

Roxanne Grinage, Plaintiff Pro Se
In the process of moving. Service may only be received Electronically at
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www.HireLyrics.org

2:09-cv-04119-MSG GRINAGE v. FERN BROWN CAPLAN, ESQUIRE et al
MITCHELL S. GOLDBERG, presiding
Date filed: 09/10/2009

November 9, 2009

VIA HAND DELIVERY

Michael E. Kunz, Clerk of Court
United States District Court for the Eastern District of Pennsylvania
601 Market Street, Room 2609
Philadelphia, PA 19106-1797

Re 2:09-cv-04119-MSG

Dear Clerk of Court:

Please find enclosed, Plaintiff's timely Response to Defendant Lisette Shirdan Harris' 11/02/09 Motion to Dismiss Second Amended Complaint claiming judicial immunity in 1983 Civil Rights Act; and Plaintiff Pro Se's Coerced Withdrawal Under Duress and Certificate of Service affirming true and correct copy provided via electronic service to Defendant's attorney Michael Daley and detailed Certificate of Service lawful explanation as to why no other service copies are provided to non-answering contemptuous Defendants in 2:09-cv-04119-MSG.

A proof of delivery service affidavit is published in the event Clerk of Court rejects described Response and Coerced Withdrawal Under Duress for any reason.

Respectfully submitted,

/s/

Roxanne Grinage

enclosure

IN THE UNITED STATES EASTERN DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

28 USCS 453

Solemn Oath of Justices and Judges

"I do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as under the Constitution and laws of the United States. So help me God."

Roxanne Grinage,

for the sake of truth in public record

Plaintiff Pro Se

v.

FERN BROWN CAPLAN, et al.

Defendants.

Judicial Oath Canon 2(B): Outside Influence.

A judge should not allow family, social, political, financial, or other relationships to influence judicial conduct or judgment. A judge should neither lend the prestige of the judicial office to advance the private interests of the judge or others nor convey or permit others to convey the impression that they are in a special position to influence the judge. A judge should not testify voluntarily as a character witness.

**OFFICIAL CORRUPTION
FRAUD CIVIL RIGHTS ACTION**

2:09-cv-04119-MSG

PLAINTIFF ROXANNE GRINAGE'S RESPONSE TO DEFENDANT JUDGE LISETTE SHIRDAN HARRIS' MOTION TO DISMISS SECOND AMENDED COMPLAINT CLAIMING JUDICIAL IMMUNITY IN 1983 CIVIL RIGHTS ACT.

JUDICIAL IMMUNITY DOES NOT EXIST FOR JUDGES WHO ENGAGE IN CRIMINAL ACTIVITY, FOR JUDGES WHO CONNIVE WITH, AID AND ABET THE CRIMINAL ACTIVITY OF ANOTHER JUDGE, OR TO A JUDGE FOR DAMAGES SUSTAINED BY A PERSON WHO HAS BEEN HARMED BY THE JUDGE'S CONNIVANCE WITH, AIDING AND ABETTING, ANOTHER JUDGE'S CRIMINAL ACTIVITY.

Defendant Philadelphia Family Court Judge Lisette Shirdan-Harris' 11/02/09 Electronically Filed Motion To Dismiss Exhibit A is Smoking Gun Confession of Guilt Indisputable Evidence Proof of Willful Complicit Accessory to Thirteen Counts grown to Seventeen Counts of Official Corruption, Child Abuse, Fraud of Several Tax Payer funded and several Economy Recovery Act Stimulus Funded Agencies; Conspiracy and Cover Up of Civil Rights Capital Crimes violating constitutional rights of Victim Plaintiff Pro Se and Roxanne Grinage's family. Defendant Judge Lisette Shirdan-Harris Acted Outside Judicial Capacity in Violation of Judicial Oath Canon 2(B): Outside Influence.

PLAINTIFF ROXANNE GRINAGE'S RESPONSE TO DEFENDANT JUDGE LISETTE SHIRDAN HARRIS' MOTION TO DISMISS SECOND AMENDED COMPLAINT CLAIMING JUDICIAL IMMUNITY IN 1983 CIVIL RIGHTS ACT.

JUDICIAL IMMUNITY DOES NOT EXIST FOR JUDGES WHO ENGAGE IN CRIMINAL ACTIVITY, FOR JUDGES WHO CONNIVE WITH, AID AND ABET THE CRIMINAL ACTIVITY OF ANOTHER JUDGE, OR TO A JUDGE FOR DAMAGES SUSTAINED BY A PERSON WHO HAS BEEN HARMED BY THE JUDGE'S CONNIVANCE WITH, AIDING AND ABETTING, ANOTHER JUDGE'S CRIMINAL ACTIVITY.

and

FEDERAL CRIME VICTIM WITNESS PLAINTIFF PRO SE DOES HEREBY WITHDRAWAL FROM HOPE OF REDRESS IN 2:09-CV-04119-MSG COERCED TO DO SO UNDER DURESS AS A RESULT OF DISCRIMINATION IMPOSED BY COUNTER INTUITIVE LEGAL STANDARDS WHICH ENSNARE VICTIM PLAINTIFF IN FAVOR OF CORRUPTION AND

**FRAUD IN FIRST JUDICIAL DISTRICT COURT OF COMMON PLEAS PHILADELPHIA
FAMILY COURT IN THE CAPACITIES LISTED HEREIN PUBLISHED FOR THE SAKE OF
TRUTH IN PUBLIC RECORD TO RESPECTFULLY SUGGESTED, RESPONSIBLE
RECORDED, US ECONOMY AND COURT REFORM AND CPS CORRUPTION
ADMINISTRATIVE SOLUTIONS TOOL, PROTOTYPE DEVELOPMENT OF US CITIZENS
CONTROLLED PUBLIC INCIDENT REPORT DOCKET DATABASE.**

COMES NOW, Plaintiff Pro Se Roxanne Grinage (“Official Corruption Fraud Civil Rights Crime Victim Plaintiff” and/or “Federal Crime Victim Witness”) for the sake of truth in public record, in her capacity as a US Citizen and Natural Guardian of an American Family as Guardianship has not been lawfully reappointed and as an Official Corruption Fraud Civil Rights Federal Crime Victim Witness Plaintiff Pro Se who is forced by coercion to withdraw under duress submitting proofs of discrimination suffered in United States District Court for the Eastern District of Pennsylvania and US Attorney’s Office for the Eastern District of Pennsylvania which perpetuate a legal monopoly in favor of Official Corruption Fraud Civil Rights Philadelphia Family Court attorneys and judges by imposing counter intuitive legal standards chock full of procedural traps which ensnare Federal Crime Victim Witness Pro Se in a Docket Case Management Agenda which is not conducive to truthful fair and accurate adjudication but is Decisively Prejudicial in Favor of Corrupt Philadelphia Family Court Defendants Attorneys and Judges captioned in 2:09-CV-04119-MSG and Defendants’ Philadelphia Family Court Judges Complicit Accessory Accomplices, Robert J. Matthews and Elizabeth Jackson relative to the constitutional capital crimes proven to have occurred in the criminally fashioned August 17, 2009 Philadelphia Family Court custody order DR No. 0C0705124. Proofs responsibly recorded, respectfully reported herein.

I. Defendant Judge Lisette Shirdan-Harris’ 11/02/09 Motion To Dismiss Plaintiff’s Second Amended Complaint should be Denied. Defendant Philadelphia Family Court Judge Lisette Shirdan-Harris’ 11/02/09 Electronically Filed Motion To Dismiss Exhibit A is Smoking Gun Confession of Guilt Indisputable Evidence Proof of Willful Complicit Accessory to Thirteen Counts grown to Seventeen Counts of Official Corruption, Child Abuse, Fraud of Several Tax Payer funded and several Economy Recovery Act Stimulus Funded Agencies; Conspiracy and Cover Up of Civil Rights Capital Crimes violating constitutional rights of Victim Plaintiff Pro Se and Roxanne Grinage’s family. Defendant Judge Lisette Shirdan-Harris Acted Outside Judicial Capacity in Violation of Judicial Oath Canon 2(B): Outside Influence and is not entitled to Judicial Immunity.

1. This Court should not allow the onerous offenses of Defendant attorneys judges captioned in 2:09-cv-04119-MSG and complicit Philadelphia Family Court accomplice Judges Robert J.

Matthews and Elizabeth Jackson to remain unchallenged for making mockery of the citizens and families of Philadelphia County including Victim Plaintiff Pro Se, Grinage/Brown family and US District Court for the Eastern District of Pennsylvania as a judicial authority for seeking lawful redress and application of our Constitution as promised in 28 USCS 453, Solemn Oath of Justices and Judges, "I do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as under the Constitution and laws of the United States. So help me God."

2. Defendant Philadelphia Family Court Judge Lisette Shirdan-Harris' electronically filed 11/02/09 Exhibit A is the smoking gun confession of guilt indisputable evidence proof of Philadelphia Family Court Judge Lisette Shirdan-Harris' willful complicity in the constitutional capital crimes committed and subsequent conspiracy to cover up, which fashioned thirteen counts grown to seventeen counts Philadelphia Family Court Defendant Fern Brown Caplan's proven criminally connived with Philadelphia Family Court Defendant Timothy E. Possenti's Philadelphia Family Court August 17, 2009 custody order DR No. 0C0705124.

3. Defendant's 11/2/09 Exhibit A is August 17, 2009 criminally contrived Philadelphia Family Court custody order indisputable evidence proof of Philadelphia Family Court Defendant Judge Lisette Shirdan Harris' willful complicity and subsequent conspiracy to cover up the constitutional civil rights violations which occurred in Philadelphia Family Court DR No. 0C0705124 and which fashioned the family and Pennsylvania and United States economy destroying criminally contrived August 17, 2009 Philadelphia Family Court Defendant Fern Brown Caplan's August 17, 2009 criminal custody order recommendation in DR No. 0C0705124.

4. Defendant Judge Lisette Shirdan-Harris may not use a smoking gun confession of guilt indisputable evidence proof of Defendant's willful complicit accessory and subsequent conspiracy to cover up proven criminally contrived August 17, 2009 Philadelphia Family Court Division's DR. No. 0C0705124 as a defense and should apologize for having set her name to the onerous Grinage/Brown family and Pennsylvania and United States Economy Destroying criminally contrived August 17, 2009 DR No. 0C0705124 Philadelphia Family Court recommended order of Defendant Fern Brown Caplan.

5. US District Court for the Eastern District of Pennsylvania should be offended that Official Corruption Fraud Civil Rights Defendant(s) in 2:09-cv-04119 would offer as a defense the smoking gun confession indisputable evidence proof of willful complicity and deliberate cover up of Defendants Fern Brown Caplan, Timothy E. Possenti and Lisette Shirdan Harris' criminal roles in the August 17, 2009 DR No. 0C0705124 criminally contrived Philadelphia Family Court order which is the product of thirteen counts grown to seventeen counts of Official Corruption Fraud and Civil Rights Crimes against Victim Pro Se's family and Pennsylvania and United States Economy.

6. Defendant Judge Lisette Shirdan-Harris' Exhibit A electronically filed 11/02/09 is onerously offensive to both Official Corruption Fraud Civil Rights Victim Plaintiff Pro and Pennsylvania State and American Taxpayer families in general and This Court should be as offended as the Philadelphia County Community which is victimized by onerous submission of smoking gun evidence indisputable evidence proof of Defendant Lisette Shirdan-Harris' willful complicity and cover up of thirteen crimes of official corruption fraud and civil rights crimes grown to be seventeen which include Judicial Perjury Sua Sponte Bench Warrant of Philadelphia Family Court complicit accessory to child abuse accomplice judge Robert J. Matthews who entered and has not withdrawn terrorist Judicial Perjury Sua Sponte Bench Warrant order the arrest of Victim Plaintiff Pro Se and her daughter to "hold and bring before Judge Robert J. Matthews only).

7. This Court should not allow the onerous offenses of Defendant attorneys judges captioned in 2:09-cv-04119-MSG and complicit Philadelphia Family Court accomplice Judges Robert J. Matthews and Elizabeth Jackson to remain unchallenged for making mockery of the citizens and families of Philadelphia County including Victim Plaintiff Pro Se, Grinage/Brown family and US District Court for the Eastern District of Pennsylvania as a judicial authority for seeking lawful redress and application of our Constitution as promised in 28 USCS 453, Solemn Oath of Justices and Judges, "I do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as under the Constitution and laws of the United States. So help me God."

II. Summarized below Victim Plaintiff's Exhibit A embedded herein and incorporated by reference, 07/20/09 47 Pages Custody Complaint including Fern Brown Caplan destroyed Exhibits A through H Family Court Clerk charged Victim Plaintiff Grandparents Grinage/Brownson \$111.36 to create DR No. 0C0705124 and destroyed by Official Corruption Fraud Civil Rights Defendant Fern Brown Caplan, Esquire connived with Defendant Timothy E. Possenti, to identify and place Victim Plaintiff Pro Se Natural Guardian Grandmother Roxanne Grinage's Grandbabies in the most abusive situation so they could continue the arrogant cover up of the 13 counts grown to 17 counts of Official Corruption Fraud and Civil Rights Violations for Financial Gain including extortion, obstruction of education and highest risk for personal injury or wrongful death in auto accident.

III. Philadelphia Family Court official corruption fraud civil rights criminal custody order DR 0C0705124 Facts for which proofs have been provided but blocked for fair and accurate adjudication due to counter intuitive legal procedures which ensnare Victim Plaintiff Pro Se and force coerced withdrawal under duress since the 09/10/09 onset of 2:09-cv-04119-MSG; wherein Official Corruption Fraud Civil Rights Crime Victim Plaintiff Pro Se began seeking fair redress (to make right what is wrong) in The United States District Court For The Eastern District of Pennsylvania ("This Court"); and for which voluminous proofs are reiterated and detailed herein; and which have been responsibly recorded and respectfully reported by Roxanne Grinage to United States District Judge Mitchell S. Goldberg and United States District Court For The Eastern District of Pennsylvania ("This Court") and United States Attorney Michael L. Levy ("US Attorney's Office") and First Judicial District Court of Common Pleas Philadelphia Family Court Division ("Philadelphia Family Court") and Federal Bureau of Investigation ("FBI") and Philadelphia's District Attorney ("DA") and Philadelphia Office of Inspector General ("OIG") and a HireLyrics Administrative Services fifteen member managed service list of Whitehouse Executive Officers including Homeland Security in care of Rahm Emanuel Chief of Staff and certain Supreme Court Justices; have been made known to United States District Court Judge Mitchell S. Goldberg of United States District U.S District Court for the Eastern District of Pennsylvania ("This Court").

- a. THE CORRUPTION, CONSPIRACY AND CONSTITUTIONAL RIGHTS CRIMES WHICH BIRTHED THE PROVEN CRIMINAL FERN BROWN CAPLAN RECOMMENDED SIGNED BY DEFENDANT JUDGE LISETTE SHIRDAN HARRIS CRIMINAL AUGUST 17, 2009 RECOMMENDED THIRTEEN COUNTS GROWN TO SEVENTEEN COUNTS OFFICIAL CORRUPTION FRAUD CIVIL RIGHTS WERE PROVEN TO FIRST JUDICIAL DISTRICT COURT OF COMMON PLEAS PHILADELPHI FAMILY COURT DIVISION **BEFORE** FERN BROWN CAPLAN PRESIDED AUGUST 14, 2009 PHILADELPHIA FAMILY COURT RULE TO SHOW CASE HEARING DR. NO. 0C0705124.
- b. Inserted Next Pages in an effort to avoid censorship as Plaintiff Roxanne Grinage's eight (8) pages of Exhibits were excluded from docket entry by purported "service by hard copy" of 09/10/2009 Complaint which were proofs of Roxanne Grinage's urgent pleas for protection and assistance to US Attorney's office US District Court for the Eastern Pennsylvania Clerk of Court ECF registration application, request for information regarding how to ask US District Court for Protection Restraining Order against Corrupt Philadelphia Family Court and Philadelphia Sheriff's office defendants; request for federal counsel, and 10/16/2009 Amended Complaint Exhibits which embedded the actual **fraudulent documents forged** by Defendant Timothy E. Possenti to summon Victim Plaintiff Pro Se to **Phony** rule to show cause hearing 10/16/2009 which prove Timothy E. Possenti shares corrupt relationship with someone in Philadelphia Family Court's Clerk office turning back the date filed stamp clock to forge phone court documents which resulted in the Philadelphia Family Court **Judicial**

Perjury Sua Sponte bench warrant arrest order of Judge Robert J. Matthews to “arrest hold and bring before Judge Matthews only” Roxanne Grinage Victim Plaintiff.

August 12, 2009

<p><u>Fax: (215) 686-4157</u> Honorable Kevin Dougherty Administrative Judge Family Division Personally and Professionally</p> <p><u>Fax: 610-627-5562</u> Timothy E. Possenti, Esq. P.C Bar Attorney Personally and Professionally</p>	<p><u>Fax: (215) 686-2913</u> Custody Masters, Individually and Jointly, Personally & Professionally Michael A. Horan, Esq., Fern B. Kaplan, Esq. Michael Schoneitz, Esq. Kathleen, Secretary</p> <p>Total Page 5 with Enclosures</p>	<p><u>Fax: (215) 686-9308</u> Mark Alleva, Clerk of the Family Court Individually and Jointly with Staff Personally and Professionally</p> <p>Re: 0C0705124</p> <p align="center">Proposed Order August 14 Rule To Show Cause</p>
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NOTICE: Flagrant uncorrected errors; censored and reversed case caption; plaintiff grandparent Brownson served at co-defendant mother’s address; docketed and consolidated for discussion at rule to show cause hearing without service on plaintiffs, co-defendants’ counterclaims against plaintiffs of grave and serious nature, including “illegal dealings with the IRS”, and unfounded “death threats” against plaintiff grand parents’ still not served upon plaintiffs; Family Court’s Clerk of Court and staff receiving and acting on correspondence of defense counsel without service or courtesy copy to plaintiffs: PUT **GRINAGE/BROWN FAMILY CHILDREN AT RISK OF ASSAULT, EMOTIONAL AND PHYSICAL INJURIES, AND LOSS OF EARNINGS** caused by reasonably anticipated unqualified orders of presiding custody masters who are without accurate and timely information to make qualified decisions concerning custody of the Grinage/Brown family children. **CCP PHILA COUNTY FAMILY COURT DIVISION EMPLOYEES ARE NOTIFIED THAT ANY ACTION/ORDER OR COURT ERROR WHICH RESULTS IN THE ABDUCTION OF GRINAGE/BROWN CHILDREN BY PROVEN MAL-PRACTICING DHS CASEWORKERS** will result in the Class Action Federal Supreme Court Litigation seeking to leverage personal and professional accountability against incompetent or dishonest Family Court/Attorney/Child Welfare decision makers; described in attached **August 12th Letter Posting to Supreme Court Justices Breyer, Scalia and Fifteen member managed service list of President Barack Obama’s Executive Staff and Officers and entered as Plaintiffs’ Exhibit I. Reference: 07/20/09 Complaint, Exhibits A through H inclusive; Reference: CP9912-06081/2 and 2/2; JD6901-99-09; CCPDeICTY98-15494; CCP Philadelphia OC/9901120 (Honorable Retired Nicholas M. D’Alessandro); DHS#152335-B; Victim Impact Statement to Hon. Sheldon C Jelin; Pennsylvania Crime Victim Compensation Claim No.: 20-0066-B will be included with Plaintiffs Responses, labeled J through Q** which cannot be entered until such time as Family Court lawfully serves co-defendants’ grave and serious 7/21/09 counterclaims upon plaintiffs.

OFFICIAL CORRUPTION FRAUD CIVIL RIGHTS FEDERAL CRIME VICTIM WITNESS PRO SE HAS PROVEN THE CORRUPTION, CONSPIRACY AND CONSTUTIONAL RIGHTS CRIMES WHICH BIRTHED THE PROVEN CRIMINAL FERN BROWN CAPLAN RECOMMENDED SIGNED BY DEFENDANT JUDGE LISETTE SHIRDAN HARRIS THIRTEEN COUNTS GROWN TO SEVENTEEN COUNTS OFFICIAL CORRUPTION FRAUD CIVIL RIGHTS CRIMES **BEFORE** AUGUST 14, 2009 DEFENDANT FERN BROWN CAPLAN PRESIDED RULE TO SHOW CAUSE HEARING WHICH BIRTHED CONNIVED CRIMINAL PHILADELPHIA FAMILY COURT AUGUST 17, 2009 CUSTODY ORDER IN DR. NO 0C0705124.

August 12, 2009

VIA FAX (202) 456-2461

Justice Stephen Breyer

"The court has found no single mechanical formula that can accurately draw the constitutional line in every case."

RAHM EMANUEL, CHIEF OF STAFF
THE WHITE HOUSE
1600 PENNSYLVANIA AVENUE, NW
WASHINGTON, D.C. 20500

Justice Antonin Scalia

"What in the world is a 'moderate' interpretation of a constitutional text? Halfway between what it says and what we'd like it to say?"

SUBHEADING ADDED: "Roxanne Grinage Respectfully Suggested Administrative Solutions for U.S. Economy Recovery, In The Trenches Qualified Contribution, Administrative Solutions for Traditionally Systemized Administrative Challenges", published and issued April 5, 2009 to President Barack Obama and fifteen Whitehouse Executive Officers via Managed Service List.

UNCHALLENGED PERVERSION OF FAMILY COURT/ATTORNEY/CHILD WELFARE ETHICS HAS EVOLVED RAPACIOUS CREDITOR MECHANISM WHICH FEEDS UPON, IN MECHANIZED FASHION, U.S. ECONOMY RECOVERY STIMULUS PLANS AND BUDGET IMPLEMENTATION. WOULD BE U.S. PRODUCT CONTRIBUTORS, CHILDREN AND FAMILIES, ARE INJURED OR DESTROYED BEFORE QUALITY OF LIFE CREATIVE WORK PRODUCT CONTRIBUTIONS OF EDUCATION, ENGINEERING, ENTERTAINMENT, TECHNOLOGY, LITIGATION, COMMUNITY SERVICE, DESIGN, ART, MILITARY/DEFENSE, MENTORING, HOUSING AND HEALTH CARE CAN BE CULTIVATED AND DELIVERED TO CONSUMER MARKETS.

Dear Supreme Court Justices and President Obama's 15 Executive Staff & Officers,

The American tragedy headlined above, exposed by journalists, directors and media and sadly documented within my nine year demonstration of invention of business method, standard access to administrative services that when rendered contingently enable fair entry into competitive processes to cause earnings and exposure opportunities for the previously unseen, unmeasured and unaccommodated Worldwide Population of Disadvantaged Creators© (www.HireLyrics.org); Can no longer be denied for its holistic detrimental impacts on U.S. Economy.

Kindly note addition of data tracking category within published draft prototype development U.S. economy and quality of life enhancing administrative solutions tool, respectfully suggested, **U.S. Citizens Controlled Public Search Incident Reporting Docket Thread Database** (shorter name pending). Free download of forty-five page document issued to President Obama's fifteen member Whitehouse Executive Staff and Officers April 6, 2009 via Managed Service List is available at top of home page of www.HireLyrics.org. Links to Video Journalism and Free Players of archived Radio Broadcasts documenting announced draft development of U.S. Citizens Controlled Public Incident Report Docket Thread Database are available on Home page of www.HireLyrics.org.

This notifies our Federal Government that constitutional rights are so flagrantly violated in our U.S. lower Family Courts, resulting in the mechanized abduction, emotional and physical injuries of children. HireLyrics is advising every American in our portal constituency to enforce our Constitutional Rights by issuing **Warnings of Intent to Seek Class Action Federal Court Scrutiny** which Individually and Personally sues for the personal assets of each and every Family Court Administrative Judge; Clerk; Custody and Support Master who docket and consolidate for discussion at Rule To Show Cause hearing without service upon respondents, claims as serious as "illegal IRS dealings" and allegations of "death threats"; negligently practicing Bar Attorneys who take \$800 from their poor father defendant client, use their relationship with Clerk of Court secretaries to ask for and receive continuances – take their wife and three sons on vacation while advising their defendant father not to speak to his child until the

pushed back court date. Unethical attorney conducts result in unfair advantage to nurturing of attorney's children while poor defendant father's children are emotionally harmed when the child calls his dad repeatedly to share good news and accomplishments and are emotionally injured when their father repeatedly hangs up the telephone without even hearing his child's voice, on the advice of the unethical. American families will seek to recover damages from the personal assets of every Staff member within the Clerk of Court's office who noted for deliberately making clerical errors in service of time sensitive documents; censoring and reversing case captions; intended to convolute for the purpose of extorting money from trusting parent/family protectors of children. Lastly, we will seek to have damages incurred by American Families as a result of Family Court/Attorney/Child Welfare machine-like assaults upon futures acknowledged by suing for personal assets and demanding the criminal prosecution of each and every Family Court Employee/Attorney/Child Welfare case worker, including so-called Chief Administrative Judges who can be shown to have ignored or played any part in any child's risk of injury, abuse and death known to be maximized when the unsavory ethics of the perverted Family Court/Attorney/Child Welfare "machine" crushes the American Family by abducting U.S. children into the horrors of Child Welfare case worker malpractice. Respectfully submitted, Roxanne Grinage

President Obama's Executive Office Managed Service List

Honorable President Barack Obama The White House 1600 Pennsylvania Avenue NW Washington, DC 20500	Dennis Blair Director National Intelligence Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500	Valerie Jarrett Senior Advisor The White House 1600 Pennsylvania Avenue NW Washington, DC 20500
Rahm Emanuel Chief of Staff The White House 1600 Pennsylvania Avenue NW Washington, DC 20500	Thomas A. Daschle Secretary Health and Human Services Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500	Melody Barnes Executive Office of The President Domestic Policy Adviser Director Domestic Policy Council Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500
Jim Messina Deputy Chief of Staff The White House 1600 Pennsylvania Avenue NW Washington, DC 20500	Elena Kagan Attorney General Justice Department Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500	Ray LaHood Secretary Transportation Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500
Mona Sutphen Deputy Chief of Staff The White House 1600 Pennsylvania Avenue NW Washington, DC 20500	Hillary Clinton Secretary of State Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500	Pete Rouse Senior Advisor The White House 1600 Pennsylvania Avenue NW Washington, DC 20500
David Axelrod Senior Advisor The White House 1600 Pennsylvania Avenue NW Washington, DC 20500	Celia Elena Rouse, Member Austan Goolsbee, Member Council of Economic Advisors Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500	Tim Geithner Secretary Treasury Department Executive Office of The President 1600 Pennsylvania Avenue NW Washington, DC 20500

**Warnings of Intent to Seek Class Action Supreme Court Scrutiny
Unchallenged Constitutional Rights Violations are Injuring Families in
First Judicial District, Court of Common Pleas, Philadelphia County, Family Court Division**

Courtesy Copy: Mayor Michael Nutter

Warnings Intent to Sue Copies via Facsimile: Mark Alleva personally and Clerk of Court clerical staff, Custody Masters Unit and Bar Attorney(s) serving as Custody Masters and their secretaries and clerical support staff, Chief Administrative Judge Dougherty who has "looked the other way" while flagrant errors conspicuous for favoring unethical defense counsel, prevent qualified decisions of Fran B. Caplan,

Esquire, Michael A. Horan, Esquire and Michael Schoneitz, Esquire and increase the chances that at least one custody master attorney will cause further injury to family in DR No. 0C0705124, by making unqualified and constitutional rights violating decision to destroy Grinage/Brown family children by returning the DHS mechanism substantially documented for causing generational injuries to the Grinage/Brown family.

Co-Plaintiffs reserve the right to produce copies, broadcast, or publish as needed, to protect Grinage/Brown family and our children from further risk of injuries; or to recover excessive costs and/or damages and/or loss of earnings being experienced caused by Court of Common Pleas, Family Court Division, Clerk of Court's Office, and Custody Masters Unit's Numerous, Flagrant and Uncorrected, Procedural and Clerical Errors, which Conspicuously Favor Defense Counsel Timothy E. Possenti, Esq., PC and are not necessarily in the best interest of any party including Defendant/Father, a valued member of the Grinage/Brown Family.

Tim Possenti

From: V R Roeder [roeder15@comcast.net]
Sent: Tuesday, August 18, 2009 12:22 PM
To: Timothy E. Possenti
Subject: Hair test for E. B.

FINANCIALLY INCENTED - V R Roeder, PhD. Is actually a Delaware County Custody Evaluator who lives in media close to Family Court favored Timothy E Possenti. As a Certified School Psychologist, V. Richard Roeder, PhD offers to manipulate Positive for Cocaine and Crack Cocaine Drug Screen Results by suggesting waiting until September and getting Timothy Possenti's addiction impaired client to pay \$225.00 to further block life saving health care Timothy E. Possenti's addiction impaired extorted client and valued member of Grinage/Brown family Victim Plaintiff Pro Se's son in law.

Mr. Possenti - Mr. E. Brown's hair test covers a period of time from the date of the test on August 12, 2009 back approximately four months to the beginning of April 2009. Mr. Brown had indicated to me that he had not used cocaine since the end of December 2008. While it would be somewhat unusual, it is possible that if he were consuming an extremely large amount of cocaine until the end of December, that cocaine in his body might continue to be absorbed into his hair into the first or second week of April 2009. The only way that this could be established would be to perform a segmented test on his hair sample to determine when the cocaine was absorbed into the hair sample (during the past 40 days, the middle 40 days, or the first 40 days). Assuming that there was no cocaine found in the first or second hair sample, it would indicate that he had not used cocaine in at least the past 80 days. I am not sure if the laboratory has enough hair remaining from the original sample to perform the segmented test, and if that were performed, there would be an additional charge of \$100. If the laboratory requires an entirely new hair sample, the charge would be \$225 for the segmented test. If Mr. Brown has not used cocaine in the past 6 to 8 months, he should be able to produce a totally clean hair sample without segmented testing by the end of September 2009. Sincerely, V. Richard Roeder PhD

FALSIFIED CASE CAPTION

FALSE RECORD. Grandparents Roxanne Grinage and Willie Brownson were the Petitioners Complainants in DR No. C75124. All evidence including 47 Pages including Exhibits A through H Grinage Brownson 7/20/09 Complaint, \$111.26 filing fee filed evidence destroyed and covered up by Fern Brown Caplan presided 8/14 Rule to Show Cause Hearing.

FALSE RECORD. No requirements of proof for statements made against Plaintiff Mother and Grandmother, i.e., "Rambling", "Paranoid", History of Mental Illness, was required by Caplan. Caplan accepted perjury testimony of CHOP social worker which relied on identity theft of Sondra Justice who was never a foster mother and rejected Roxanne's binder full of proofs that slanderous comments made by Timothy E. Possenti about the history of Grinage/Brown family were documented in prior courts as false.

CIVIL AND CONSTITUTIONAL RIGHTS VIOLATIONS

FERN CAPLAN IS HEARD ON DIGITAL RECORDING SAYING "WHATEVER" AND "I DIDN'T EVEN READ IT."

FINANCIALLY INCENTED CRIMINALLY ENDANGERING ORDER MADE BY CAPLAN 2 DAYS BEFORE SHE LEARNED POSITIVE FOR COCAINE AND CRACK COCAINE TEST RESULTS OF TIMOTHY POSSENTI'S CLIENT. Fern Brown Caplan ordered all parties to urine tests August 14 and is heard on digital recording of hearing that she would extend courtesy to Timothy E. Possenti to wait until Monday the 17th for his client's hair follicle drug tests. Fern Brown Caplan concealed August 14th urine test results and wrote order August 17th without waiting for Timothy E. Possenti's promised Hair Follicle Tests. Roxanne picked up a copy of the Fern Brown Caplan recommended August 17th order that Lisette Shirdan Harris signed on August 18th before Timothy E. Possenti submitted Positive for Cocaine and Crack Cocaine Drug Test Results for his client in writing by fax to Fern Brown Caplan on August 19th.

EVIDENCE CENSORED/DESTROYED

ROXANNE GRINAGE CAN BE HEARD ON DIGITAL EVIDENCE FILE ASKING WITNESSES IF THEY HAD ANY KNOWLEDGE OF DISEASE OF ADDICTION AND FERN CAPLAN CONSTANTLY SUSTAINED POSSENTI'S OBJECTIONS TO DESTROY ALL EVIDENCE OF PRIOR DHS AND FAMILY COURT MALPRACTICE VICTIMIZATIONS OF GRINAGE/BROWN FAMILY AND ALL QUALIFIED EVIDENCE ABOUT THE FATAL DISEASE OF ADDICTION THAT IS TERMINAL IF NOT TREATED WITH HEALTH CARE.

CASE ID. 0C0705124 ORDER DATE: 17TH AUGUST, 2009

**COMMON PLEAS OF PHILADELPHIA COUNTY
FAMILY COURT DIVISION**

CASE ID. 0C0705124

ORDER

2009, IT IS HEREBY ORDERED AS FOLLOWS:

AND EVIDENCE OFFERED AT HEARING ON PETITION FOR CUSTODY, BY AND ON BEHALF OF FERN BROWN, CHOP SOCIAL WORKER AND FATHER'S ORDER IS ENTERED, PENDING HEARING ON ON 1/25/10, AT 9AM, IN CTRM 5, 34 S

ORDER IS HEREBY VACATED.

ERICK BROWN SHALL HAVE SHARED LEGAL CUSTODY (9/22/06) AND ARRIYEL BROWN

EVERY SATURDAY, FROM 10AM TO 7PM: AND VISITS BY THE PARTIES. IF MOTHER OBTAINS CUSTODY OF CHILDREN, HER VISITS MAY BE EXTENDED TO 10PM. FATHER SHALL BE RESPONSIBLE FOR

GRANDMOTHER ROXANNE GRINAGE, BEING CUSTODY TO BE SHARED WITH MOTHER AS AGREED AND

ORDER BEFORE MASTER SCHONZEIT ARE

TO ASSIST IN THE IMPLEMENTATION OF THIS

ORDER WITHOUT PREJUDICE TO ANY PARTY, PENDING

Lisette Shirdan Harris
HONORABLE LISETTE SHIRDAN-HARRIS J.

Page 1

PURSUANT TO Pa.R.C.P. 236(b)

Fern B. Caplan
Custody Master

AUG 18 2009

FIRST JUDICIAL DISTRICT OF PA
USER I.D.: KFW

6. CIRCLE ONE:

A. A complaint/petition is being filed with this petition.

B. A complaint/petition was filed on _____ (date) and a hearing has been scheduled on _____ (date).

Grandparents: 11 page Notarized Affidavit + 36 pp Proofs Attached 07/20/09

7. Petitioner believes that a situation exists that requires an emergency listing because:

a. On 07/05/09 Erick Brown (father) moved in with a woman & her 13 yr old son & 18 yr old daughter he met in May when grandparents confronted him about his latest drug & alcohol relapse & leaving the kids with girlfriend & older children until 10:30pm same day kids got shots & needed to be watched for convulsions.

b. On 07/10/09 Lorraine Grinage (mother) took Ezekiel and Arriyel from their familiar home, toys, clothes, potty training and learning to read, with grandparents who have cared for and supported the children all of their lives, to her room in a rooming house where she has her boyfriend, Russell Robinson, visit overnight.

c. 07/13 - 07/15, Lorraine told grandmother she sent kids to stay with Erick Brown and new girlfriend's older kids overnight in exchange for Erick promising to pay her child support. Both Parents are endangering babies Ezekiel and Arriyel by having them sleeping around & leaving babies with boyfriends/girlfriends & older kids.

and 7/17 thru 7/19 - Lorraine told us last night kids at 972 Anchor St. with Sandra Sullivan on 7/20 & 7/21. Please help us go with Police to get Ezekiel & Arriyel. We have no contact - No way of knowing what is happening to them at 972 Anchor

WHEREFORE, petitioner respectfully requests that this honorable court grant the following relief:

Grandparents Pray for Reliefs listed in Notarized Affidavit with Proof Exhibit A, B, C, D, E, F, G and H AND AS Summarized and Pasted at the bottom of this page. Petitioner's house.

Date: 07/20/2009 July 20, 2009

X Roxanne Grinage Grandmother

Petitioner

X Willie L Brownson grand father

I verify that the statements made in this petition are true and correct. I understand that false statements herein are made subject to the penalties of PA. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 07/20/2009

X Roxanne Grinage

X Willie L Brownson grand father

Petitioner

PLAINTIFF/PETITIONER GRANDPARENTS RESPECTFULLY PRAY COURT, DHS, AND LAW ENFORCEMENT GRANT RELIEFS THAT WILL PROTECT BABIES EZEKIEL BROWN (DOB: 9/22/06) AND ARRIYEL R. BROWN (DOB: 07/22/08) IN THE FOLLOWING WAYS:

1. ORDER BOTH PARENTS, LORRAINE GRINAGE BROWN and ERICK L. BROWN, TO RETURN EZEKIEL (dob: 09/22/06) and ARRIYEL (dob: 07/22/08) to the children's familiar safe home of Grandparents, Roxanne Grinage and Willie Brownson, 8239 Frankford Avenue, Apt. 110, Philadelphia, Pa. 19136, to be reunited with the children's familiar toys, books, clothes, beds, nutritious meals, learning to read, walk, talk, potty training, obs, sesame street and national geographic online activities and tutorials, and stability for a PERIOD OF AT LEAST SIX (6) MONTHS. PLEASE GIVE GRANDPARENTS' PERMISSION

ORDER ARREST OF ERICK L. BROWN and/or LORRAINE GRINAGE BROWN and/or SAUNDRA SULLIVAN, IF EITHER OR ALL DEFENDANTS PARTICIPATE IN KIDNAPPING/TRANSPORTING THE CHILDREN FROM GRANDPARENTS' HOME, ANY COURT APPEARANCE, ANY NURSERY SCHOOL, TWELVE STEP RECOVERY MEETING, PLAYGROUND, OR ANY DHS APPOINTMENT for a PERIOD OF AT LEAST SIX (6) MONTHS.

ORDER SAUNDRA SULLIVAN STAY AWAY FROM BABIES EZEKIEL AND ARRIYEL BROWN. SAUNDRA SULLIVAN HAS CRIMINAL INTENTIONS REGARDING LORRAINE and ERICK BROWN'S CHILDREN, EZEKIEL and ARRIYEL BROWN.

Plaintiff Grandparents offered Proofs that were Censored by Caplan in 7/20 Petition and Complaint 47 Pages Exhibits A through H. This says: ORDER SAUNDRA SULLIVAN STAY AWAY FROM BABIES EZEKIEL AND ARRIYEL BROWN, SAUNDRA SULLIVAN HAS CRIMINAL INTENTIONS REGARDING LORRAINE AND ERICK BROWN'S CHILDREN AND ARRIYEL BROWN. Plaintiff Grandparents have reason to believe that: (1) Philadelphia Civil Dockets show multiple car accidents where Plaintiff Sandra Sullivan settles out of court after minor child has been injured - Sandra Sullivan continues to drive Ezekiel and Arriyel in her vehicle with and without either parent while being hearing disabled, collecting social security disability for hearing disability. Three (3) Civil Court Cases Auto Accident in 2002 and 2007 where Sandra Sullivan sued and settled when her minor aged daughter was injured and details of Accident Reports in 2202 and 2007 show she was hit because of her inability to hear. (2) Sandra Sullivan is defrauding Social Security Administration, earning money by assisting Erick Brown in his illegal repairs of cars on the street and at her house while collecting Social Security Disability for hearing disability; and (3) Sandra Sullivan Announces pool Parties at her house for neighborhood children when she is supposedly hearing disabled in both ears. PLEASE ORDER SAUNDRA SULLIVAN, (Father's Girlfriend) to STAY AWAY FROM BABIES EZEKIEL AND ARRIYEL BROWN FOR A PERIOD OF A LEAST 18 MONTHS OR AS LONG AS THE COURT WILL ALLOW.

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

ROXANNE
Petitioner

FAMILY COURT
DOMESTIC RELATIONS DIVISION

WILLIE
Respondent

DRS

TEMPORARY EX PARTE
ORDER

AND NOW, THIS 20TH day of July, 2009, upon

Consideration of the matter before this Court, it is hereby

ORDERED, ADJUDGED AND DECREED that PENDING FURTHER ORDER OF COURT, MATERNAL GRANDMOTHER, ROXANNE GRINAGE AND MATERNAL STEP-GRANDFATHER, WILLIE BROWNSON A/K/A BROWNSON ARE AWARDED SHARED PHYSICAL AND LEGAL CUSTODY OF THE CHILDREN: EZEKIEL BROWN, D.O.B. 9/22/06 AND ARAIYEL BROWN, D.O.B. 7/22/08. ALL LAW ENFORCEMENT TO ASSIST IN THE FORTHWITH RETURN OF SAID CHILDREN TO THE CUSTODY OF THE MATERNAL GRANDPARENTS.

Michael G. Hoover, Esq.
Curtis D. Hoover

BY THE COURT:
[Signature]

OFFICE OF THE CLERK OF COURT
PHILADELPHIA COUNTY
1500 MARKET STREET
PHILADELPHIA, PA 19102
TEL: 215-686-1000

PSYCHEMEDICS CORPORATION

HAIR ANALYSIS DRUG TEST RESULTS Patented Technologies

CLIENT

Voice: (610) 892-0800 / Fax: (610) 892-9997

V. Richard Roeder, Ph.d
 V. RICHARD ROEDER, PHD
 211 N. Monroe Street
 2nd Floor
 MEDIA PA 19063

Client Code: RICROE
 Entity ID: 10011965
 OCF ID: K522563

Date Collected: 08/12/2009
 Date Received: 08/13/2009
 Date Reported: 08/17/2009
 Test Use: Other

Lab ID: 116255941
 Subject ID: 256-41-9031
 Sample Length: 0 to 3.9cm

55# E, B
 90-120 days

Drug:	Result:	RIA Cutoffs:	Mass Spec Cutoffs:
COCAINE	Mass Spec POSITIVE	5 ng/10mg	5 ng/10mg
Parent drug and Metabolites present			
Cocaine:	Positive 13.5 ng/10mg		
Benzoylcegonine:	Positive 2.4 ng/10mg		
Cocaine ethylene:	Positive 1.8 ng/10mg		
NorCocaine:	Positive 0.7 ng/10mg		
OPIATES	Negative	2 ng/10mg	
PHENCYCLIDINE (POP)	Negative	3 ng/10mg	
AMPHETAMINES	Negative	5 ng/10mg	
MARIJUANA	Negative	2 ng/gm	

- Sample received with Chain of Custody Intact.
- A "Negative" result means that the drug was not detected in an amount that meets or exceeds the cutoff. A "Positive" result means that the drug was detected in an amount that meets or exceeds the Mass Spec cutoff.
- Technical questions concerning these results should be directed to the Laboratory Director. Please contact your Client Services Representative for assistance.

I certify that the sample identified by the Lab Identification Number on this result has been examined upon receipt, handled and analyzed in accordance with applicable procedures, and that the results set forth above are for that specimen.


 Gloria Amelgas, MT (ASOP)



TIMOTHY E. POSSENTI,
ESQUIRE, P.C.

30 West State Street
P.O. Box 715
Media, Pennsylvania 19063
610-627-5560
Fax: 610-627-5562
Email: TEPesquire@aol.com

August 19, 2009

VIA FAX 215-686-2913

Master Fern B. Caplan, Esquire
Philadelphia County Court of Common Pleas
Family Court Division
1133 Chestnut Street
Philadelphia, PA 19107

RE: *Grinage and Brownson v. Brown and Grinage*; No. 0C0705124

Dear Master Caplan:

Enclosed herewith please find the hair follicle drug test results for my client, Erick Brown. I asked Dr. Roeder to send me an email because Mr. Brown is adamant he has not used any illicit drugs since December of last year. I have enclosed that email message to me from Dr. Roeder for your review. I also understand the recent urine drug screen you ordered for him was negative. To be able to show at the next hearing that Mr. Brown is not using drugs and that he is being honest about the time of his last use, we intend to undertake the hair follicle test suggested by Dr. Roeder in September as outlined in his message.

I received these items at my office yesterday morning and I apologize it has taken me until today to send them to you. Your attention is most appreciated.

Very truly yours,

TIMOTHY E. POSSENTI

WILLFUL RECKLESS ENDANGERMENT. OBSTRUCTION OF HEALTHCARE. OBSTRUCTION OF EDUCATION.

Timothy Possenti, Esq. Willfully Recklessly Endangers Roxanne Grinage's grandchildren by suggesting in August 19th Fax to proven corrupt Fern B. Caplan, Esquire that Roxanne Grinage's small grand children should remain at highest risk of personal injury, obstruction of education, molestation, auto accident or drowning injury or wrongful death, abandonment, mental cruelty for 6 months egregiously implies that it's no big deal that Timothy Possenti's late produced test results of his addiction impaired client are in fact POSITIVE FOR COCAINE AND CRACK COCAINE SINCE HIS ADDICTION IMPAIRED CLIENT, ROXANNE'S SON IN LAW CAME TO LIVE WITH GRANDPARENTS AND THE CHILDREN APRIL 16TH. Timothy E. Possenti's egregious suggestion and Fern B. Caplan's and Shiridan-Harris and Elizabeth Jackson's participation in allowing the Willful and Reckless 6 month endangerment of Roxanne Grinage's grandchildren, obstructed educational opportunities, and obstruction of life saving healthcare for Timothy Possenti's, addiction impaired client is Financially Incented, Egregious, Corrupt and Criminal. Fern B. Caplan ordered 3 urine drug tests August 14th and concealed the results for Pro Se Plaintiffs, but Timothy E. Possenti writes in his August 19th Faxed Positive for Cocaine and Crack Cocaine Drug Results for his client "I understand the recent urine screen you ordered for Mr. Brown was negative." further proving the corrupt nature of Fern B. Caplan's conspicuous for violating civil constitutional right to pro se disclosure and discovery In favor of paid attorney, Timothy E. Possenti, Esq., PC. This is one more example of how Caplan favors paid attorney Possenti, to the detriment of Roxanne Grinage's family.

DESTROYED BY CORRUPTION DEFENDANT FERN BROWN CAPLAN, ESQUIRE

August 6, 2009, FORMAL LETTER NOTICE, Fax: (215) 686-9308, Mark Alleva, Deputized Prothonotary, Clerk of the Family Court, 1133 Chestnut Street, First Floor Philadelphia, PA 19107 Fax: (215) 686-2913, Michael A. Horan, Esquire, Acting Chief, Custody Master 46 S. 11th Street, Room 276, Philadelphia, PA 19107, Fax: 215-686-1757, Office of the Inspector General, City of Philadelphia, ATTN: Amy Kurland, The Curtis Center 601 Walnut Street, Suite 300 East, Philadelphia, PA 19106, CCP, Philadelphia, Family Court Division, Civil Action Custody Dr. No. 0C0705124

Dear Sirs and Madam,

Due to the injuries suffered by our family as a result of documented Family Court administrative errors and DHS caseworker malpractice 2000 and 2001, attached to Plaintiffs' 07/20/2009 Complaint as Exhibit B, pages 1 through 16 within the context of Exhibits A through H inclusive, incorporated by reference as if fully set forth herein; Roxanne Grinage is compelled to issue this FORMAL LETTER NOTICE regarding DR No. 0C0705124. This FORMAL LETTER NOTICE is transmitted via facsimile or certified mail and documents Roxanne Grinage's truthful and accurate experiences within the above matter for the period beginning 07/20/09 to 08/6/09.

CLERK OF COURT'S OFFICE STAFF IS PERFORMING DATA ENTRY UNAUTHORIZED ABBREVIATIONS OR DATA ENTRY TYPOS, WHICH CAUSE CASE CAPTION AND SUBSEQUENT FAMILY COURT PETITION AND FILINGS TO BE UNLAWFULLY CENSORED, REVERSED OR FALSIFIED.

FLAGRANT PROCEDURAL AND CLERICAL ERRORS OF FAMILY COURT CLERK'S OFFICE AND CUSTODY MASTER'S UNIT IN THE ADMINISTRATION OF DR. NO. 0C0705124 ARE CONSPICUOUS FOR FAVORING DEFENDANT'S COUNSEL, AND CONVOLUTE UNNECESSARILY COPLAINTIFFS' HOPE OF QUALIFIED ADJUDICATION AND QUALIFIED RULINGS IN THE BEST INTERESTS OF THE GRINAGE/BROWN FAMILY: LORRAINE GRINAGE, COPLAINTIFF/MOTHER, ERICK BROWN DEFENDANT/FATHER, AND THEIR CHILDREN EZEKIEL AND ARRIYEL BROWN. COPLAINTIFFS DO NOT RECEIVE SERVICE OR TIMELY COPIES OF CLERK'S DOCKETED ACTIVITY IN MATTER 0C0705124.

THIRD REQUEST TO CORRECT IMMEDIATELY CASE CAPTION DR NO. 0C0705124
L. GRINAGE, R.GRINAGE/BROWNSON v. ERICK L. BROWN
(Lorraine Grinage joined Co-Plaintiffs by Consent Agreement and 08/04/09 Petition To Modify Custody which was also docketed, consolidated with future hearing without service on parties)

1. 07/20/2009, Stamped Filed, Petition and Complaint
2. 07/20/2009, Temporary Ex Parte Order of Custody Master Michael A. Horan, Esq.; typo made in clerk's office showing a judge of different name "entered the Ex Parte Temporary Order on Lorraine's 08/04/2009, Petition To Modify Custody.
3. 07/30/2009, Letter of Roxanne Grinage to Clerk of Court, and Custody Master with emailed and faxed courtesy copy to Defendant's Counsel, Timothy E. Possenti, Esq.
4. 08/03/2009, Emailed communications between Roxanne Grinage and Defense Counsel, Timothy E. Possenti, Esq.

5. 08/04/2009, Stamped Filed, Co-Plaintiff Lorraine Grinage Petition to Modify Custody with Reversed Censored Falsified Unlawful Case Caption caused by clerical error.
6. 08/05/2009, Notarized Executed Consent Custody Agreement with Stipulations for drug treatment for Defendant Father Erick L. Brown and supervised visitation, by and between Lorraine Grinage, (formerly codefendant), joined with Co-Plaintiffs, Roxanne Grinage/Brownson.
7. 08/05/2009, Stamped Filed, Temporary Order of Protection, Lorraine Grinage and minor children Ezekiel and Arriyel Brown against Erick L. Brown, Respondent/Father before Judge Summers, August 10th.
8. Clerk of Court and Custody Master's office are permitting Defendant, Erick L. Brown's counsel, Timothy E. Possenti, Esq. to glean unfair advantaged from his prior building of relationships with Family Court staff in his capacity as a Bar Attorney, to the detriment of Co-Plaintiffs Pro Se, whose primary purpose for soliciting Court's adjudication, is to ensure best possible health recovery solutions for addict Erick L. Brown, Defendant/Father and the best and safest care, nurturing and education of Lorraine and Erick's children, Ezekiel and Arriyel (Ages 3 and 1).
9. Clerk of Court and Custody Master receive and act upon correspondence from defense counsel, Timothy E. Possenti, Esquire, P.C., docket, consolidate and relist without courtesy copy or service upon plaintiffs. Plaintiffs learned by telephoning Clerk's Office and then speaking with Kathleen in Custody Master's Unit that Timothy E. Possenti's request for continuance of 08/06/09 Rule To Show Cause hearing because he was "constrained to attend prepaid family vacation in upstate New York" (unopposed by Plaintiffs), was granted. On the date of this FORMAL LETTER NOTICE (08/06/09), Co-Plaintiffs Lorraine Grinage, Roxanne Grinage or Willie Brownson have not received written notice or subpoena from the Court confirming relisting of Rule To Show Cause hearing granted as a result of Timothy's E. Possenti's 8/03/09 fax to Court which denied Plaintiffs, pro se of any faxed or mailed courtesy copy. Kathleen in Custody Master's Office told Roxanne Grinage on telephone that subpoena/notices were in front of her to be mailed/served upon parties announcing relisted Rule To Show Cause Hearing Relisted August 14, still not received on August 6th by any Co-Plaintiffs (L. Grinage, R. Grinage/Brownson).
10. 08/03/2009, Email correspondence by and between Roxanne Grinage and Timothy E. Possenti, Esq. demonstrates that defense counsel, for whatever reason, refuses to courteously comply with Plaintiffs' emailed faxed letters of July 30th and August 3rd requesting timely courtesy copies of correspondence with the court that impact scheduling and is unnecessarily convoluting these quality of life impacting procedures.
11. 07/30/09, Plaintiffs' faxed letter of July 30, 2009 requesting service of Defendant's counter claims and courtesy copies of Defense Counsel's correspondence with the Court which impacts scheduling is attached. Clerk's Office and Defense Counsel continue to ignore July 30, 2009 written request of Co-Plaintiffs, Grinage, Grinage and Brownson.
12. 08/03/09, Clerk of Court and Custody Master's office are permitting Timothy E. Possenti, Esq. to glean unfair advantaged from his prior building of relationships with Family Court staff, to the detriment of Grinage/Brown Family, whose primary purpose is to ensure best possible health recovery solutions for addict Erick L. Brown, Defendant/Father and the best and safest care, nurturing and education of Lorraine and Erick's children, Ezekiel and Arriyel (Ages 3 and 1).

13. 08/03/09, Court Clerk, (Custody Master's Unit) is receiving and acting upon correspondence of Defense Counsel, Timothy E. Possenti, Esq. which impacts scheduling, Custody Master and Judge assignment in this matter without requiring Defense Counsel to courteously copy Co-Plaintiffs, Pro Se, unfairly favoring Defense Counsel's relationship with Court's staff and unlawfully imposing unfair disadvantage against Co-Plaintiffs, pro se, for preparing responses and producing evidence and witnesses, as well as, thwarting The Grinage/Brown family's primary purpose for seeking this Court's adjudication in this matter, i.e., the best health recovery for Erick L. Brown, Defendant/Father, Lorraine Grinage, Co-Plaintiff/Petitioner/Mother, and best possible care, nurturing and education of their children Ezekiel and Arriyel (Ages 3 and 1). Timothy E. Possenti, Esquire has served as Support Master and his name is prevalent on several Family Court Administration Meeting Minutes.
14. 08/03/09, Timothy E. Possenti's refusal to timely copy Co-Plaintiffs pro se on correspondence with the Court which impacts scheduling and Mr. Possenti's failure to perform service (COS) of his client, Erick L. Brown's 07/21/09 Counterclaims (docketed and consolidated with rule to show cause hearing) upon Co-Plaintiffs after two respectful requests to do so, before leaving on family vacation and after requesting and being granted continuance of rule to show cause hearing; are detrimental to the clarity of these Court proceedings and arrogantly disrespect the concerns of the Grinage/Brown family which are the timely best interest of our children and grandchildren. Court Clerk and Custody Master's Unit is permitting Defense Counsel to unfairly give higher priority to Timothy E. Possenti's family vacation priorities without affording Co-Plaintiffs' children and grandchildren equal consideration of timely service on Clerk's office activity on this case.
15. 08/04/09, Clerk's Office has Censored and Reversed Custody Matter Caption and Inserts Erroneous name of Court Authority which did not issue 07/20/09 Temporary Ex Parte Order, and abbreviates such that terms of 07/20/09 are unclear and Petitioner's Stipulation for Defendant/Father to have Supervised Visits are contingent on Erick L. Brown completed drug and alcohol treatment; probationary drug and alcohol testing; and that Lorraine's Order of Protection against Erick L. Brown require Erick L. Brown to coordinate with Plaintiff/Grandparents supervised visits in the event August 14th and November 23rd presiding Custody Master(s) or Judge(s) might order.
16. 08-04-09, 08-05-09 and 08-06-09, Plaintiff/Petitioner Clerk's Office stamped filed, Petition To Modify Custody, Petition For Order of Protection; and Petition Divorce Complaint; respectively against custody matter OC0705124 Defendant/Father Erick L. Brown and Clerk's False Reversed and Censored case caption was erroneously generated on the 08-04-09, 08-05-09 and 08-05-09.
17. 08/05/2009, Erick L. Brown is Sole Defendant in Civil Action Custody DR No. OC0705124. There is NO LAWFUL SERVICE of any filing of Erick Brown v. Roxanne Grinage and Court's record must be corrected without further delay. Former Co-Defendant, Lorraine Grinage, Mother is Joined By Consent Agreement with Plaintiff Grandparents. If Clerk's office data entry fields do not permit Clerk's staff to enter full names of Co-Plaintiffs, kindly abbreviate CORRECT CASE CAPTION ALL MAILERS ALL DOCUMENTS: GRINAGE, GRINAGE, BROWNSON V. ERICK L. BROWN
18. 08/06/2009, Mr. Possenti, Esquire apparently has left for vacation, after being granted continuance and relisting of which Co-Plaintiffs are not notified or made aware of in writing. Further, Mr. Possenti, Esquire apparently has left for vacation, ignoring Plaintiffs' respectful request to be served with his client's, Defendant, Erick L. Brown's, 07/21/2009,

Answers and Counterclaims which have been docketed and consolidated for discussion at Rule To Show Cause Hearing without service on Plaintiffs.

19. 08/04/09, 08/05/09, 08/06/09, CLERK'S STAFF FAMILY COURT DATA ENTRY ERROR IS AUTOMATICALLY REPLICATED WITHIN SUBSEQUENT RELATED CASE OPENINGS, i.e., PETITION TO MODIFY CUSTODY FILED BY MOTHER COPLAINTIFF/PETITIONER 08/04/09; PETITION ORDER OF PROTECTION FILED BY COPLAINTIFF/PETITIONER MOTHER, 08/05/09 AND DIVORCE COMPLAINT FILED BY COPLAINTIFF/PETITIONER MOTHER, 08/06/09.
20. Plaintiffs Pro Se learn about case activity by calling Clerk's office and receive various and contradictory verbal representations depending on which staff member answers the telephone. Plaintiffs are entitled to lawful service of activity which affects a president Custody Master's or Judge's knowledge of the quality of life impacting issues of any custody case. Kindly standardize Court procedures to include Co-Plaintiffs, L. Grinage, R. Grinage and Brownson v. Erick L. Brown. CORRECT ALL MAILERS ALL DOCUMENTS DR. NO. 0C0705124.

Respectfully submitted,

/s/

Roxanne Grinage

cc: Timothy E. Possenti, Esq. (via fax 610-627-5562 w/ Custody Consent Stipulation)
Erick L. Brown c/o Sandra Sullivan girlfriend (via 8/6/09 hand delivery service of TOP)

Co-Plaintiffs reserve the right to produce copies, broadcast, or publish as needed, to protect Grinage/Brown family and our children from further risk of injuries; or to recover excessive costs and/or damages and/or loss of earnings being experienced caused by Court of Common Pleas, Family Court Division, Clerk of Court's Office, and Custody Masters Unit's Numerous, Flagrant and Uncorrected, Procedural and Clerical Errors, which Conspicuously Favor Defense Counsel Timothy E. Possenti, Esq., PC and are not necessarily in the best interest of any party including Defendant/Father, a valued member of the Grinage/Brown Family.

ROXANNE GRINAGE PROVES CRIMES OF FERN BROWN CAPLAN AND TIMOTHY E. POSSENTI, ESQ., PC NEXT PAGES.

Fax From L. GRINAGE, R GRINAGE/BROWNSON

AUGUST 6, 2009 Fax Letter From Victim Plaintiff Pro Se Roxanne Grinage to

TO: Fax: (215) 686-4157, Honorable Kevin Dougherty, Administrative Judge, Family Division 1801 Vine Street – Suite 314, Philadelphia, PA 19103, Fax: (215) 686-9308, Mark Alleva Deputized Prothonotary, Clerk of the Family Court, 1133 Chestnut Street, First Floor, Philadelphia, PA 19107, Fax: 610-627-5562, Timothy E. Possenti, Esq. P.C, 30 West State Street, Media, PA 19063,

Re: Phila. County, CCP, Family Court Division, Civil Action, DR. NO.: OC0705124

Note: Court's cancellation and relisting notice of 6-Aug-09 hearing is postmarked 5-Aug-09 and received in 6-Aug-9 mail.

CLERK OF COURT DOCKETED AND CONSOLIDATED WITH RULE TO SHOW CAUSE HEARING WITHOUT SERVICE UPON PLAINTIFFS, 07/21/09 COUNTERCLAIMS OF DEFENDANT. PLAINTIFFS ARE UNFAIRLY ASKED TO "SHOW CAUSE"/DEFEND AGAINST PETITION/CLAIMS WHICH HAVE NOT BEEN MADE KNOWN TO DEFENDANTS BY SERVICE OF SAME.

CLERK OF COURT, CUSTODY MASTERS AND DEFENDANT'S COUNSEL ARE NON-RESPONSIVE TO PLAINTIFFS' 07/30/09 AND 8/06 PLEAS FOR TIMELY SERVICE OF DEFENDANT'S 07/21/09 COUNTERCLAIMS.

Dear Hon. Dougherty, will you please cause service of Defendant's 07/21/09 docketed and consolidated for discussion at Rule To Show Cause hearing to be timely served upon Co-Plaintiffs so that we might become qualified to show cause/defend against claims made by Defendant, Erick L. Brown?; or Please GRANT Continuance of Rule To Show Cause hearing until such time as numerous administrative errors performed in clerk's office and detailed in attached

08/06/2009, FORMAL LETTER NOTICE PROCEDURAL AND CLERICAL ERRORS OF CLERK OF COURT/CUSTODY MASTER RISK QUALIFIED ADJUDICATION OF CCP PHILA. FAM. CT. DIV. CIV. CUSTODY DR. NO. 0C0705124. L. GRINAGE, R. GRINAGE/BROWNSON v. ERICK L. BROWN, are corrected? Thank you.

STIPULATION:

COPLAINTIFFS MOTHER AND GRANDPARENTS ASK FAMILY COURT AND LAW ENFORCEMENT TO ORDER AND SUPERVISE DRUG AND ALCOHOL, 28 DAY IN-PATIENT, AND ONE YEAR AFTER CARE TREATMENT, INCLUDING 90 NARCOTICS ANONYMOUS MEETINGS IN 90 DAYS AND LAW ENFORCEMENT (PROBATION) ADMINSTRATED/SUPERVISED REGULAR AND RANDOM DRUG AND ALCOHOL URINE AND BREATHALIZER TESTING FOR A PERIOD OF NOT LESS THAN SIX MONTHS OF ERICK L. BROWN, Defendant Father AND DEFENDANT FATHER, ERICK L. BROWN BE GRANTED SUPERVISED VISITS WITH SUBJECT CHILDREN IN CCP PHILA. FAM CT DIV. CIVIL ACTION DR NO. 0C0705124

LORRAINE GRINAGE, mother and ROXANNE GRINAGE, grandmother, BELIEVE AND AGREE, Lorraine Grinage should share equally in legal and physical custody of her children for a period of six (6) months pending Erick L. Brown demonstrating recovery from the fatal disease of addiction and the increasing violent and abandonment behaviors associated with Erick L. Brown's frequent relapses.

Custody Masters in CCP Phila Family Court Division Civil Action No. DR OC0705124 ARE SO ADVISED THAT ABOVE CUSTODY AGREEMENT IS SUBSTANTIALLY PROVEN TO BE IN THE BEST INTEREST OF EZEKIEL AND ARRIYEL BROWN COURT RECORDED ACTIONS ATTACHED.

(1) Court Stamped Filed 08/05/09, Order of Protection against Erick L. Brown Lorraine Grinage, minor children, Ezekiel and Arriyel's

(2) Court Stamped Filed 08/04/09, Petition To Modify Custody Order Lorraine Grinage Co Plaintiff joined with Plaintiff Grandparents against Erick L. Brown

(3) Lorraine Grinage vs. Erick L. Brown Fault Divorce Petition Pending.

VERIFICATION

We, Roxanne Grinage and Lorraine Grinage, have sworn and signed in the presence of a notary public that the statements made in this Affidavit are true and correct. We understand that Pennsylvania laws provide for penalties relating to falsification of sworn and unsworn statements to Court authorities. Plaintiff Grandmother Co Plaintiff/Petitioner Mother

DESTROYED BY CORRUPTION DEFENDANT FERN BROWN CAPLAN, ESQUIRE

ROXANNE GRINAGE PROVES CRIMES OF FERN BROWN CAPLAN, TIMOTHY E. POSSENTI AND COMPLACENT CULPABILITY OF CLERK OF COURT, JUDGE LISETTE-SHIRDAN-HARRIS AND ADMINISTRATIVE JUDGE KEVIN DOUGHTERY
ROXANNE GRINAGE AND WILLIE BROWNSON PLAINTIFF/PETITIONER
GRANDPARENTS, PRO SE

July 30, 2009, VIA FACSIMILE ONLY, Fax: (215) 686-9308, Mark Alleva, Deputized Prothonotary, Clerk of the Family Court, 1133 Chestnut Street, First Floor, Philadelphia, PA 19107, Fax: (215) 686-2913, Michael Horan, Esquire, Acting Chief, Custody Master, 46 S. 11th Street, Room 276, Philadelphia, PA 19107, Fax: (215) 686-9286, Michael Schonzeit, Esquire
In care of, Lisa Dacri, Clerical Supervisor, Custody Masters, 46 S. 11th Street – Room 280 Philadelphia, PA 19107

Re: Roxanne Grinage and Willie Brownson v. Erick L. Brown and Lorraine Grinage
Phila. County, CCP, Family Court Division, Civil Action, DR. NO.: OC0705124
DEFENDANTS' July 21, 2009 ANSWERS and COUNTERCLAIMS were
DOCKETED and CONSOLIDATED WITHOUT SERVICE UPON PLAINTIFFS
Rule To Show Cause Rule Returnable, 6-AUG-09 @ 1:30pm Rm 280
Custody Masters Conference/Hearing, 23-NOV-09 @ 10:00am Rm 280

Dear Messrs. Alleva, Horan and Schonzeit:

Plaintiffs have learned that Defendants' 07/21/09 Answers and Counterclaims were docketed by Clerk of Court on 07/21/09 and Consolidated "for discussion" at the Rule To Show Cause hearing before Acting Chief Custody Master Michael Horan, Esquire, without Service upon Plaintiffs.

Plaintiffs respectfully request Clerk of Court anticipate and accept, for filing, Plaintiffs' Responses to Defendants' 07/21/09 Answers and Counterclaims and Plaintiffs' Amended Complaint to be fairly consolidated for "discussion" in the event Custody Master approves Defendant's attorney, Timothy E. Possenti's request for continuance of 6-AUG-09 Rule To Show Cause Hearing.

Plaintiffs are in receipt of Timothy E. Possenti, Esquire, P.C.'s courtesy copy of his July 28th letter to Custody Master Michael A. Horan, Esquire, entering Mr. Possenti's appearance as counsel for Defendant Erick L. Brown in the above matter. Plaintiffs respectfully ask Mr. Possenti to correct erroneous [DR. No. 0C1240705] styled in the "Re" line of his July 28th entry of appearance letter and to reflect correct Phila. County CCP Family Court Division Civil Action DR No. OC0705124, on all future filings and correspondence in this matter.

Plaintiffs request Mr. Possenti certify service (COS) to Plaintiffs of any court filings done by Mr. Possenti's office on behalf of Defendant Erick L. Brown, and to continue to provide courtesy copies of correspondence which impacts scheduling in this matter.

Plaintiffs do not oppose Mr. Possenti's request for continuance of August 6th Rule To Show Cause hearing as Plaintiffs share family values which support the importance of Mr. Possenti taking vacation with his family in upstate New York. Plaintiffs look forward to Court's written notice of any Custody Master's or Clerk's rescheduled dates in this matter.

Plaintiffs understand that 07/20/09 Temporary Ex Parte Order of Acting Chief Custody Master Michael A. Horan, remains enforce until further Ruling(s) of Custody Master at Court approved, scheduled or rescheduled Rule To Show Cause Hearing.

Plaintiffs herewith inform the Custody Master and Defendant's counsel of Plaintiffs Grandparents' willingness to participate in mediation, visitation consent agreements and stipulations that resolve this dispute in the best interests and safety of Ezekiel (09/22/06) and Arriyel (07/22/08), and Mr. Possenti's client, Defendant, Erick L. Brown, and Plaintiffs' daughter and the children's' mother, Lorraine Grinage. Drug Testing for father, Erick L. Brown is a substantially qualified demand of the Plaintiffs/Grandparents.

Plaintiffs respectfully give updated accounting to Custody Master with below excerpt from the Plaintiffs' Amended Complaint being drafted by Roxanne Grinage which Plaintiffs will file before Rule To Show Cause Hearing.

Mother/codefendant, Lorraine Grinage and Grandparent Plaintiffs have worked out temporary consent agreement which enables safe care of Ezekiel and Arriyel and overnight visits with the mother as much as Lorraine's landlady will permit until Custody Master's Rulings at Rule To Show Cause Hearing currently scheduled and possibly continued from 6-AUG-09 pending Custody Masters approval, and/or 23-NOV-09 Custody Masters Conference/Hearing before Michael Schoneitz.

cc: Timothy E. Possenti, Esquire, P.C. (via email TEPEsquire@aol.com and via fax (610) 627-5562), Lorraine Grinage (picked up in person when visiting children today 7/30/09).

07/07/09 ROXANNE GRINAGE PROVES CRIMES OF FERN BROWN CAPLAN, TIMOTHEY E. POSSENTI AND COMPLACENT CULPABILITY OF CLERK OF COURT, JUDGE Prior Injuries and Damages Suffered by Grinage/Brown Family Caused by Department of Human Services Child Welfare Malpractice and Family Court Misadministration. Dated July 7, 2007., Honorable Mayor John Street, Esteemed Cabinet Members Joyce Wilkerson, Chief of Staff, Pedro A. Ramos, Managing Director, Room 215 City Hall, Philadelphia, PA 19107, Via Facsimile: (215) 686-2180 Honorable Mayor Elect, Michael Nutter, 42 S. 15th Street, Suite 625, Philadelphia, PA 19102, Via Facsimile: (215) 545-4088, Via e-mail: Info@NutterForMayor.com, Certified Mail / Return Receipt, Lynne Abraham, District Attorney Three South Penn Square, Philadelphia, PA 19107-3499, Via Facsimile: 215-563-0047
Via e-mail: DA.WEBMAIL@phila.gov, Carol Wilson Spigner, DSW
Field Center for Children's Policy, Practice and Research of Pennsylvania, 3815 Walnut Street Philadelphia, PA 19104-6179, Via Facsimile: (215) 573-7199, Via e-mail: cwilliam@sp2.upenn.edu, Via Certified Mail / Return Receipt, Frank Cervone, Esquire, Executive Director, Support Center for Child Advocates, Philadelphia Children's Alliance Board Member, 1900 Cherry Street, Philadelphia, PA 19103, Via Facsimile: 215.925.4756
Via Certified Mail / Return Receipt John Delaney, Esquire, Philadelphia Children's Alliance Board of Director Member, Deputy District Attorney, Trial Division, Three South Penn Square Philadelphia, PA 19107-3499, Via Facsimile: 215-563-0047, Via e-mail: DA.WEBMAIL@phila.gov, Via Certified Mail / Return Receipt, Arthur C. Evans, Acting Commissioner DHS, Via e-mail: Arthur.C.Evans@phila.gov, Joseph E. Kuna
Acting Deputy Commissioner DHS, Via e-mail: Joseph.E.Kuna@phila.gov,
Ellen Walker, Director, Community-Based Prevention Services, Via email: Ellen.Walker@phila.gov, DHS Ombudsman, Department of Human Services, c/o Patrick J. Mullen, 1515 Arch Street 8th floor, Philadelphia, PA 19102, Deputy City Editors Philadelphia Inquirer, Dan Biddle, Julie Busby, Francisco Delgado, Conrad Grove, Via e-mail: dbiddle@phillynews.com, jbusby@phillynews.com, fdelgado@phillynews.com, cgrove@phillynews.com, Executive Editor, Patti Hassler, Leslie Stahl, Correspondent

60 Minutes, 524 West 57th Street, New York, NY 10019, Via Certified Mail / Return Receipt
Via e-mail: 60m@cbsnews.com,

Addressed specifically to Arthur C. Evans, Joseph E Kuna and DHS Ombudsman, This records my strongest hope that the learning of the Child Welfare Review Panel, and the Mayor's Executive Order to "expeditiously" implement the Panel's recommendations; "New Risk Assessment tools to be used by social workers in assessing the safety of children in homes;" is in time to save the life, health and future of my 9 month old grandson, Ezekiel Z. Brown.

Addressed specifically to, Mayor Elect Michael Nutter and Dr. Carol Spigner

I pray your visions and admirable work will be galvanized such that my 9 month old grandson might be spared the harms already experienced by my family as a result of the previously unexamined, unaccountable child welfare system in Philadelphia.

August 12, 2009, Fax: (215) 686-4157, Honorable Kevin Dougherty, Administrative Judge
Family Division, Personally and Professionally

Fax: 610-627-5562, Timothy E. Possenti, Esq. P.C, Bar Attorney, Personally and Professionally Fax: (215) 686-2913, Custody Masters, Individually and Jointly, Personally & Professionally, Michael A. Horan, Esq., Fern B. Kaplan, Esq., Michael Schoneitz, Esq.
Kathleen, Secretary

DESTROYED BY CORRUPTION DEFENDANT FERN BROWN CAPLAN, ESQUIRE

Total Page 5 with Enclosures Fax: (215) 686-9308, Mark Alleva, Clerk of the Family Court
Individually and Jointly with Staff, Personally and Professionally, Re: 0C0705124
Proposed Order, August 14 Rule To Show Cause

NOTICE: Flagrant uncorrected errors; censored and reversed case caption; plaintiff grandparent Brownson served at co-defendant mother's address; docketed and consolidated for discussion at rule to show cause hearing without service on plaintiffs, co-defendants' counterclaims against plaintiffs of grave and serious nature, including "illegal dealings with the IRS", and unfounded "death threats" against plaintiff grand parents' still not served upon plaintiffs; Family Court's Clerk of Court and staff receiving and acting on correspondence of defense counsel without service or courtesy copy to plaintiffs: PUT GRINAGE/BROWN FAMILY CHILDREN AT RISK OF ASSAULT, EMOTIONAL AND PHYSICAL INJURIES, AND LOSS OF EARNINGS caused by reasonably anticipated unqualified orders of presiding custody masters who are without accurate and timely information to make qualified decisions concerning custody of the Grinage/Brown family children.

CCP PHILA COUNTY FAMILY COURT DIVISION EMPLOYEES ARE NOTIFIED THAT ANY ACTION/ORDER OR COURT ERROR WHICH RESULTS IN THE ABDUCTION OF GRINAGE/BROWN CHILDREN BY PROVEN MAL-PRACTICING DHS CASEWORKERS will result in the Class Action Federal Supreme Court Litigation seeking to leverage personal and professional accountability against incompetent or dishonest Family Court/Attorney/Child Welfare decision makers; described in attached August 12th Letter Posting to Supreme Court Justices Breyer, Scalia and Fifteen member managed service list of President Barack Obama's Executive Staff and Officers and entered as Plaintiffs' Exhibit I. Reference: 07/20/09 Complaint, Exhibits A through H inclusive; Reference: CP9912-06081/2 and 2/2; JD6901-99-09; CCPDelCTY98-15494; CCP Philadelphia OC/9901120 (Honorable Retired Nicholas M. D'Alessandro); DHS#152335-B; Victim Impact Statement to Hon. Sheldon C Jelin; Pennsylvania Crime Victim Compensation Claim No.: 20-0066-B will be included with Plaintiffs Responses, labeled J through Q which cannot be entered until such time as Family Court lawfully serves co-defendants' grave and serious 7/21/09 counterclaims upon plaintiffs.

ROXANNE GRINAGE PROVES CRIMES OF FERN BROWN CAPLAN, TIMOTHY E. POSSENTI AND COMPLACENT CULPABILITY OF CLERK OF COURT, CULPABLE COMPLACENT FAMILY COURT JUDGES.

FIRST JUDICIAL DISTRICT, COMMONWEALTH OF PENNSYLVANIA COURT OF COMMON PLEAS, FAMILY COURT DIVISION

CIVIL ACTION CUSTODY DR. NO. 0C0705124 Incorrectly Captioned

PROPOSED ETHICAL O R D E R

(DESTROYED BY CORRUPTION DEFENDANT FERN BROWN CAPLAN, ESQUIRE)

AND NOW COMES, this 14th Day of August, 2009, and GRANTS Petitioner/Mother and Grandparents shared legal and physical custody with supervised visitation with defendant father Erick L. Brown, pending Erick L. Brown demonstrating clean time drug addiction relapse free for a period of 6 months and under no circumstance are children Ezekiel and Arriyel to be left unsupervised or transported with or by Sandra Sullivan, hearing disabled, functionally illiterate and multiple auto accident cash settling plaintiff in three Pennsylvania Civil Dockets.

J.

08/26/2009 Post

Email Thread between Timothy E. Possenti, Esquire PC and Roxanne Grinage dba HireLyrics

-----Original Message-----

From: "Roxanne Grinage" [dignityforthehumanspirit@hirelyrics.org]

Date: 08/28/2009 09:03 PM

To: TEPEsquire@aol.com

Subject: Fwd: Acknowledged RE: August 28th Telephone Conversation

So as not to "rant", I acknowledge that your position is that you are not working with Fern Brown Caplan and Lisette Shirdan-Harris to correct the financially incented order that destroys my family. I also have a recorded record of the hearing on digital recorder and it is clear from any objective listener that Constitutional Rights to due process, pro se plaintiffs service, disclosure and discovery were not acknowledged. It was clear that a CHOP witness' verbal testimony relied on her claimed knowledge of me and Lorraine when we are heard stating over and over again that she does not know either of us and Lorraine is heard saying over and over again that she never confided anything in Social Worker, Patricia Lee, LSW. None of your witness' verbal testimony including that of what Sondra Justice supposedly said to her was in her written report. You and Fern Caplan ignored my August 17th fax pointing out the Sondra Justice is absolutely enraged that her name was used - identity stolen. Further, Caplan, censored our family's submission of prior victimizations by Department of Human Services DHS proofs and accepted Patricia's Lee's testimony that I have a "history of mental problems" instead of recording truthfully that my family has been injured as a result of multiple DHS case worker malpractice and Family Court misadministration, Plaintiff's Exhibit B pages 1 through 16.

Fern B. Caplan is heard on our digital recording of the August 14th Rule To Show Cause hearing (referring to our letter to the Supreme Court Justices Breyer and Scalia compiling the numerous Court errors, caption censorship, service at wrong address, no service of Defendants 7/21/09 answers and counterclaims that were consolidated for discussion at August 6 rule to show cause hearing and never served on Plaintiffs - Every time you or plaintiffs, me and my

daughter referred to evidence of pro se protectors of babies Ezekiel and Arriyel, Fern B. Caplan is heard saying "I didn't even read that," and "whatever." Fern Caplan is heard extending you the courtesy of not writing the order until your promised hair follicle tests came in expected Monday. Instead Fern B. Caplan wrote the Order on Monday August 17 without having your Positive of for Cocaine and Crack Cocaine drug test, evidenced by your Delaware County (this case is in Philadelphia County) Custody Evaluator's fax cover time stamped August 17th 8:45 PM. You and Fern Caplan ignored my 8-17-2009 fax request to learn the results of the urine tests Fern Caplan Ordered. Then, 2 days after the premature unqualified drafted order of Fern Brown Caplan, on August 19th you fax the suggestion to Fern B. Caplan two days later to leave the kids with Sandra Sullivan knowing that he's positive for Cocaine in April. I clearly documented the Constitution Rights violations that occurred in August 14th Hearing, with proofs, and documented your Willful Reckless Endangerment and attempt to extort additional money from your addiction impaired client. We can be heard on the recorded file asking whether your witness had any training in addiction as a disease recognized by the American Medical Association. Fern B. Caplan is heard sustaining your objections to even learn about the harms that are caused when an addict is active and is not mandated into treatment, destroying the 4 and 5 years worth of evidence plaintiffs pro se provided 7/20/09 Complaint Exhibits A through H. Fern B. Caplan destroyed the qualified proofs that Erick has been self and clinically diagnosed with the disease of addiction and abandons or endangers his family in progressively hazardous ways. Progression is one of the symptoms of the disease. We had 4 years of proofs. Also Erick brought the kids over after having them one week with the filthy clothes they had on when he picked them up from Lorraine's last Friday.

I am committed to exposing for the sake of saving my grand kids every crimes that has been committed against my family by unethical Family Court affiliated "professionals" who exploit their positions of having some say over what happens to children. If I am raving then so is the rest of the world because, Mr. Possenti, there is a movement worldwide to Dismantle the Corrupt Family Court machine. Ethical Politicians/Attorneys are causing funding to be cut; Ethical Federal Attorneys are taking on pro bono landmark class actions and I am prepared to defend to the death, my constitutional right to keep my family safe from any more quality of life harms by Complacent Negligent Judges taking 18 months and sometimes the life the destroyed child to admit they signed "orders" for which they did not verify whether or not Fourth Amendment due process was observed.

Again, there will be no more defenses of the proven corrupt 8-17-09 order of Custody Master Fern Brown Caplan, signed by Hon. Lisette Shirdan-Harris. I and collaborators will continue aggressively to submit blog, video and citizenship reporting journalism which names the actual names of our assailants who call us crazy because we take exception to the destruction of our futures. I am demonstrating proving costs associated with corrupt attorneys' crimes and pulling restitution from personal assets. Perhaps you won't be so cavalier about obstructing our children's education if your kids' college funds were attached. FYI, published journalism is only slander if it's not true and it can't be proven. We have proofs and verify every single thing we publish. You will not win by intimidating us. Fix the order that threatens my grand kids - use the same favor demonstrated to you already by Fern Caplan as you admitted in your August 19th fax to her that you knew the results of August 14th urine tests when my fax request to learn same was ignored. Sincerely, Roxanne Grinage Apologize for the typos.

"The answer to missed educational opportunities; oppressive contracts and unaccountability horror stories; racism; poverty and hate-based ideas festering into terrorism, is the responsible development of entities that standardize access, standardize procedures, and standardize services." Respectfully, Roxanne Grinage" HireLyrics Schematics 2003.

IV. Plaintiff Pro Se Roxanne Grinage has experienced discrimination which perpetuates a legal monopoly in favor of Official Corruption Fraud Civil Rights Philadelphia Family Court attorneys and judges by imposing counter intuitive legal standards chock full of procedural traps which ensnare Federal Crime Victim Witness Pro Se in a Docket Case Management Agenda which is not conducive to truthful fair and accurate adjudication but is Decisively Prejudicial in Favor of Corrupt Philadelphia Family Court Defendants Attorneys and Judges captioned in 2:09-CV-04119-MSG.

8. Plaintiff Pro Se has been denied the right to confer with federal counsel.

9. Plaintiff Pro Se has been denied timely service because of Clerk of Court's refusal to correct docket summary errors reported in writing to Clerk of Court and Honorable Mitchell S. Goldberg 09/12/09, 09/14/09 and 09/18/09. Roxanne Grinage is informed of docket activity by Pacer Login.

10. Plaintiff Pro Se has been denied fair and accurate adjudication of the true and accurate Cause and Nature of Action 2:09-cv-04119 caused by US Eastern District Court Eastern District of Pennsylvania Clerk of Court's refusal to correct docket summary errors reported in writing to Clerk of Court and Honorable Mitchell S. Goldberg 09/12/09/09/14/09 and 09/18/09.

11. Plaintiff Pro Se is discriminated against to perpetuate a legal monopoly in favor of Official Corruption Fraud Civil Rights Philadelphia Family Court Defendants judges and attorneys, Fern Brown Caplan, Timothy E. Possenti, Lisette Shirdan-Harris and Defendants' exposed complicit accessory accomplice Philadelphia Family Court Judges Robert J. Matthews and Elizabeth Jackson.

a. Plaintiff Pro Se Federal Crime Victim Witness was warned not to complain or to write directly to Honorable Mitchell S. Goldberg's chambers by fax even though Plaintiff Pro Se is a party who is repeatedly denied US Attorney's Crime Victim Bill of Rights "right to confer with federal counsel" in Official Corruption Fraud Civil Rights 2:09-cv-04119, thus imposing counter intuitive legal procedures which discriminate against Victim Plaintiff Pro se who does not have qualified counsel representation in favor of Defendants who are commercial litigation attorneys admitted to practice in US District Court for the Eastern District of Pennsylvania but who perpetrated constitutional capital crimes official corruption fraud and civil rights crimes upon Victim Plaintiff Pro Se and Grinage/Brown Family and Pennsylvania and US Economy in Philadelphia Family Court DR No. 0C0705124.

b. True and Accurate Cause and Nature of Victim Plaintiff Pro Se's 09/10/09 Complaint is incorrectly represented in US Eastern District Court for the Eastern District of Pennsylvania, deleting Victim Plaintiff Pro Se's true and correct Jury Trial Demanded, Damages \$900,000.00, true and accurate cause and nature of action which are capital crimes in violation of the Constitution and outside any lawful judicial capacity and preceding and trumping and having nothing to do with 1983 Civil Rights Act and Victim Plaintiff Pro Se was visited by Two US Marshalls and told she may not point out these Docket Summary Errors by fax or communicate directly with Judge Mitch S. Goldberg after notifying His Honor in writing by faxed letter notices of the Docket Summary Errors which preclude fair and qualified accurate adjudication of Federal Crime Victim Witness Plaintiff Pro Se's 09/10/09 Complaint which created 2:09-cv-04119-MSG and which Victim Plaintiff Pro Se notified US Eastern District Court Clerk in writing 09/12/2009, 09/14/2009 and 09/18/2009.

c. Plaintiff Pro Se Federal Crime Victim Witness was warned not to publish or distribute video or blog journalism which reported on the growing data within Pennsylvania and US Department of Treasury registered HireLyrics Administrative Services which reported to Homeland Security and Supreme Court Justices the civil unrest bred in Plaintiff Pro Se's qualified data of Philadelphia Community's, and American Families' growing disdain for the arrogant systematic unaccountability for the kidnap for profit, family and economy destroying corrupt fraud civil rights crimes of Philadelphia Family Court attorneys and judges Defendants.

d. Plaintiff Pro Se Federal Crime Victim Witness was denied ECF filing for submitting proofs of criminal nature and true and accurate cause of action, 32 pages of proofs reported to exist in Roxanne Grinage 09/10/2009 Complaint to US District Court for the Eastern District of Pennsylvania.

e. Defendant Judge Lisette Shirdan Harris is prejudicially and procedurally favored as Philadelphia Family Court Official Corruption Fraud Civil Rights Defendant is allowed to electronically efile as a defense Exhibit A the August 17, 2009 Philadelphia Family Court DR No. 0C0705124 criminally contrived custody order instrument for which Victim Plaintiff Pro Se's 32 pages of evidence proofs submission were blocked by US District Court Eastern District of Pennsylvania's counter intuitive legal procedures which ensnare Victim Plaintiff Pro Se in a Docket Case Management agenda which is not conducive to fair and accurate adjudication and decisively prejudiced in favor of 11/02/09 electronically filed Motion To Dismiss Plaintiff's Amended Complaint.

f. US Eastern District Court's for the Eastern District of Pennsylvania's refusal to correct the docket summary errors which were reported in writing 09/12/09, 09/14/09 and 09/18/09 included typographical errors in Plaintiff Pro Se's address in 2:09-cv-04119 have resulted in mailed service of Honorable Mitchell S. Goldberg's Order to Strike Plaintiff's Second Emergency Amended Complaint and Defendant's certified service of Motion to Dismiss to be undelivered. Roxanne spoke with Clerk of Court's office on Friday November 6, 2009, and although Clerk's staff member made typographical correction in apartment number address, staff member advised Victim Plaintiff Pro Se that docket report would still reflect that Plaintiff Pro Se's mail is returned to the Court undeliverable discriminating against Plaintiff Pro Se procedurally and credibly.

12. Plaintiff Pro Se is discriminated against for fair and accurate adjudication as reflected in Docket report 2:09-cv-04119 (inserted below) which is chock full of counter intuitive legal procedures which Victim Plaintiff was not required to be knowledgeable of when victimized by Corrupt Philadelphia Family Court Defendants Fern Brown Caplan, Timothy E. Possenti and Lisette Shirdan Harris, but which unfairly force coerced withdrawal under duress of Victim Plaintiff Pro Se who is not an attorney and is punished because she is not knowledgeable of legal procedures and citations which strike, censor and dismiss the Official Corruption Fraud Civil Rights accurate cause and nature of action in 2:09-cv-04119.

STANDARD

**United States District Court
Eastern District of Pennsylvania (Philadelphia)
CIVIL DOCKET FOR CASE #: 2:09-cv-04119-MSG**

GRINAGE v. FERN BROWN CAPLAN, ESQUIRE et al
Assigned to: HONORABLE MITCHELL S. GOLDBERG
Cause: 42:1983 Civil Rights Act

Date Filed: 09/10/2009
Jury Demand: None
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

Plaintiff

ROXANNE GRINAGE

represented by **ROXANNE GRINAGE**
8239 FRANKFORD AVENUE, APT. 110
PHILADELPHIA, PA 19136
PRO SE

V.

Defendant

FERN BROWN CAPLAN, ESQUIRE

Defendant

TIMOTHY E. POSSENTI
ESQUIRE, PC

Defendant

LISETTE SHIRDAN-HARRIS
ESQUIRE

represented by **MICHAEL DALEY**
SUPREME COURT OF PA
ADMINISTRATIVE OFFICE OF PA
COURTS
1515 MARKET ST., STE 1414
PHILADELPHIA , PA 19102
215-560-6300
Email: michael.daley@pacourts.us
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

SERGEANT MUSE
AND/OR USER OF MOBILE TELEPHONE
215-906-3955

Defendant

USER OF FAX NO. 215-686-3555

Defendant

JOHN D. GREEN
SHERIFF, SHERIFF'S DEPT-DOMESTIC
RELATIONS

Date Filed	#	Docket Text
09/10/2009	<u>1</u>	MOTION for Leave to Proceed in forma pauperis filed by ROXANNE GRINAGE..(ks,) (Entered: 09/10/2009)
09/15/2009	<u>2</u>	ORDER THAT PLAINTIFF IS GRANTED LEAVE TO PROCEED IN FORMA PAUPERIS. THE COMPLAINT IS TO BE FILED AND SUMMONS ARE TO BE ISSUED. THE UNITED STATES MARSHAL FOR THE EASTERN DISTRICT OF PENNSYLVANIA SHALL SERVE THE SUMMONS AND COMPLAINT UPON THE DEFENDANTS AT NO COST TO THE PLAINTIFF. SIGNED BY HONORABLE MITCHELL S. GOLDBERG ON 9/15/09. 9/16/09 ENTERED AND COPIES MAILED

		TO PRO SE.(ah) (Entered: 09/16/2009)
09/15/2009	3	COMPLAINT against FERN BROWN CAPLAN, ESQUIRE, TIMOTHY E. POSSENTI, LISETTE SHIRDAN-HARRIS, SERGEANT MUSE, USER OF FAX NO. 215-686-3555, JOHN D. GREEN (IFP GRANTED), filed by ROXANNE GRINAGE. (EXHIBITS FILED IN HARD COPY).(ah) (Entered: 09/16/2009)
09/15/2009		Summons Issued as to FERN BROWN CAPLAN, ESQUIRE, TIMOTHY E. POSSENTI, LISETTE SHIRDAN-HARRIS, SERGEANT MUSE, USER OF FAX NO. 215-686-3555, JOHN D. GREEN. 6 Forwarded To: U.S. Marshal Service on 9/16/09. (ah) (Entered: 09/16/2009)
09/15/2009	4	ORDER THAT PLAINTIFF'S "EMERGENCY REQUEST FOR RESTRAINING ORDER" AND "EMERGENCY REQUEST FOR INJUNCTIVE RELIEF" ARE DENIED WITHOUT PREJUDICE. PLAINTIFF MAY RESUBMIT HER REQUESTS IN COMPLIANCE WITH FED. R. CIV. P. 65. SIGNED BY HONORABLE MITCHELL S. GOLDBERG ON 9/14/09. 9/15/09 ENTERED AND COPIES MAILED TO PRO SE.(ah) (Entered: 09/16/2009)
10/16/2009	5	AMENDED COMPLAINT against FERN BROWN CAPLAN, ESQUIRE, TIMOTHY E. POSSENTI, LISETTE SHIRDAN-HARRIS, SERGEANT MUSE, USER OF FAX NO. 215-686-3555, JOHN D. GREEN, filed by ROXANNE GRINAGE. (EXHIBITS FILED IN HARD COPY).(ah) (Entered: 10/16/2009)
10/16/2009		Summons Issued as to FERN BROWN CAPLAN, ESQUIRE, TIMOTHY E. POSSENTI, LISETTE SHIRDAN-HARRIS, SERGEANT MUSE, USER OF FAX NO. 215-686-3555, JOHN D. GREEN. 6 Forwarded To: U.S. Marshal Service on 10/16/09. (ah) (Entered: 10/16/2009)
10/26/2009	6	EMERGENCY SECOND AMENDED COMPLAINT against FERN BROWN CAPLAN, ESQUIRE, TIMOTHY E. POSSENTI, LISETTE SHIRDAN-HARRIS, SERGEANT MUSE, USER OF FAX NO. 215-686-3555, JOHN D. GREEN, filed by ROXANNE GRINAGE.(Stricken from Record for Failure to Comply)(sg,) (Entered: 10/28/2009)
10/27/2009	7	ORDER THAT PLAINTIFFS EMERGENCY REQUEST FOR RESTRAINING ORDER IS DENIED WITHOUT PREJUDICE. PLAINTIFF MAY RESUBMIT HER REQUEST IN COMPLIANCE WITH FED.R.CIV.P.65.. SIGNED BY HONORABLE MITCHELL S. GOLDBERG ON 10/26/2009. 10/28/2009 ENTERED AND COPIES MAILED TO PRO SE.(sg,) (Entered: 10/28/2009)
10/29/2009	8	ORDER THAT THE CLERK OF COURT IS DIRECTED TO STRIKE PLAINTIFFS, "EMERGENCY SECOND AMENDED COMPLAINT," FROM THE RECORD FOR FAILURE TO COMPLY WITH F.R.C.P. 15(a). SIGNED BY HONORABLE MITCHELL S. GOLDBERG ON 10/29/2009. 10/30/2009 ENTERED AND COPIES MAILED to Pro Se.(sg,) (Entered: 10/30/2009)
11/02/2009	9	NOTICE of Appearance by MICHAEL DALEY on behalf of LISETTE SHIRDAN-HARRIS with Certificate of Service(DALEY, MICHAEL) (Entered: 11/02/2009)
11/02/2009	10	MOTION to Dismiss <i>Plaintiff's Amended Complaint</i> filed by LISETTE SHIRDAN-HARRIS. Certificate of Service and Memorandum of Law. (Attachments: # 1 Text of Proposed Order, # 2 Exhibit A)(DALEY, MICHAEL) (Entered: 11/02/2009)
11/05/2009		LETTER TO R. GRINAGE RETURNED TO SENDER, INSUFFICIENT ADDRESS. UNABLE TO FORWARD. (sg,) (Entered: 11/05/2009)

Judicial immunity does not exist for judges who engage in criminal activity, for judges who connive with, aid and abet the criminal activity of another judge, or to a judge for damages sustained by a person who has been harmed by the judge's connivance with, aiding and abetting, another judge's criminal activity.

1. Official Corruption Fraud Civil Rights Crime Victim Plaintiff Roxanne Grinage exhausted every lawful remedy for seeking redress (to make right what is wrong) in This Court but received counter intuitive legal standards discriminatory for ensnaring Official Corruption Fraud Civil Rights Victim Plaintiff Pro Se, which have denied fair and accurate adjudication of the 13 counts of official corruption, fraud and civil rights crimes Complained about and Proven to This Court, September 10, 2009, September 12, 2009, September 14, 2009, September 18, 2009, September 24, 2009, October 16, 2009, October 26, 2009.

2. This Court demonstrates decisive prejudiced in favor of Official Corruption Fraud Civil Right Philadelphia Family Court Defendant Attorneys and Judges including Lisette Shirdan-Harris captioned within 2:09-cv-04119, and accomplice judicial perjuring Sua Sponte Bench Warrant issuer Family Court Judge Robert K. Matthews who is not captioned within 2:09-cv-04119, but surfaced on October 16, 2009 as corruption cover up accomplice made know to This Court when Official Corruption Fraud Civil Rights Victim Plaintiff lawfully filed October 26, 2009 Second Emergency Amended Complaint since stricken from This Court's records ensnared by discriminatory procedural counter intuitive agenda rather than a rightfully expected truth seeking agenda.

WHEREFORE, Victim Plaintiff Pro Se demands an apology or a lawful defense explanation by way of answer in this US District Court for the Eastern District of Pennsylvania compelling Defendants Fern Brown Caplan, Timothy E. Possenti and Lisette Shirdan-Harris' to answer the true and accurate nature and cause of action 2:09-cv-04119-MSG and answer for the proven thirteen grown to seventeen counts of conspiracy to defraud several Tax payer and Recovery.gov agencies including First Judicial District Court of Common Pleas Philadelphia Family Court, the resident families and neighborhoods of Philadelphia County; financially incented civil rights violations including denial of due process, conspiracy, slander, willful reckless child endangerment, extortion of Timothy E. Possenti's client, conspiracy to commit kidnap for profit, racketeering and human trafficking, judicial misconduct, judicial perjury, judicial negligence, chronic case management misadministration, prolonged child abuse, willful obstruction of health care, willful obstruction of education, emotional and mental injury including parent alienation syndrome, neurosis and permanent mental disability, complicit accessory maximizing risk of

child rape, complicit accessory to pedophilia, censorship of evidence, destruction of evidence and cover up, child selling, terror threats, impending false arrest and judicial perjury sua sponte bench warrants terrorizing with threat of false arrest, police brutality, complicit accessory to maximizing risk of personal injury and forced commercial transactions.

WHEREFORE, Victim Plaintiff Pro Se expects US Eastern District Court for the Eastern District of Pennsylvania to apply 28 USCS 453, Solemn Oath of Justices and Judges, "I do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as under the Constitution and laws of the United States. So help me God." In the application of 28 USCS 453, Solemn Oath of Justices and Judges, US District Court for the Eastern District of Pennsylvania must acknowledge that Philadelphia Family Court Defendant Judge Lisette Shirdan Harris did not abide by Canon 2 of Pennsylvania and US Judicial Conduct and had to repeatedly violate Canon 2 to willfully perpetrate and conspire to cover up the crimes proven within 2:09-cv-04119, Judicial Oath Canon 2(B): Outside Influence. A judge should not allow family, social, political, financial, or other relationships to influence judicial conduct or judgment. A judge should neither lend the prestige of the judicial office to advance the private interests of the judge or others nor convey or permit others to convey the impression that they are in a special position to influence the judge. A judge should not testify voluntarily as a character witness.

WHEREFORE, Victim Plaintiff Pro Se has lawful and moral reason to expect US District Court to Deny Defendant Lisette Shirdan-Harris' Motion To Dismiss Plaintiff's Second Amended Complaint as application of 28 USCS 453, Solemn Oath of Justices and Judges will end the discriminatory legal procedures which ensnare Plaintiff Pro Se in favor of Commercial Litigation Attorney Defendants in 2:09-cv-04119-MSG and in so doing will fairly acknowledge that Defendant Philadelphia Family Court Judge Lisette Shirdan-Harris' 11/02/09 Electronically Filed Motion To Dismiss Exhibit A is Smoking Gun Confession of Guilt Indisputable Evidence Proof of Willful Complicit Accessory to Thirteen Counts grown to Seventeen Counts of Official Corruption, Child Abuse, Fraud of Several Tax Payer funded and several Economy Recovery Act Stimulus Funded Agencies; Conspiracy and Cover Up of Civil Rights

Capital Crimes violating constitutional rights of Victim Plaintiff Pro Se and Roxanne Grinage's family.
Defendant Judge Lisette Shirdan-Harris Acted Outside Judicial Capacity in Violation of Judicial Oath
Canon 2(B): Outside Influence and is not entitled to Judicial Immunity.

WHEREFORE, Victim Plaintiff Pro Se restates her request that US Eastern District Court for the Eastern District of Pennsylvania correct the docket summary errors in 2:09-cv-04119-MSG which deny Jury Trial, Damages and Mask true and accurate cause and nature of Official Corruption Fraud Civil Rights Complaint 2:09-cv-04119 which have nothing to do with 1983 Civil Rights Act, Judicial Immunity and everything to do with Capital Crimes of Conspiracy, Human Trafficking, Extortion, Willful Complicity to commit crimes in violation of The Constitution by Defendants who are overwhelmingly proven criminals in 2:09-cv-04119 and Philadelphia Family Court DR No 0C0705124.

WHEREFORE, Victim Plaintiff Pro Se restates by reference as if fully incorporated herein Complaint 09/10/2009; Amended Complaint including Exhibit Proofs of Defendant Timothy E. Possenti's fraudulent documents and corrupt manipulation of Clerk's Date Stamp Clock; and 10/26/2009 Second Emergency Amended Complaint, by reference as if fully set forth herein and restates request for protection for the ongoing and progressively damaging and costly conspiracy and cover up of the Philadelphia Family Court Defendants captioned in 2:09-cv-01149. Judicial immunity does not exist for judges who engage in criminal activity, for judges who connive with, aid and abet the criminal activity of another judge, or to a judge for damages sustained by a person who has been harmed by the judge's connivance with, aiding and abetting, another judge's criminal activity.

WHEREFORE, Victim Plaintiff Pro Se restates that all those proven Philadelphia Family Court Defendants and complicit accessories within 2:09-cv-04119 indicate publicly that Judicial Perjury Sua Sponte Bench Warrant for the arrest of Victim Plaintiff Pro Se and her daughter is no longer in effect.

WHEREFORE, Victim Plaintiff Pro Se restates expectation that This Court should hold Philadelphia Family Court Defendants in contempt for refusal to answer Thirteen Counts Official Corruption, Fraud, Willful Reckless Child Endangerment within Victim Plaintiff's Pro Se's 09/10/2009 complaint

WHEREFORE, Victim Plaintiff Pro Se restates her right to expect US District Court for the Eastern District of Pennsylvania to Order Corruption Fraud Civil Rights Philadelphia Family Court positioned and commercial litigation attorneys admitted to practice in this US District Court For The Eastern District of Pennsylvania to Stop Slandering, Terrorizing, issuing Sua Sponte Bench Warrants or otherwise threatening the arrest or detainment of Roxanne Grinage or the Grinage/Brown family already profusely victimize by Philadelphia Family Court's Corruption Fraud Civil Rights Defendants in 2:09-cv-04119.

WHEREFORE, Victim Plaintiff Pro Se restates for the sake of truth in public record that US Eastern District Court for the Eastern District of Pennsylvania has incorrectly summarized the Docket Summary details of 2:09-cv-04119 which delete Federal Crime Victim Witness Plaintiff Pro Se's Demand for Jury Trial, Damages \$900,000.00 and preclude fair qualified and accurate adjudication of the Constitutional Capital Crimes, Fraud of several tax payer and Pennsylvania and Federally funded agencies and Willful Reckless Child Endangerment, Extortion, Conspiracy and Cover Up, Racketeering and Kidnap for Profit, judicial perjury, judicial misconduct crimes inflicted upon Victim Plaintiff's Grinage/Brown Family and allowed to continue to be progressively worsened by the counter intuitive legal procedures which ensnare Victim Plaintiff Pro Se in favor of the corruption commercial litigation attorneys admitted to practice in US District Court for the Eastern District of Pennsylvania who are Defendants in Official Corruption Fraud Civil Rights Cause of Action created by Roxanne Grinage's 09/10/2009 Complaint of the crimes proven to have been committed by Fern Brown Caplan, Esquire, Timothy E. Possenti, Esquire, PC and Lisette Shirdan-Harris, Philadelphia Family Court DR No. 0C0705124.

WHEREFORE, Victim Plaintiff Pro Se restates Judicial immunity does not exist for judges who engage in criminal activity, for judges who connive with, aid and abet the criminal activity of another judge, or to a judge for damages sustained by a person who has been harmed by the judge's connivance with, aiding and abetting, another judge's criminal activity.

WHEREFORE, VICTIM PLAINTIFF PRO SE has lost faith and hope that she or any victim of systematic corruption in Philadelphia's Family Court will receive fair and accurate adjudication for the

Official Corruption Fraud Civil Rights Crimes suffered and continued to be suffered unrestrained by US District Court For The Eastern District of Pennsylvania and reserves Roxanne Grinage's constitutional right to complain to a Higher Court or Higher US Government Authority at any time in the present or future that Victim Plaintiff Pro Se might have hope of fair redress of the crimes committed against Plaintiff Pro Se which occurred in Corrupt Philadelphia Family Court DR No. 0C0705124, now known to the U.S. Eastern District Court for the Eastern District of Pennsylvania.

WHEREFORE, Federal Crime Victim Witness Plaintiff Pro Se does hereby withdrawal from hope of redress in 2:09-cv-04119-MSG coerced to do so under duress as a result of discrimination imposed by counter intuitive legal standards which ensnare Victim Plaintiff in favor of Corruption and Fraud in First Judicial District Court of Common Pleas Philadelphia Family Court in the capacities listed herein published for the sake of truth in public record to respectfully suggested, responsible recorded, US Economy and Court Reform and CPS Corruption Administrative Solutions Tool, Prototype Development of US Citizens Controlled Public Incident Report Docket Database.

1. *Corruption Fraud Civil Rights Victim Plaintiff, Pro Se Roxanne Grinage, in her capacity as a U.S. Citizen and Natural Guardian of an American Family who is a Crime Victim of Official Corruption Fraud Civil Rights Crimes repeatedly inflicted by individually and systematically Corrupt First Judicial District Court of Common Pleas Philadelphia Family Court Attorneys and Judges Defendants captioned in 2:09-cv-04119-MSG, and in Crime Victim Plaintiff's capacity for having suffered US Eastern District Court For The Eastern District of Pennsylvania's counter intuitive legal procedures which ensnare Official Corruption Fraud Civil Rights Victim Plaintiff Pro Se in Prejudicial Favor of Philadelphia Family Court Defendants Attorneys and Judges and official Corruption Defendants' Philadelphia Family Court Accomplice Judges; and US Attorney's Office imposed repeated denial of Federal Crime Victims Rights as set forth in 18 U.S.C. § 3771 specifically (1) reasonable protection from the accused; (2) reasonable and accurate timely notice of any public court proceeding; (3) the right not to be excluded from any public court proceeding; (4) The right to be reasonably heard at any public proceeding in the district court; (5) The reasonable right to confer with the attorney for the Government in the case; (6) The right to full and timely restitution as provided in law; (7) The right to proceedings free from unreasonable delay; (8) The right to be treated with fairness and with respect for the victim's dignity and privacy (Judicial Perjury Sua Sponte Bench Warrant Family Court Judge Accomplice Robert J. Matthew)s.*

2. *Corruption Fraud Civil Rights Victim Plaintiff, Pro Se Roxanne Grinage, in her capacity as a Federal Crime Victim Witness Plaintiff; U.S. Citizen and Natural Guardian of an American Family who are Victims of Official Corruption Fraud Civil Rights Crimes repeatedly inflicted by Corrupt First Judicial District Court of Common Pleas Philadelphia Family Court Attorneys and Judges Defendants captioned in 2:09-cv-04119-MSG and Defendant's complicit accessory Philadelphia Family Court Judges Robert J. Matthews and Elizabeth Jackson; and*

3. *Corruption Fraud Civil Rights Victim Plaintiff, Pro Se Roxanne Grinage, in her capacity as a Plaintiff Pro Se for having suffered denial of fair timely accurate adjudication for redress in US*

Eastern District Court For The Eastern District of Pennsylvania imposed by counter intuitive legal procedures which ensnare Official Corruption Fraud Civil Rights Federal Crime Victim Witness Plaintiff Pro Se in Decisive Prejudicial Favor of Philadelphia Family Court Defendants Attorneys and Judges captioned in 2:09-cv-04119, Defendants' Philadelphia Family Court complicit accessory judges, Robert J. Matthews and Elizabeth Jackson); and

Dated: _____

Roxanne Grinage, Victim Plaintiff Pro Se

Certificate of Service

I, Roxanne Grinage, hand delivered signed original of PLAINTIFF ROXANNE GRINAGE'S RESPONSE TO DEFENDANT JUDGE LISETTE SHIRDAN HARRIS' MOTION TO DISMISS SECOND AMENDED COMPLAINT CLAIMING JUDICIAL IMMUNITY IN 1983 CIVIL RIGHTS ACT. JUDICIAL IMMUNITY DOES NOT EXIST FOR JUDGES WHO ENGAGE IN CRIMINAL ACTIVITY, FOR JUDGES WHO CONNIVE WITH, AID AND ABET THE CRIMINAL ACTIVITY OF ANOTHER JUDGE, OR TO A JUDGE FOR DAMAGES SUSTAINED BY A PERSON WHO HAS BEEN HARMED BY THE JUDGE'S CONNIVANCE WITH, AIDING AND ABETTING, ANOTHER JUDGE'S CRIMINAL ACTIVITY. AND, FEDERAL CRIME VICTIM WITNESS PLAINTIFF PRO SE DOES HEREBY WITHDRAWAL FROM HOPE OF REDRESS IN 2:09-CV-04119-MSG COERCED TO DO SO UNDER DURESS AS A RESULT OF DISCRIMINATION IMPOSED BY COUNTER INTUITIVE LEGAL STANDARDS WHICH ENSNARE VICTIM PLAINTIFF IN FAVOR OF CORRUPTION AND FRAUD IN FIRST JUDICIAL DISTRICT COURT OF COMMON PLEAS PHILADELPHIA FAMILY COURT IN THE CAPACITIES LISTED HEREIN PUBLISHED FOR THE SAKE OF TRUTH IN PUBLIC RECORD TO RESPECTFULLY SUGGESTED, RESPONSIBLE RECORDED, US ECONOMY AND COURT REFORM AND CPS CORRUPTION ADMINISTRATIVE SOLUTIONS TOOL, PROTOTYPE DEVELOPMENT OF US CITIZENS CONTROLLED PUBLIC INCIDENT REPORT DOCKET DATABASE. To the Clerk's office, Michael E. Kunz, Clerk of Court, United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Room 2609, Philadelphia, PA 19106-1797, and followed Clerk's staff for either accepting for filing, leaving in bin No. 9 or if Clerk of Court has refused acceptance for any reason have published sworn affidavit of service with true and correct copy. I have emailed copies to MICHAEL DALEY SUPREME COURT OF PA ADMINISTRATIVE OFFICE OF PA COURTS, 1515 MARKET ST., STE 1414 PHILADELPHIA , PA 19102 215-560-6300, Email: michael.daley@pacourts.us, but have not sent true and correct copies to remaining defendants as they continue to victimize Victim Plaintiff Pro Se with acts of terror including but not limited to fashioning of fraudulent documents, manipulation of Family Court's date stamp clock, summoning Victim Plaintiff to phony Rule to Show Cause hearing, Roxanne Grinage's grandbabies are placed at highest risk of abuses injuries and wrongful death described herein; their contemptuous refusal to answer Victim Plaintiff Pro Se's 09/10/09 Complaint and the stalking terror sua sponte bench warrant, having been followed and shown a fire arm of which Victim Plaintiff Pro Se continues to have no protection from, a mugging which Plaintiff cannot prove was ordered by the Defendants but occurred outside Plaintiff's home as she was walking to bus stop. Victim Plaintiff Pro Se should not be required to interface with Defendants in 2:09-cv-04119 who contemptuously refuse to comply with lawful processes within 2:09-cv-04119. If Corrupt Family Court Defendants are ever required to answer, Victim Plaintiff Pro Se will serve them with a copy of Roxanne Grinage's timely response.

/s/

Dated: November 9, 2009

(hand delivered by Roxanne's husband with cover letter to clerk of court Michael E. Kunz)

Roxanne Grinage