

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS  
JUL 17 2024  
By: TAMMY H. DOWNS, CLERK  
DEP CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS

LAURA LYNN HAMMETT, an  
individual,

Plaintiff,

vs.

PORTFOLIO RECOVERY  
ASSOCIATES, LLC, a Limited  
Liability Company; DOES 1-99

Defendants

Case No.: 4:21-CV-00189-LPR

Plaintiff's Motion for a Stay of Execution of Judgment Pending Petition for Writ of  
Certiorari to the United States Supreme Court

Comes Now, Plaintiff Laura Lynn Hammett who in support of the above titled motion states:

This motion is made pursuant to Federal Rule of Civil Procedure 62.

Plaintiff intends to file a Petition for Writ of Certiorari in the United States Supreme Court.

While still in the draft stage, the question asked is whether discriminatory practices against the vast majority property class, those who cannot afford legal representation, violate Constitutional due process and the United Nation's Declaration of Human Rights, Article One?

Specific practices that were raised at the district and circuit court that are not consistent in jurisdictions throughout the nation include:

1. denial of access to electronic filing;
2. the fictionalization of proceedings and evidence by sealing portions of the record without good cause;
3. failure to admit evidence collected and conclusions about practices drawn through civil investigations by district attorneys and regulatory agencies;
4. holding laypersons to the level of eloquence and detail required of litigants who can afford teams of attorneys, and;

5. that judges who have what can appear to a reasonable person to be a bias in favor of the represented party refrain from recusing themselves, and their orders are upheld on appeal.

There are several reasons it is more likely that the Supreme Court will grant certiorari to this petition than that it grants certiorari to other petitions filed by pro se litigants.

As this court acknowledged, Hammett has a higher level of verbal communication skills than most pro se litigants.

The question raised affects most of the population. The common person who cannot afford attorney representation is disempowered to access justice.

The question raised gives the Supreme Court the opportunity to make practices and policies regarding pro se litigants consistent nationwide.

The Supreme Court recently overturned the precedent set by *Chevron* regarding deference to regulatory agency legal interpretations of statutes. The question of deference to regulatory agencies' conclusions of fact arising from publicly funded civil investigations, and the public's right to use those conclusions in private causes of action, is a critical and natural next issue for SCOTUS to consider.

Allowing Portfolio Recovery Associates, LLC to move forward with its collection of costs is unnecessarily burdensome to Hammett. First, complying with

procedure to protect assets that are not available for collection, such as her pension, will distract Hammett from the already daunting job of distilling and organizing pertinent parts of the record, formatting and printing her petition. Also, PRA controls billions of dollars in assets, whether cash, line of credit or lists of alleged debt. While Hammett is not yet destitute, the involuntary expenditure for PRA's costs might send her into bankruptcy. That is why Hammett did not hire an attorney nor avail herself of the permissive discovery tool of depositions. Hammett's efforts to live within her modest means resulted in an 803 FICO score. Enforcement of judgment might affect Hammett's ability to borrow money to pay the cost of appeal to the Supreme Court and may result in bankruptcy.

For these reasons, Hammett begs the Court to stay proceedings in the district court pending petition for writ of certiorari.

Dated July 17, 2024

A handwritten signature in cursive script that reads "Laura Hammett". The signature is written in black ink and is positioned above the printed name and address.

Laura Lynn Hammett  
16 Gold Lake Club Road  
Conway, Arkansas 72032  
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thenext55years@gmail.com  
Plaintiff Pro Se

## CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2024, a true and exact copy of the foregoing was filed with the Clerk of the Court for entry on the electronic filing system which will cause service upon all counsel of record via email.

A handwritten signature in cursive script, reading "Laura Hammett", written in black ink.

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