

2019-1794

IN THE
UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

SAP AMERICA, INC.,
Plaintiff-Appellee,

v.

Dr. Lakshmi Arunachalam,
a woman

Appeal from the United States District Court for the Northern District of California
in Case No. 4:13-cv-01248-PJH, Judge Phyllis J. Hamilton

Dr. Lakshmi Arunachalam, a woman's
PETITION FOR *EN BANC* RE-HEARING

March 5, 2020

Dr. Lakshmi Arunachalam, a woman,
222 Stanford Avenue,
Menlo Park, CA 94025
Tel: 650.690.0995;
laks22002@yahoo.com

Dr. Lakshmi Arunachalam,
a woman.

<p>Dr. Lakshmi Arunachalam, a Woman</p> <p style="text-align: center;">Against</p> <p>Federal Judiciary (status: clipped sovereignty), — District Courts of Delaware, Texas and California; — Caroline Craven; — Robert W. Schroeder, III; — Alan D. Albright; — Richard G. Andrews; — Elizabeth D. Laporte; — Phyllis J. Hamilton; — James Donato; — J. Rodney Gilstrap; — Edward J. Davila; — Sue L. Robinson; — Leonard P. Stark; — Thomas S. Hixsom; — John Cerino; — U. S. Court of Federal Claims; — Ryan T. Holte; — Lisa Reyes; — Third, Fifth, Ninth and Federal Circuit Courts; — Alan D. Lourie; — Kimberly A. Moore; — Raymond T. Chen; — Raymond C. Clevenger III; — Pauline Newman; — Sharon Prost; — Evan J. Wallach; — Jimmie V. Reyna; — Todd M. Hughes; — Timothy B. Dyk; — Kathleen M. O’Malley; — Richard G. Taranto; — Supreme Court of the United States;</p> <p>Executive Branch; — U. S. Patent and Trademark Office (USPTO); — Patent Trial and Appeals Board (PTAB); — Brian J. McNamara; — Sarah E. Craven; — Nathan A. Kelley; — David Ruschke;</p>	<p>Jurisdiction: <u>Court of Record</u></p> <p>Federal Case Nos.: 2019-1794; 2019-1251; 2019-1223; 18-1250-EJD; 12-4962-TSH; 13-1248-PJH; 16-358-RTH; 13-1812-RGA; 14-373-RGA; 16-281-RGA; 12-282-RGA/SLR/RGA; 14-490-RGA; 15-259-RGA; 12-355-RGA; 14-00091-RGA; 14-1495; 15-1424; 15-1429; 15-1433; 15-1831; 15-1869; 16-110; 16-1560; 16-1607; 17-1721; 17-2401; 18-1057; 18-1064; 18-2105; 19-112; 19-113; 19-114; 19-50597; 19-40597; 19-40601; 19-50613; 19-50615; 19-50636; 19-50659; 15-3569; 16-3663; 16-3765; 18-3177;</p>
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<ul style="list-style-type: none"> — Andrei Iancu; — Zoila E. Cabrera; — Jennifer S. Bisk; — Kevin Turner; — Stephen C. Siu; — Barack Obama; — Vishal Amin; — U.S. Department of Justice (USDOJ); <ul style="list-style-type: none"> — Claire T. Cormier; — Scott S. Bolden; — Alice S. Jou; — U.S. International Trade Commission (USITC); <p>Legislative Branch;</p> <ul style="list-style-type: none"> — United States Congress; <ul style="list-style-type: none"> — Anna Eshoo; — United States Senate; <ul style="list-style-type: none"> — Patrick J. Leahy; — Dianne Feinstein; — Nancy Pelosi; <p>Corporate Wrongdoers;</p> <ul style="list-style-type: none"> — Apple, Inc.; <ul style="list-style-type: none"> — David Melaugh; — Tim Cook; — SAP America, Inc.; <ul style="list-style-type: none"> — Samir Pandya; — Jennifer Morgan; — Christian Klein; — William McDermott; — Samsung Electronics America, Inc.; — Facebook, Inc.; — Alphabet Inc.; — Microsoft Corporation; — International Business Machines Corporation; <ul style="list-style-type: none"> — M.H. Browdy; — Virginia "Ginni" Marie Rometty; — JPMorgan Chase & Co.; <ul style="list-style-type: none"> — Jamie I. Dimon; — Kathlyn M. Cardbeckles; — Michael A. Pearce; — Daryl W. Wooldridge; — Fiserv, Inc.; <ul style="list-style-type: none"> — Lynn McCreary; — Jeffery W. Yabuki; — Fremont Bank and Fremont Bancorporation; 	<p>18-3178; 18-3179; 13-1333-RGA; 15-00023-EDL; 15-00024-EDL; 15-00025-EDL; 18-3995-EJD; 16-6591-EJD; 17-3325-EJD; 17-3383-EJD; 18-2488-JD; 19-171-ADA; 19-172-ADA; 19-349-ADA; 19-350-ADA; 19-351-ADA; 19-352-ADA; 13-605-JRG; 19-19-RWS-CMC; 19-18- RWS-CMC; 18-9383; 18-9115; 18-9346; 19-5033; 18-9386; 18-7691; 17-231; 17-277; 16-1442; 16-1184; 15-691; 16-3663; 18-72569; 18-72557; 18-72572; 18-71335; 337-TA-1094;</p> <p>NOTICE OF AND VERIFIED CLAIM OF (1) TRESPASS BY CONSTITUTIONAL TORTFEASOR RESPONDENTS ON PROPERTY/MY RIGHTS/CASE BY INTENTIONAL FALSE OFFICIAL STATEMENTS DESIGNED TO COVER UP THEIR</p>
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<p>— Terrance Stinnett; — Wells Fargo Bank, N.A.; — Citigroup, Inc., Citibank, N.A.; — Fulton Financial Corporation; — Eclipse Foundation, Inc.; — Presidio Bank; — Intuit, Inc.; — Uber Technologies, Inc.; — Tony West, — Lyft, Inc.; — Exxon Mobil Corporation; — Kronos Incorporated; — Citizens Financial Group, Inc.</p> <p>Corporate Wrongdoers’ Attorneys; — Lori A. Gordon; — Edward L. Tulin; — Tharan Gregory Lanier; — Brian E. Ferguson; — Anita Fern Stork , Esq.; — Heidi Lyn Keefe; — Ryan R. Smith; — Klaus Hemingway Hamm; — Kevin James Culligan; — Joseph M Beauchamp; — Douglas R. Nemece; — Ramsey M. Al-Salam; — Danielle T. Williams; — Sarah S Eskandari; — Baldassare Vinti; — Justin Grant Hulse; — John H. Barr , Jr.; — John Allen Yates; — Michael J Sacksteder; — Michael Q. Lee; — David Ellis Moore; — Mark J. Abate; — Matthew John Parker; — Sasha G. Rao; — Robert Scott Saunders; — Jessica R. Kunz; — Andrew D. Gish; — Daniel Alexander Devito; — David S. Bloch; — Candice Claire Decaire; — Winn Garth;</p>	<p>CONSTITUTIONAL NONFEASANCE AND <u>FALSE CLAIM</u> AND TAMPERING WITH PUBLIC RECORD, WARRANTING CRIMINAL CHARGES, (2) LACK OF JURISDICTION, (3) FEDERAL CIRCUIT’S 2/13/20, 2/24/20 AND 2/26/20 VOID ORDERS AND JUDGMENT, AND (4) INJURY: IN CONTEMPT, IN DISHONOR, IN FALSE CLAIM, IN <u>BREACH OF FIDUCIARY DUTY/PUBLIC TRUST/SOLEMN OATH OF OFFICE</u>; DENIAL OF DUE PROCESS, MOVING INTO JURISDICTION UNKNOWN.</p> <p>I, a woman, ORDER FEDERAL CIRCUIT CONSTITUTIONAL TORTFEASOR RESPONDENTS TO ENFORCE <u>THE MANDATED PROHIBITION</u> AGAINST REPUDIATING GOVERNMENT ISSUED CONTRACT GRANTS AS DELINEATED IN <i>FLETCHER V. PECK</i> (1810), <i>TRUSTEES OF DARTMOUTH COLLEGE V. WOODWARD</i> (1819), <i>GRANT V. RAYMOND</i> (1832), <i>U.S. V. AMERICAN BELL TELEPHONE COMPANY</i> (1897), <i>OGDEN V. SAUNDERS</i> (1827) — GOVERNING SUPREME COURT PRECEDENT LAW OF THE CASE AND THE SUPREME LAW OF THE LAND.</p> <p>I ORDER THE CLERK OF THE COURT TO MOVE THIS IN TO THE CLAIMS SIDE OF THE COURT, TO THE COMMON LAW COURT OF RECORD.</p> <p>TRIAL BY JURY.</p>
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<p>— A.James Isbester; — Robert G. Sterne; — Sterne, Kessler, Goldstein & Fox P.L.L.C; — Skadden, Arps, Slate, Meagher & Flom LLP; — Jones Day; — Cooley LLP;</p> <p>Other Wrongdoers; — Eric M. Davis; — Supreme Court of the State of Delaware; — Newcastle County Superior Court; — O’Kelly & Ernst, LLC, — Pazuniak Law Office, LLC, — George Pazuniak; — Sean T. O’Kelly; — Ryan M. Ernst; — IPLAW 360; — Britain Eakin; — Kat Greene; — Tiffany Hu; — Kevin Penton; — Adam LoBelia.</p> <p style="text-align: center;">Constitutional Tortfeasor Respondents.</p>	
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PETITION FOR EN BANC RE-HEARING

I, Dr. Lakshmi Arunachalam, a woman, one of the People of We, The People, of California and the United States of America, and inventor of the Internet of Things — Web Apps displayed on a Web browser — in this Common Law Court of Record, **hereby ORDER** Federal Circuit Constitutional Tortfeasor Respondents to enforce *the Mandated Prohibition* against repudiating Government issued Contract Grants as delineated in *Fletcher v. Peck* (1810), *Trustees of Dartmouth College v. Woodward* (1819), *Grant v. Raymond* (1832), *U.S. v. American Bell Telephone Company* (1897), *Ogden v. Saunders* (1827) — Governing Supreme Court Precedent Law of the Case and The Supreme Law of the Land — the *SOLE* issue and *UNDISPUTED material fact* and **THE LAW OF THE CASE**, integral to all of my cases and *prima facie* evidence of the validity of all of my claims which the Judiciary has been avoiding at the cost of their Oaths..

The “courts have nothing to act upon,” as Chief Justice Marshall declared, but simply to perform their duty and uphold their solemn oaths of office.¹

¹ **Panel Decision is contrary to Governing Supreme Court Precedents:**

Fletcher v. Peck, 10 U.S. 87 (1810) that **a grant is a contract** that cannot be repudiated— the Law of the Case and Supreme Law of the Land.

Trustees of Dartmouth College v. Woodward, 17 U.S. 518 (1819):

“The law of this case is the law of all... Lower courts ...have nothing to act upon...” “...applicable to contracts of every

The Court received and docketed my Petition for *En Banc* Re-Hearing via paper to enforce the same. Federal Circuit has breached its solemn oaths of office, lost its jurisdiction and **is not the tribunal — I am the tribunal, I am the only woman who has jurisdiction to rule on my case(s).** Federal Circuit's 2/13/20, 2/24/20 and 2/26/20 Orders are Void. The Court has now demanded that I send in 54 copies of this Petition, making it hazardous, expensive and burdensome for me to have access to the Court in violation of Due Process and the Constitution, entitling me to Constitutional Redress. *See* ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141.

With respect to Fundamental, Substantive, and Due Process Itself: “Any process or Court attempting to or adjudicating a contract by estopping a material part of it from being considered *prima facie* denies a litigant due process entitlement to an honest, though not learned tribunal; and if injured by the corruption or fraud of the court is entitled to redress.” [ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, § 140]; “and final decisions upon the ultimate question of due process cannot be conclusively codified to any non-judicial tribunal. Any attempt to do this whether by direct denial of access to the courts upon this question of due process by hindering access to the courts or **making resort to the courts upon it difficult, expensive, hazardous, all alike violate the Constitutional provision.**” [ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141]

I, Dr. Lakshmi Arunachalam, a woman, hereby file this Notice of and Verified Claim of (1) Trespass by Constitutional Tortfeasor Respondents on Property/my Rights/Case by intentional FALSE OFFICIAL STATEMENTS designed to cover up their Constitutional nonfeasance and FALSE CLAIM and Tampering with Public Record, Warranting Criminal Charges, (2) Lack of Jurisdiction, (3) Federal Circuit's 2/13/20, 2/24/20 and 2/26/20 Void Orders and Judgment, and (4) Injury: In Contempt, In Dishonor, In False Claim, In Breach of Fiduciary Duty/Public

description...vested in the individual; ...right...of possessing itself of the property of the individual...for public uses; a right which a magnanimous and just government will never exercise without amply indemnifying the individual;”

Grant v. Raymond, 31 U.S. 218 (1832):

“By entering into public contracts with inventors, the federal government must ensure a “faithful execution of the solemn promise made by the United States;”

U.S. v. American Bell Telephone Company, 167 U.S. 224 (1897):

“the contract basis for intellectual property rights heightens the federal government's obligations to protect those rights. ...give the federal government “higher rights” to cancel land patents than to cancel patents for inventions;”

Ogden v. Saunders, 25 U.S. 213 (1827) applies the logic of sanctity of contracts and vested rights directly to federal grants of patents under the IP Clause.

Panel Decision is contrary to Federal Circuit's own rulings.

1. ***Aqua Products Inc. v. Matal***, Fed. Cir. 15-1177 (2017) reversed all Court and PTAB rulings that failed to consider “the entirety of the record” —Patent Prosecution History.
2. Federal Circuit's ruling of 2/13/20 in another case reported by IPLAW360 that PTAB may not find indefiniteness of a patent claim in an IPR Review.

Trust/Solemn Oath of Office, without jurisdiction; Denial of Due Process, Moving into Jurisdiction Unknown.

The Constitutional Tortfeasor Respondents named are listed in the Title *supra* and incorporated herein by reference as if stated herein, **and further includes IPLAW 360, Britain Eakin, Kat Greene, Tiffany Hu, Kevin Penton, and Adam LoBelia, for false reporting, aiding and abetting treason, acting in cohort with the other Constitutional Tortfeasor Respondents to continue operating as a Racketeering Enterprise with a common core objective by the three Departments of Government, intentionally violating the Separation of Powers and Contract Clauses and the Takings Clause of the Constitution.**

Federal Circuit's 2/13/20, 2/24/20, 2/26/20 Orders and Judgment have no legal force or effect, and are incapable of confirmation or ratification, and hereby stand vacated instantly by operation of law. I claim the invalidity of the Federal Circuit's 2/13/20, 2/24/20, 2/26/20 Orders and Judgment, as my rights have been affected directly or collaterally.

FEDERAL CIRCUIT CONSTITUTIONAL TORTFEASOR RESPONDENTS MADE FALSE OFFICIAL STATEMENTS, with intent to deceive, signing false records, regulations, orders, and other official documents, knowing it to be false, and making other false official statements of collateral estoppel without considering Patent Prosecution History, and without enforcing *Fletcher*, knowing it to be false. The falsity has been in respect to a material matter, and may be considered as some evidence of the intent to deceive. Federal Circuit's 2/13/20, 2/24/20, 2/26/20 Orders and Judgment are replete with FALSE CLAIMS — A false representation made by Respondents and the Panel in its 2/13/20 Void Order and Judgment, as to a fact on which the whole cause depends. Criminal charges against the Respondents is warranted for the Panel's Void Order and Judgment based on false claims and false official statements.

The Judiciary remaining silent (as fraud) in willful or culpable silence after being put on notice of and not enforcing Governing Supreme Court Precedent Law of the Case and the Supreme Law of the Land — first, above all else,— in dishonor, in breach of fiduciary duty/public trust and solemn oath of office — voiding all Orders, **HAS CREATED A CONSTITUTIONAL EMERGENCY, PLACING NATIONAL SECURITY AT RISK.**

The Panel in its 2/13/20 Void Order made many false official statements, one of which is as follows:

“Regarding Dr. Arunachalam’s challenges and motions under *Fletcher v. Peck*, 10 U.S. (6 Cranch) 87 (1810), and “prosecution history estoppel” under *Aqua Products, Inc. v. Matal*, 872 F.3d 1290 (Fed. Cir. 2017) (*en banc*), **we have previously addressed these arguments [False Claim.]**, stating that “[t]he Supreme Court in *Oil States Energy Services, LLC v. Greene’s Energy Group, LLC*, — U.S.—, 138 S. Ct. 1365, 1375 & n.2, 1377–78, 200 L. Ed. 2d 671 (2018) **rejected several similar [False Claim.] Constitutional challenges to the inter partes review process.**” Int’l Bus. Machs. Corp., 759 F. App’x at 933. Dr. Arunachalam has not provided any reason that the same reasoning does not apply to a district court’s authority to invalidate a patent. Accordingly, we reject Dr.

Arunachalam's constitutional challenges and deny her motions raising those same constitutional challenges.”

This is a **WILLFULLY FALSE OFFICIAL STATEMENT**. The entire Judiciary failed to address Dr. Lakshmi Arunachalam, a woman's Notices of Constitutional challenges and motions and *Fletcher v. Peck* and Governing Supreme Court Precedent Law of the Case, and the fact that the courts disparately failed to apply this Court's reversal of all Orders by Courts and PTAB that failed to consider “the entirety of the record” — Patent Prosecution History in my cases. The Federal Circuit did not address these issues “previously” as the Panel has falsely alleged in its False Official Statement, nor did the Supreme Court “reject several similar constitutional challenges to the inter partes review process” in *Oil States*. I, Dr. Lakshmi Arunachalam, a woman, has been the first and only woman who has been the whistleblower in bringing to the attention of the courts that Governing Supreme Court Precedents as in *Fletcher v. Peck*, *Trustees of Dartmouth College v. Woodward*, *Grant v. Raymond*, *Ogden v. Saunders*, *U.S. v. American Bell Telephone Company* estop the Courts from breaching their solemn oaths of office in not enforcing the Governing Supreme Court Precedent Law of the Case and the Supreme Law of the Land. There could never have been any “similar constitutional challenges,” let alone “several,” as falsely propounded by the Panel in its FALSE OFFICIAL STATEMENT in its Void 2/13/20 Order. Every inferior court and the Supreme Court must enforce the Governing Supreme Court Precedent Law of the Case and the Supreme Law of the Land. This issue is material to the Panel's Void 2/13/20 Order based on its materially false statement and is a FALSE CLAIM and FALSE OFFICIAL STATEMENT by the Panel. This warrants criminal charges against the Panel, Solicitees and Solicitors, IPLAW 360 and Britain Eakin engaged in solicitation of FALSE CLAIMS to be propagated across multiple courts and the world, as public fraud.

The Panel could not Procedurally go into Session and Rule when I, a woman, had already Ordered on 2/6/2020 that we are now in a Common Law Court of Record and this Court had Nothing to Act Upon But Do Its Duty and Abide By Its Oath of Office and Enforce *Fletcher* and other Governing Supreme Court Precedent Law of the Case and The Supreme Law of The Land.

The Panel unlawfully went into session on 2/7/20, when I am the tribunal in this common law Court of Record as of 2/6/20, and failing to enforce *Fletcher* and other Governing Supreme Court Precedents in an overt act of willful disobedience and desperation by moving to jurisdiction unknown is more than a dereliction of duty, by engaging in Mutiny and Sedition with intent to usurp or override lawful authority of the Constitution, and with intent to cause the overthrow or destruction of lawful civil authority, refusing, in concert with the USPTO/PTAB, Legislature and Judiciary, to obey orders or otherwise do its duty and creating revolt, violence, and other disturbance against that authority— the Supreme Law of the Land, amounting to war on the Constitution.

The Panel moved into jurisdiction unknown and engaged in Mutiny by refusing to obey orders or perform duties in a collective concert of treasonous insubordination and dereliction of duty and necessarily including Judges, Defendants, Legislature, Agency, Judiciary and attorneys acting together in concert in resisting lawful authority and consisting simply of a persistent and concerted refusal or omission to obey orders, or to do duty, with an insubordinate intent to usurp or override

lawful authority, the intent declared in words in Erroneous and Fraudulent Orders of the Panel or inferred from the Panel's acts, omissions, concealing material facts requires the Panel to be impeached and arrested.

Panel Failed to Apply This Court's *Aqua Products Inc. v. Matal* (2017) that Reversed all Rulings that failed to consider "The Entirety of The Record" —Patent Prosecution History.

Panel Remained Silent as Fraud on Material *Prima Facie* Evidence — Patent Prosecution History — that the Patent Claim Terms are neither Indefinite nor the Patent Claims Invalid.

Courts condemned before inquiry, when claims were unambiguous in view of *prima facie* material intrinsic evidence of Patent Prosecution History, never considered by any Court in any of my cases, starting from the very first case, nor examine independent and dependent claims of my virgin U.S. Patent Nos. 7,930,340; 8,271,339, never examined by any court nor re-examined by PTAB, nor of any of my patents. Even if the claims of my U.S. Patent Nos. 5,987,500; 8,037,158; and 8,108,492 are invalid (which they are not), as falsely alleged by the **Judicial Racketeering Enterprise**, Appellees and Judges in an orchestrated farce, those so-called "invalid" claims of the '500, '492 and '158 patents have no effect on the independent or dependent claims of the patent-in-suit. The District Court never reached the patent case.

Appellees, attorneys, Courts, PTAB and USDOJ were again put on notice of Governing Supreme Court Precedent Law of the Case and *Aqua Products*. They have remained silent (as fraud) in willful or culpable silence. Their lack of response is a Default, after being put on notice. Their Silence "comprises their stipulation and confession jointly and severally to acceptance of all statements, terms, declarations, denials and provisions herein as facts, the whole truth, correct and fully binding on all parties." "Upon Default, all matters are settled *res judicata* and *stare decisis*" and Appellees must pay up the royalties long overdue.

JUDICIARY AND PTAB'S MISFEASANCE UNDER COLOR OF LAW IN A PATENTLY (MANUFACTURED) ANTI-TRUST ENVIRONMENT

All of my cases are one continuum, wherein "a body of men/women...actually assembled for the purpose of effecting by force a treasonable object" perpetrated by the three branches of Government, (Judiciary, Legislature and Executive Agency— USPTO/PTAB), in cohort with the Appellees, against the inventor Dr. Lakshmi Arunachalam, a woman, and the nation and in fiduciary breach of public trust, by stealing my significant inventions – Web Apps Displayed on a Web browser – from which Appellees and the Government are unjustly enriched by trillions of dollars, a sufficient overt act done with treasonable intent. Chief Justice Marshall said that war was actually levied under such circumstances in *U.S. v. Burr*, 25 F. Cas. 55, 161 (CCD, Va. No. 14693), warranting this Court to resolve what all courts have been avoiding, to **stop the fraudulent and seditious Racketeering administration of patent law as a public fraud** perpetrated by all three branches of Government, as Solicitees in response to Solicitations by Appellees and their lawyers.

- 1. PANEL FAILED TO APPLY THAT GOVERNING SUPREME COURT PRECEDENT LAW OF THE CASE COLLATERALLY ESTOP RESPONDENTS' FALSE PROPAGANDA OF COLLATERAL ESTOPPEL FROM VOID ORDERS BY**

FINANCIALLY-CONFLICTED JUDGES AND JUDGES WHO COMMITTED TREASON BY BREACHING THEIR SOLEMN OATH OF OFFICE.

2. **PANEL'S WILLFULLY FALSE STATEMENTS POSE A CONSTITUTIONAL EMERGENCY AND A NATIONAL SECURITY THREAT.**
3. **WILLFULLY FALSE STATEMENTS BY THE PANEL CONTRARY TO MATERIAL PRIMA FACIE EVIDENCE—PATENT PROSECUTION HISTORY—THAT MY PATENT CLAIMS ARE VALID — AND CONTRARY TO GOVERNING SUPREME COURT PRECEDENT LAW OF THE CASE AND SUPREME LAW OF THE LAND — *FLETCHER V. PECK* (1810); *TRUSTEES OF DARTMOUTH COLLEGE V. WOODWARD* (1819); *GRANT V. RAYMOND* (1832); *U.S. V. AMERICAN BELL TELEPHONE COMPANY* (1897) — — CONSTITUTE FRAUD ON THE COURT, SEDITIOUS ATTACK ON THE CONSTITUTION, PATTERNED BREACH OF SOLEMN OATHS OF OFFICE, OBSTRUCTION OF CONSTITUTIONAL JUSTICE — A CONSTITUTIONAL EMERGENCY.**
4. **DATE OF DISCOVERY DICTATES STATUTE OF LIMITATIONS IN RICO, NOT AN ARTIFICIAL 2002 DATE MANUFACTURED BY THE PANEL IN ITS WILLFULLY FALSE STATEMENTS.**

“A patent **shall be presumed valid**. Each claim of a patent (whether in independent, dependent, or multiple dependent form) **shall be presumed valid** independently of the validity of other claims; dependent or multiple dependent claims shall be presumed valid even though dependent upon an invalid claim.” 35 USC § 282.

The very Patent Statute proves the Panel's and Respondents' Statements **blatantly false** that

“patent claims asserted were barred by collateral estoppel either because they were squarely invalidated in prior cases or *depended on claims previously invalidated.*”

Judge Andrews admitted holding stock in JPMorgan during the pendency of that case. Governing Supreme Court precedents **and Aqua Products collaterally estop Appellees' and the Court's false allegations of collateral estoppel from Void Orders.**

THE PANEL KNOWINGLY CREATED A GRAVE RISK OF SUBSTANTIAL DAMAGE TO THE NATIONAL SECURITY, IN THE COMMISSION OF THE OFFENSE:

1. **of Perjury, because the Panel in a judicial proceeding or in a course of justice willfully and corruptly- upon a Lawful oath, gave a false testimony material to the issue or matter of inquiry; and in any statement subscribed any false statement material to the issue or matter of inquiry; and the Panel did not then believe the testimony to be true.**
2. **as commissioned officers, of Conduct unbecoming of an officer and gentleman, as they did or omitted to do certain acts including knowingly making a false official**

statement and all disorders and neglects to the prejudice of good order and discipline in the United States and of a nature to bring discredit upon the Judiciary and United States; and offenses that involve noncapital crimes or offenses which violate Federal law; by acts of dishonesty, unfair dealing, indecency, indecorum, lawlessness, injustice, or cruelty toward Dr. Lakshmi Arunachalam, a woman.

3. of misprision of serious offenses by Judges Andrews, Davila, Albright, Hixsom, Hamilton, Laporte, Appellees and attorneys and wrongfully concealed the serious offenses and failed to make it known to civilian authorities as soon as possible.
4. of obstructing justice by wrongfully influencing, intimidating, impeding, or injuring a witness, namely, Dr. Lakshmi Arunachalam, a woman, and by means of bribery, intimidation, misrepresentation, extortion, judicial oppression, and force and threat of force of dismissing the case if I did not omit material evidence of their culpability in an amended complaint by Judges Andrews and Davila, and delaying or preventing communication of information relating to a violation of any criminal statute of the United States to a person authorized by a department, agency, or Judiciary of the United States to conduct or engage in investigations or prosecutions of such offenses; or endeavoring to do so; and did so in the case of Judges Andrews, Davila, Albright, Hixsom, Hamilton, Donato, Laporte against whom the Panel had reason to believe there would be criminal proceedings pending; and that the act was done with the intent to influence, impede, or otherwise obstruct the due administration of justice;
5. of bad behavior and standing in dishonor, for which the Judges should be removed for good cause showing;
6. of willfully and unlawfully altering, concealing, removing, mutilating, obliterating, or destroying public record.

My Judgment and a Certificate of Service are attached.

Dated: March 5, 2020

Respectfully Submitted,



Dr. Lakshmi Arunachalam, a woman.
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650 690 0995; Laks22002@yahoo.com
Dr. Lakshmi Arunachalam, a woman.

CERTIFICATE OF COMPLIANCE WITH FRAP 32(A)(7)(B)

The undersigned hereby certifies that this brief complies with the type-volume limitation of Federal Rules of Appellate Procedure 32(a)(7)(B).

1. The brief contains 3038 words, excluding the parts of the brief exempted by Federal Rule of Appellate Procedure 32(a)(7)(B)(iii).
2. The brief has been prepared in a proportionally spaced typeface using Microsoft Word in 14 point Times New Roman font.

March 5, 2020

Respectfully submitted,



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222 Stanford Avenue, Menlo Park, CA 94025
Tel: 650.690.0995; Email: laks22002@yahoo.com
Dr. Lakshmi Arunachalam, a woman.

JUDGMENT

It is hereby Ordered, adjudged and decreed that:

1. The Federal Circuit Constitutional Tortfeasor Respondents enforce *Fletcher v. Peck*, 10 U.S. 87 (1810) that **a grant is a contract** that cannot be repudiated; *Trustees of Dartmouth College v. Woodward*, 17 U.S. 518 (1819): “The law of this case is the law of all... Lower courts ...have nothing to act upon...” *Grant v. Raymond*, 31 U.S. 218 (1832): “By entering into public contracts with inventors, the federal government must ensure a “faithful execution of the solemn promise made by the United States;” *U.S. v. American Bell Telephone Company*, 167 U.S. 224 (1897): “the contract basis for intellectual property rights heightens the federal government’s obligations to protect those rights. ...give the federal government “higher rights” to cancel land patents than to cancel patents for inventions;” *Ogden v. Saunders*, 25 U.S. 213 (1827) applies the logic of sanctity of contracts and vested rights directly to federal grants of patents under the IP Clause — the Governing Supreme Court Precedent Law of the Case and Supreme Law of the Land, and end the Racketeering scheme to violate the Takings Clause of the Constitution under color of Judicial authority by misfeasance, malfeasance and nonfeasance supported by their breach of solemn oaths.
2. The Federal Circuit Constitutional Tortfeasor Respondents apply *Aqua Products Inc. v. Matal*, Fed. Cir. 15-1177 (2017) that reversed all Court and PTAB rulings that failed to consider “the entirety of the record” — Patent Prosecution History — to all of my cases(s).
3. There is Trespass on Property, Trespass on Dr. Lakshmi Arunachalam, a woman’s rights, Trespass on the case, all by False Claim and Tampering with Public Record, Denial of Due Process, Lack of Jurisdiction and Injury: Respondents have been in Contempt, in Dishonor, in Breach of Fiduciary Duty/Public Trust/Solemn Oath of Office, moving into Jurisdiction Unknown.
4. The Panel’s 2/13/20, 2/24/20 and 2/26/20 Orders and Judgment are Void and are hereby vacated.
5. The Panel and Respondents are hereby criminally charged with trespass on property/rights/case by false claim and with treason for breaching their oaths of office and not enforcing the Governing Supreme Court Precedent Law of the Case and Supreme Law of the Land, in all of Dr. Lakshmi Arunachalam, a woman’s cases.
6. I Order the Bailiff to have the Respondents arrested for breach of their solemn oaths of office.
7. The Respondents, all Federal Circuit Judges, Judges, Justices, lawyers, Clerks and public officials are hereby Ordered to produce and place in the record their certified oaths of office

and bonds within 5 days of the date of Dr. Lakshmi Arunachalam, a woman's Petition for *En Banc* Re-Hearing, **which they failed to do upon my previous Notice.**

8. I Order the Clerk of the Court to Move this in to the Claims side of the Court, to the Common Law Court of Record. **I further Order the Clerk to stamp and sign this Judgment.**
9. I order each of the Respondents collectively to immediately pay damages of U.S. \$One Hundred Billion dollars to Dr. Lakshmi Arunachalam, within ten days of the date of this Final Judgment, Order and Decree.

Dated: March 5, 2020

Ordered by:



Dr. Lakshmi Arunachalam, a woman.
222 Stanford Ave
Menlo Park, CA 94025
650 690 0995; Laks22002@yahoo.com

CERTIFICATE OF SERVICE

I certify that on 3/5/20, I sent a copy of the foregoing and Addendum of copy of the Panel's opinions via USPS via Priority Mail to:

Tharan Gregory Lanier tglanier@jonesday.com
JONES DAY,
1755 Embarcadero Road, Palo Alto, CA 94303
Tel: 650.739-3939
Attorneys for Plaintiff-Appellee SAP America, Inc.

Judge Edward J. Davila,
District Court Judge of the Northern District of California, San Jose Division,
Robert F. Peckham Federal Building & United States Courthouse
280 South 1st Street, Room 2112
San Jose, CA 95113
Respondent and Presiding Judge;

Judge Thomas Hixson,
Magistrate Judge of the Northern District of California, San Francisco Division,
San Francisco, CA;
Respondent and Presiding Judge;

Judge Phyllis Hamilton,
District Court Judge of the Northern District of California, Oakland Division,
Oakland, CA;
Respondent and Presiding Judge;

And to all the Constitutional Tortfeasor Respondents as well to the following Appellees:

1. Apple, Inc.;

Brian E. Ferguson,
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Suite 600, 2001 M Street, N.W., Washington, DC 20036;
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2. Samsung Electronics America, Inc.;

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4. Alphabet, Inc.;

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Counsel for Alphabet, Inc.

5. Microsoft Corporation;

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Counsel for Microsoft.

6. IBM;

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7. SAP America, Inc.;

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Counsel for SAP America, Inc.;

8. JPMorgan Chase and Company;

Doug Nemec,
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Counsel for JPMorgan Chase & Co;

9. Fiserv, Inc.;

Ramsey M. Al-Salam;
Perkins Coie LLP,
1201 Third Avenue, Suite 4000, Seattle, WA 98101-3099;
206-359-8000; ramsalam@perkinscoie.com;
Counsel for Fiserv;

10. Wells Fargo Bank, N.A.;

E. Danielle T. Williams,

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11. Citi Group, Inc., Citicorp, CitiBank, N.A.;

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12. Fulton Financial Corporation;

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13. Eclipse Foundation, Inc.;

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212-969-3000; Email: bvinti@proskauer.com

Counsel for Eclipse Foundation, Inc.

14. Presidio Bank

A. James Isbester,

Kilpatrick Townsend Stockton LLP,

Two Embarcadero Center, Suite 1900, San Francisco, CA 94111

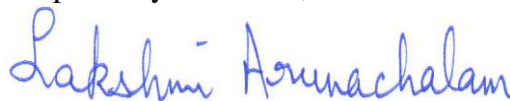
Telephone: 415 576 0200; Email: jisbester@kilpatrickstockton.com,

Counsel of Record for Defendant-Appellee, Presidio Bank;

and **one original and 54 (18 copies for each of the 3 cases 19-1251, 19-1223 and 19-1794) copies** via Fedex to: Clerk of Court, U. S. Court of Appeals for the Federal Circuit, 717 Madison Place NW, Washington, DC 20439.

March 5, 2020

Respectfully submitted,



Dr. Lakshmi Arunachalam, a woman,
222 Stanford Avenue, Menlo Park, CA 94025
650.690.0995; Email: laks22002@yahoo.com

Dr. Lakshmi Arunachalam, a woman.

ADDENDUM: COPY OF THE PANEL'S OPINIONS