gordon Wayne Watts, Amicus

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