20-136

IN THE
UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

In re: Dr. Lakshmi Arunachalam, *a woman*,
Petitioner

On Petition for Writ of Mandamus to the United States District Court for the District of Delaware in Case No. 1:14-cv-00091-RGA, Judge Richard G. Andrews, and other cases listed in my Petition for Writ of Mandamus filed 6/22/20, which this Court has omitted

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Dr. Lakshmi Arunachalam, *a woman*'**s**
PETITION FOR *EN BANC* REHEARING OF MY IFP MOTION

July 22, 2020

Dr. Lakshmi Arunachalam, a woman,
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Dr. Lakshmi Arunachalam, a woman,
Self-Represented Petitioner

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STATEMENT OF SELF-REPRESENTED PETITIONER

Based on my professional judgment, I believe the Court's decision is contrary to the following decision(s) of the Supreme Court or the precedents of this Court:

1. The Court's decision denying me my IFP Motion is contrary to the Supreme Court's decisions in *Arunachalam v. Lyft*, 19-8029, in which Chief Justice Roberts recused for want of jurisdiction, voiding all his Orders in all of my cases; *Cooper v. Aaron*, 358 U.S. 1 (1958); *Ableman v. Booth*, 62 U.S. 524 (1859); *Sterling v. Constantin*, 287 U.S. 397 (1932) on Government officials non-exempt from absolute judicial immunity:

   "no avenue of escape from the paramount authority of the…Constitution…when …exertion of…power… has overridden private rights secured by that Constitution, the subject is necessarily one for judicial inquiry…against…individuals charged with the transgression"

   and, **ALP VOL. 12. CONST. LAW, CH. VII, SEC. 1, §141. With respect to Fundamental, Substantive, and Due Process Itself:**

   > "Any process or Court…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." [§141];

And, *Festo Corp. v Shoketsu Kinzoku Kogyo Kabushiki Co*., 535 U.S. 722 (2002);

Fletcher v. Peck, 10 U.S. 87 (1810); *Trustees of Dartmouth College v. Woodward*, 17 U.S. 518 (1819); *Grant v. Raymond*, 31 U.S. 218 (1832); *U.S. v. American Bell Telephone Company*, 167 U.S. 224 (1897).

2. This Court's decision denying IFP Motion is contrary to this Court's decision in *Kumar v. Ovonic Battery Co., Inc. And Energy Conversion Devices, Inc*., Fed. Cir. 02-1551, -1574, 03-1091 (2003), 351 F.3d 1364, 1368, 69. (2004); *Aqua Products Inc. v. Matal*, Fed Cir. Case 15-1177, October 4, 2017; *Arthrex, Inc. v. Smith & Nephew, Inc.*, No. 2018-2140, slip op. (Fed. Cir. Oct. 31, 2019); *Virnetx Inc. v. Cisco Systems and USPTO* (intervenor) (Fed. Cir. 5/13/2020*)*. *Arthrex* applies to: "All agency actions rendered by those [unconstitutionally appointed] APJs."

Dated: July 22, 2020

Lakshmi Arunachalam

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PETITION FOR *EN BANC* REHEARING OF MY IFP MOTION

Dr. Lakshmi Arunachalam ("Dr. Arunachalam"), the victim and aggrieved party, hereby objects to the entirety of the Court's Order of 7/21/20, which has distorted the facts and the law. This case is constitutionally more significant than *Marbury v. Madison* and more egregious in civil rights violations than *Brown v. Board of Education*.

This Court must take Judicial Notice that on 5/18/20, Chief Justice Roberts recused from Dr. Arunachalam's constitutionally significant case of her patented inventions of the Internet of Things (IoT) - Web Apps displayed on a Web browser. Dr. Arunachalam/inventor asked Chief Justice Roberts the Question in 19-8029:

QUESTION PRESENTED

> Whether it is Sedition that Chief Justice Roberts engaged in conflict of interest against inventors as a member of the Knights of Malta with fealty to the Queen of England who controls SERCO and QinetiQ Group Plc, both British companies, in services that prejudice the inventor's patent properties.

Chief Justice Roberts promptly recused on 5/18/20. This voids all his Orders in ALL of Dr. Arunachalam's cases, **for want of jurisdiction**, as well as in Cases 19-8029, 18-9383, **upon which this Court based its Erroneous and Fraudulent Order denying my IFP Motion**. Chief Justice Roberts' wife running a legal recruiting firm placing lawyers at opposing law firms and opposing corporations, IBM, Microsoft, is a huge financial conflict of interest for Chief Justice Roberts.

Eight Justices remained silent. Is this not misprision of treason? They breached their solemn oaths of office and failed to enforce *Fletcher*. The Court offer no defense for their breach of solemn oaths of office and not abiding by the *Mandated Prohibition* declared by Chief Justice Marshall, obfuscating, with volumes of unnecessary information, irrelevant to the IFP Motion at hand, draining the Public Trust Doctrine of its vitality by resorting to hair splitting and misapplying procedural doctrine, to avoid enforcing *Fletcher*.

Petitioner is entitled to Constitutional Redress, IFP Motion must be granted.
Res accendent lumina rebus
One thing throws [‘Constitutional’.] ***Light upon others.***

> *THE ONE THING*, here is the *(collusively)* concerted *(oppressive)* silence *(as willful and wanton public fraud)* in *‘Breach of Solemn Oath Duty’* under *‘Color of Law and Authority’* – NONFEASANCE-FAILURE(S) to uphold and enforce the *(stare decisis)* ‘*MANDATED PROHIBITION*’ – AGAINST REPUDIATING GOVERNMENT ISSUED CONTRACT GRANTS [*FLETCHER V. PECK* (1810).] *(of any kind without just compensation [Dartmouth College.])* –the Law of the Case and Law of the Land; *CORRUPTLY*, designed in *‘Breach of Public Contract’* to violate the Supremacy and Contract Clause(s).

Summary: Dr. Lakshmi Arunachalam, a 72-year old, disabled, single woman of color, born in India, citizen of the United States, obtained her Ph.D. in Electrical Engineering and living and working in high-tech in the United States for 50 years, is the inventor of the Internet of Things (IoT) — Web Applications displayed on a Web browser. Dr. Arunachalam has been injured financially and physically by the concerted, patently oppressive, **corrupt process disorder** by the Judiciary acting

as Attorneys to Corporate Infringers (as in the Gen. Flynn case), all disorders and neglects to the prejudice of good order, discipline and justice, of a nature to bring discredit upon the Judiciary and United States, and crimes and offenses which violate Federal and state laws and the Constitution. The denial of due process could not have been more egregious by the Judiciary depriving her of her right to jury trial. As a result, Dr. Arunachalam has not had her day in court, in over a decade, in 100 cases of patent infringement, antitrust, RICO. They collusively deprived Dr. Arunachalam of her rights without remedies.

Introduction: The USPTO granted Dr. Arunachalam more than a dozen patents that have a priority date of 1995, a time when two-way real-time Web transactions from Web Applications was non-existent. Since being granted her Patents, Dr. Arunachalam entered into Intellectual Property (IP) licensing agreements with Fortune 500 companies, Bank of America, Capital One, Barclays Bank, UBS, M&T Bank, Sovereign Bank, Walmart, TD Bank, Ally Bank, All State Insurance, to name a few.

On 9/16/2011, the **unconstitutional** Leahy-Smith America Invents Act (AIA)[1], also called the Patent Reform Act of 2011, was enacted into law by then

[1] Congress engaged in **Misfeasance** by enacting the:

- Federal Courts Improvement Act (FCIA) of 1982 creating the Federal Circuit to violate the Contract Clause of the Constitution; and

President Obama, **in contempt of the *Mandated Prohibition*** — AGAINST REPUDIATING GOVERNMENT ISSUED PATENT CONTRACT GRANTS — ***stare decisis* Governing Supreme Court Precedents**, as declared by Chief Justice Marshall, to fast-track invalidate granted patents in **a corrupted re-examination process**, without considering material *prima facie* intrinsic evidence – Patent Prosecution History, which is no re-examination at all.

The rest is about **Malfeasance** by the Judiciary and USPTO oppressing Dr. Arunachalam, bullying her into silence for being the first one to put them on notice of their solemn oath duty to enforce the *Mandated Prohibition* of the Constitution, engaging in RICO, aiding and abetting anti-trust, obstruction of justice, allowing the importation from China of infringing products, hurting the domestic industry and economy.

As a result, Dr. Arunachalam has been financially injured in the order of trillions of dollars by the largest heist of the century of her intellectual property by Corporate Infringers after signing NDAs with her in 1995, without paying royalties. Apple, Amazon, Samsung Electronics America, Inc., Facebook, Google, Microsoft, IBM, SAP America, Inc., JPMorgan Chase & Co, Fiserv, Wells

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- America Invents Act (AIA) of 2011 for the Executive Branch (USPTO) to perform the function of the Judiciary in violation of the Separation of Powers Clause and Contract Clause of the Constitution by USPTO's unconstitutionally appointed judges (APJs) in violation of the Appointments Clause of the Constitution, as declared in *Arthrex* by the Federal Circuit.

Fargo Bank, Citigroup, Citibank, Fulton Financial Corporation, Eclipse Foundation, Inc., (just to name a few) have unjustly enriched themselves by trillions of dollars and in terms of their growth by their continued, unlicensed use of Dr. Arunachalam's intellectual property.

There are certain moral attributes common to the ideal officer and the perfect gentleman, a lack of which is indicated by acts of dishonesty, unfair dealing, indecency, indecorum, lawlessness, injustice, or cruelty. Not everyone is or can be expected to meet unrealistically high moral standards, but there is a limit of tolerance based on customs of the service and national necessity below which the personal standards of an officer cannot fall without seriously compromising the person's standing as an officer or the person's character as a gentleman.

I. *STARE DECISIS MANDATED PROHIBITION* BY THE SUPREME COURT DOES NOT SUPPORT THE JUDICIARY'S AND USPTO/PTAB ORDERS WHICH ARE UNCONSTITUTIONAL AND VOID IN VIEW OF *FLETCHER* AND ARE NOT LEGALLY SOUND.

1. WILLFUL BREACH OF DUTY:

(i) **Existence of Duty:** The Judiciary, USPTO and Attorneys to Corporate Infringers have a duty to uphold and enforce the Supreme Law of the Land and Law of the Case — the *stare decisis Mandated Prohibition* from repudiating Government issued Patent Contract Grants declared by Chief Justice Marshall in Governing Supreme Court Precedents, *Fletcher v. Peck* (1810), *Dartmouth College* (1819), *Grant v. Raymond* (1832), *et al*.

(ii)**They were aware of their duty**. Dr. Arunachalam repeatedly put them on notice of their duty to enforce *Fletcher*, which they ignored.

(iii) **They wantonly failed in their duty to perform**. They breached their duty and solemn oaths of office. They warred against the Constitution.

(iv) **Dr. Arunachalam was injured financially and physically by that breach**, which is the proximate cause of the injury to Dr. Arunachalam. The Judiciary and USPTO aided and abetted in the unjust enrichment of Corporate Infringers of the order of trillions of dollars. President Trump's 6/19/2017 (at the American Technology Roundtable, White House[2]) estimated value in excess of $3.5 trillion from just 22 organizations, all of whom use and benefit from Dr. Arunachalam's property, is substantially less than per Web transaction per Web App in use by each Corporate Infringer and its customers, including the Government.

(v) **They were collectively malicious**. They made it expensive, hazardous and burdensome for Dr. Arunachalam to have access to the court on the question of due process itself, all in violation of the Constitutional provision. *See* **ALP VOL. 12.**

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[2] Attendee List: Surety Bond Holder Attendees: Oracle, Apple, IBM, Microsoft, CIA, Google, Alphabet, Facebook, Clarion, Palantir, Kleiner Perkins, VMWare, Dell, EMC, NSA, In-Q-Tel, Intel, Qualcomm, Akamai, SAP, CMU, Stanford, Hoover Institution, MasterCard, Amazon, Washington Post, MIT, Ohio State, Accenture, UNC, Adobe and OpenGov.
Administration Attendees: John F. Kelley, Jared Kushner, Ivanka Trump, Christopher P. Liddell, Steven T. Mnuchin, John M. Mulvaney, David J. Shulkin, Seema Verma.

CONST. LAW, CH. VII, SEC. 1. **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." **§ 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." **§141**.

Damages: not less than $100B (this is a substantial compromise from President Trump's 6/19/2017 (at the American Technology Roundtable, White House) estimated value in excess of $3.5 trillion from just 22 organizations, all of whom use and benefit from Dr. Arunachalam's property, and which is substantially less than per Web transaction per Web App in use by each Corporate Infringer and its customers, including the Government.) JPMorgan reported in its website that it had 7000 Web Apps in just one Business Unit.

II. JUDICIARY DID NOT FIND CHANGED FACTS OR CIRCUMSTANCES TO AVOID PRECLUSION BASED ON PRIOR JUDGMENT NOR CREATE OR CLAIM A PARTICULAR EXCEPTION, TAKING THIS CASE OUT OF THE PROHIBITION CONTAINED IN THE CONSTITUTION:

Do changes in facts and circumstances exist, and if so, do they support the (in)validity Erroneously and Fraudulently ruled? The relevant facts or

circumstances have not changed such that the prior Supreme Court's *Fletcher* decision should dictate the result in the present case(s), not the Supreme Court's rulings in 19-8029, that this Court relied on the deny my IFP Motion.

Judiciary and Attorneys Made False Official Statements with intent to deceive.

Judges, with stock in litigants, refused to recuse, Ordered Defendants not to answer Dr. Arunachalam's Complaint(s) and to Default, canceled initial Case Management Conferences, then dismissed Dr. Arunachalam's cases without a hearing, and one year after Judgment and Appeal, Ordered Defendants to move for attorneys' fees, and two years after Judgment, granted attorneys' fees, for "a crime committed by the Adjudicators," "not by Plaintiff," for no injury incurred by Defendants.

The Judiciary and USPTO punished Dr. Arunachalam under the color of law and authority in retaliatory, cruel and unusual punishment in violation of the 8th Amendment, making it expensive, hazardous and burdensome for her to have access to the courts—all in violation of the Constitution. *See* ALP Vol XII, **§ 141**.

Judges and USPTO impaired the contract protected by the Constitution of the United States by not considering intrinsic material *prima facie* evidence when **claims were unambiguous in view of intrinsic evidence** – Patent Prosecution History, and not applying the Federal Circuit's *Aqua Products*' reversal of all such Erroneous and Fraudulent Orders that failed to consider "the entirety of the record" and made **False Official Statements** and **False Claims** of collateral estoppel,

falsely propagated across all District and Appellate courts, **collaterally estopped by void Orders by financially conflicted Judges** who admitted holding direct stock in the Defendants JPMorgan Chase & Co. and Microsoft and refused to recuse, without considering intrinsic material *prima facie* evidence and without applying the *Mandated Prohibition* of the Constitution — Governing Supreme Court Precedents — both (the intrinsic evidence of the record and the *Mandated Prohibition* of the Constitution) of which collaterally estop the falsely propagated collateral estoppel, **inchoate offenses** collectively committed by the Judiciary, USPTO and Defendants/Corporations. The Judiciary and USPTO aided and abetted in the theft of Dr. Arunachalam's property, **unjustly enriching Defendants/Corporations by trillions of dollars**.

This rescinding act has the effect of an *ex post facto* law and forfeits the estate of Dr. Arunachalam "for **a crime** not **committed** by" Dr. Arunachalam, "but **by the Adjudicators**" by their Orders which "unconstitutionally impaired" the contract with Dr. Arunachalam, which, "as in a conveyance of land, the court found a contract that the grant should not be revoked." The Judiciary and USPTO bullied and intimidated Dr. Arunachalam, took away her electronic filing capability after refusing to recuse for holding stock in Microsoft, Judge Andrews awarded $150K (currently under appeal) as attorneys' fees after refusing to recuse for holding stock in JPMorgan Chase & Co., for the crime committed by the

Adjudicators, sent the U.S. Marshall to Dr. Arunachalam's home and to accost her at public events such as at Stanford Law School, *disparately* ordering her to call a teleconference meeting with the Board and with the Defendants to request that her filings be docketed in **18 re-exams**! Who harassed whom? They denied Dr. Arunachalam both procedural due process and substantive due process and denied her fundamental right to emergency medical care during a medical crisis and dismissed her case despite and during a medical crisis. District Court judges **ridiculed Dr. Arunachalam for her speech impediment from a head injury and concussion and refused to release the audio transcripts**, tampered with the record, hid her filings, struck her filings for no valid rhyme or reason, stayed their oaths of office.

Courts/USPTO denied Dr. Arunachalam the protection from Patent Prosecution History, a key contract term between the Inventor and Government. Defendants and Judges concealed material *prima facie* evidence Dr. Arunachalam's patent claims are not invalid nor indefinite, propagated a false Collateral Estoppel Argument, which fails in light of Governing Supreme Court Precedents and Federal Circuit's *Aqua Products*' 15-1177 (2017) ruling that voided all Court and PTAB Orders that failed to consider "the entirety of the record"— Patent Prosecution History, material *prima facie* evidence that her patent claims are neither invalid nor claim terms indefinite. Supreme Court's *Festo* ruling

restrains the lower courts from *disparately* failing to consider Patent Prosecution History in my cases. *Festo Corp. v Shoketsu Kinzoku Kogyo Kabushiki Co.,* 535 U.S. 722 (2002).

Dr. Arunachalam's properties are protected by contract, itself protected by the Constitution of the United States. The Erroneous and Fraudulent Orders by the Judiciary and Agency impaired the contract and impaired Dr. Arunachalam's properties and violated the Constitution of the United States. **Dr. Arunachalam is entitled to Constitutional redress**.

The Judiciary deprived Dr. Arunachalam of the payment for each Web transaction/per Web application in use, which it allowed Corporate America to steal.

Dr. Arunachalam's inventions are in ubiquitous use worldwide, allowing Microsoft, IBM, SAP, JPMorgan Chase & Co. and the U.S. Government to make $trillions, including investors with stock in the above Corporations, like Judge Richard G. Andrews, PTAB Judges McNamara, Stephen C. Siu who refused to recuse.

District and Appellate Court Orders violate the U.S. Constitution, inconsistent with the "faithful execution of the solemn promise made by the United States" with the inventor and constitute treason. J. Marshall declared **'Crime by the Adjudicators'** in *Fletcher*. Chief Justice Marshall declared that any acts and

Orders by the Judiciary that impair the obligation of the contract within the meaning of the Constitution of the United States **"are consequently unconstitutional and void."**

This entire Case revolves around the Judiciary avoiding enforcing *Fletcher*, at all costs.

WHY? The fact of the matter — **the State of the Union** — **is:** there is no middle ground. The Court is not fooling anyone. The three Branches of Government concertedly share a common objective — to remain silent as fraud, willfully and wantonly avoiding enforcing *Fletcher* and Governing Supreme Court Precedents. Why has the Judiciary not enforced *Fletcher* and Governing Supreme Court Precedents? They know why — because enforcing *Fletcher* exposes the entire Patent System, operating as a criminal enterprise, defrauding the public.

Dr. Arunachalam has been forced to state the obvious. Courts do not like it. So Courts dismissed her Cases for false reasons while Chief Justice Roberts admitted by his recusal on 5/18/20 that the facts and the law are on Dr. Arunachalam's side.

Relief Sought: Order Corporate Infringers to pay Dr. Arunachalam per Web transaction per Web application in use, which the three Branches of Government aided and abetted Corporate America to steal. The Supreme Court **already** reversed the unconstitutional void Orders in Dr. Arunachalam's cases in 1810 and

1819. Chief Justice Marshall declared that any acts and Orders by the Judiciary that impair the obligation of the contract within the meaning of the Constitution of the United States **"are consequently unconstitutional and void."** Order the Courts and USPTO to enforce the Law of the Land - *Fletcher, Dartmouth College* and Governing Supreme Court Precedents.

Executive Order by President Trump (**as the entire Judiciary breached its solemn oaths of office and lost jurisdiction**) to: (i) Enforce the Law of the Land - *Fletcher, Dartmouth College,* Governing Supreme Court Precedents. (ii) Reverse all unconstitutional void Orders in Dr. Arunachalam's cases. (iii) Declare America Invents Act reexamination provision null and void, as violating the prohibition of the Constitution, thereby reinstating all granted patents invalidated by said mal-administered re-examination process without considering intrinsic evidence — Patent Prosecution History. (iv) Order Corporate Infringers to pay the royalties rightfully owed to the inventor.

I am here because I have presented this to my local Congresswoman Anna Eshoo, Congressman Ro Khanna, and Senators Dianne Feinstein, Nancy Pelosi and Kamala Harris in California for almost 4 years, only to be ignored and rebuffed and not giving me appointments to meet with them.

This Court has a duty to bring this matter of treason committed by the Judiciary to the attention of the Governor, President and Senate Judiciary

Committee and have me present to the Senate Judiciary Committee well ahead of the Elections, replace Chief Justice Roberts now, well before the elections, and have Judicial officers forfeit their office for "misbehavior"; and, have President Trump and Vice-President Trump to get the Executive Order signed by the President to void all unconstitutional orders in my cases and void Obama's unconstitutional America Invents Act. Both I, as well as the nation, and all inventors will benefit from the service this Court has a duty to provide us, to bring this matter to the attention of President Trump now to get the Executive Order.

Please help me, as I am left with no remedies, as the Judiciary is hell-bent on obstructing justice by such procedural roadblocks as denying my IFP Motion, and aiding and abetting anti-trust by Corporate Infringers against a small business and me, the inventor, whose inventions are the backbone of the nation's economy, and powers national security and has enabled the nation to work remotely during COVID. Examples of my IoT machines are the millions of Web Apps in Apple's App Store in Apple's iPhone, and on Google Play on Android devices, Web banking Web Apps, healthcare Web Apps, Facebook, Twitter and other social networking Web Apps, and myriads of other Web Apps.

THE COURT CANNOT DETERMINE THAT MY ACTION WAS "FRIVOLOUS, UNREASONABLE, OR WITHOUT FOUNDATION." TO THE CONTRARY, ACTION WAS CLEARLY IN EXCESS OF SUCH OFFICER'S JURISDICTION,

to deprive me of my federally protected rights; my right to be free from a

conspiracy "to prevent, by force, intimidation, or threat" my First Amendment rights to Petition the Government for Grievance; in any court of the United States a right to be free from a conspiracy to obstruct justice; and my protected right from deprivations "of equal protection of the laws, or of equal privileges and immunities under the laws." The Court has not proven bad faith or malice on my part nor that any particular claim is frivolous, nor can they. This Court's manifest confusion about the facts of this case, and procedural irregularities and falsely accusing Dr. Arunachalam as "vexatious" for defending the Constitution and its cruel and unusually punitive intentions are well documented and is "the very antithesis of calling balls and strikes." This Court denying me my IFP Motion to cover up its own culpability and lawlessness — bespeaks of a Court not only biased against me, but not doing its duty to enforce the Law of the Land. "This is an umpire who has decided to steal public attention from the players and focus it on himself. He wants to pitch, bat, run bases, and play shortstop. In truth, he is way out in left field." This Court's outrage at Dr. Arunachalam does reveal "a 'deep-seated ... antagonism that would make fair judgment impossible.' *Liteky*, 510 U.S. at 555."

WHEREFORE, this Court must remove the procedural roadblock it has thrown before me in order not to enforce *Fletcher* in the Writ of Mandamus I filed a Petition for, and has made it expensive, hazardous and burdensome for me to have access to the court on the question of due process itself, all alike violating the

Constitutional provision and entitling me to Constitutional redress, in the interest of public trust and justice. **This Court's Order denying IFP Motion must be reversed. IFP Motion must be granted**.

Dated: July 22, 2020

Respectfully submitted,

Lakshmi Arunachalam

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VERIFICATION

In accordance with 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

Lakshmi Arunachalam

Dr. Lakshmi Arunachalam, a woman
Self-Represented Petitioner

Executed on July 22, 2020

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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 3562 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.

July 22, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on July 22, 2020, I filed an original of the foregoing Brief, Certificate of Counsel/Self-Represented Petitioner of the number of words and Verification with the Clerk of the Court in the United States Court of Appeals for the Federal Circuit, by Express Priority Mail via the U.S. Postal Service for overnight delivery to:

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and I certify that on the same day, I served a copy on counsel of record for all Respondents, via email and by Express Mail via the U.S. Postal Service for overnight delivery at the following addresses:

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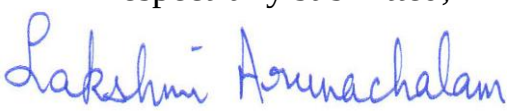

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