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IN THE Supreme Court of the United States

R. S. RAGHAVENDRA, Founder, Racial Equality Struggles For Columbia University Employees (RESCUE) Ad Hoc Committee, *Petitioner*.

v.

JANE E. BOOTH, THE TRUSTEES OF COLUMBIA UNIVERSITY, ET AL., Respondents.

In. Re. R. S. RAGHAVENDRA

On Petition for a Writ of Certiorari (on Mandamus Petition) to the United States Court of Appeals for the Second Circuit

PETITION FOR A WRIT OF CERTIORARI

R (Randy) S. Raghavendra, *M.B.A.*. RESCUE Ad Hoc Committee P.O. Box 7066, Hicksville, New York, 11802-7066 RSRaghavendra@Yahoo.Com (646) 229-9971 *Petitioner*

QUESTIONS PRESENTED

On July 11, 2018, by disregarding even the U.S. Equal Employment Opportunity Commission's recent 2016 finding, the Appeals Court denied Petitioner's Writ of Mandamus petition to reverse a permanent injunction issued by non-recusing District Court Judge Paul A. Crotty -- against whom Criminal Complaints are already pending before U.S. Attorney/FBI and New York State Attorney General for obstruction of justice and other corrupt practices to induce payment of at least a \$215,000 "BRIBE" in the guise of bogus attorney fees to his friend/ financial-interest and Petitioner's own one-ofsix-cases/out-going/40-hours Attorney Louis Stober by Defendant Columbia University in exchange for masterminding an elaborate betraying, fraud scheme, and also engaging in other disbarrable attorney misconduct by demanding even totally baseless. unprecedented. UNTHINKABLE and \$5,000/day fines against his own client (Plaintiff) to:

- (1) prevent a \$200 Million Dollars (Coca Cola & TEXACO-Style) Class Action against Columbia;
- (2) indefinitely stay the already scheduled jury trial as ordered by New York State Supreme Court Justice Joan Kenney; and
- (3) prevent completion of expressly agreed arbitration for immediate organization of an Anti-Discrimination Minority Employees Association even after the period (2003-2009) of that 265-years old prestigious University's worst racial crisis.

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Previously, on July 30, 2009, Columbia attorneys, in collusion with his own one-of-sixcases/out-going/40-hours attorney Stober induced Petitioner – a 57-years old, highly respected executive with the spirit of Dr. Martin Luther King – to sign a 2-Page Arbitration Contract by using false pretexts and promises to complete an expressly agreed arbitration under exclusive jurisdiction of labor arbitrator, Martin Scheinman, F. for immediate organization of the first Equal Opportunity Promoting "Minority Employees Association" at 265-yeears old Columbia.

The FOUR questions presented are as follows:

- I. Did the Appeals Court Err or Violate Petitioner's First Amendment Right to Petition the Courts by Failing to Issue a Writ of Mandamus for Reversing the Permanent Injunction Issued by Non-Recusing District Judge Paul A. Crotty – Who Has Also Been Criminally Charged with Obstruction of Justice and Aiding & Abetting Perjury and Fraud to Induce Payment of At least a \$215,000 Bribe in Guise of Bogus Attorney Fees to His Friend/"Financial-interest and Petitioner's Own One-of-Six-Cases/Out-Going/ Client-Betraying/40-Hours Attorney Stober?
- II. Did the Appeals Court Err by Failing to Enforce the Federal Arbitration Act and Chevron Doctrine by Not Compelling Expressly Agreed Arbitration Under Jurisdiction of the Labor Arbitrator, Martin F. Scheinman, for Organization of the EEOC-Authorized First Equal Opportunity Promoting "Minority

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Employees Association" at the 265-Years old Columbia University?

- III. Did the Appeals Court Err by Failing to Enforce the Seventh Amendment of the United States Constitution and 28 U.S.C. § 2283 (Anti-Injunction Act/Younger Abstention) by Not Issuing a Declaratory Order Allowing Petitioner to Complete Already Scheduled But (Fraudulently) Stayed Jury Trial that was Ordered by New York State Supreme Court Justice Joan Kenney in His 2003 Main Action Where Defendant Columbia President Lee C. Bollinger Would Have Been Compelled to Testify Regarding His Prestigious University's Institutionalized Race Discrimination Practices?
- IV. Did the Appeals Court Err by Failing to Enforce 28 U.S.C. § 455 (Federal Judge Recusal Law) and Code of Judicial Conduct by Not Ordering the Recusal of District Judge Crotty

 Who Had Openly Engaged in Various Corrupt
 Practices to Legitimize the Payment of At Least a \$215,000 Bribe in the Guise of Bogus
 Attorney Fees to His Friend/Financial-Interest and Petitioner's Own One-of-Six-Cases
 /Client-Betraying/40-Hours Attorney Stober by the Powerful Defendant Columbia University?

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PARTIES TO THE PROCEEDING¹ AND CORPORATE DISCLOSURE

Petitioner is R (Randy) S. Raghavendra, Founder of the Racial Equality Struggles for Columbia University Employees (RESCUE) Ad Hoc Committee. Petitioner is not a corporation.

Respondents are Jane E. Booth, General Counsel of Columbia University, and The Trustees of Columbia University in the City of New York (a private institution of higher education). Hon. Paul A. Crotty is the district judge against whom the Writ of Mandamus Petition is being sought.

As of July 2009, Petitioner had an impending \$200 Million Dollars (Coca Cola & TEXACO-Style) Class Action on behalf of thousands of alleged victims of institutionalized discrimination in employment and three other already pending actions. Petitioner had two main pro se cases in the New York State Supreme Court and two supplementary cases in the Federal District Court. One-of-six-Cases/Out-Going/40-hours/attorney Louis Stober was attorney on record in one and only the 2006 (back-pay damages) case.

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¹ This writ of certiorari petition is based on the most recently filed 17-cv-4480 (Continuing Employment Discrimination & Retaliation and Breach of 2009 Arbitration Contract) case that was originally assigned to District Judge Robert W. Sweet but was improperly transferred to the non-recusing District Court Judge Paul A. Crotty who had repeatedly denied any kind of fact-finding whatsoever in this matter during the past eight years in any of the Petitioner's improperly dismissed three other cases and without allowing for the completion of the expressly agreed arbitration under . Judge Crotty had openly condoned perjury, attorney fraud and other misconduct and has obstructed the independent prosecution of any "perjury, fraud and bribery" related claims in any other courts.

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