

**In the Supreme Court of the United States**

—  
MARK WARREN TETZLAFF, PETITIONER  
v.  
EDUCATIONAL CREDIT MANAGEMENT CORPORATION

—  
*ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SEVENTH CIRCUIT*

—  
**Supplemental Certificate of Service**  
***concurrent with***  
**Judicial Notice of Two Scrivener's Errors**

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## Supplemental Certificate of Service

As indicated in the “PROOF (CERTIFICATE) OF SERVICE” for my two filings dated Friday, 05 February 2016 (namely the “MOTION OF GORDON WAYNE WATTS FOR LEAVE TO INTERVENE OR JOIN AS PLAINTIFF-PETITIONER IN ORDER TO FILE A PETITION FOR REHEARING,” *and the* “PETITION FOR REHEARING”), I served the three (3) parties of record (This Court, Counselor Douglas Hallward-Driemeier, and Counselor Natalie R. Eness), as indicated.

However, when serving the hard copy by FedEx this Friday, I used Counselor Hallward-Driemeier's old address (700 12th Street, N.W., Suite 900, Washington, DC), taken from my address book, from when he replied to an email, when we were opposing counsel in both *Obergefell, et al., v. Hodges*, No. 14-556 and *In Re Gordon Wayne Watts*, No. 14-8744, wherein he declined consent for me to file a proposed *amicus curiae* brief. While he might still get a copy of my filing (either due to my e-service and/or having his FedEx mail forwarded to his current address), nonetheless, I did not serve him properly. I pray This Court countenance this old *pro se* litigant and view my error as *de minimus*. *[[Since This Court's next conference is not until 02-22-2016, I trust and hope that there was no prejudice or inconvenience to any party for my human oversights.]]*

To correct my oversight, I am now serving ALL four (4) parties of record (see below) this “Supplemental Certificate of Service concurrent with Judicial Notice of Two Scrivener's Errors,” and also I'm serving Counselor Hallward-Driemeier's CURRENT postal address that which I filed this Friday 05 February 2016, namely my motion to intervene **and** my petition for a rehearing.

- Supreme Court of the United States, 1 First Street, N.E., Washington, DC 20543, ATTN: Clerk of the Court, (202) 479-3011, [MeritsBriefs@SupremeCourt.gov](mailto:MeritsBriefs@SupremeCourt.gov)
- ((OLD ADDRESS)) Douglas Hallward-Driemeier, Counsel for Petitioner, MARK WARREN TETZLAFF, c/o: Ropes & Gray LLP, 700 12th Street, N.W., Suite 900, Washington, DC 20005, (202) 508-4776, [Douglas.Hallward-Driemeier@RopesGray.com](mailto:Douglas.Hallward-Driemeier@RopesGray.com)
- ((CURRENT ADDRESS)) Douglas Hallward-Driemeier, Counsel of Record for Petitioner, MARK WARREN TETZLAFF, c/o: Ropes & Gray LLP, 2099 Pennsylvania Avenue, NW, Washington, DC 20006, (202) 508-4600, [Douglas.Hallward-Driemeier@ropesgray.com](mailto:Douglas.Hallward-Driemeier@ropesgray.com)
- Natalie R. Eness, Counsel of Record for Respondent, ECMC 1 Imation Place, Bldg 2 Oakdale, MN 55128 (651) 325-3636, [ness@ecmc.org](mailto:ness@ecmc.org)

\*\*\* Furthermore, I hereby certify that, contemporaneous to my service by FedEx 3rd-party commercial carrier and/or USPS, I am also serving all parties by email.

\*\*\* Furthermore, I hereby certify that, in addition to the foregoing and in addition to any availability of my brief that The Court may make available for download, I am also making my filings in the above-captioned case (the Fri 05 Feb 2016 Intervention and Rehearing filings and today's corrective filings) available for open-source (free) download, as soon as practically possible on the front-page news of The Register, whose links are as follows:

<http://www.GordonWatts.com>

and:

<http://www.GordonWayneWatts.com>

**Monday, 08 February 2015**

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s/ Gordon Wayne Watts

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## Judicial Notice of Two Scrivener's Errors

Although I genuinely believe that both of these errors did not confuse anyone, just to be sure, I shall make proper corrections.

**Under Rule 201(c)(2), Fed.R.Civ.P., The Court must take judicial notice** if a party requests it and the court is supplied with the necessary information. As we've found before (in my prior filing in the above-captioned case), **Appellate** Courts, while not bound by the Federal Rules of **Civil** Procedure, generally use them as good guidelines.

((#1)) First off, in my Certificate of Service in my intervention this past Friday, I made reference to my "MOTION FOR REHEARING," and it was clear that I meant my "PETITION FOR REHEARING."

I trust and hope that This Court does not whack me for being a poor, *pro se* litigant, who is preparing these filings without the aid of any lawyer: The meaning should have been clear from the content.

((#2)) Moreover, when proof-reading my brief, after I filed it & served all parties, I found a small number of grammatical-type Scrivener's errors, none of which should confuse anybody, but one was particularly odd—In my "PETITION FOR REHEARING" (page 3, paragraph 2, centre of page), I said the following:

“Well, ability to file bankruptcies is the 'Economic Second Amendment,' and when colleges knew student loans were almost impossible to discharge in bankruptcy (due to the *Brunner* test).”

**That was not a complete sentence and left the reader 'hanging'** like a 'hanging chad' in the 2000 residential race recounts. (I was very fatigued for a number of reasons, not the least of which was my IPF paperwork, which left me spent and fatigued.) – What I (clearly) meant was the following:

“Well, the ability to file bankruptcies is the 'Economic Second Amendment,' and when colleges knew student loans were almost impossible to discharge in bankruptcy (due to the *Brunner* test), the colleges and lenders knew student borrowers of college loans were unable to defend themselves—and both parties engaged in Predatory Lending, victimising the helpless & defenseless college student borrowers with soaring & skyrocketing tuition—price-gouging them, like one shoots 'fish in a barrel'.

For this reason, (conservative) supporters of the Second Amendment should not deny college students. Likewise, (liberal) supporters of helpless college students should be in agreement that student borrowers need the same protections as ALL OTHER borrowers—including **Credit Card users** and the “**über-rich**,” all of whom can obtain bankruptcy discharge.”

Respectfully submitted,

**Monday, 08 February 2015**

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s/ Gordon Wayne Watts  
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