

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, Murugappan Natesan's
**AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONER'S PETITION
FOR EN BANC REHEARING**

November 12, 2020

Murugappan Natesan
3589 Rosinress Drive, San Ramon, CA 94582
Tel: 510-889-7753
Email: Gappsatesan@yahoo.com
Murugappan Natesan, Amicus Curiae

TABLE OF CONTENTS

STATEMENT OF IDENTITY OF THE *AMICUS CURIAE*, ITS INTEREST IN THE CASE, AND THE SOURCE OF ITS AUTHORITY TO FILE.....6

STATEMENT OF *AMICUS CURIAE* ON WHO AUTHORED THE BRIEF AND WHO CONTRIBUTED MONEY TO AUTHOR THE BRIEF.....7

AMICUS CURIAE BRIEF 8

CONCLUSION 9

CERTIFICATE OF COMPLIANCE WITH FRAP 32(a)(7)(B)..... 10

CERTIFICATE OF SERVICE..... 11

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

I, Murugappan Natesan, the *amicus curiae* in this case, reside at 3589 Rosincrest Drive, San Ramon, CA 94582.

I am a Management Consultant who helps businesses conceptualize and implement strategic mission-critical programs that either help them grow, develop and deploy new products and services more quickly, implement programs that strengthen their infrastructure, services or institute best practices and business processes that improve productivity and increase competitiveness. I also work with key executives and assist them with developing their skills and that of their corporation to achieve better results and strengthen their institution to scale new heights. I understand the need for innovation and creativity to help us all continuously improve in how we do things for the betterment of individuals, corporations and society in general. I came to this country because it was the cradle of innovation and individual contribution was rewarded. Everyone could partake in the American Dream and reap the rewards of their creativity and innovation. I truly believe that the Constitution, the courts and the rule of law will not deny anyone their due rewards by denying due process and that the system of justice would always prevail and everyone can have their day in court. When I became a citizen of the United States, I took a solemn oath to defend

the Constitution of the United States. I expect public officials, judges and lawyers to abide by their solemn oath duty to defend the Constitution.

AMICUS CURIAE'S INTEREST IN THIS CASE: My interest in the case is to ensure justice and for the courts to help this Petitioner get her day in court by public officials merely performing their ministerial duty so as to not deny the Petitioner due process and allow her to collect royalties from the corporations who have infringed on her patents


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, Murugappan Natesan, declare that I authored this brief.
2. Neither Petitioner or Appellees nor their counsel authored the brief in whole or in part.
3. No party or a party's counsel contributed money that was intended to fund preparing or submitting the brief; and
4. No person, - other than the *amicus curiae*, who is an individual, (there are no members, and no counsel) - contributed money that was intended to fund preparing or submitting the brief.

November 12, 2020

Respectfully submitted,


Murugappan Natesan
3589 Rosincrest Drive, San Ramon, CA 94582
Tel: 510-889-7753
Email: Gappsatesan@yahoo.com
Murugappan Natesan, Amicus Curiae

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

I, Murugappan Natesan, an *amicus curiae*, hereby file this *Amicus Curiae* Brief in support of Petitioner, Dr. Lakshmi Arunachalam.

SUMMARY OF ARGUMENT: The Court must remove any roadblocks in the flow of justice for the Petitioner. Public officials have not given the Petitioner her day in court in 20 years by failing in their ministerial duty to abide by their solemn oaths to enforce the Constitution and Supreme Court precedents ruled by Chief Justice Marshall in accord with the Contract Clause of the Constitution that a patent grant is a contract that cannot be revoked. This denial of due process warrants reversal of orders.


ARGUMENT: The Petitioner has been denied due process in 20 years by public officials failing to perform their ministerial duties and therefore the Petitioner has been left with rights and no remedy.

This is an extraordinary situation: because the Petitioner has no remedy from the courts as they have dismissed all her cases without giving her due process by failing in their ministerial duty to enforce the Constitution and Supreme Court precedents set by Chief Justice Marshall that a patent grant is a contract that cannot be rescinded by the absolute highest authority in accord with the Contract Clause and Separation of Powers Clause of the Constitution. This Court's lack of enforcement of the Law of the Land has caused the lower courts, USPTO, Supreme Court and clerks of courts

to violate their Constitutional obligation and to not comply with the law in the case of the Petitioner.

CONCLUSION: The solution for this complication is very simple. The Court should enforce the Law of the Land, as declared by Chief Justice Marshall in Supreme Court precedents. This will help ensure that justice is served.

November 12, 2020 Respectfully submitted,


Murugappan Natesan
3589 Rosinress Drive, San Ramon, CA 94582
Tel: 510-889-7753
Email: Gappsnotesan@yahoo.com
Murugappan Natesan, Amicus Curiae

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 303 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,



Murugappan Natesan
3589 Rosinress Drive, San Ramon, CA 94582
Tel: 510-889-7753
Email: Gappsnotesan@yahoo.com
Murugappan Natesan, Amicus Curiae

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:

Citi Group, Inc., Citicorp, CitiBank, N.A.;
Nicholas Hunt Jackson, Dentons US LLP
1900 K Street NW, Washington, DC 20006
(202) 408-6463; Email: nicholas.jackson@dentons.com
Eric Sopher; Foley & Lardner LLP
Washington Harbour
3000 K Street, N.W. | Suite 600
Washington, D.C. 20007-5109
Direct 202.295.4149; Cell 202.714.0431; esopher@foley.com

Counsel for Appellees, Citi Group, Inc., CitiBank, N.A.;

November 12, 2020

Respectfully submitted,



Murugappan Natesan
3589 Rosincrest Drive, San Ramon, CA 94582
Tel: 510-889-7753
Email: Gappsatesan@yahoo.com
Murugappan Natesan, Amicus Curiae



NOV 13 2020
RECEIVED
2020 NOV 13 AM 11:44
US COURT OF APPEALS
FEDERAL CIRCUIT

RT 0
FZ 0
5460
11.13

Align top of FedEx Express® shipper

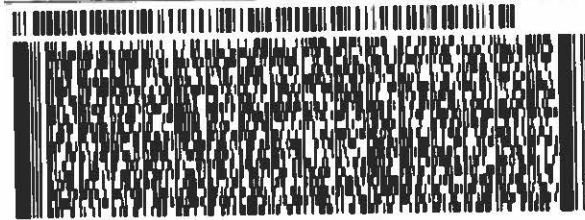
ORIGIN ID: ZWIA (302) 427-3908
MURUGAPPAN NATESAN
3589 ROSINCRESS DRIVE
SAN RAMON, CA 94582
UNITED STATES US

SHIP DATE: 12NOV20
ACTWGT: 0.20 LB MAN
CAD: 0901152/CAFE3407
BILL SENDER

TO CLERK OF THE COURT
US COURT OF APPEALS FOR FED. CIR.
717 MADISON PLACE NW

WASHINGTON DC 20439
REF: CITI GROUP

INV: 687212 DEPT: VIRTUAL DOCKET



FedEx
Express



TRK# 9040 1482 5480
0201

FRI - 13 NOV 10:30A
PRIORITY OVERNIGHT

EP BZSA

20439
DC-US IAD

Part # 155148-434 RIT EXP 05/20

