CASE NO. 121,573

IN THE KANSAS SUPREME COURT

EDDIE MENDIA

Plaintiff- Appellant

Vs

SHANE MOYER,ABBY HARMAN

Defendants- Appellees

PETITION FOR REVIEW OF EDDIE MENDIA

APPEAL FROM THE KANSAS APPELATE COURT , KANSAS

Honorable David E. Bruns Judge

District Court Case No. 2017 cv 00582

Eddie Mendia

1706 Ellis

Wichita, Ks. 67211

Appellant, Pro Se

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Issue 2: WHETHER the people's Constitution mandates the length and breath of the Court's liberal construction as applied to the poor , pro se and whether interpretations

that would change or modify the people's Constitution amount to a denial of equal access to government and courts and equal protection of the Law::

Nature of the Case

The root cause of the case was that ms. Harmon lost her I phone 5 realizing this on March 8th ,2015. She called her boyfriend Mr Moyer to use his own personal I phone to start pinging through the means of a GPS electronic signal from his own home in Haysville,Ks..to locate her I phone. When he did he went to go pick her up then on to pick up her brother Mr. Bauer for extra help.

Contrary to KSA 70-102 they themselves went to take back the I phone. Plaintiff alleges severe mental trauma manifesting in physical pains with other physical injuries and vehicle damages and contents. Then they ran from the scene of the accident before the police could arrive. The police recorded there statements as herein stated. Progressive Insurance claim adjuster took Mr. Moyer's statements recording them much as herein stated admitting to his liability of running plaintiff out of his lane and over curbs.

During the dependency of the case Ms.Welch paid for by Progressive Insurance on several occurrences en-gauged Judge Dahl within seconds of the hearings with extrajudicial conversations in a pointed flirting exchange with lots of giggles about her partners losing a big case in the judges courtroom amounting to a size-able plaintiff's verdict. In seeing Judge Dahl responding, leaning in towards her, to enjoy her flirting manners , I had to leave the court room feeling I was intruding in an

intimate encounter. I waited in the hall for 10 minutes then seeing they were still at it I just left.

I filed a KSA 60-212 c Motion For Judgment on The Pleadings with supporting exhibits. In defendant's response they asked the court not to address my Motion and the court never did. Plagued with sever emotional trauma and being also captivated and pheromone-sly affected , I mistakenly filed a KSA 60-259 Summary Judgment Motion allegedly not in compliance with Supreme Court rules. Judge Dahl ruled against my KSA 60-259 Summary Judgment but let stand my KSA 60-212 c Motion unaddressed.

Judge Dahl filed his Summary Judgment Order denying all my claims with respect to the KSA 60-259 Summary Judgment Motion I had filed by mistake, for non conforming to Supreme Court Rule. The exception was an Order for a trial to see if Mr. Bauer could be found liable for injuries and damages he caused outside Mr. Moyer's truck. This is solely a question of law. He was not named in the lawsuit by name, no recovery possible at all. He was a co conspirator. I was under direct orders not to address the verdict question at all. The jury could not consider my testimony or exhibits in following instructions only about the verdict instruction.

My KSA 60-212 c Motion would be effectively buried under trial and appeal statutes and procedural questions.

On November 5th, 2018 I filed a Motion for Recluse of Judge Dahl because of extreme favoritism. It was denied. The I presented Affidavit of Prejudice and was taken to Judge Fleetwood to rule on that affidavit charged extreme favoritism evidenced by the lack of legal reasoning in summary judgment order and putting a question of law to the jury'. Judge Fleetwood didn't feel Judge Dahl's action were blatant enough for recluse , stated could not rule on issues set for trial would have to wait for appeal, for the trial to go on.

The trial was had under my objection otherwise Judge Dahl would have dismissed the case he stated. There was no verdict. They were being asked a question of law which they wrote down no. this is not a trial at all void of due process and equal access to per sent claims , forbidden by will of the People in their Constitution Bill of Rights #3 and #18 and 14th Amendment U.S. Constitution.

Plaintiff filed a Motion within days of Judge Dahl filed the Journal entry after the nugatory trial was had . It was agreed to wait to have the hearing until the transcripts of the trial were produced. There were delays due to injuries of the reported. The hearing was on April 16 2019. During the hearing Judge Dahl produces direct evidence of favoritism by openly advocating giving legal advice to defendant's attorney about the proper Kansas statutes to use. Judge Dahl dismissed all of Plaintiff's claims.

Plaintiff filed his Notice of Appeal, after waiting for the transcript to be filed to see if Judge Dahl advocating for defendants made it into the record.

Notice of Appeal was filed. Plaintiff started getting the Docketing Statement ready for the Court of Appeals. The Docketing Statement was sent in on June 18,2019. It contained Judge Fleetwood's Journal Entry that was file into the District Court's Journal Records on May 22 ,2019 marked as page 6 in the Docketing Statement. Page 1 number 2 c. Was this case disposed of in the district court by : James Fleetwood. His Journal Entry file date of May 22,2019 amended my Notice of Appeal to be effective from the Journal Entry file date per the language of the Notice of Appeal.

The Docketing Statement was the only filing available at the Court of Appeals and is not a record as per statute but it clearly states Judge Fleetwood's as the last controlling Journal Entry for appeal purposes. THE APPEALS COURT USED THE WRONG JOURNAL ENTRY as the basis to form it's conclusion of not having Jurisdiction then ordering dismissal. Not the will of the People.

Statements of Facts

The record , at the Sedgwick County clerk of the Appellate Court , was faulty as it was assembled into a table of contents , and I was in progress of correcting that record to include Judge Fleetwood's final journal entry filed in the record on May 22,2019. With that filling my Notice Of Appeal dated April 23,2019 became effective ,amended, and encompasses Judge Fleetwood's Journal Entry, as supported by provisions of the Bill of Rights #s 1, 3 , 18. There is no legal record on appeal at the court of appeals because I have not filed my brief. The Docketing Statement supports the showing of the final journal entry for appeals purposes filed by judge Fleetwood to ensure JUSTICE in the questioning whether it was a proper and legal trial ordered by Judge Dahl, which no reasonable person would believe as a legal trial.

The breath and reach of the leniency accorded to the poor , pro se is stated in the Bill of Rights #1 ; #3 ; #18 as the will of the People that have mandated so in vetoing to accept the Constitution

Arguments and Authorities

By letter from the appellant court dated August 12, 2019 It states in part.

[Based on the record currently on file with the clerk of the appellant court.] --

this does not state a location of the clerk-- The record , at the Sedgwick County clerk of the Appellate Court , was faulty as it was assembled into a table of contents , and I was in progress of correcting that record to include Judge Fleetwood's final journal entry filed in the record on May 22,2019. With that filling my Notice Of Appeal dated April 23,2019 became effective and encompasses Judge Fleetwood's Journal Entry, as supported by provisions of the Bill of Rights #s 1, 3 , 18.

The Appellate Court abused it's de**secration** in that the bases for it's decision was on the wrong journal entry. See Frost v Hardin, 218 Kan,260-63 (1975).also 203 Kan.289-93., No reasonable person would take the view , decision adopted by the court of appeals. See 271 Kan. 355-68 (2001) it is repugnant to the Constitution.

Judge Fleetwood is the presiding judge of the district court , heard evidence pertaining to the case and also filed a journal entry on issues intrinsic to this very case being the final journal entry per statute. KSA 60-254(b),,KSA 2007 Supp. 60-2102(a)(4)

On. Friday September 13, 2019. I Eddie Mendia was at the Sedgwick County Court of Appeals Court Clerk counter at about 12:30 pm. I was there to get a copy of the Appellate Court call to the District Court ordering the case file to be forwarded to Topeka Appellate Court. The clerk from the Appellate section went to check the record. She stated the record has not been forwarded. She went back to double check and came back to the counter to state the record was still at the District Court and had not been forwarded and there was no call from Appeals court for the record to be forwarded as of that date.

The Appellant Court had based their decision on a faulty made up record. The evidence of this is that it stated that the District Courts journal entry was filed on November 20, 2018. This is not correct. The correct journal entry was on May 22, 2019 signed by Judge Fleetwood which became the basis of Plaintiff Appeal when it was filed. At the time of the May 22, 2019 filing the Plaintiffs Notice of Appeal had been on file at the Appellant Court for 29 days and was applicable to the May 22, 2019. Journal Entry filing. The issues were even more relevant because it addressed allegations that went beyond the trial but also to the conduct of the trial, but filed before the transcript was finished on May That filing of the transcript records shows how Judge Dahl on the record sided with the Defendants representing for the record the correct Kansas Statue to use in argument by Defendants Attorney who was calling in form Missouri direct prima facie proof of still being under Pamela

Welch's flirtation vexing spell an agent paid for by Progressive Insurance compremising a district court Judge to be extremely favorable to the defendants in his decisions in the case.
The plaintiff docketing statement was submitted on June 18, 2019 contained Judge Fleetwood's May 22, 2019 Journal Entry numbered as Page 6. The docketing Statement page 1 # 2 b Lists Judge Fleetwood as other Judges who signed orders. Then on C. James Fleetwood listed as he dispo**sed** of the case in District Court. THIS ESTABLISHES THE APPELLATE COURTS JUSRISDICTION.

The Appellate Court focused on the wrong journal entry. The right one is documented in Plaintiffs DOCKETING STATEMENT (not the record per statute). Page 6 of the docketing statement that the Appellate court has access to was certified by the clerk of the district court a correct copy of the original instrument on file.
This being Judge Fleetwood's Journal Entry on May 22, 2019.
Plaintiffs NOTICE OF APPEAL of April 23, 2019 was timely encompassing Judge Fleetwood Journal Entry of MAY 22, 2019. a direct appeal thereof. The issue of KSA 2018 Supp. 60-2013 (a) would not apply if the correct focus on Judge Fleetwood's Journal Entry as the Appellate Courts basis was to have been used by the Appellate Court. This would be proper in that # 6, of Plaintiffs DOCKETING STATEMENT filed June 18, 19. Starts with naming Judge Fleetwood conducting a hearing on Nov 5, 19. hearing more important issues than that of the trial that happened later that day.
It was the intent of the Judge Fleetwood in filing his Journal Entry to have it supersede Judge Dahl's trial Journal Entry so that JUSTICE would prevail in this case.

Judge Fleetwood was aware of the issues in the case but did not "feel"that I established prejudice of favoritism by Judge Dahl even though Pamela Welch admitted to extra Judicial conversation that did have an effect on the mind of Judge Dahl as KSA 60-441& 404 recognizes that there is no question of the mental process since there is no possible way to test the truth or veracity. See Manhatton v. Eldred, Ks. Ct. App.(1989). Judge Dahl's ruling were against the weight of the evidence. See Butter v. HCA Health (Ct of App. Ks. 1999). Pamela Welch and Judge Dahl admitted to extraneous conversational influence. Ms. Welch before Judge Dahl and Judge Fleetwood, and Judge Dahl from the bench in addressing the Motion for recluse. How those influences then operated upon Judge Dahl's mind is revealed by his legal decisions and his directly siding and advocating giving legal advice to defendant's attorney during a hearing on the record.

Judge Fleetwood could not intervene in the issues of the upcoming trial claims ,which could only be done on appeal , but wanted the proceedings to run their course relying on time to manifest as to any claims made by plaintiff. Judge Fleetwood's journal entry purposed this to be the

vehicle to accomplish JUSTICE to the victim in the matter before him.

Therefore as the Appellate Court has cited Northern v ONEOK 916 Kan.296, citing Harsch v Miller, 288 Kan. 280 on page 289 (" Appeals to the Supreme Court may be taken from any final order under KSA 2007 Supp. 60-2102(a)(4) or KSA 26-504 or KSA 60-254(b) . Judge Fleetwood's purposed his Journal Entry as certification as the final Order on all issues based and referenced in plaintiff's MOTION FOR RECLUSE and AFFIDAVATE OF PREDJUDICE in conforming to KSA 60-254(b). see,eg.,Wilkinson,256 Kan. At 146-47. Judge Fleetwood's Journal Entry purposed to secure the JUST, speedy and inexpensive determination of this action pursuant to the Kansas Public Policy. See, Connell v State Highway Comm.,192 Kan. 371-74(1964), see also Cooke v Gillespie, 285 Kan.748-54(2008). The purpose of an action is revealed by the effect or function it produces es.

All of the foregoing manifest the rise of the Titans, [The Kansas Constitution with it's Bill of Rights partnered with The U.S. Constitution ie 14th amendment vs The Kansas Legislature's desires and limits set by it's statutes. see generally KSA 2007 Supp. 60-2102 appeals and KSA 2018 Supp. 60-2103(a) time limits. The Kansas Poor ,Pro Se vs The giants of the justice monopoly championed by the Bar Association (the profession) administered by the Courts.

Kansas has addressed this confrontation in it's early years with the adoption of the Kansas Constitution 1859. The Supreme Court justices were in tune with the people's rock solid Constitution (The Law) , that protected ALL the people of the State ,, The 2010 census counted 2,853,118 Kansans with 12.8% 361,000 below the poverty line.

In Anderson v Cloud County, 77 Kan.721 (Ks. S. Ct. 1908) Herein Judge J. Porter determined that Constitutional protections are based upon the theory that the State is a unit, to be governed throughout it's length and breadth on all subjects of common interest by the same Constitution, and that these Constitutions are public laws in their application and uniform in their application until the people shall change the Constitution themselves. Here is the gist of the matter the Constitution is the public law that affects the welfare of the state as a unit. A private law such as KSA 2018 Supp. 60-2103(a) time limits and KSA 2007 Supp.60-2102 appeals and 304 Kan.80-87(2016) as these are applied to the poor , pro se

are ones that provides an exception to the Constitution being a species of class legislation to benefit the Bar disregarding what the people embedded in their Constitution, with protections for all the people as an emphatic declaration of their determination to strike at the root of the evil , casting aside the poor pro se , purposing to the relying upon the vigilance of the courts to restrain themselves and the actions of the legislature. The courts shall give the constitutional protections to all the people as intended by the people. The mere mention of naming those rights is recognition of this necessity.

The People have enumerated that the provisions of the Bill Of Rights of Kansas's Constitution #1 , #3 , #18 shall not be abridged and the Legislature shall NOT pass laws that may have interpretations to have the effect to limit a whole section of Kansans equal access to have their petitions properly determined by government/courts thereby creating a preference for the rich who can afford attorneys. To accomplish that outcome the Constitution nor Bill of Rights do NOT state that a person:

1.Have legal training in speech , writings even to be able to state a claim.

2. Adhere to rules or procedures adopted by legislatures or courts

3. Not subject to time limits when not expressly stated to them by the court.

4. Not subject to the adversarial process that the justice monopoly has instituted by Bar members. ie failed to respond to made up statements by opposing counsel.

5. No latitude or leniency is too much when attempting to recover for injuries and damages from those liable.

6. No acknowledgments or adoptions by courts shall infringe rights protected by Bill Of Rights. It is not a question of being unable, unwilling, or declaring to find that right—They were embedded in the Constitution no interpretations needed. It's incorrectly stated in State v Gill,287 Kan. 294 citing 278 Kan. 109-111 (2004) The Constitution mandates no need for findings such as 296 Kan. At 99-102. The record relied on by the Appeals Court is unknown and/or made up by the district court appeals clerk, Sedgwick County.

7. The right to appeal is maintained by the people when the court has not accomplished or satisfied the rights protected by the Kansas Constitution Bill of Rights #1, #3,#18 ie until a court rules on my KSA 60-212 c Motion.

Constitutions are the work, NOT of legislatures or of the courts, but of the PEOPLE. The People give , and the People take away, Constitutional provisions.

Issue II: WHETHER the people's Constitution mandates the length and breath of the court's liberal construction as to be applied to the poor , pro se and whether interpretations that would change or modify the people's Constitution amount to a denial of equal access to government and equal protection of the Law.

Alliance Mortgage Co. v. Postine, 281 Kan. 1266(2006) ; Gallo v. Prudential Sers. 22 F .3d

1219 (2nd Cir. 1994) direct evidence of discrimination is RARE, nevertheless it is the **will of the people** for equal justice in the Courts, this is more than inferred, it's a right, substantial. It is enough for the Pro Se to present his Petition and be construed by the Courts for it's intended purpose so as to have equal access to present to the Courts. The very same thing that our Ks. Bill of Rights protect s with section 3 and 18. Another showing of direct evidence of abuse of discretion is the reviling I received from Judge Dahl for having bothered his favorites is at Vol 10 P 22 L 12-19. He had abused his discretion all through out this case after Progressive had ,turned , him through the flirting of Mrs. Welch defendant's attorney for their cause so not to loose another case.

Appellant filed a post trial motion on November 26, 2018. It is plaintiff's contention that this filing was treated according to the policy of pro se leniency, and that supported by the fact that defendants vehemently objected to that motion, but the court did construe and treat it as a motion brought under K.S.A. 2018 Supp.60-2103(a) when it convened the hearing on August 16, 2019 over said defendant's objections, which complies with Kansas' Bill of Rights section 3 and 18.----Judge Dahl proceeded as is normal if he would have construed the motion in a way to allow him to proceed but without specifying

" We hold that [t]he rights of a person injured by the tortuous act of another too have remedy for his injuries in a **court of law** is one of the basic constitutional rights guaranteed protection by the Kansas Courts. " 297 Kan. 125 Syl. 3 free from bias, any appearances of favoritism, and honest application of the law.

Ks. Bill of Rights # 18 fundamental constitutional right to have a remedy for injuries to a person, property by due course of LAW fundamental right. This applies to the very poorest even the uneducated to come before the Court, not bound by the BA R's Monopoly of the Justice System in it's adopting
rules ,free of their adversarial instituted system. (placing an unreasonable impediment upon a Pro Se and one afflicted with pleaded sever mental trauma not providing accommodations violates due process.. also # 3 violating equal access to the Justice System in the Courts. The provisions of the Constitution are self-activating basis for causes of actions for granting relief, that being a government function of the State, precludes time limits on matters relevant to self-government see..Schenek v U.S. 249 U.S. 47(1919).

Julie M Bradlow, Procedural Due Process rights of a Pro Se civil litigants, 55 U. CHI. L. REV. 659-678(1988)(Noting that flexible construction of pro se pleadings is meant to combat dismissal where a cause of action[exist] but the motion fails to say the" MAGIC WORDS".

The10th Circuit asks the Courts to apply the pro se intent that makes the most sense to the Law , see,eg., Hallv. Bellmon, 935 F .2d 1106-10(10th Cir.1991) (describing liberal construction as requiring the Courts to read the pleadings to state a valid claim if reasonable, despite, among other things, a pro se litigant's " confusion of various legal theories " and "poor syntax and sentence construction.). Includes citation to the statutes, accommodations to be fashioned for confusion of legal theories when afflicted with mental trauma, labored reasoning,.

Congress has addresses mental trauma by codifying the statutory right of EQUAL ACCESS to the Courts. See.28 U.S.C. #1654(2006) The plaintiff had to proceed without an attorney afflicted by sever mental trauma directly caused by the defendants , hiding behind the vial of the justice system represented by their insurance company betting that the afflicted plaintiff would loose pitted against their assigned attorney in litigating the whole case. Plaintiff would not be EQUAL in all phases of the case and before the Court. Then the Court compounded the effects by it's judicial indifference by issuing Journal Entries with wrong case captions, threats to dismiss the case with those wrong case captions, also having journal entries promptly file stamped then delaying scanning entry into the court journal record up to 20 days

IN THE INTREST OF JUSTICE, the Court MUST exhibit patience and tolerance to the Pro Se to permit the widest latitude in any effort to prove the charges made in his K.S.A. 60-212(c) Motion. See..91 C.J.S. P 126 HN 44__Pete v Henderson,124 Cal. App. 2d 487(1954),269 p .2d 78, 45 A.L.R. 2D 58(1st Dist. 1954). Our Supreme Court has said as much in it's interpreting K.S.A. 40-284 in Cannon v. Farmers Ins. Co.(Ks. Sup. Ct. 87,080(2002) implying that insurance company s not set obstacles to the victims seeking redress for injuries. AND in this same spirit Courts must not impose adopted rules that would shield the wrong doers from the PRO SE'S reach because of LACK of knowledge of the justice monopoly's procedures.

See Robert Bacharach & Lyn Entzeroth, Judaical Advocacy in Pro Se Litigation:; A return to Neutrality, 42 Ind. L.REV. 19, 22-26 (2009) (noting that Courts created ways to ensure that meritorious pro se suits would not be dismissed simply because the litigants lacked knowledge and experience, one of which was liberal construction).

See Iqbal, 129 S, Ct. at 1950 (" When there are well-pleaded factual allegations, a court should assume their veracity and then determine whether they plausibly give rise to an entitlement to relief,").The vexing of Judge Dahl by Progressive Ins. through their hired agent Pamela Welch.

See Drew A. Swank, The Pro Se Phenomenon, 19 BYU J. PUB. L. 373-75 (2005) (noting that the " American legal idea is that both the wealthy and the pauper could have access to the courts and could be treated equally with the resulting decisions being as fair as possible"). When a plaintiff pro se alleges trauma in mental process directly related to the actions of the defendants being amplified

See Swank,supra note I, at 1546 (discussing the importance of self-representation to the fundamental precept of equality before the Law) even to include the homeless, the poor.

See VanWormer, supra note 20, at 993 ("[t]he self-represented 'are more likely to...have problems understanding and applying the procedural and substantive LAW pertaining to their claim' (quoting Buxton, supra note 31, at 114).

See Edward M. Holt, How to treat "FOOLS" ; exploring the Duties Owed to Pro Se Litigants in Civil Cases, 25 J. LEGAL PROF. 167-69(2001) (asserting that the Supreme Court responded to the potential for UNFAIR dismissal of pro se cases by requiring Judges to liberally construe pro se litigant's complaints). A judge cannot order a trial wherein the pro se is ORDERED not to address the verdict questions during the so called trial that were presented to the Jury. This is way beyond unfair not even in America except at the time when slaves were legally owned as property.

See, e.g., Weixel v. Bd. Of Edue.,287 F .3d 138, 145-46 (2d Cir. 2002) (constructing a pro se complaint to make the best argument that the allegations suggest) ; Franklin v. Rose, 765 F .2d 82, 85 (6th Cir. 1985) (providing a pro se petition for habeas corpus an " active interpretation " to " encompass any allegation stating relief federal " (quoting White v. Wyrick, 530 F .2d 818-19 (8th Cir. 1976) (per curiam)))). Provides guidance in state cases.

See Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam) (admonishing the lower court for dismissing allegations as conclusion when they were adequate to put the [] matters in issue") the the establishing of the LAW of the case as set by Judge Woolley ""whether Mr. Moyer has set forth a legal justification for using his own iPhone to continue to tract and stalk Mr. Mendia after seeing the target iPhone moving around on his personal iPhone view screen, then with his own truck take Abby and Casey to Mr. Mendia's location to severely shadow his truck causing injuries and damages in violation of several LAWS.. not even at the so called trial.. [[Simply put, Courts should accept general statements regarding objectively verifiable facts, the motive for certain can be confirmed or disproved by evidence, while that conduct's constitutionality is a determination made only in light of such evidence.]] Mr. Moyer's admitted to statements ,admitted to under oath as plaintiff alleges, made to his progressive insurance company treated as sworn testimony confirming plaintiff's claims..

It is the will of the people that they have equal access and due process to their government ie: the Court guaranteed by the executive branch for the redress of their grievances based on the merits of the facts. This Law is supreme expressed in our Ks. Bill of Rights sec. #s 1 , 3 , 18. Statutes and / or rules that prohibit this fundamental right are prohibited. One example see, State v. Kelly, 244 P ,3d 639 (a Pro Se's failure to cite the correct statutory grounds for the claims made is immaterial).reversed and remanded. " Because the district court should have construed the motion to express the proper legal intent.). The people further will that a pro se's interest to present his case to the Court unhindered is of the most supreme importance to warrant constitutional protection. As this case warrants.

If that part of the judgment is attacked by a motion ,is contrary to the public policy, it is void under long established Law. See Exparte Windell, 152 Kan.776 (S. Ct. 6-1940 1935). KSA 60-260(b)(4) Judgment under attack. The so called Trial of November 5th and 6th,2018.

Conclusion

Jurisdiction [not the docketing statement]as regarding the poor , pro se is mandated by the people of Kansas in their Constitution and Bill of Rights # 1, #3, #18 guaranteeing access to government/courts to present grievances and have a decision on those claims rendered. Any obstacles by the Legislature or Courts are repugnant to the will of the PEOPLE TO SECURE SUCH RIGHTS.

The Appeals Court had authority to construe plaintiff post trial motion . See Ksa 60-2103 (a) " or **when no remedy is specified,** for such action as the Appellate court having jurisdiction over the appeal deems appropriate " means that ordinarily would have as in next in line the higher court.

WHEREFORE plaintiff prays the case be remanded for an evidentary hearing to establish the proper record to be used as the legal basis for a JUST decision 2. to grant the appeal to go forward. Addressing the denial of Judge Fleetwood's Journal Entry with the proof of favoritism in the transcripts.

Respectfully Submitted,
/s/
Eddie Mendia, 1706 Ellis
Wichita,Kansas -67211
316-993-5446

CERTIFCATE OF SERVICE

I certify that I have faxed this entire document to S Bruss @ 816-421-7195 on this 27th day of September , 2019 for the defendants and will confirm by phone.

Eddie Mendia
/s/