(Appellate Case: 15-4189)

FOR THE TENTH CIRCUIT

FEB. 28, 2017

FILED IN UNITED STATES DISTRICT COURT, DISTRICT OF UTAH

FEB 2 8 2017

D. MARK JONES, CLERK

DEPUTY CLERK

Plaintiff-Appellant, v.

GARY R. HERBERT, in his official capacity as Governor of the State of Utah, and JOSEPH K. MINER, in his official capacity as Executive Director of the Department of Health, *Defendants-Appellees*.

On Appeal From the United States District Court for the District of Utah Honorable Clark Waddoups, No. 2:13-CV-00217

IN THE UNITED STATES COURT OF APPEALS

PLANNED PARENTHOOD ASSOCIATION OF UTAH,

## MOTION FOR DISCOVERY

NOW COMES a Friend of the court, Jonathan L. Peterson of 3670 S. RedMaple Rd. SLC, UT 84106

# TO THE HONORABLE Chief Judge Timothy M. Tymkovich & 10th Circuit Court of Appeals:

-In pursuit of justice for the unborn, currently denied competent legal Representation,

I present a science survey for court recognized experts (medical doctors & PhD. Life science experts) for their opinion on this crucial question that is the foundation of Roe vs.Wade or Abortion on demand rights of women to take their life.

I request the courts and other parties subpoena the expert witnesses I have requested and any other qualified experts for their (under legal oath) give opinions so this denied truth of science reality can prevent further taking of human life outside of medical necessity or due process (for rape & incest).

So far, none of the authorities with responsibility to use this new information have asked experts so a court record can confirm science consensus to prevent further unconstitutional loss of life.

Our unborn have a right to ask for expert opinion, by the citizen group who take their very lives, now having knowledge and will not share it with the public, their patients or the court: without subpoena forcing them. Demand this question be answered and place their answers in the court record to save our unborn lives.

"When Is the Beginning of Life For All (higher) Life Forms: Except Human Beings?

1-\_ at the starting point of fertilized egg having cell animation.

2- at some later point in time after fertilized egg cell animation is detected.

I request subpoenas for witnesses & their responses: of both Pro-Life & Pro-Choice Experts for the court.

6 stated as Pro-Life doctors & 6 or more Pro-Choice doctors currently performing abortions.

Dr. Joseph K. Miner-director Utah Dept.of Health

Dr. Lexi Grosvenor Eller, MD-Intermountain Health

Utah Sen./Dr. Brian S. Shiozawa Utah Rep./Dr. Michael S. Kennedy

Dr. Leah Torres, MD- IASIS Healthcare Dr. M. Sean Esplin, MD- U.of Utah Prof.

Utah Rep./Dr. Michael S. Kennedy Utah Rep./Dr. Edward H. Redd Utah Rep./Dr. Stewart E. Barlow Dr. Mr. Sean Esplin, MD- U.of Utan Prof.
Dr. Nicola Riley, MD SMP Family Medicine

Utah Rep./Dr. Raymond P. Ward

Dr. David Turok, U.of Utah ob-gyn professor

I also request subpoena for UAG Sean Reyes & asst. UAG attorney Daniel Burton for testimony- as to why they have not used the Science Survey, having it for over a year.

### RESPECTFULLY SUBMITTED

by myself, Jonathan L. Peterson: as a friend of the court and being under Constitutional Oath for life – Honorable Discharge US Army 1973.

I, the undersigned, hereby certify that a true and correct copy of the foregoing Motion for Discovery was forwarded to Gov. Gary Herbert, Joseph Miner, Peggy A. Tomsic (plaintiff), Judge Clark Waddoups and UAG Sean Reyes.

Name JONATHAN L. PETERSON Sign

Services Will CINITITUDE

FEB 2 8 2018

AT DEPT. OF HEALTH - UTAH

FEB 2 8 2017

GENERAL

EXECUTIVE

Office of the Governor

## **Description of Attached Document**

APPELLATE CASE: 15-4189 IN THE UNITED STATES COURT OF APPEALS Title of Type of Document

FEB. 28, 2017

**Number of Pages** 

Jurat

State of

County of

Subscribed and sworn to before me on this 26 of Feb

year

name of document signer

Witness my hand and official seal.

**Notary Signature** 

NAYELI MANZANO
Notary Public • State of Utah
Commission # 688114 My Commission Expires
April 01, 2020

(seal)

Jonathan L. Peterson Behavior Research for Humanity IIC. 3670 S. Red Maple Rd. Salt Lake City, UT 84106 (ph.208-650-1346) ilp1997@msn.	APPLIED LOGIC- If you believe the answer to Q&A is choice #1- Then does this truth apply to human life as well? (true)		Title or expertise (email).	NAME JOSEPH K. MINER M.D. SIGN	When Is the Beginning of Life For All (higher) Life Forms: EXCEPT HUMAN  1at the starting point of fertilized egg having cell animation.  2at some later point in time after fertilized egg cell animation is	ASK FOR THEIR SCIENCE-BASEDOPINION W-STATEMENT @AmerMedicalAssn @StevenStackMD SEP -9 2016  3: 35 / ATTORNEY GENERAL SEP -9 2016  DEC 20 2016  SUBVEY FOR DOCTORS OF MEDICINE & Ph. D LIFE SCIENCE EXPERTS-
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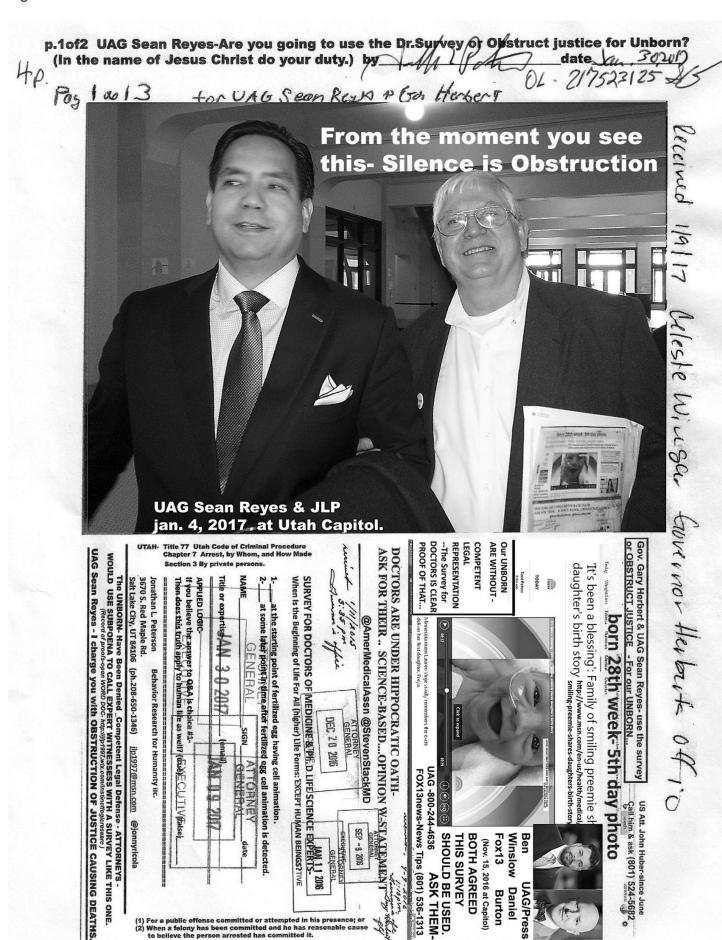
WOULD USE SUBPOENA TO CALL EXPERT WITNESSESS WITH A SURVEY LIKE THIS ONE.

(Record of proofs-open WORD DOC- http://jip1997.wix.com/instinctlogicresearc)

The UNBORN- Have Been Denied Competent Legal Defense - ATTORNEYS -

What possible excuse could you have: not to use this proof of life? (world)

Jonathan L. Peterson B	If you believe the answer to Q&A is choice #1- Then does this truth apply to human life as we	APPLIED LOGIC-	Title or expertise	Rep. Stewart Barlow MD Sen. Brian Shiozawa MD NAME Rep. Raymond Ward MD SIGN	1at the starting point of fertilized egg hat 2at some later point in time after fertilized egg hat some later point in time after fertilized egg hat some later point in time after fertilized egg hat some later point in time after fertilized egg hat some later point in time after fertilized egg hat some later point in time after fertilized egg hat some later point of fertilized egg hat some later point in time after fertilized eg	SURVEY FOR DOCTORS When Is the Beginning of Life	received 3:35 pm office	K FOR THEIR SCIE  @AmerMedia	CTORS ARE UNDER
Behavior Research for Humanity IIc.	If you believe the answer to Q&A is choice #1- Then does this truth apply to human life as well? (true)		(email)	Barlow MD iozawa MD Ward MD SIGN	at the starting point of fertilized egg having cell animation. at some later point in time after fertilized egg cell animation.  Rep. Michael Kennedy MD  Rep. Edward Redd MD	SURVEY FOR DOCTORS OF MEDICINE & PH. D LIFE SCIENC when Is the Beginning of Life For All (higher) Life Forms: EXCEPT HUM	DEC 20 2016	ASK FOR THEIR SCIENCE-BASEDOPINION W-S  @AmerMedicalAssn @StevenStackMD	DOCTORS ARE UNDER HIPPOCRATIC OATH-
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Gov. Gary Herbert & UAG Sean Reyes- use the survey or OBSTRUCT JUSTICE - For our UNBORN...



#### JONATHAN

# born 28th week-5th day photo

'It's been a blessing': Family of smiling preemie sh daughter's birth story http://www.msn.com/en-us/health/medical, smiling-preemie-shares-daughters-birth-story





**UAG/Press** 

**Our UNBORN ARE WITHOUT -**

TODAY

Terri Peters

COMPETENT **LEGAL** REPRESENTATION -- The Survey for **DOCTORS IS CLEAR** PROOF OF THAT...



Fox13 Burton (Nov. 15, 2016 at Capitol) **BOTH AGREED** 

Winslow Daniel

THIS SURVEY SHOULD BE USED.

4-9-2016

Minnesota mom Lauren Vinje vividly remembers the excite deliver her first daughter, Freya.

UAG -800-244-4636

**ASK THEM-**

FOX13news-News Tips (801) 536-1313

DOCTORS ARE UNDER HIPPOCRATIC OATH-ASK FOR THEIR .. SCIENCE-BASED .... OPINION W-STATEM

@AmerMedicalAssn @StevenStackMD

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SURVEY FOR DOCTORS OF MEDICINE & Ph.D LIFE SCIENCE EXPERTS When Is the Beginning of Life For All (higher) Life Forms: EXCEPT HUMAN BEINGS?TIVE

Dr. Rand P	aul (Senator) <sub>sid</sub>	in	date
Title or expertise		(email)	(twitter- @RandPau
APPLIED LOGIC-			
If you believe the answ Then does this truth ap	er to Q&A is choice #3 oly to human life as w	- /ell? (true)	(false)
			:=====================================
Jonathan L. Peterson 3670 S. Red Maple Rd. Salt Lake City, UT 84106	Behavior Research (ph.208-650-1346)	ilp1997@msn.com	@jonnyricola

Attn. Dr. Michael S. Kennedy-(fax-801-796-0625) 2nd fax number (Feb. 11, 2017) Premier Family Medical - Lindon Clinic and Urgent Care 801-796-1333

I have submitted medical evidence several times to you\_that your patients rights are being violated by murder.

You are under Hippocratic Oath, Officer of the Court Oath & under Constitutional Oath of office for Utah House member.

Your silence is inexcusable and obstruction of Justice. I hope you will do your duty under all three oaths.

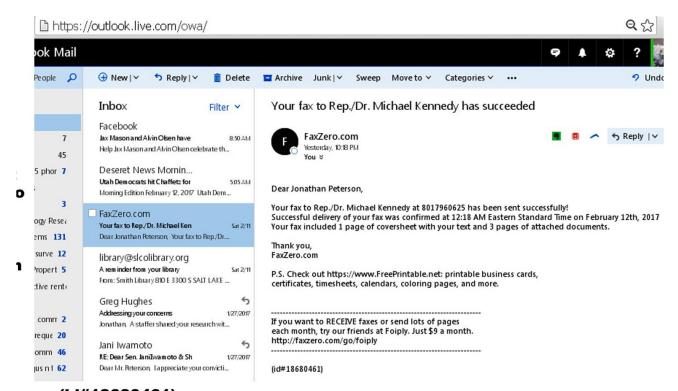
State your expert opinion and file it with UAG Reyes, the House & Senate & as a courtesy give me a copy to use for the unborn rights of discovery, to be enforced. I would that you do not need this threat of prosecution- but going against instinct is very difficult. If you don't take responsibility and support the Dr. Survey given to you many times-with your expert opinion. I will file against you and the other doctors under Constitutional Oath with the

http://www.dopl.utah.gov/investigations/complaint.html

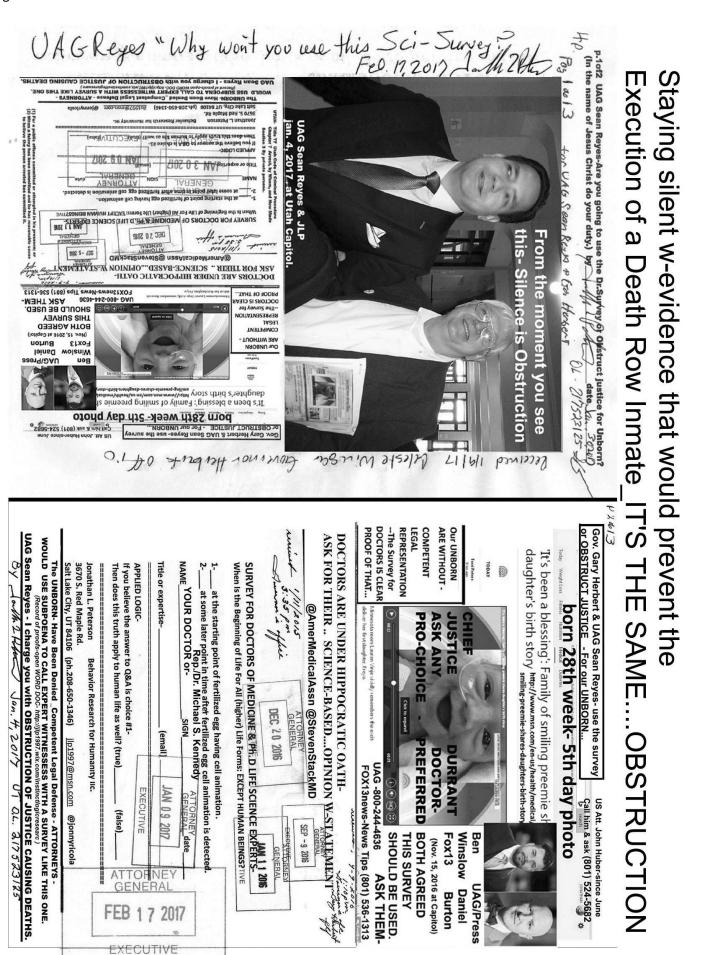
You and doctors Redd, Barlow & Shiozawa must make public this new information or violate law.

Please call me and let me know of your intentions. Sincerely, Jonathan L. Peterson 3670 S. RedMaple Rd. SLC,UT 84106 (208-659-1346) jlp1997@msn.com @jonnyricola (twitter)

PDF- UAG Reyes 4p stamped & ID JAN.30- 2017 COLOR 72dpi P 1of4 FX photos B&W4fax 11x8 PDF- UAG Reyes 4p stamped & ID JAN.30- 2017 COLOR 200dpi P 3of4 FX photo B&W PDF- GOV. SURVEY jan 11, 2016 FX 4th stamp Rep.-Dr. Michael S. Kennedy 200dpi B&W Z 90



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p.3 of 4

This is the end of ROEvsWADE & ABORTION on DEMANDWe don't need an Amendment or
US Supreme Court to get a court injunctionbased on expert witness testimony filed in state & federal courts.
NO EXPERT IS GOING TO SAY CHOICE #2
When under oath....that would be PERJURY.
Use the DR. SURVEYIT IS A GIFT FROM GOD.
sincerely,
brother-longthan

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CTORS ARE UNDER HIPPOCRATIC OF THEIR SCIENCE-BASEDO	PINION W-STATEMENT
@AmerMedicalAssn @StevenS	StackMD GENERAL
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Jonathan L. Peterson Behavior Research for Humanity IIC.	APPLIED LOGIC- If you believe the answer to Q&A is choice #1- Then does this truth apply to human life as well? (true).	expertise	1at the starting point of fertilized egg having cell animation. 2at some later point in time after fertilized egg cell animation NAME Rep./Dr. Michael S. Kennedy SIGN	ASK FOR THEIR SCIENCE-BASEDOPINION W-STATEMEN  @AmerMedicalAssn @StevenStackMD  ATTORNEY  ATTORNEY  GENERAL  GENERAL  SEP -9 2016  SURVEY FOR DOCTORS OF MEDICINE & Ph. D LIFE SCIENCE EXPERTS-  when is the Beginning of Life For All (higher) Life Forms: EXCEPT HUMAN BEINGS? TIVE
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WOULD USE SUBPOENA TO CALL EXPERT WITNESSESS WITH A SURVEY LIKE THIS ONE.

(Record of proofs-open WORD DOC- http://jip1997.wix.com/instinctlogicresearc) The UNBORN- Have Been Denied \_Competent Legal Defense - ATTORNEYS -

(notarize)-

Sen. Orrin Hatch & Sen. Mike Lee -

(801-524-4380)

(801-524-5933)

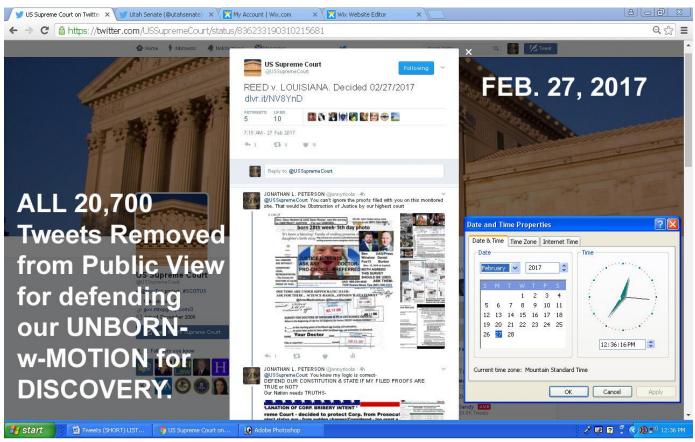
Or UAG Sean Reyes (800-244-4636

= MURDER ENDS.

1 phone Call to US Attorney John Huber (801-524-5682

P.5 of 13 P.5 of 13 & Utah House of Representatives ews were Human Being orcea THE INSANITY OF "CHOICE" =Forced Remorse UTAH-**Title 77 Utah Code of Criminal Procedure** Chapter 7 Arrest, by Whom, and How Made WOULD USE SUBPOENA TO CALL EXPERT WITNESSESS WITH A SURVEY LIKE THIS ONE.
(Record of proofs-open WORD DOC- http://jip1997.wix.com/instinctlogicresearc) Section 3 By private persons. THEY MUST USE IT. ROEVSWADE. IS Based On FALSE BELIEFS = DUTY Gov. Herbert & UAG Reyes have Dr.SURVEY FOR MONTHS & KNOW **Planned** The UNBORN- Have Been Denied \_Competent Legal Defense - ATTORNEYS -Salt Lake City, UT 84106 3670 S. Red Maple Rd. When Is the Beginning of Life For All (higher) Life Forms: EXCEPT HUMAN BEINGS? TIVE SURVEY FOR DOCTORS OF MEDICINE & PH. D LIFE SCIENCE EXPERTS Jonathan L. Peterson APPLIED LOGIC-NAME YOUR DOCTOR If you believe the answer to Q&A is choice #1 Title or expertise-Then does this truth apply to human life as well? (true) or Sen./Dr. Brian E. Shiozawa at the starting point of fertilized egg having cell animation. at some later point in time after fertilized egg cell animation is detected **Parenthood** hope you repent before-WRATHofGOD (ph.208-650-1346) Behavior Research for Humanity IIc. GENERAL DEC 20 2016 SIGN (email jlp1997@msn.com bshiozawa@le.utah.gov EXECUTIVE JAN 0.9 2017 a Baby Is a Bad Cho (false) @jonnyricola KECKEN DRIVEY SEP - 9 2016 GENERAL (1) For a public offense committed or attempted in his presence; o

@UtahSenate- U R a creepy bunch of unfaithful, unlawful, violators of your constitutional oath of office-



https://twitter.com/jonnyricola/status/836243832891027456 https://twitter.com/jonnyricola/status/836245279590404096 https://twitter.com/jonnyricola/status/836246084041101312 https://twitter.com/jonnyricola/status/836246914018365440 https://twitter.com/jonnyricola/status/836247981112250368

