

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

DIVISION OF ADMINISTRATIVE LAW APPEALS

DOCKET # RM-14-363

[BORIM # 2010-426]

2 March 2015

Board of Registration in Medicine)
Petitioner)
)
vs.)
)
Bharanidharan Padmanabhan MD PhD)
Respondent (Dr Bharani))

MOTION TO REQUEST ISSUANCE OF A WRITTEN RULING REGARDING
RESPONDENT’S RAISING OF THE DOCTRINE OF UNCLEAN HANDS
IN
RESPONDENT’S 13 JANUARY 2015 ‘MOTION TO COMPEL DISCOVERY
AND SEEK SANCTIONS FOR CONSCIOUS FRAUD BY THE GOVERNMENT’

- 1 Respondent filed in early January 2015 a proper Motion regarding the US Supreme Court’s condemnation of unclean prosecutions and the Doctrine of Unclean Hands but has to date received no written Ruling in response.

- 2 Respondent proved that the Petitioner, the Government’s Board of Registration in Medicine, had consciously engaged in the same egregious unlawful conduct that has already been condemned by the US Supreme Court and condemned again by the US Ninth Circuit on the 8th of January 2015. US 9th Cir. 13-56132

- 3 Since Respondent’s submission of his Motion on the Government’s Unclean Hands, he has since further proved felony perjury by the Government’s

witnesses, conduct that they engaged in expressly to further the Government's false unclean prosecution.

- 4 As the felony perjury was expressly in support of the Government's corrupt false prosecution, there is no way the Government's lawyer, Mr James Paikos, is unaware that his witnesses LIED UNDER OATH or that they were going to.
- 5 To date Respondent is unaware of any Motion by the Government's lawyer to repudiate his witnesses' felony perjury despite his obligation to do so as an attorney licensed in the Commonwealth of Massachusetts and under ABA Rules, unlike the California Attorney General who, with her public immediate response in the judicially condemned Ninth Circuit case proved she clearly cares about the rule of law and the interests of justice. Attached.
- 6 Wherefore Respondent respectfully requests the Hearing Officer to issue a long-awaited written Ruling on whether DALA accepts and abides by rulings from the US Supreme Court regarding unclean hands.
- 7 Respondent also respectfully requests a written Ruling from the Hearing Officer condemning the subornation of perjury by the Government as well as deliberate knowing conscious use of anonymous unsworn testimony in conscious contravention of both the law which the Government is required to uphold as well as a clear ruling from the US Supreme Court.

Respectfully submitted,

Bharanidharan Padmanabhan MD PhD

pro se

Board Certified in Neurology

Double-Fellowship-trained in Multiple Sclerosis

PhD in Multiple Sclerosis

I hereby certify that I served a copy of this Motion to BORIM Counsel James Paikos and his supervisor Debra Stoller separately via Fax on the 3rd of March, 2015.

Bharanidharan Padmanabhan MD PhD

pro se

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