

ATTACHMENT A

Conferral Emails

From: Plaintiff/Appellant/Employee X'
To: Defendant/Appellee/'Company Y'

October 2024

Showcasing Defendant's Failure
to Dispute Material/Pertinent Facts

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, October 23, 2024 11:01 AM
To: Doud, Kimberly <KDoud@littler.com>
cc: Lopez, Vivian <VLopez@littler.com>; Shelnut, Lisa <LShelnut@littler.com>; Robertson, Lauren C. <LCRobertson@littler.com>
Subject: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Hello Allstate,

As noted multiple times¹, you are destined to commit [at least] three counts of perjury [at the [11th Circuit Court of Appeals – US](#)]. Thus, it’s my duty² to alert the court/public of your imminent defiling-of-the-judiciary.

So, do you have any objection to my upcoming “*Motion for Judicial Notice of Plaintiff’s Full Administrative Complaint (Dated 4/10/19)*”?

I’m filing it pursuant to [Rule 10\(e\)\(2\) Fed. R. App. P.](#), [Rule 28\(j\) Fed. R. App. P.](#), [Local Rule 27-1 11th Cir. R.](#), and [Rules 201/301/302 Fed.R.Evid.](#)

Plaintiff:	Elias Makere, FSA, MAAA
Defendant:	Allstate Insurance Company
Case Number:	3:20-cv-00905-MMH-LLL
Court:	US Court of Appeals, 11 th Circuit
Lower Court:	US District Court, Florida, Middle District (Jacksonville)
Type:	Employment Discrimination (42 USC §1981 , §760 FS , EPA , Title VII)

Document: ³	<i>Appellant’s Motion for Judicial Notice of Appellant’s Full Administrative Complaint (Dated 4/10/19)</i>
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¹ see [Initial Brief](#) at ¶20/30/62/63/135/etc; see [Response... Summary Judgment](#) at ¶13/33/36/69/etc.

² see [Florida’s False Claims Act](#); see [18 USC §1001](#); see [18 USC §1018](#)

³ the lower court (ie, [USFLMD](#)) already took judicial notice of this filing date (see {#108} at ¶136). Yet, of course, you’re destined to repeat your lie [in the appellate court – [USCA11](#)].

Purpose = (1) substantiate the filing date of Appellant’s state charge; (2) substantiate the date of receipt of Appellant’s discrimination charge; (3) supply factual framework surrounding discriminatory retaliation; (4) streamline federal appeal; (5) help supply the details for which the Court needs; (6) corner your perjurious guilt; and more.

Please answer as soon as you can.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
 Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
 Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
 11th Cir. Case No.: 21-11901; 22-13587
 904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
 3709 San Pablo Rd. S. #701
 Jacksonville, FL 32224
Ancient Proverb: For every wrong there is a right.

From: Doud, Kimberly <KDoud@littler.com>
Sent: Wednesday, October 23, 2024 1:57 PM
To: Justice (Actuarial) <justice.actuarial@gmail.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full
Administrative Complaint (4/10/19)

Mr. Makere:

I disagree with your characterizations in your email below. Allstate objects to your proposed Motion for Judicial Notice of Plaintiff's Full Administrative Complaint as unnecessary given your stated purpose. Thank you.

Kimberly Doud

Office Managing Shareholder

407.393.2951 direct, 407.864.1852 mobile, 407.641.9263 fax

KDoud@littler.com

Pronouns: She/Her



Fueled by ingenuity. Inspired by you.

Labor & Employment Law Solutions | Local Everywhere
111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, October 23, 2024 2:06 PM
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>;
'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full
Administrative Complaint (4/10/19)

Hello Allstate,

What “characterizations” do you disagree with?

Please let me know.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Thursday, October 24, 2024 8:00 AM
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

I haven't heard back from you regarding your bare allegation [on "*characterizations*"] (which indicates the falsehood of it – especially considering [your rampant lies](#)).

So, may you please let me know if you dispute the following fact:

1. On April 10, 2019, Elias Makere emailed [his Charge of Discrimination](#) to the [Florida Commission on Human Relations](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **1:00 PM EST Today (10/24/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
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Jacksonville, FL 32224

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From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Thursday, October 24, 2024 1:01 PM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full
Administrative Complaint (4/10/19)

Good Afternoon Allstate,

I haven't heard back from you regarding the fact that April 10, 2019 marked the date that Elias Makere (ie, me/Plaintiff/Appellant) emailed [his Charge of Discrimination](#) to the [Florida Commission on Human Relations](#). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

2. The [Florida Commission on Human Relations](#) placed a 4/10/2019-2:35PM timestamp on Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **5:00 PM EST Today (10/24/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Thursday, October 24, 2024 12:13 PM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Mr. Makere,

Your initial brief sets forth your position for the basis of this appeal in your initial brief. Allstate will provide its position in its Answer Brief.

As such, Allstate opposes your motion for judicial notice as such motion is procedurally improper, unnecessary, and frivolous as the Eleventh Circuit cannot consider the same when determining the merits of your appeal if not contained in the record before the district court. In other words, the Eleventh Circuit's review of your appeal is limited to the record before the district court at that time.

Please note if you proceed with filing this motion, Allstate will seek recovery of its fees/costs incurred in defending against the motion. Thank you!

Regards,
Lauren

Lauren C. Robertson
Associate
407.393.2928 direct, 305.496.9749 mobile
LCRobertson@littler.com



Labor & Employment Law Solutions | Local Everywhere
111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Thursday, October 24, 2024 12:50 PM
To: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Afternoon Allstate,

May you please **cite some legal authorities** (eg, opinions; statutes; rules; etc.) to support your contention (ie, '*judicial notice is procedurally improper, unnecessary, and frivolous*')?

From what I've seen, there are no authorities to support your contention. In fact, there are several authorities that refute your contention (eg, [Rules of Appellate Procedure](#); [USCA11 Local Rules of Court](#); [§90.201 FS](#); [§90.202 FS](#); [§90.203 FS](#); [§120.569 FS](#); [Rule 201 Fed. R. Evid.](#); [11th Circuit Internal Operating Procedures](#); etc.)

Nevertheless – as it stands right now – **you have failed to dispute both facts***:

1. On April 10, 2019, Elias Makere emailed [his Charge of Discrimination](#) to the [Florida Commission on Human Relations](#)
2. The [Florida Commission on Human Relations](#) placed a 4/10/2019-2:35PM timestamp on Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)

* please see the attached documents

Please send me your citations (if any) before **5:00 PM EST Today (10/24/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, October 25, 2024 8:01 AM
To: Robertson, Lauren C. <LCRobertson@littler.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

5PM came & went, but you failed to dispute the underlying fact (ie, that *The [Florida Commission on Human Relations](#) placed a 4/10/2019-2:35PM timestamp on Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)*). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

3. On February 9, 2021 Elias Makere (ie, Plaintiff/Appellant) moved the District Court (ie, The US District Court in-and-for the Middle District of Florida) to take judicial notice of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **12:00 PM EST Today (10/25/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Doud, Kimberly <KDoud@littler.com>
Sent: Friday, October 25, 2024 7:46 AM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Robertson, Lauren C. <LCRobertson@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Mr. Makere:

It is unclear why you are sending these emails or what you are attempting to confer about under Middle District of Florida Local Rule 3.01(g) (or why). We have twice provided Allstate's position on your proposed Motion for Judicial Notice of Plaintiff's Full Administrative Complaint. Thank you.

Kimberly Doud

Office Managing Shareholder

407.393.2951 direct, 407.864.1852 mobile, 407.641.9263 fax

KDoud@littler.com

Pronouns: She/Her



Fueled by ingenuity. Inspired by you.

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111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, October 25, 2024 9:45 AM
To: Doud, Kimberly <KDoud@littler.com>; Robertson, Lauren C. <LCRobertson@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

Although I've [preemptively] addressed your inquiry multiple times already, please [also] confer these additional authorities:

- [Addendum 8, 11th Circuit Local Rules](#)
 - ie the Court's inherent power to discipline attorneys for misconduct/dishonesty
- [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#)
 - "The commission by a lawyer of any act that is unlawful or contrary to honesty and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor."
 - Also see [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#), etc.

These additional authorities deal with the ramifications that your attorneys will face. Ramifications, of course, for carrying out your bidding. Bidding, of course, which is centered around [your rampant perjury/dishonesty/misconduct](#). In other words, my upcoming motion will also be used **to hold your attorneys accountable** (ie, *Kimberly-Doud-0523771*, *Lauren-Robertson-1024845*, etc.). Please let me know if you have any questions about that.

Nevertheless, you still haven't responded to the underlying prompt (ie, whether-or-not you dispute fact #3). Thus – for the sake of convenience – I'm repeating the prompt here...

May you please let me know if you dispute the following fact:

3. On February 9, 2021 Elias Makere (ie, Plaintiff/Appellant) moved the District Court (ie, *The US District Court in-and-for the Middle District of Florida*) to take judicial notice of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Please answer before **12:00 PM EST Today (10/25/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224
Ancient Proverb: For every wrong there is a right.

From: Doud, Kimberly <KDoud@littler.com>
Sent: Friday, October 25, 2024 9:04 AM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Robertson, Lauren C. <LCRobertson@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Mr. Makere:

There is no need to respond to your prompts, and we will not do so. The only upcoming motion you have indicated is your proposed Motion for Judicial Notice of Plaintiff's Full Administrative Complaint. You have Allstate's position. Thank you.

Kimberly Doud

Office Managing Shareholder

407.393.2951 direct, 407.864.1852 mobile, 407.641.9263 fax

KDoud@littler.com

Pronouns: She/Her



Fueled by ingenuity. Inspired by you.

Labor & Employment Law Solutions | Local Everywhere
111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, October 25, 2024 10:01 AM
To: 'Doud, Kimberly' <KDoud@littler.com>; 'Robertson, Lauren C.' <LCRobertson@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

In the interest of judicial economy (please allow [Local Rule 12-2 USCA11](#)), will you hereby admit that *April 10, 2019 marked the date that Elias Makere filed his [\[April 10, 2019\] Charge of Discrimination?](#)*

Here are the benefits (among others) to your admission:

- ✓ Save the Court's time
- ✓ Save the Parties' time
- ✓ Preclude the Need for *Appellant's Forthcoming Motion* (ie, this motion)
- ✓ Preclude the Prospects of *Appellee's Unsubstantiated Request for Costs* (regarding *Appellant's Forthcoming Motion*)
- ✓ Reduce this email chain (note: there are several more emails forthcoming – which must be communicated [for the record])
- ✓ Simplify several issues-on-appeal (see [Opening Brief at I, III, VI, VIII](#))

So, please let me know if you hereby admit that '*April 10, 2019 marked the Filing Date of my Second Charge*' (otherwise, I'll have to proceed with this motion/conferral).

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
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3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

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From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, October 25, 2024 11:02 AM
To: 'Doud, Kimberly' <KDoud@littler.com>; 'Robertson, Lauren C.' <LCRobertson@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

12PM came & went, but you failed to dispute the underlying fact (ie, that 'on February 9, 2021 Elias Makere (ie, Plaintiff/Appellant) moved the District Court (ie, The US District Court in-and-for the Middle District of Florida) to take judicial notice of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

4. On November 28, 2023 Allstate Insurance Company (ie, Defendant/Appellee) admitted that April 10, 2019 marked the date that Elias Makere filed his [\[April 10, 2019\] Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (duty to confer in good faith – persuasive authority).

Please answer before **5:00 PM EST Today (10/25/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, October 28, 2024 1:31 PM
To: Doud, Kimberly <KDoud@littler.com>; Robertson, Lauren C. <LCRobertson@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Hello Allstate,

You've missed another deadline (ie, 5:00 PM EST on Friday, October 25, 2024).

So, **another underlying fact has gone undisputed** (ie, *On November 28, 2023 Allstate Insurance Company (ie, You/Defendant/Appellee) **admitted that April 10, 2019 marked the date** that Elias Makere filed his [\[April 10, 2019\] Charge of Discrimination](#)*).

Onwards, may you please let me know if you dispute the following fact:

5. On January 9, 2024 Elias Makere (ie, Me/Plaintiff/Appellate) moved the District Court (ie, USFLMD) to punish you (via [Rule 11](#) sanctions) for your material lie [regarding the filing date of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)]
 - a. please see the first attachment ([linked here](#)).

As you probably know by now – I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **5:00 PM EST Today (10/28/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Monday, October 28, 2024 12:57 PM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Allstate disagrees with your characterization of “another underlying fact has gone undisputed.” To be clear, no fact has gone undisputed. Local Rule 3.01(g) of the United States District Court Middle District of Florida requires parties to confer regarding the relief sought in a motion filed before the Middle District of Florida. The Rule has no application before the Eleventh Circuit.

Notwithstanding, you have Allstate’s position on your Motion for Judicial Notice. Allstate will address its position in its response to your Motion. Thank you!

Regards,
Lauren

Lauren C. Robertson

Associate

407.393.2928 direct, 305.496.9749 mobile

LCRobertson@littler.com



Fueled by ingenuity. Inspired by you.

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111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, October 28, 2024 1:15 PM
To: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Afternoon Allstate,

Four days have passed and – despite authoring multiple replies – **you still haven't disputed the fact.** Therefore, the fact is [still] undisputed; as follows:

4. It is an undisputed fact that – on November 28, 2023 – Allstate Insurance Company (ie, You/Defendant/Appellee) admitted that April 10, 2019 marked the date that Elias Makere filed his [\[April 10, 2019\] Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, we're now on fact #5 (due to your failure to dispute the above-listed fact [on time]):

5. On January 9, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, [USFLMD](#)) to punish you (via [Rule 11](#) sanctions) for your material lie [regarding the filing date of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)]
 - a. please see the second attachment ([linked here](#)).

- It bears repeating, please confer the rules/regulations on attorney dishonesty/misconduct (eg [Addendum 8, 11th Circuit Local Rules](#); [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#))

Please let me know if you dispute Fact #5 [before **5:00 PM EST Today (10/28/2024)**].

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
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Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Tuesday, October 29, 2024 9:01 AM
To: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

5PM came & went, but you [once again] **failed to dispute** the underlying fact (ie, that '*On January 9, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, [USFLMD](#)) to punish you (via [Rule 11](#) sanctions) for your material lie [regarding the filing date of Elias Makere's [April 10, 2019 Charge of Discrimination](#)] to take judicial notice of Elias Makere's [April 10, 2019 Charge of Discrimination](#))*'). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

6. On March 26, 2024 the District Court (ie, USFLMD) took judicial notice of the fact that April 10, 2019 marked the date that Elias Makere filed his [April 10, 2019 Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **1:00 PM EST Today (10/29/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Tuesday, October 29, 2024 12:15 PM
To: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Afternoon Allstate,

1PM came & went, but you [once again] **failed to dispute** the underlying fact (ie, that '*On March 26, 2024 the District Court (ie, [USFLMD](#)) took judicial notice of the fact that April 10, 2019 marked the date that Elias Makere filed his [\[April 10, 2019\] Charge of Discrimination](#)*'). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

7. On April 11, 2024, Allstate Insurance Company (ie, You/Defendant/Appellant) told the District Court (ie, [USFLMD](#)) Allstate's repeated lie about the filing date of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **5:00 PM EST Today (10/29/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, October 30, 2024 9:30 AM
To: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Morning Allstate,

5PM came & went (once again), and you [once again] **failed to dispute** the underlying fact (ie, that 'On April 11, 2024, Allstate Insurance Company (ie, You/Defendant/Appellant) told the District Court (ie, [USFLMD](#)) Allstate's **repeated lie** about the filing date of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

8. On May 6, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, [USFLMD](#)) to punish you (via [Rule 11](#) sanctions) for **your [repeated] material lie** [regarding the filing date of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#)]
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **2:00 PM EST Today (10/30/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, October 30, 2024 1:06 PM
To: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: Re: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Full Administrative Complaint (4/10/19)

Good Afternoon Allstate,

2PM came & went (once again), and you [once again] **failed to dispute** the underlying fact (ie, that 'On May 6, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, [USFLMD](#)) to punish you (via [Rule 11](#) sanctions) for **your [repeated] material lie** [regarding the filing date of Elias Makere's [\[April 10, 2019\] Charge of Discrimination](#))). Thus, that fact has gone **undisputed**.

In summary, you've failed to dispute all of these underlying facts (pointing to **your ongoing/imminent perjury**):

#	Undisputed Fact	Link
1	On April 10, 2019, Elias Makere emailed his Charge of Discrimination to the Florida Commission on Human Relations	Oo_A_Email.pdf
2	The Florida Commission on Human Relations placed a 4/10/2019-2:35PM timestamp on Elias Makere's [April 10, 2019] Charge of Discrimination	Oo_B_Timestamp.pdf
3	On February 9, 2021 Elias Makere (ie, Plaintiff/Appellant) moved the District Court (ie, The US District Court in-and-for the Middle District of Florida) to take judicial notice of Elias Makere's [April 10, 2019] Charge of Discrimination	Oo_C_JudNote.pdf
4	On November 28, 2023 Allstate Insurance Company (ie, Defendant/Appellee) admitted that April 10, 2019 marked the date that Elias Makere filed his [April 10, 2019] Charge of Discrimination	Oo_D_Admission.pdf
5	On January 9, 2024 Elias Makere (ie, Me/Plaintiff/Appellate) moved the District Court (ie, USFLMD) to punish you (via Rule 11 sanctions) for your material lie [regarding the filing date of Elias Makere's [April 10, 2019] Charge of Discrimination]	Oo_E_Sanctions.pdf
6	On March 26, 2024 the District Court (ie, USFLMD) took judicial notice of the fact that April 10, 2019 marked the date that Elias Makere filed his [April 10, 2019] Charge of Discrimination	Oo_F_Order.pdf
7	On April 11, 2024, Allstate Insurance Company (ie, You/Defendant/Appellant) told the District Court (ie, USFLMD) Allstate's repeated lie about the filing date of Elias Makere's [April 10, 2019] Charge of Discrimination	Oo_G_RepeatedLie.pdf
8	On May 6, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, USFLMD) to punish you (via Rule 11 sanctions) for your [repeated] material lie [regarding the filing date of Elias Makere's [April 10, 2019] Charge of Discrimination]	Oo_H_Sanctions.pdf

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (duty to confer in good faith – persuasive authority).

Please answer before **5:00 PM EST Today (10/30/2024)**. As usual, I'll call you to follow-up.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant

Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)

Federal Case No.: 4:21-cv-00096 | (Early, USFLND)

11th Cir. Case No.: 21-11901; 22-13587

904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com

3709 San Pablo Rd. S. #701

Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

ATTACHMENT B

Conferral Emails

From: Plaintiff/Appellant/Employee X'
To: Defendant/Appellee/'Company Y'

November 2024

Showcasing Defendant's Failure
to Dispute Material/Pertinent Facts

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, November 04, 2024 8:00 AM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
 Filmore, Michelle <MFilmore@littler.com>
Subject: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Hello Allstate,

As noted multiple times¹, you are destined to commit [at least] three counts of perjury [at the [11th Circuit Court of Appeals – US](#)]. Thus, it’s my duty² to alert the court/public of your imminent defiling-of-the-judiciary.

So, do you have any objection to my upcoming “*Motion for Judicial Notice of Appellee’s Original Position Statement (Dated 9/8/17)*”?

I’m filing it pursuant to [Rule 10\(e\)\(2\) Fed. R. App. P.](#), [Rule 28\(j\) Fed. R. App. P.](#), [Local Rule 27-1 11th Cir. R.](#), and [Rules 201/301/302 Fed.R.Evid.](#)

Plaintiff:	Elias Makere, FSA, MAAA
Defendant:	Allstate Insurance Company
Case Number:	3:20-cv-00905-MMH-LLL
Court:	US Court of Appeals, 11 th Circuit
Lower Court:	US District Court, Florida, Middle District (Jacksonville)
Type:	Employment Discrimination (42 USC §1981 , §760 FS , EPA , Title VII)

Document:	<i>Appellant’s Motion for Judicial Notice of Appellee’s Original Position Statement</i>
------------------	---

¹ see [Initial Brief](#) at ¶20; see [Response... Summary Judgment](#) at ¶24/35/50/etc.; see [Motion... Sanctions](#) at ¶12/3/8/13/14/21/33/

² see [Florida’s False Claims Act](#); see [18 USC §1001](#); see [18 USC §1018](#); see [Addendum 8 11th Cir. R.](#); see [Rule 3-4.3 RRTFB](#)

Purpose = (1) substantiate Appellee’s extrinsic fraud-upon-the-court; (2) substantiate the manifest injustice that has descended upon this case; (3) supply factual framework surrounding Appellee’s discrimination; (4) streamline federal appeal; (5) help supply the details for which the Court needs; (6) corner your perjurious guilt; and more.

Please answer as soon as you can.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
 Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
 Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
 11th Cir. Case No.: 21-11901; 22-13587
 904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
 3709 San Pablo Rd. S. #701
 Jacksonville, FL 32224
Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, November 06, 2024 12:16 PM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Afternoon Allstate,

Two days have passed, but I still haven't heard back from you (regarding your position on my upcoming motion).

So, may you please let me know if you dispute the following fact:

1. In Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#), he listed race **and** sex as the bases for his discrimination complaint
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **5:00 PM EST Today (11/6/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Thursday, November 07, 2024 8:31 AM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Morning Allstate,

5PM came & went, yet you **failed to dispute** the underlying fact (ie, that 'In Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#), he listed race **and** sex as the bases for his discrimination complaint'). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

2. In Allstate Insurance Company's Response [to Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)], **Allstate acknowledged** that race **and** sex were the bases for Elias Makere's [First Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **1:00 PM EST Today (11/7/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Thursday, November 07, 2024 1:02 PM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Afternoon Allstate,

1PM came & went, yet you [once again] **failed to dispute** the underlying fact (ie, that '*In Allstate Insurance Company's Response [to Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)], Allstate acknowledged that race and sex were the bases for Elias Makere's [First Charge of Discrimination](#)*'). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

3. In the Florida Commission on Human Relations' **Notice of Determination** [regarding Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)], **the State of Florida acknowledged** that race and sex were the bases for Elias Makere's [First Charge of Discrimination](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **5:00 PM EST Today (11/7/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, November 08, 2024 9:01 AM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Morning Allstate,

5PM came & went (once again), yet you [once again] **failed to dispute** the underlying fact (ie, that ‘*In the Florida Commission on Human Relations’ Notice of Determination [regarding Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#)], the State of Florida acknowledged that race **and** sex were the bases for Elias Makere’s [First Charge of Discrimination](#)’). Thus, that fact has [once again] gone **undisputed**. Onwards...*

May you please let me know if you dispute the following fact:

4. On May 21, 2021, Allstate Insurance Company filed a document in the District Court (ie, USFLMD); thereby [falsely] stating that Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#) did **not** include a basis of sex discrimination
 - a. please see the first attachment ([linked here](#)).

Of course, I’m sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **1:00 PM EST Today (11/8/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

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From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, November 08, 2024 1:06 PM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Afternoon Allstate,

1PM came & went (once again), yet you [once again] **failed to dispute** the underlying fact (ie, that 'On May 21, 2021, Allstate Insurance Company filed a document in the District Court (ie, USFLMD); thereby [falsely] stating that Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) did **not** include a basis of sex discrimination'). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

5. On May 21, 2021, Allstate Insurance Company attached a document [to its District Court filing] that showed that Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) did **indeed** include a basis of sex discrimination
 - b. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **5:00 PM EST Today (11/8/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, November 11, 2024 9:31 AM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Morning Allstate,

5PM came & went (once again), yet you [once again] **failed to dispute** the underlying fact (ie, that 'On May 21, 2021, Allstate Insurance Company [attached a document](#) [to its District Court filing] that showed that Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) did **indeed** include a basis of sex discrimination'). Thus, that fact has [once again] gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

6. On June 11, 2021, Elias Makere (ie, me/Appellant/Plaintiff) moved the District Court to punish you (via [Rule 11 Sanctions](#)) (for your lie regarding the fact that Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) included a basis of sex discrimination).
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **1:00 PM EST Today (11/11/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, November 11, 2024 1:50 PM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Afternoon Allstate,

1PM came & went (once again), yet you [once again] **failed to dispute** the underlying fact (ie, that ‘*On June 11, 2021, Elias Makere (ie, me/Appellant/Plaintiff) moved the District Court to punish you (via [Rule 11 Sanctions](#)) (for your lie regarding the fact that Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#) included a basis of sex discrimination)*’). Thus, that fact has [once again] gone **undisputed**.
Onwards...

May you please let me know if you dispute the following fact:

7. On June 25, 2021, Allstate Insurance Company (ie, you/Appellee/Defendant) responded to Elias Makere’s [Rule 11 Motion for Sanctions](#); thereby **acknowledging** the fact that Elias Makere charged you with **perpetrating a fraud** upon the District Court (ie [USFLMD](#)) (regarding your lie about the inclusion of a sex discrimination basis [in Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#)])
 - a. please see the first attachment ([linked here](#)).

Of course, I’m sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **5:00 PM EST Today (11/11/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Tuesday, November 12, 2024 11:46 AM
To: Doud, Kimberly <KDoud@littler.com>
cc: Robertson, Lauren C. <LCRobertson@littler.com>; Vega, Eddie <EVega@littler.com>;
Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination |
Position Statement (9/8/17)

Good Morning Allstate,

5PM came & went (once again), yet you [once again] **failed to dispute** the underlying fact (ie, that ‘*On June 25, 2021, Allstate Insurance Company (ie, you/Appellee/Defendant) responded to Elias Makere’s [Rule 11 Motion for Sanctions](#); thereby **acknowledging** the fact that Elias Makere charged you with **perpetrating a fraud** upon the District Court (ie [USFLMD](#)) (regarding your lie about the inclusion of a sex discrimination basis [in Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)\]](#))’). Thus, that fact has [once again] gone **undisputed**. Onwards...*

May you please let me know if you dispute the following fact:

8. On April 11, 2024, Allstate Insurance Company (ie, you/Appellee/Defendant) told the District Court (ie [USFLMD](#)) Allstate’s repeated lie about the inclusion of a sex discrimination basis [in Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)\]](#))
 - a. please see the first attachment ([linked here](#)).

Of course, I’m sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **2:00 PM EST Today (11/12/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Tuesday, November 12, 2024 8:40 PM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Mr. Makere,

Allstate opposes your Motion for Judicial Notice of Appellee's Original Position Statement for the same reasons set forth in its Response to your Motion for Judicial Notice of Appellant's Full Administrative Complaint Dated 4/10/19. No fact has gone undisputed. Allstate disagrees with your characterizations below. Thank you!

Regards,
Lauren

Lauren C. Robertson
Associate
407.393.2928 direct, 305.496.9749 mobile
LCRobertson@littler.com



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Labor & Employment Law Solutions | Local Everywhere
111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Tuesday, November 12, 2024 9:05 PM
To: Robertson, Lauren C. <LCRobertson@littler.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Good Evening Allstate,

What “characterizations” do you disagree with?

For the sake of convenience, here are the eight undisputed facts:

1. In Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#), he listed race **and** sex as the bases for his discrimination complaint
 - a. please see the first attachment (Op_A_*.pdf)
2. In Allstate Insurance Company’s Response [to Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#)], **Allstate acknowledged** that race **and** sex were the bases for Elias Makere’s [First Charge of Discrimination](#)
 - a. please see the second attachment (Op_B_*.pdf)
3. In the Florida Commission on Human Relations’ **Notice of Determination** [regarding Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#)], **the State of Florida acknowledged** that race **and** sex were the bases for Elias Makere’s [First Charge of Discrimination](#)
 - a. please see the third attachment (Op_C_*.pdf)
4. On May 21, 2021, Allstate Insurance Company filed a document in the District Court (ie, USFLMD); thereby [falsely] stating that Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#) did **not** include a basis of sex discrimination
 - a. please see the fourth attachment (Op_D_*.pdf)
5. On May 21, 2021, Allstate Insurance Company attached a document [to its District Court filing] that showed that Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#) did **indeed** include a basis of sex discrimination
 - a. please see the fifth attachment (Op_E_*.pdf)
6. On June 11, 2021, Elias Makere (ie, me/Appellant/Plaintiff) moved the District Court to punish you (via [Rule 11 Sanctions](#)) (for your lie regarding the fact that Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#) included a basis of sex discrimination).
 - a. please see the sixth attachment (Op_F_*.pdf)
7. On June 25, 2021, Allstate Insurance Company (ie, you/Appellee/Defendant) responded to Elias Makere’s [Rule 11 Motion for Sanctions](#); thereby **acknowledging** the fact that Elias Makere charged you with **perpetrating a fraud** upon the District Court (ie [USFLMD](#)) (regarding your lie about the inclusion of a sex discrimination basis [in Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#)])
 - a. please see the seventh attachment (Op_G_*.pdf)
8. On April 11, 2024, Allstate Insurance Company (ie, you/Appellee/Defendant) told the District Court (ie [USFLMD](#)) Allstate’s repeated lie about the inclusion of a sex discrimination basis [in Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)](#)])
 - a. please see the eighth attachment (Op_H_*.pdf)

Please let me know.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Tuesday, November 12, 2024 9:21 PM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Mr. Makere,

Allstate's position will be addressed in its response. Allstate opposes your Motion. No facts have gone undisputed by Allstate.

Regards,
Lauren

Lauren C. Robertson
Associate
407.393.2928 direct, 305.496.9749 mobile
LCRobertson@littler.com



Fueled by ingenuity. Inspired by you.

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111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Tuesday, November 12, 2024 9:40 PM
To: Robertson, Lauren C. <LCRobertson@littler.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Good Evening Allstate,

What is your availability for a quick phone call?

The goal of the call will be to exhaust all '*good faith efforts to resolve [my upcoming] motion*' (please confer [Local Rule 3.01\(g\) USFLMD](#) – persuasive authority).

Therein, you'll have an opportunity to:

- (1) get a **concise explanation** of what you're being accused of (ie, perjury; defrauding the court; etc.);
- (2) get a **precise rundown** of the facts-at-hand;
- (3) **examine** the facts;
- (4) **address** your accuser;
- (5) **narrow down** the issues;
- (6) **save** judicial resources/intervention; and
- (7) more

So, may you please tell me what your availability is [for a phone call regarding my upcoming motion]?

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, November 13, 2024 9:21 AM
To: Robertson, Lauren C. <LCRobertson@littler.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Good Morning Allstate,

2PM came & went (once again), yet you [once again] **failed to [directly] dispute** the underlying fact (ie, that *'On April 11, 2024, Allstate Insurance Company (ie, you/Appellee/Defendant) told the District Court (ie [USFLMD](#)) Allstate's repeated lie about the inclusion of a sex discrimination basis [in Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)\]'](#)*). Thus, that fact has [once again] gone **undisputed**.
Onwards...

May you please let me know if you dispute the following fact:

9. On May 6, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, [USFLMD](#)) to punish you (via [Rule 11](#) sanctions) for **your [repeated] material lie** [regarding the existence of a sex discrimination basis [in Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)\]](#))
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **1:00 PM EST Today (11/13/2024)**.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, November 13, 2024 1:01 PM
To: Robertson, Lauren C. <LCRobertson@littler.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Good Afternoon Allstate,

1PM came & went (once again), yet you [once again] **failed to [directly] dispute** the underlying fact (ie, that ‘On April 11, 2024, Allstate Insurance Company (ie, you/Appellee/Defendant) told the District Court (ie [USFLMD](#)) Allstate’s repeated lie about the inclusion of a sex discrimination basis [in Elias Makere’s [First Charge of Discrimination \(circa 6/30/17\)\]’\). Thus, that fact has \[once again\] gone **undisputed**.](#)

In summary, you’ve failed to [directly] dispute all of these underlying facts (pointing to **your ongoing/imminent perjury**):

#	<u>Undisputed Fact</u>	<u>Link</u>
1	In Elias Makere’s First Charge of Discrimination (circa 6/30/17) , he listed <u>race</u> and <u>sex</u> as the bases for his discrimination complaint	Op_A_FirstCharge.pdf
2	In Allstate Insurance Company’s Response [to Elias Makere’s First Charge of Discrimination (circa 6/30/17)], Allstate acknowledged that <u>race</u> and <u>sex</u> were the bases for Elias Makere’s First Charge of Discrimination	Op_B_RespondentAnswer.pdf
3	In the Florida Commission on Human Relations’ Notice of Determination [regarding Elias Makere’s First Charge of Discrimination (circa 6/30/17)], the State of Florida acknowledged that <u>race</u> and <u>sex</u> were the bases for Elias Makere’s First Charge of Discrimination	Op_C_NOD.pdf
4	On May 21, 2021, Allstate Insurance Company filed a document in the District Court (ie, USFLMD); thereby [falsely] stating that Elias Makere’s First Charge of Discrimination (circa 6/30/17) did not include a basis of <u>sex</u> discrimination	Op_D_Perjury_20210521.pdf
5	On May 21, 2021, Allstate Insurance Company attached a document [to its District Court filing] that showed that Elias Makere’s First Charge of Discrimination (circa 6/30/17) did indeed include a basis of <u>sex</u> discrimination	Op_E_Perjury_20210521.pdf
6	On June 11, 2021, Elias Makere (ie, me/Appellant/Plaintiff) moved the District Court to punish you (via Rule 11 Sanctions) (for your lie regarding the fact that Elias Makere’s First Charge of Discrimination (circa 6/30/17) included a basis of sex discrimination).	Op_F_Sanctions_20210611.pdf
7	On June 25, 2021, Allstate Insurance Company (ie, you/Appellee/Defendant) responded to Elias Makere’s Rule 11 Motion for Sanctions ; thereby acknowledging the fact that Elias Makere charged you with perpetrating a fraud upon the District Court (ie USFLMD) (regarding your lie about the inclusion of a sex discrimination basis [in Elias Makere’s First Charge of Discrimination (circa 6/30/17)])	Op_G_Acknowledge.pdf

8	On April 11, 2024, Allstate Insurance Company (ie, you/Appellee/Defendant) told the District Court (ie USFLMD) Allstate's repeated lie about the inclusion of a sex discrimination basis [in Elias Makere's First Charge of Discrimination (circa 6/30/17))]	Op_H_RepeatedLie.pdf
9	On May 6, 2024 Elias Makere (ie, Me/Plaintiff/Appellant) moved the District Court (ie, USFLMD) to punish you (via Rule 11 sanctions) for your [repeated] material lie [regarding the existence of a sex discrimination basis [in Elias Makere's First Charge of Discrimination (circa 6/30/17))]	Op_I_Sanctions.pdf

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

For the final time, may you please let me know if you have any direct disputes to any of these facts. Please answer before **4:00 PM EST Today (11/13/2024)**. As usual, I'll call you to follow up.

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Wednesday, November 13, 2024 1:29 PM
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Mr. Makere:

We oppose you motion. We dispute the statements contained the table below as characterized. We will set forth our position in response to your motion. At this time, there is nothing further to confer about.

Kimberly Doud

Office Managing Shareholder

407.393.2951 direct, 407.864.1852 mobile, 407.641.9263 fax

KDoud@littler.com

Pronouns: She/Her



Fueled by ingenuity. Inspired by you.

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111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Wednesday, November 13, 2024 2:10 PM
To: Doud, Kimberly <KDoud@littler.com>; Robertson, Lauren C. <LCRobertson@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Position Statement (9/8/17)

Good Afternoon Allstate,

Do you dispute that the attached document is **a true & correct copy** of your *Position Statement* (9/8/17)?

Defendant's/Appellee's/Allstate's Notarized Position Statement (9/8/17)	TextBookDiscrimination.com/Files/CA11/Op_z_FullResponse.pdf
--	---

Pursuant to [Rules 201/301/302 Fed.R.Evid.](#) (also see [§90 FS](#)), the Court must have record of your knowledge of the undisputed fact(s).

Please let me know before 4:00 PM EST today (11/13/24).

Thank You,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

ATTACHMENT C

Conferral Emails

From: Plaintiff/Appellant/Employee X'
To: Defendant/Appellee/'Company Y'

December 2024

Showcasing Defendant's Failure
to Dispute Material/Pertinent Facts

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, November 25, 2024 10:46 AM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Hello Allstate,

As noted multiple times¹, you are destined to commit [at least] three counts of perjury [at the [11th Circuit Court of Appeals – US](#)]. Thus, it's my duty² to alert the court/public of your imminent defiling-of-the-judiciary.

So, do you have any objection to my upcoming “*Motion for Judicial Notice of the FCHR Case Numbers*”?

I'm filing it pursuant to [Rule 10\(e\)\(2\) Fed. R. App. P.](#), [Rule 28\(j\) Fed. R. App. P.](#), [Local Rule 27-1 11th Cir. R.](#), and [Rules 201/301/302 Fed.R.Evid.](#)

Plaintiff:	Elias Makere, FSA, MAAA
Defendant:	Allstate Insurance Company
Case Number:	3:20-cv-00905-MMH-LLL
Court:	US Court of Appeals, 11 th Circuit
Lower Court:	US District Court, Florida, Middle District (Jacksonville)
Type:	Employment Discrimination (42 USC §1981 , §760 FS , EPA , Title VII)

Document:	<i>Appellant's Motion for Judicial Notice of the FCHR Case Numbers</i>
------------------	--

¹ see [Initial Brief](#) at ¶130; see [Response... Summary Judgment](#) at ¶13/33/36/69/etc.

² see [Florida's False Claims Act](#); see [18 USC §1001](#); see [18 USC §1018](#); see [Addendum 8 11th Cir. R.](#); see [Rule 3-4.3 RRTFB](#)

Purpose = (1) substantiate Appellee's extrinsic fraud-upon-the-court; (2) substantiate the manifest injustice that has descended upon this case; (3) supply factual framework surrounding Appellee's discrimination; (4) streamline federal appeal; (5) help supply the details for which the Court needs; (6) corner your perjurious guilt; and more.

Please answer as soon as you can.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224
Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, December 06, 2024 10:01 AM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Morning Allstate,

Eleven days have passed, but I still haven't heard back from you (regarding your position on my upcoming motion).

So, may you please let me know if you dispute the following fact:

1. The FCHR assigned case number **2017-01432** to Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **2:00 PM EST Today (12/6/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, December 09, 2024 8:01 AM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Morning Allstate,

2PM came & went, yet you **failed to dispute** the underlying fact (ie, that '*The FCHR assigned case number **2017-01432** to Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)*'). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

2. On September 8, 2017, you acknowledged that the FCHR assigned case number **2017-01432** to Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Please answer before **12:00 PM EST Today (12/9/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, December 09, 2024 12:00 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

12PM came & went, yet you [once again] **failed to dispute** the underlying fact (ie, that 'On September 8, 2017, you acknowledged that the FCHR assigned case number **2017-01432** to Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#)'). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

3. The FCHR assigned case number **2019-19238** to Elias Makere's [Second Charge of Discrimination \(circa 4/10/19\)](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority).

Please answer before **5:00 PM EST Today (12/9/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, December 13, 2024 12:30:43 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

5PM came & went, yet you [once again] **failed to dispute** the underlying fact (ie, that *'The FCHR assigned case number **2019-19238** to Elias Makere's [Second Charge of Discrimination \(circa 4/10/19\)](#)'*). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

4. On May 3, 2019, an attorney filed a Notice of Appearance for Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) (ie, FCHR Case Number **2017-01432**)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith – persuasive authority*).

Additional Authorities:

Please [also] confer these additional authorities:

- [Addendum 8, 11th Circuit Local Rules](#)
 - ie *the Court's inherent power to discipline attorneys for misconduct/dishonesty*
- [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#)
 - *"The commission by a lawyer of any act that is unlawful or contrary to honesty and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor."*
 - Also see [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#), etc.

These additional authorities deal with the ramifications that your attorneys will face. Ramifications, of course, for carrying out your bidding. Bidding, of course, which is centered around [your rampant perjury/dishonesty/misconduct](#). In other words, my upcoming motion will also be used **to hold your attorneys accountable** (ie, *Kimberly-Doud-0523771, Lauren-Robertson-1024845*, etc.). Please let me know if you have any questions about that.

Please answer before **4:00 PM EST Today (12/13/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587

904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Friday, December 13, 2024 12:58 PM EST
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Allstate opposes your motion for the same reasons asserted in our prior responses and for which the Court denied your two previously filed motions for judicial notice.

Regards,
Lauren

Lauren C. Robertson

Associate | Littler

407.393.2928 direct, 305.496.9749 mobile

LCRobertson@littler.com

111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, December 13, 2024 1:16 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

As mentioned before, my conferral with you goes beyond this immediate case. My conferral also deals with your attorneys' culpability; please see the following authorities:

- [Addendum 8, 11th Circuit Local Rules](#)
 - ie the Court's inherent power to discipline attorneys for misconduct/dishonesty
- [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#)
 - "The commission by a lawyer of any act that is unlawful or contrary to honesty and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor."
 - Also see [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#), etc.

These additional authorities deal with the ramifications that your attorneys will face. Ramifications, of course, for carrying out your bidding. Bidding, of course, which is centered around [your rampant perjury/dishonesty/misconduct](#). In other words, my upcoming motion will also be used **to hold your attorneys accountable** (ie, *Kimberly-Doud-0523771, Lauren-Robertson-1024845*, etc.). Please let me know if you have any questions about that.

Moreover, you haven't disputed the fact . For the sake of convenience, I've repeated it here:

4. On May 3, 2019, an attorney filed a Notice of Appearance for Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) (ie, FCHR Case Number **2017-01432**)
 - a. please see the first attachment ([linked here](#)).

May you please let me know if you dispute that fact (↑)?

As before, please answer before **4:00 PM EST Today (12/13/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com
3709 San Pablo Rd. S. #701
Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Friday, December 13, 2024 4:01 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Hello [Again] Allstate,

4PM came & went, yet you [once again] **failed to dispute** the underlying fact (ie, that 'On May 3, 2019, an attorney filed a Notice of Appearance for Elias Makere's [First Charge of Discrimination \(circa 6/30/17\)](#) (ie, FCHR Case Number **2017-01432**)'). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

5. On May 16, 2019, you acknowledged that 2019-19238 was the case number that the FCHR assigned to Elias Makere's [Second Charge of Discrimination \(circa 4/10/19\)](#)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority). Please [also] confer these additional authorities:

Additional Authorities:

- [Addendum 8, 11th Circuit Local Rules](#)
 - ie *the Court's inherent power to discipline attorneys for misconduct/dishonesty*
- [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#)
 - "The commission by a lawyer of any act that is **unlawful or contrary to honesty** and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor."
 - Also see [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#), etc.

These additional authorities deal with the ramifications that your attorneys will face. Ramifications, of course, for carrying out your bidding. Bidding, of course, which is centered around [your rampant perjury/dishonesty/misconduct](#). In other words, my upcoming motion will also be used **to hold your attorneys accountable** (ie, *Kimberly-Doud-0523771, Lauren-Robertson-1024845*, etc.). Please let me know if you have any questions about that.

Please answer before **12:00 PM EST on Monday (12/16/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
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From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, December 16, 2024 12:01 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

12PM came & went, yet you [once again] **failed to dispute** the underlying fact (ie, that 'On May 16, 2019, you acknowledged that 2019-19238 was the case number that the FCHR assigned to Elias Makere's [Second Charge of Discrimination \(circa 4/10/19\)](#)'). Thus, that fact has gone **undisputed**. Onwards...

May you please let me know if you dispute the following fact:

6. On October 30, 2023, you claimed that Elias Makere had an attorney for his [Second Charge of Discrimination \(circa 4/10/19\)](#) (ie, FCHR Case Number **2019-19238**)
 - a. please see the first attachment ([linked here](#)).

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (duty to confer in good faith – persuasive authority).

Additional Authorities:

Please [also] confer these additional authorities:

- [Addendum 8, 11th Circuit Local Rules](#)
 - ie the Court's inherent power to discipline attorneys for misconduct/dishonesty
- [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#)
 - "The commission by a lawyer of any act that is unlawful or contrary to honesty and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor."
 - Also see [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#), etc.

These additional authorities deal with the ramifications that your attorneys will face. Ramifications, of course, for carrying out your bidding. Bidding, of course, which is centered around [your rampant perjury/dishonesty/misconduct](#). In other words, my upcoming motion will also be used **to hold your attorneys accountable** (ie, Kimberly-Doud-0523771, Lauren-Robertson-1024845, etc.). Please let me know if you have any questions about that.

Please answer before **4:00 PM EST Today (12/16/2024)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant

Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)

Federal Case No.: 4:21-cv-00096 | (Early, USFLND)

11th Cir. Case No.: 21-11901; 22-13587

904.294.0026 | justice.actuarial@gmail.com | www.TextBookDiscrimination.com

3709 San Pablo Rd. S. #701

Jacksonville, FL 32224

Ancient Proverb: For every wrong there is a right.

From: Robertson, Lauren C. <LCRobertson@littler.com>
Sent: Monday, December 16, 2024 1:01 PM EST
To: Justice (Actuarial) <justice.actuarial@gmail.com>; Doud, Kimberly <KDoud@littler.com>
cc: Vega, Eddie <EVega@littler.com>; Filmore, Michelle <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Mr. Makere,

Allstate opposes your motion for the reasons already stated. The motion is frivolous and unnecessary. Allstate will be filing a motion for determination of frivolous appeal with its Answer Brief today and pursuant to Rule 38, Federal Appellate Rules of Procedure. Please confirm if we should represent to the Court this motion is opposed by you by 5:00 p.m. EST.

Regards,
Lauren

Lauren C. Robertson
Associate
407.393.2928 direct, 305.496.9749 mobile
LCRobertson@littler.com



Fueled by ingenuity. Inspired by you.

Labor & Employment Law Solutions | Local Everywhere
111 N Orange Ave, Suite 1750, Orlando, FL 32801

From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, December 16, 2024 2:01 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

You have [still/once-again] failed to dispute the underlying fact (ie, that *'On October 30, 2023, you claimed that Elias Makere had an attorney for his [Second Charge of Discrimination \(circa 4/10/19\)](#) (ie, FCHR Case Number **2019-19238**)'*). I've given you until **4:00 PM EST Today (12/16/2024)** to directly dispute that fact.

Please keep in mind that – so far – you've failed to dispute all of these underlying facts (pointing to **your ongoing/imminent perjury**):

#	Undisputed Fact	Link
1	The FCHR assigned case number 2017-01432 to Elias Makere's First Charge of Discrimination (circa 6/30/17)	0q_A_FirstCharge.pdf
2	On September 8, 2017, you acknowledged that the FCHR assigned case number 2017-01432 to Elias Makere's First Charge of Discrimination (circa 6/30/17)	0q_B_FirstResponse.pdf
3	The FCHR assigned case number 2019-19238 to Elias Makere's Second Charge of Discrimination (circa 4/10/19)	0q_C_COA-SecondCharge.pdf
4	On May 3, 2019, an attorney filed a Notice of Appearance for Elias Makere's First Charge of Discrimination (circa 6/30/17) (ie, FCHR Case Number 2017-01432)	0q_D_NOA-FirstCharge.pdf
5	On May 16, 2019, you acknowledged that 2019-19238 was the case number that the FCHR assigned to Elias Makere's Second Charge of Discrimination (circa 4/10/19)	0q_E_NOA-SecondCharge.pdf
6	On October 30, 2023, you claimed that Elias Makere had an attorney for his Second Charge of Discrimination (circa 4/10/19) (ie, FCHR Case Number 2019-19238)	0q_F_GMOT-FalseClaim.pdf

Of course, I've been sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority). Please [also] confer the [aforementioned] authorities regarding the culpability of your attorneys (eg, [Addendum 8, 11th Circuit Local Rules](#); [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#); [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#)).

So, may you please let me know – by **4:00 PM EST Today (12/16/2024)** – if you have any direct disputes to any of these facts.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
11th Cir. Case No.: 21-11901; 22-13587
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From: Justice (Actuarial) <justice.actuarial@gmail.com>
Sent: Monday, December 16, 2024 4:02 PM EST
To: 'Doud, Kimberly' <KDoud@littler.com>
cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>; 'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

4PM came & went (once again), yet you [once again] **failed to [directly] dispute** the underlying fact (ie, that 'On October 30, 2023, you claimed that Elias Makere had an attorney for his [Second Charge of Discrimination \(circa 4/10/19\)](#) (ie, FCHR Case Number **2019-19238**)'). Thus, that fact has [once again] gone **undisputed**.

In summary, you've failed to [directly] dispute all of these underlying facts (pointing to **your ongoing/imminent perjury**):

#	<u>Undisputed Fact</u>	<u>Link</u>
1	The FCHR assigned case number 2017-01432 to Elias Makere's First Charge of Discrimination (circa 6/30/17)	Oq_A_FirstCharge.pdf
2	On September 8, 2017, you acknowledged that the FCHR assigned case number 2017-01432 to Elias Makere's First Charge of Discrimination (circa 6/30/17)	Oq_B_FirstResponse.pdf
3	The FCHR assigned case number 2019-19238 to Elias Makere's Second Charge of Discrimination (circa 4/10/19)	Oq_C_COA-SecondCharge.pdf
4	On May 3, 2019, an attorney filed a Notice of Appearance for Elias Makere's First Charge of Discrimination (circa 6/30/17) (ie, FCHR Case Number 2017-01432)	Oq_D_NOA-FirstCharge.pdf
5	On May 16, 2019, you acknowledged that 2019-19238 was the case number that the FCHR assigned to Elias Makere's Second Charge of Discrimination (circa 4/10/19)	Oq_E_NOA-SecondCharge.pdf
6	On October 30, 2023, you claimed that Elias Makere had an attorney for his Second Charge of Discrimination (circa 4/10/19) (ie, FCHR Case Number 2019-19238)	Oq_F_GMOT-FalseClaim.pdf

Of course, I'm sending you these facts & questions in accordance with [Rule 3.01\(g\) USFLMD](#) (*duty to confer in good faith* – persuasive authority). Please [also] confer the [aforementioned] authorities regarding the culpability of your attorneys (eg, [Addendum 8, 11th Circuit Local Rules](#); [Rule 3-4.3 RRTFB | Misconduct and Minor Misconduct](#); [Rule 3-5.1 RRTFB](#), [Chapter 4 RRTFB](#)).

Therefore, I'll be moving forward; and doing so – notably – on the basis that you haven't disputed any of these [indisputable] facts.

Please govern yourself accordingly.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant

Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)

Federal Case No.: 4:21-cv-00096 | (Early, USFLND)

11th Cir. Case No.: 21-11901; 22-13587

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cc: 'Robertson, Lauren C.' <LCRobertson@littler.com>; 'Vega, Eddie' <EVega@littler.com>;
'Filmore, Michelle' <MFilmore@littler.com>
Subject: RE: Judicial Notice (?) | 24-11336 | Makere v Allstate | Employment Discrimination | Case Numbers

Good Afternoon Allstate,

Do you dispute that the linked document is **a true & correct copy** of *Elias Makere's* [Second Charge of Discrimination \(circa 4/10/19\)](#) (ie, FCHR Case Number **2019-19238**)?

Plaintiff's/Appellant's Second Charge of Employment Discrimination (4/10/19)	TextBookDiscrimination.com/Files/CA11/0o_A_FullCharge.pdf
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Pursuant to [Rules 201/301/302 Fed.R.Evid.](#) (also see [§90 FS](#)), the Court must have record of your knowledge of the undisputed fact(s).

Please let me know before **12:00 PM EST tomorrow (12/17/24)**.

Thank you,

Elias Makere, FSA, MAAA | Civil Litigant
Federal Case No.: 3:20-cv-00905 | (Allstate, USFLMD)
Federal Case No.: 4:21-cv-00096 | (Early, USFLND)
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