

20-2196

IN THE
UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

Dr. Lakshmi Arunachalam,
a woman,

v.

CITIGROUP INC.,
CITICORP,
CITIBANK N.A.,
Defendants-Appellees,

DOES 1-100,
Defendants,

Appeal from the United States District Court for the District of Delaware
in Case No. 1:14-cv-00373-RGA, Judge Richard G. Andrews

Amicus Curiae, Sherna Madan, M.D.'s
**AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONER'S PETITION
FOR EN BANC REHEARING**

November 12, 2020

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Sherna Madan, M.D., Amicus Curiae

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**STATEMENT OF THE IDENTITY OF THE *AMICUS CURIAE*,
ITS INTEREST IN THE CASE, AND
THE SOURCE OF ITS AUTHORITY TO FILE**

I, Sherna Madan, M.D., the *amicus curiae* in this case, live in California and practice medicine at 39 Birch St, Redwood City, CA 94062.

I am and have been a physician in private practice for 34 years for many of which I have been Petitioner, Dr. Lakshmi Arunachalam's personal physician.

AMICUS CURIAE'S INTEREST IN THIS CASE: My interest in this case is to appeal for justice and the rule of law. I have watched closely and with horror and disbelief as Dr. Arunachalam has been systematically denied her rights and recognition for her various and extremely significant inventions/patents that have been the underpinning of the information technology revolution that we all enjoy — Web Apps displayed on a Web browser. Over and over again, I have watched as judges and lawyers who have put their own financial interests and those of large corporations with deep pockets, ahead of their mandate and sacred duty to ensure the rule of law, by at the very least, performing the ministerial acts required of their solemn oath and duty to defend the Constitution and Supreme Court precedents in accord with the Contract Clause and Separation of Powers Clause of the Constitution. As a physician entrusted with the lives and well-being of my patients, I am well aware that I must hold myself to a higher standard. I expect no less of other professionals, including judges and lawyers. Unfortunately, the right to a fair and

just legal system has not been extended to Dr. Arunachalam, for unclear reasons but possibly including greed, racism and misogyny, compounded by courts failing to perform certain ministerial acts, such as failing to promptly docket Dr. Arunachalam's filings without withholding them or altering the record, failing to promptly process payment of fees she submits and delaying this process for her cases, and failing to abide by their solemn oaths of office to enforce the Constitution and Supreme Court precedent-creating rulings by Chief Justice Marshall that prohibit the rescinding of patent grants, which are defined as contracts, in accord with the Contract Clause of the Constitution.

I am therefore writing this *Amicus Curiae* brief to request that this Court reverse the lower court's rulings and require public officials involved with the legal system to perform their ministerial duties as mandated by law. There can be no democracy without a legal system that operates with fairness and integrity for all its citizens, not just for those with wealth and power.

SOURCE OF AMICUS CURIAE'S AUTHORITY TO FILE: I have filed a Motion for Leave to file this *Amicus Curiae* Brief.

**STATEMENT OF AMICUS CURIAE ON WHO AUTHORED THE BRIEF
AND WHO CONTRIBUTED MONEY TO AUTHOR THE BRIEF:**

1. I, Sherna Madan, M.D., declare that I authored this brief.
2. Neither Petitioner or Appellees nor their counsel authored the brief in whole or in part.

AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONER DR. LAKSHMI ARUNACHALAM'S PETITION FOR *EN BANC* REHEARING

I, Sherna Madan, M.D., an *amicus curiae*, hereby file this *Amicus Curiae* Brief in support of Petitioner, Dr. Lakshmi Arunachalam's Petition for *En Banc* Rehearing in this case.

SUMMARY OF ARGUMENT: I have watched closely and with horror and disbelief as Dr. Arunachalam has been systematically denied her rights and recognition for her various and extremely significant inventions/patents that have been the underpinning of the information technology revolution that we all currently enjoy — Web Apps displayed on a Web browser. Over and over again, I have watched as judges and lawyers have put their own financial interests and those of large corporations with deep pockets, ahead of their mandate and sacred duty to ensure the rule of law by performing the ministerial acts of abiding by their solemn oath and duty to defend the Constitution and Supreme Court precedents in accord with the Contract Clause and Separation of Powers Clause of the Constitution.

ARGUMENT: This situation is cause for great alarm, since when public officials fail in the performance of fundamental ministerial duties, access to justice is severely blocked, as it has been repeatedly in over 100 cases filed by Dr. Arunachalam. I am now and have been a physician in private practice for 34 years, for many of which I have been Petitioner, Dr. Lakshmi Arunachalam's personal physician. As a physician entrusted with the lives and well-being of my patients, I am well aware

that I must hold myself to a higher standard. I expect no less of other professionals, including judges and lawyers. Unfortunately, the right to a fair and just legal system has not been extended to Dr. Arunachalam, for unclear reasons but possibly including greed, racism and misogyny, compounded by courts failing to perform certain ministerial acts, such as failing to promptly docket Dr. Arunachalam's filings without withholding them or altering the record, failing to promptly process payment of fees she submits and delaying this process for her cases, and failing to abide by their solemn oaths of office to enforce the Constitution and Supreme Court precedent-creating rulings by Chief Justice Marshall that prohibit the rescinding of patent grants, which are defined as contracts, in accord with the Contract Clause of the Constitution.

CONCLUSION: I am therefore writing this *Amicus Curiae* brief to request that this Court reverse the lower court's rulings and require public officials involved with the legal system to perform their ministerial duties as mandated by law. There can be no democracy without a legal system that operates with fairness and integrity for all its citizens.

November 12, 2020

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE WITH FRAP 32(g)

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

1. The brief contains 439 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.

November 12, 2020 Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on November 12, 2020, I filed an original of the foregoing briefs, with the Clerk of the Court in the United States Court of Appeals for the Federal Circuit, via the USPS to:

The Clerk of the Court,
U.S. Court of Appeals for the Federal Circuit,
717 Madison Place NW, Washington, DC 20439

and I certify that on the same day, I served a copy on counsel of record for all Appellees, via email and/or via the U.S. Postal Service at the following address:

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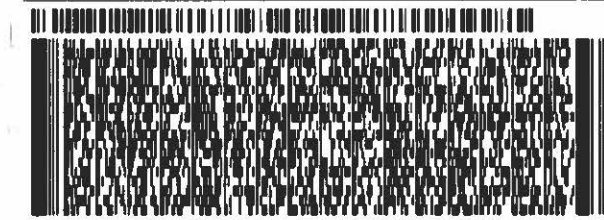
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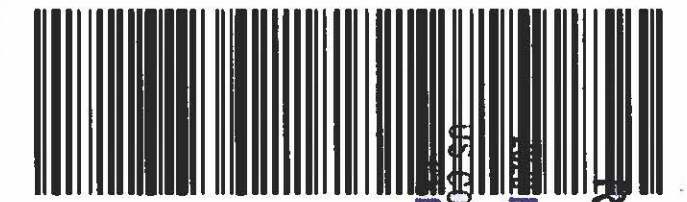
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