

STATE OF NEW HAMPSHIRE
SUPREME COURT
Case No. 2019-0051

RECEIVED

Clifford E. Avery v Commissioner, New Hampshire Department of Corrections MAR 19 2020

HERE PAUL BLACKMER'S INVITED TO SUBMIT AMICUS CURIAE BRIEF NH SUPREME COURT

PRELIMINARY STATEMENT:

It is obvious Laaman v Helgemoe 437 F.Supp. 269 at 326 "3. Jurisdiction of this case is specifically retained." is violated/breached. The mysterious means (see Long John Baldry for "judicial boogiewoogie") exploited to sabotage this element of the D.N.H. order is not to be determined by means of the Lexis Advance research provided by State of New Hampshire Department of Corrections (hence DOC). Paul Blackmer's request to Clerk Eileen Fox for adequate research information relative to sabotage of page 326 dicta has not been responded to.

Truth dispositive is if the at issue agreement (specifics of the here at issue alleged to be "agreement" that has enabled the sabotage of enforcement of the here at issue Laaman v Helgemoe 437 F. Supp. 269 at 326 imposed element of the here at issue Laaman v Commissioner David Bownes order is not available by means of search of the here at issue Lexis Advance provided research material.) sanctions sabotage of the Laaman v Helgemoe order the said "agreement" is necessarily void as to what purpose does Laaman v Helgemoe function without enforcement?

"HUF"

Now comes pro se amicus curiae briefer Paul Blackmer and says:

1. If prisoners are sanctioned to amend Laaman v Helgemoe and/or the agreements here at issue dispositive ramifications relevant to this sanction justly impose it functionally dispositively relative to this that the Concord Prison law library functions in above the law capacity relative to Casey v Lewis 43 F.3d 1261 in toto imposed imperative where said Casey v Lewis functions to enhance and expand constitutionally imposed imperative of law of the land according to Bounds v Smith 430 US 817 in toto .
2. Truth dispositive imposes to compel conclusion Paul Blackmer is unable to determine what has imposed to enable State of New Hampshire to agree to enforce Laaman v Helgemoe order and then litigate means to enable State of New Hampshire judicial and executive branch of government to breach said agreement based on some sovereign immunity rationale that smacks of resurrection of states rights rationale that went south with Jim Crow.
3. Paul Blackmer in his possibly astute pro se analysis sees that if State of New Hampshire concludes the agreement agreed to as party to Laaman v Helgemoe decision is not to be enforced, then the matter of enforcement of Laaman v Helgemoe in toto lands back in the lap of United States District Court for New Hampshire and is not summarily voided as to prisoner rights?

"HUF"

4. Paul Blackmer moves that this Supreme Court shall grant that Paul Blackmer shall have opportunity to make effort to competently submit amicus curiae brief in this instant invitation matter after State of New Hampshire prison library is compelled by order of this Supreme Court to comply with Casey v Lewis 43 F.3d 1261 imposed imperative while said Casey v Lewis functions in support of Bounds v Smith 430 US 817 as law of the land. At issue law library has some sovereign immunity as excuse to defy imperative imposed by Casey v Lewis 43 F.3d 1261 in toto as applies to individual prisoner litigants such as but not limited to Paul Blackmer? This where relative to such capacity Casey v Lewis 43 f.3d 1261 in toto is Shepardized 63 times.

WHEREFORE pro se amicus curiae briefer Paul Blackmer submits this litigation in response to Clerk Eileen Fox' invitation dated ? and in accordance with granted expansion of time of February 3, 2020.

Possibly a copy shall be provided as Casey v Lewis 43 f.3d 1261 imposes to compel, but this functions problematically as usual.

Paul Blackmer swears under penalty of perjury that the facts presented at this brief are truth as Paul Blackmer knows truth to be and copy requirement satisfaction is problematic as usual.

Respectfully Submitted:

Paul Blackmer

Paul Blackmer #71470

State Prison, P.O. Box 14

Concord, NH 03301-0014, March 16, 2020

Paul Blackmer 3/16/20

State of New Hampshire
County of Merrimack
Sharon G. Tobin

EXHIBIT as posted by alleged to be law librarian Dana Banner on March 16, 2020! In this see functioning contempt of imperative imposed by Casey v Lewis 43 F.3d 1261 as example of continuing contempt thereof!

Paul Blackmer #71470 3/16/20

PPD 7.22: "Library typewriters are a service and are not provided by mandate."

NH Courts have ruled that Resident legal filings do not have to be typed. As long as that is in effect, the DOC will not supply new typewriters or repair them.

Two of our five working typewriters have recently been broken by users. There is no DOC budget for repair or replacement.

At present, we now have only 3 working typewriters. We cannot reserve typewriters. They are on a first come / first served basis.

See Casey v Lewis 43 F.3d 1261 at 1280 "C.TYPEWRITERS ..." for Paul Blackmer's fundamental right to due process of law while the involved State of New Hampshire and Federal Courts criminally knowingly obstruct justice by means of refusal to order retained defense counsel Mark Sisti is to provide transcript producing testimony that shall provide proof NH's Attorney General's Office has enabled Paul Blackmer's long known to be patently unconstitutional imprisonment by means of October 1994 criminal obstruction of justice! HH?

3/16/20