

No. _____ 06-80 JUL 17 2006

In The OFFICE OF THE CLERK
Supreme Court of the United States

STATE OF LOUISIANA, through the
DEPARTMENT OF TRANSPORTATION
AND DEVELOPMENT,

Petitioner,

vs.

ALBERT ROUYEA, ET AL.,

Respondents.

**On Petition For Writ Of Certiorari To The
Supreme Court Of The State Of Louisiana**

PETITION FOR WRIT OF CERTIORARI

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and Development*

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QUESTIONS PRESENTED FOR REVIEW

1) May a state court ignore the federal legislative prohibition embodied in 23 U.S.C. § 409, regarding the discovery of, admission as evidence, or consideration for other purposes of data compiled pursuant to the purposes of the Highway Safety Act, set forth in 23 U.S.C. § 130, 144, and 152, by allowing the plaintiff to introduce into evidence the Department of Transportations and Development's "Highway Needs and Priorities" information?

2) Is information compiled pursuant to the purposes of the Highway Safety Act, but before the passage of 23 U.S.C. § 409, subject to the federal statutory prohibition regarding its discovery, admission as evidence, or consideration for other purposes in any action for damages?

No. 06-81 JUL 13 2006

In The OFFICE OF THE CLERK
Supreme Court of the United States

MARALYN S. JAMES,

Petitioner,

v.

METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY
NASHVILLE PUBLIC LIBRARY,

Respondent.

**On Petition For A Writ Of Certiorari
To The United States Court Of Appeals
For The Sixth Circuit**

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether the decision of the Sixth Circuit which is inconsistent with this Court's subsequent decision in *Burlington N. & S.F.R. Co. v. White*, 548 U.S. ___, No. 05-259, slip op. 1-18 (June 22, 2006) should be remanded to the Sixth Circuit for reconsideration.

2. Whether an employer may be held liable for retaliatory discrimination under Title VII by depriving the employee of her career and the opportunity to draw her full service pension after she made complaints of age and disability discrimination.

Supreme Court, U.S.
FILED

No. 06-06-82 JUL 19 2006

IN THE OFFICE OF THE CLERK
Supreme Court of the United States

HARTFORD FIRE INSURANCE COMPANY,
Petitioner,

v.

JASON RAY REYNOLDS,
Respondent.

**On Petition for a Writ of Certiorari to the
United States Court of Appeals
for the Ninth Circuit**

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether the Ninth Circuit erred in holding, in acknowledged conflict with other circuits, that a defendant may “willfully” violate Section 616 of the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681n, by acting merely in “reckless disregard” of statutory obligations, rather than by acting with knowledge that its conduct violates FCRA.

2. Whether the Ninth Circuit erred in creating new and open-ended disclosure requirements for adverse action notices beyond the discrete list expressly set forth in Section 615 of FCRA, 15 U.S.C. § 1681m(a).

In the Supreme Court of the United States

MOHAMMED HUSSAIN,

Petitioner,

v.

R. JAMES NICHOLSON, SECRETARY,
DEPARTMENT OF VETERAN'S AFFAIRS,

Respondents.

**ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE D.C. CIRCUIT**

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

- 1) Does this Court's recent decision in *Burlington v. White*, 126 S. Ct. 2405 (2006), compel reversal of the Court of Appeals' decision in *Hussain v. Nicholson*, 435 F. 3d 359 (2006), which defined an "adverse action," under the retaliation provision of Title VII of the Civil Rights Act of 1964, as a significant change in employment status, such as hiring, firing, failing to promote?
- 2) Do *Reeves v. Sanderson Plumbing Prod.*, 530 U.S. 133 (2000) and *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 250 (1986) compel reversal of the Court of Appeals' decision, where the court accepted as fact the disputed assertions of the employer and ignored the plaintiff's evidence?
- 3) Does *Pennsylvania State Police v. Suders*, 542 U.S. 129, 134 (2004), compel reversal of the Court of Appeals' decision in *Hussain*, holding that Dr. Hussain's claim did not meet the standards of a hostile work environment or constitute constructive discharge?
- 4) Does *Chandler v. Roudebush*, 425 U.S. 840 (1976), holding that district court proceedings are *de novo* proceedings which entitle a plaintiff to discovery in that forum, compel reversal of the Court of Appeals' denial of discovery, in part, because Dr. Hussain had begun discovery in his EEOC proceedings before filing suit?
- 5) Do *Conley v. Gibson*, 355 U.S. 41, 45-46, 47-48 (1957) and *First National Bank of Arizona v. Cities Service Co.*, 391 U.S. 253, 298 (1968) and Fed. R. Civ. P. Rule 56(f) compel reversal of the Court of Appeals' grant of summary judgment to Defendant, based on factual affidavits of Defendant's agents, where plaintiff has been denied discovery necessary to rebut their factual allegations?

06-84 JUL 19 2006

No. _____
~~OFFICE OF THE CLERK~~

IN THE
Supreme Court of the United States

SAFECO INSURANCE COMPANY OF AMERICA, ET AL.,
Petitioners,

v.

CHARLES BURR, ET AL.,
Respondents.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

PETITION FOR A WRIT OF CERTIORARI

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July 19, 2006

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QUESTION PRESENTED

Whether the Ninth Circuit erred in holding that a defendant can be found liable for a “willful” violation of the Fair Credit Reporting Act (“FCRA”) upon a finding of “reckless disregard” for FCRA’s requirements, in conflict with the unanimous holdings of other circuits that “willfulness” requires actual knowledge that the defendant’s conduct violates FCRA.

No. 06-85 JUL 19 2006

OFFICE OF THE CLERK

In The
Supreme Court of the United States

MARICOPA COUNTY SHERIFF'S OFFICE,
JOE ARPAIO, THE DULY ELECTED
SHERIFF OF MARICOPA COUNTY, et al.,

Petitioners,

v.

U.S. DISTRICT COURT FOR
THE DISTRICT OF ARIZONA,

Respondent.

**On Petition For A Writ Of Certiorari
To The United States Court Of Appeals
For The Ninth Circuit**

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED FOR REVIEW

1. Whether the Ninth Circuit erred in declining jurisdiction as to Petitioners' Writ of Mandamus where the District Court has failed to make a ruling upon Petitioners' Motion to Terminate this litigation pursuant to 18 U.S.C. § 3626, which has been pending since September 25, 2001, and where the same statute requires a prompt ruling on such a motion.
2. Whether the Ninth Circuit erred in declining jurisdiction as to Petitioners' Writ of Mandamus where the District Court has failed to terminate this litigation pursuant to 18 U.S.C. § 3626, and where the same statute specifies that prospective relief related to jail operations that were in existence when the statute was enacted becomes terminable no later than April 26, 1998.

FILED

No. 06-87 JUL 18 2006

OFFICE OF THE CLERK

In The
Supreme Court of the United States

—◆—
GREG ALAN MORGAN,

Petitioner,

v.

UNITED STATES OF AMERICA, ET AL.,

Respondents.

—◆—
**On Petition For Writ Of Certiorari
To The United States Court Of Appeals
For The Ninth Circuit**

—◆—
PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

Whether the court of appeals erred in concluding that this Court's decision in *Foman v. Davis*, 371 U.S. 178 (1962) grants district courts' discretion to deny an amendment asserted under the first sentence of Fed.R.Civ.P. 15(a)? (Second Appeal).

Whether the court of appeals erred in holding that "military bases" are exempt from the probable cause requirement of the Fourth Amendment to the United States Constitution? (First Appeal).

U.S. SUPREME COURT, U.S.
FILED

06-88 JUL 14 2006

OFFICE OF THE CLERK

In the
Supreme Court of the United States

BAYER CORPORATION AND WYETH,
Petitioners,

v.

JAMES E. ANDERSON, et al.,
Respondents.

On Petition for a Writ of Certiorari to the United
States Court of Appeals for the Ninth Circuit

PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED

Whether plaintiffs asserting claims only against diverse defendants can defeat a defendant's right to remove, based on diversity jurisdiction, by improperly joining (a) plaintiffs asserting claims against non-diverse defendants, and (b) non-diverse defendants against whom they assert no claims?