No. 12-618

In the Supreme Court of the United States

CHUCK ZAMIARA, CURTIS CHAFFEE, AND
SHARON WELLS, PETITIONERS

v.

KEVIN KING

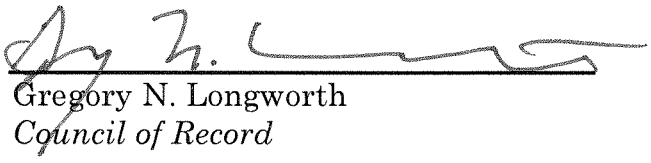
ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

RESPONDENT'S MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Under Supreme Court Rule 39, Respondent asks leave to proceed *in forma pauperis*.

The United States District Court in this case granted Respondent's motion for appointment of counsel under 28 U.S.C. § 1915, allowing Respondent to proceed *in forma pauperis*.

Respectfully submitted,



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Dated: December 17, 2012

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QUESTION PRESENTED

Whether prison officials may be personally liable under § 1983 for violating a prisoner's First Amendment rights by proximately causing an adverse action to be taken against the prisoner either by aiding or participating in the implementation of the adverse action or by inducing another to initiate the adverse action.

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STATEMENT OF THE CASE

Plaintiff-Respondent Kevin King ("King") is an inmate in the custody of the Michigan Department of Corrections (the "Department"). This case involves retaliatory actions that Petitioners took against King during his brief stint at the Brooks Correctional Facility ("Brooks") between September 1999 and May 2000.

I. Factual Background

As the Sixth Circuit correctly observed, "King was undeniably the litigious type."[1] He was an active participant in a state-court class-action case ("*Cain*") involving prisoners' property rights, had filed grievances for himself, and had assisted other prisoners in the filing of grievances.[2] Other than these protected activities, there is no evidence that King's behavior was problematic.[3] Nevertheless, a few prison officials apparently despised King and sought to punish him for his protected activities.

On September 17, 1999, King arrived at Brooks in security level II. Just seven days later, Petitioner Sharon Wells ("Wells"), a Resident Unit Manager at Brooks, ordered Sandra Naves, a corrections officer, to issue a notice of intent to classify King to administrative segregation (an "NOI") for inciting a demonstration, even though Naves told Wells that Naves had no basis for writing the NOI. King never had a hearing on the NOI because he was transferred to another facility for a

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1 Petition App. 26a.
2 Petition App. 26a.
3 Petition App. 26a-27a.

medical procedure before the hearing date; the Department did not pursue the NOI when King returned to Brooks a couple of months later.[4]

After King returned to Brooks, on February 19, 2000, Wells directed an unidentified corrections officer to issue a major misconduct ticket against King for being out of place. King was found not guilty of this charge.[5]

The following month, on March 31, 2000, Wells ordered Bonnie Lewis ("Lewis") to issue another major misconduct ticket to King, this time for creating a disturbance. Again, King was found not guilty after Lewis retracted her statement and told Assistant Deputy Warden Michael Singleton ("Singleton") that Wells had told her to issue the ticket.[6]

On April 20, 2000 – just three days after King was found not guilty on the March 31 ticket, Wells asked Deputy Warden Shirlee Harry ("Harry") to remove King from her unit.[7] Wells's memorandum to Harry asserted that King had told a unit officer that he could incite other prisoners to cause a disturbance anytime he wanted, but there is no evidence corroborating Wells's assertion.[8]

Based on Wells's request, Harry apparently directed Curtis Chaffee ("Chaffee"), the Transfer Coordinator at Brooks, to make arrangements to transfer King to another prison, also in security level II.[9] In preparation for the transfer, Chaffee performed a security screen review to determine King's proper security

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4 Petition App. 4a.
5 Petition App. 5a-6a.
6 Petition App. 6a-7a.
7 Petition App. 7a.
8 Petition App. 7a-8a.
9 Petition App. 8a.

level; the security screen showed that King should remain in security level II, so Chaffee's security screen stated that King was "Manageable in Level II / Remain in Level II.[10]

Chaffee forwarded the paperwork to Chuck Zamiara ("Zamiara"), a Classification Specialist at the Department's central office in Lansing.[11] In the email that accompanied the paperwork, Chaffee cited only protected conduct – King's litigation activities – as the basis for the request; Chaffee testified that he was aware of no misconduct by King that would warrant a security-level increase.[12] Nevertheless, just forty minutes later, Zamiara replied, directing Chaffee to transfer King to security level III: "Let's send him to URF as a level III, note in the departure, prisoner is preceived [sic] as a disruptive prisoner who is manipulating others to create unrest at LRF."[13] Yet Zamiara was unable to identify any disruptive conduct or any source of this "perception" about King.[14] As the Sixth Circuit held, "[t]he only information that Zamiara had regarding King was in the email from Chaffee."[15]

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[10] Petition App. 8a, 10a.
[11] Petition App. 8a.
[12] Petition App. 8a-9a.
[13] Petition App. 9a.
[14] Petition App. 46a and n.23.
[15] Petition App. 46a.

Because King was on a hold list,[16] Nick Ludwick ("Ludwick"), the Department's Classification Director, also had to approve the transfer. During the forty-minute period between emails with Chaffee, Zamiara spoke with Ludwick who agreed to increase King's security level. While Zamiara testified at trial that Ludwick was solely responsible for the decision to increase King's security level, the Sixth Circuit correctly noted that Zamiara's credibility was "highly questionable."[17] Contrary to Zamiara's testimony, Ludwick testified that he merely followed Zamiara's recommendation to increase King's security level.[18] Besides, Zamiara's testimony on this point misrepresented the process: "Chaffee and Ludwick both indicated that Zamiara would first approve the transfer, and then Ludwick or [Ludwick's predecessor Dan] Bolden would need to approve lifting the hold to permit the transfer to occur."[19]

After receiving Zamiara's email telling him to increase King's security level, Chaffee revised the security screen to reflect that King would be transferred to security level III but he left intact his statement that King was "Manageable in

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[16] The hold list is a list of prisoners who could not be transferred to a different facility without the approval of the Department's classification director. King had been on the hold list for a decade after a confidential informant accused King of planning to cut the exterior wires of the prison, get in a waiting Pizza Hut delivery vehicle, and drive to a waiting helicopter, which would fly him to South America. Trial Ex. 39. Based on the testimony of prison officials and the Detroit Police Department, the informant was not a credible informant, as he made virtually identical claims about five other supposed escape attempts over a brief period of time, in an attempt to win favor of the Department. The hearing officer dismissed the NOI, finding no credible evidence against King. Trial Ex. 40. Nevertheless, King was never removed from the hold list. Petition App. 9a n.8.

[17] Petition App. 43a-44a and 44a n.22.

[18] Petition App. 44a-45a n.22.

[19] Petition App. 45a n.22.

Level II / Remain in Level II."[20] In addition to Chaffee, Wells also approved the security screen.[21]

On May 17, 2000, King was transferred to Chippewa Correctional Facility in security level III, where he remained until February 2001 when he was transferred to Thumb Correctional Facility in security level II.[22] King remained in security level II from 2001 through the trial in this case.[23]

II. Procedural Background

King filed his complaint in 2002, asserting several claims against Zamiara, Chaffee, Lewis, Wells, Singleton, Warden Mary Berghuis, Terry Swift, and Dan Bolden in their individual and official capacities. The district judge dismissed all counts. King appealed the dismissal and the United States Court of Appeals for the Sixth Circuit reversed in part on October 7, 2005, reinstating King's claim that the defendants had increased his security level in retaliation for protected conduct ("*King I*").[24] In *King I*, the Sixth Circuit identified the elements of King's retaliation claim:

> To prove a retaliation claim, King must show that: (1) he engaged in protected conduct; (2) an adverse action was taken against him that would deter a person of ordinary firmness from continuing to engage in

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[20] Petition App. 10a-11a. When Assistant Attorney General Peter Govorchin later learned about the internal inconsistency in the security screen, he directed Zamiara who directed Warden Berghuis who directed Chaffee to destroy the old security screen and replace it with a new one, backdated to the date of the original security screen, that screened King for security level III. Petition App. 10a-11a.

[21] Petition App. 10a.

[22] Petition App. 10a-11a.

[23] Petition App. 11a-12a.

[24] *See* Petition App. 84a-107a.

> that conduct; and (3) the adverse action was motivated, at least in part, by his protected conduct.[25]

The Sixth Circuit held that "King's participation in the *Cain* lawsuit and legal assistance to inmates were protected activities."[26] The Sixth Circuit also held that "[i]ncreasing King's custody security level was an adverse action because the result of more restrictions and fewer privileges could deter a person of ordinary firmness from engaging in protected conduct."[27] But the Sixth Circuit held that genuine issues of material fact existed concerning whether the increase in his security level was motivated, at least in part, by his protected conduct.[28]

Following remand, the defendants filed a second summary-judgment motion, this time claiming that they were entitled to qualified immunity. Under 28 U.S.C. § 636(b)(1)(B), the magistrate judge recommended that the district judge deny the defendants' motion but the district judge granted it. King again appealed and the Sixth Circuit again reversed, holding that the defendants were not entitled to qualified immunity ("*King II*").[29]

Following the second remand in *King II*, the district court granted King's motion for appointment of counsel under 28 U.S.C. § 1915,[30] and allowed King to engage in discovery.[31] After engaging in written discovery and taking numerous depositions, the parties filed cross-motions for summary judgment, each of which

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[25] Petition App. 95a-96a.
[26] Petition App. 96a. See also Petition App. 12a.
[27] Petition App. 101a. See also Petition App. 12a.
[28] Petition App. 102a-106a. See also Petition App. 12a-13a.
[29] Petition App. 82a-83a. See also Petition App. 13a.
[30] Record 76, 87, and 88.
[31] Record 97.

the district judge granted in part and denied in part. The judge dismissed Lewis, Swift, and Bolden based on their third summary-judgment motion, so the case went to trial against Zamiara, Chaffee, Wells, Singleton, and Berghuis.[32]

Following a two-day bench trial, the district judge issued its opinion finding in favor of all five defendants. According to the district judge, the defendants did not increase King's security level because of his protected activities but rather because "he was using his influence over other prisoners to create problems and was undermining the authority of prison officials."[33] In response, King appealed for the third time. After carefully parsing the evidence against each of the five defendants, the Sixth Circuit reversed the district judge as to Zamiara, Chaffee, and Wells, and, for the third time, remanded the case to the district court, this time with instructions to enter judgment in favor of King against those three defendants and determine an appropriate remedy ("*King III*").[34] The defendants then filed their petition with this Court.

ARGUMENT

In *King III*, the Sixth Circuit held that "protected speech causes an adverse action if the speech motivates an individual actor to take acts that then proximately cause an adverse action."[35] Because "[c]ausation in the constitutional sense is no different from causation in the common law sense[,]" the court held that "[a]n officer

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[32] Record 153-154.
[33] Petition App. 19a.
[34] Petition App. 50a.
[35] Petition App. 16a.

may therefore be liable under § 1983 'for the natural consequences of his actions.'"[36] The court continued: "This includes liability for acts giving rise to the ultimate harm, even if the harm is executed by someone else."[37] This holding was not novel: An *en banc* decision of the Eighth Circuit rejected prison officers' argument that, "since they did not have the authority to alter the [prisoner's security] classification, any consequence of that status cannot be their responsibility."[38] And the court in *King III* further held that "[i]ndividuals who aid in the implementation of an adverse action at the instructions of a superior will be liable along with their superior if they knew or should knew or should have known that the adverse action was unlawful."[39] On these bases, the Sixth Circuit held that Wells, Chaffee, and Zamiara violated King's rights.

Petitioners attack the Sixth Circuit's decision, arguing that only Ludwick had the authority to reclassify King so Petitioners were "non-decision-makers" who cannot be held liable.

In support of their petition, Petitioners rely on Supreme Court Rule 10(a) and (c), citing two bases for the writ. First, relying on Rule 10(a), Petitioners argue that the Sixth Circuit's decision is "in conflict with a decision" of the Second Circuit in *Deters v. Lafuente*, 386 F.3d 185 (2d Cir. 2004). Second, Petitioners rely on Rule 10(c), arguing that the Sixth Circuit has decided an important federal question

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[36] Petition App. 17a (quoting *Monroe v. Pape*, 365 U.S. 167, 187 (1961)).
[37] Petition App. 17a.
[38] Petition App. 19a-20a. *Villanueva v. George*, 659 F.2d 851, 854 (8th Cir. 1981) (*en banc*) (*quoted in Thaddeus-X v. Blatter*, 175 F.3d 378, 393 (6th Cir. 1999) (*en banc*)).
[39] Petition App. 19a.

in a way that conflicts with relevant decisions of this Court. Both of Petitioners' arguments are wrong.

I. *King III* does not conflict with *Deters*.

In *Deters*, two police officers from the Poughkeepsie, New York, police department were arrested and charged with assault in connection with their arrest of a man. On the same day, their police department brought departmental disciplinary charges against them.[40] After the officers were subsequently acquitted of the criminal charges, in 1994, they sued for false arrest, malicious prosecution, and violation of their civil rights.[41] Despite their acquittal, the city administrator – "the only person empowered under the City Charter to prosecute or dismiss the disciplinary charges against the plaintiffs" – refused to dismiss the disciplinary charges.[42] For the next few years, there were settlement discussions in which the city offered to dismiss the disciplinary charges if the officers dismissed their lawsuit.[43]

In 1996, the defendants in the case, Lafuente and Knapp, became mayor and police chief, respectively.[44] There is no indication that either Lafuente or Knapp influenced or tried to influence the city administrator's decision to maintain the disciplinary charges. In fact, "[i]n 1997, Lafuente asked Knapp to review the pending disciplinary charges and report to her about them. Knapp's report

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[40] 368 F.3d at 186.
[41] *Id.*
[42] *Id.* at 186-87.
[43] *Id.* at 186.
[44] *Id.* at 187.

recommended that the disciplinary charges be dismissed."[45] Finally, in 2000, a hearing officer recommended the dismissal of the disciplinary charges and the city administrator did dismiss the charges.[46]

Two years later, in 2002, the police officers filed a claim against Lafuente and Knapp under 28 U.S.C. § 1983, alleging that "Lafuente and Knapp maintained plaintiffs' disciplinary proceedings when they knew the charges were baseless."[47] Not surprisingly, the Second Circuit held that Lafuente and Knapp could not be held liable. "We fail to see how Lafuente and Knapp, without any authority to stop the proceedings, violated plaintiffs' constitutional rights by not dismissing them."[48]

Deters is unlike *King III* in several respects. First, while Lafuente and Knapp had no power to dismiss the disciplinary charges, each of Petitioners played a necessary role in King's transfer to security level III. Yes, Ludwick's approval was required to transfer King to another prison, but the security screen, which Chaffee and Wells signed, and Zamiara's approval were equally necessary for King's transfer and security-level increase. In other words, unlike *Deters*), Petitioners had – and exercised – power to increase King's security level. Second, Lafuente and Knapp did not influence or try to influence the city administrator's decision to maintain the disciplinary charges, unlike Zamiara, who recommended that Ludwick approve transferring King with an increased security level. And third, Lafuente and Knapp did not aid in the implementation of an adverse action at the

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[45] *Id.*
[46] *Id.*
[47] *Id.*
[48] *Id.* at 189.

instructions of a superior when they knew or should have known that the adverse action was unlawful, while Petitioners did.

Contrary to Petitioners' argument, *Deters* does not conflict with *King III*. This Court has previously refused to grant a writ of certiorari without a "direct conflict among the Circuits."[49] Inasmuch as *Deters* does not involve a prison reclassification or even deal with a situation where several persons played a necessary role in the final outcome (as did all three Petitioners) or made a recommendation to the supposed final decisionmaker (as did Zamiara), Petitioners' argument is meritless.

King III is actually much closer factually to a different Second Circuit case in which that court reached the same conclusion as *King III*. In *Warner v. Orange County Dep't of Probation*,[50] the Second Circuit held that a probation officer could be held liable under § 1983 for violating the plaintiff's First Amendment rights by recommending that the plaintiff be sentenced to an unconstitutional alcohol-treatment program, even though a judge made the sentencing decision. So, too, this Court has held that a judge's decision to issue an arrest warrant does not break the causal chain between an officer's improvident application for the warrant and the ensuing arrest.[51]

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[49] *Bunting v. Mellen*, 541 U.S. 1019, 1021 (2004).

[50] *Warner v. Orange County Dep't of Probation*, 115 F.3d 1068, 1072-74 (2d Cir. 2007) (*cited in Powers v. Hamilton County Public Defender Comm'n*, 501 F.3d 592, 609 (6th Cir. 2007)).

[51] *Malley v. Briggs*, 475 U.S. 335, 338-39, 344 n.7 (1986).

Thus, not only is *King III* not in conflict with the Second Circuit's decision in *Deters*), *King III* is supported by earlier decisions of the Second Circuit and this Court.

II. *King III* does not conflict with decisions of this Court.

Petitioners also argue that *King III* conflicts with this Court's decisions in *Staub v. Proctor Hospital*[52] and *Hartman v. Moore*.[53] Petitioners are wrong again.

In *Staub*, the plaintiff, Staub, claimed that his employer illegally terminated his employment on account of his military service, in violation of the Uniformed Services Employment and Reemployment Rights Act.[54] According to Staub, his supervisor, Mulally, and Mulally's supervisor, Korenchuk, were hostile to Staub's military service.[55] Yet the decision to fire Staub was made by Buck, after she received a complaint from another employee, independently reviewed Staub's personnel file, and relied on Korenchuk's prior report that Staub had ignored a correction-action directive.[56] While Staub subsequently claimed that Korenchuk's report was false, Buck was unaware of this assertion at the time she made the decision to fire Staub.[57]

The issue in *Staub* was not whether Mulally or Korenchuk could be held liable, but only whether Proctor Hospital could be held liable. This alone

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[52] 131 S. Ct. 1186 (2011).
[53] 547 U.S. 250 (2006).
[54] 38 U.S.C. § 4311.
[55] *Staub*, 131 S. Ct. at 1189.
[56] *Id.*
[57] *Id.*

sufficiently distinguishes *Staub* from *King III*, warranting denial of Petitioners' petition. At any rate, *Staub* is not inconsistent with *King III*.

While this Court observed that Mulally's and Korenchuk's actions were insufficient "to render Mulally or Korenchuk responsible[,]"[58] the apparent reason for this was twofold: First, they were not defendants in the case and, second, they did not make, or even encourage, the decision to fire Staub. Further, the Court ultimately held that Proctor could be held liable and the basis for that holding supports the Sixth Circuit's decision in *King III*.

This Court rejected Proctor's argument that it could be held liable only if the decisionmaker (either the technical decisionmaker or the agent for whom she was the "cat's paw") is motivated by discriminatory animus. "Animus and responsibility for the adverse action can both be attributed to the earlier agent (here, Staub's supervisors) if the adverse action is the intended consequence of that agent's discriminatory conduct."[59] "[I]t is axiomatic under tort law that the exercise of judgment by the decisionmaker does not prevent the earlier agent's action (and hence the earlier agent's discriminatory animus) from being the proximate cause of the harm."[60] What follows in the Court's opinion is the part of the Court's holding apropos here:

> We do not think that the ultimate decisionmaker's exercise of judgment automatically renders the link to the supervisor's bias "remote" or "purely contingent." The decisionmaker's exercise of judgment is *also* a proximate cause of the employment decision, but it is common for injuries to have multiple proximate causes. Nor can the

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[58] *Id.* at 1191.
[59] *Id.* at 1192.
[60] *Id.*

> ultimate decisionmaker's judgment be deemed a superseding cause of the harm. A cause can be thought "superseding" only if it is a "cause of independent origin that was not foreseeable."[61]

Thus, contrary to Petitioners' argument, even if Ludwick had been the sole decisionmaker, Petitioners' actions still could have been – indeed, were – a proximate cause of King's injury.

Petitioners argue that *King III* also conflicts with *Hartman v. Moore*. In that case, Moore sued a federal prosecutor and several postal inspectors under *Bivens v. Six Unknown Fed. Narcotics Agents*, 403 U.S. 388 (1971). Moore's claim was that the inspectors, with retaliatory animus, convinced the prosecutor to charge Moore based on very limited evidence.[62] This Court held that "a plaintiff like Moore must show that the nonprosecuting official acted in retaliation, and must also show that he induced the prosecutor to bring charges that would not have been initiated without his urging."[63] In other words, the existence of probable cause would defeat the claim, regardless of the motives of the inspectors who persuaded the prosecutor to bring charges.[64]

King III does not conflict with *Hartman*. Of course, if there had been some legitimate basis for increasing King's security level, Petitioners might not be liable (though *Reichle v. Howards*, discussed below, suggests that they might still be liable). But there was no such basis. Plain and simple, Petitioners increased King's

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[61] *Id.* (quoting *Exxon Co., U.S.A. v. Sofec, Inc.*, 517 U.S. 830, 837 (1996), and omitting other citation).
[62] *Hartman*, 547 U.S. at 253-54.
[63] *Id.* at 262.
[64] *Id.* at 263.

security level solely in retaliation for his protected conduct. There was no "probable cause" (in the parlance of *Hartman*) that could preclude Petitioners' liability.

In the course of their discussion of *Hartman*, Petitioners also wrongly argue that *King III* conflicts with *Reichle v. Howards*, 132 S. Ct. 2088, 2095 (2012). In *Reichle*, Howards brought a *Bivens* claim against Reichle and Doyle, claiming that they arrested him in retaliation for his criticism of Vice President Cheney.[65] The question before the Court involved qualified immunity: Did clearly established law provide that Reichle and Doyle could be held liable for retaliatory arrest despite the existence of probable cause to make the arrest.[66] Observing "a legal backdrop that treated retaliatory arrest and prosecution claims similarly[,]"[67] this Court held that Reichle and Doyle were entitled to qualified immunity because *Hartman* at least raised a legitimate question about whether an officer making a retaliatory arrest could be liable when probable cause exists for the arrest.[68] But contrary to Petitioners' suggestion, *Reichle* does not hold that a prosecutor's (or any other decisionmaker's) decision is an intervening cause that necessarily cuts off liability for other defendants. Instead, its analysis of *Hartman* is correct when understood in the proper context that the existence or nonexistence of probable cause may determine liability.

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[65] *Reichle*, 132 S. Ct. at 2092.
[66] *Id.* at 2093.
[67] *Id.* at 2095.
[68] *Id.* at 2096-97.

Further, in *Reichle*, this Court gave two reasons that *Hartman*'s retaliatory-prosecution rule might not apply to retaliatory arrests.[69] First, the Court observed that "the causal connection in retaliatory prosecution cases is attenuated because those cases necessarily involve the animus of one person and the injurious action of another, but in many retaliatory arrest cases, it is the officer bearing the alleged animus who makes the injurious arrest."[70] In this case, Petitioners actually participated in King's security-level increase, more like an arresting officer than an officer that simply provides information to a prosecutor who then decides to prosecute. And second, the Court also observed that, "in retaliatory prosecution cases, the causal connection between the defendant's animus and the prosecutor's decision is further weakened by the 'presumption of regularity accorded to prosecutorial decisionmaking.'"[71] As the Court noted in *Reichle*, "That presumption does not apply here."[72] Nor does such a presumption apply in this case.

III. *King III* will not "bring cascades of new prisoner litigation."

Petitioners' final argument is that, if the Court allows *King III* to stand, it will bring cascades of new prisoner litigation. Petitioners' fears are not only irrelevant (because the Sixth Circuit correctly decided this case), those fears are also unfounded. *King III* did not break new ground in this Sixth Circuit. Rather, the decision is firmly based on prior decisions of the Sixth Circuit, specifically *Thaddeus-X v. Blatter*, 175 F.3d 378, 393 (6th Cir. 1999) (*en banc*), and *Siggers-El v.*

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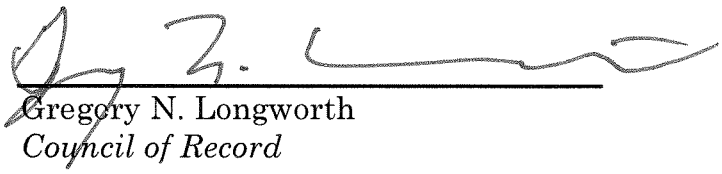
[69] *Id.* at 2096.
[70] *Id.* (internal citation omitted).
[71] *Id.* (quoting *Hartman*, 547 U.S. at 263).
[72] *Id.*

Barlow, 412 F.3d 693 (6th Cir. 2005). The cascade of new prisoner litigation should have started flowing more than a decade ago, but alas this has not happened.

CONCLUSION

Plaintiff-Respondent Kevin King respectfully asks the Court to deny Petitioners' petition for a writ of certiorari.

Respectfully submitted,



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Dated: December 17, 2012

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PROOF OF SERVICE

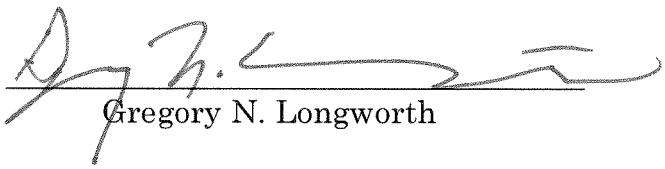
I, Gregory N. Longworth, do swear or declare that on this date, December 17, 2012, as required by Supreme Court Rule 29, I have served the enclosed **MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*** and **RESPONDENT'S BRIEF IN OPPOSITION TO PETITION FOR A WRIT OF CERTIORARI** on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

John J. Bursch
PO Box 30212
Lansing, MI 48909

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2012.



Gregory N. Longworth

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