

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA, JACKSONVILLE DIVISION

ELIAS MAKERE, FSA, MAAA )  
 )  
Plaintiff ) Case No (LT)  
 ) **3:20-cv-00905-MMH-LLL**  
 )  
v. )  
 )  
ALLSTATE INSURANCE COMPANY, )  
 )  
Defendant )

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**PLAINTIFF’S NOTICE OF RELATED ACTION**  
**([APPELLATE] MOTION TO SET ASIDE DEFAULT)**

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PLEASE TAKE NOTICE – pursuant to Local Rule 1.07(c) – that Plaintiff, ELIAS MAKERE, has notified the 11<sup>th</sup> Circuit Court of Appeals of his forthcoming ‘*Motion to Set Aside Clerk Default*’. Plaintiff, of course, is the appellant in that ‘*foreign*’ case (hereinafter “Appellate Case”). The Appellate Case is as follows:

|                   |   |
|-------------------|---|
| Court:            | US Circuit Court of Appeals, 11 <sup>th</sup> Circuit |
| Case Number:      | 24-11336-J  |
| Case Number (LT): | 3:20-cv-00905-MMH-LLL (USFLMD)                        |
| Caption:          | Makere v Allstate                                     |
| Type:             | 42 USC §1981; 42 USC §1985; EPA; FCRA; Title VII;     |
| Appellant:        | Elias Makere, FSA, MAAA                               |
| Appellee:         | Allstate Insurance Company                            |

### Relation:

1. The Appellate Case and the instant case (ie, *Makere v Allstate*), stem from the **same transactions & occurrences**. Specifically, the cases share the same facts surrounding: (i) **Defendant's employment discrimination**; (ii) the State of Florida's **directed corruption** (eg, **perjury, evidence destruction, statutory bribery**, etc.); and (iii) the government's errors (which have injured Plaintiff). Plus, they are infused with the same **prejudicial animus** for Plaintiff.
2. Notably, the Appellate Case is a direct appeal of the instant case {#119}.

### Pending Matters

3. Moreover, the Appellate Case will soon be ruling on a *Motion to Set Aside Default*. Earlier today, Plaintiff notified that court of [his upcoming filing of] that [aforementioned] motion. A copy of that Plaintiff-written notice is attached (please see **Attachment A**).
4. Summarized briefly, the 11<sup>th</sup> Circuit Clerk punished Plaintiff for Defendant's shortcomings. Plus, immediately thereafter – on Friday, July 5, 2024 – that same clerk attempted to entice this Court to [use its false/unconstitutional punishment to] further disenfranchise Plaintiff.
5. As such, Plaintiff hereby notifies this Court of the 11<sup>th</sup> Circuit Clerk's fraudulent enticement. A fraudulence that Plaintiff will fully brief the 11<sup>th</sup> Circuit Court of Appeals on (within the required time).

**CONCLUSION**

WHEREFORE, Plaintiff respectfully asks this Court to: (i) beware of the 11<sup>th</sup> Circuit Clerk's fraudulent enticement (see {#130}); and (ii) await the 11<sup>th</sup> Circuit's ruling on Plaintiff's forthcoming '*Motion to Set Aside Clerk Default*' – before considering the 11<sup>th</sup> Circuit's fraudulent enticement.

Dated this 10<sup>th</sup> day of July 2024.

Respectfully submitted,

/s/ Elias Makere

**ELIAS MAKERE, FSA, MAAA**, Appellant

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Hobart, IN 46342

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## CERTIFICATE OF COMPLIANCE

I certify that the size and style of type used in this document is Times New Roman 14-point Font (caption) and Century Schoolbook 13-point Font (contents); thus complying with the font requirements of Local Rule 1.08.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10<sup>th</sup> day of July 2024, I electronically filed the foregoing with the Clerk of Courts by using its online filing page. A notice – via CM/ECF – will be sent to the attached service list.

/s/ Elias Makere

Endnotes:

Link to Underlying Complaint ([HTML](#), [PDF](#), [Video](#))

|              |  |
|--------------|--|
| <b>HTML</b>  | <a href="http://TextBookDiscrimination.com/Allstate/Complaint-Full">TextBookDiscrimination.com/Allstate/Complaint-Full</a>   |
| <b>PDF</b>   | <a href="http://TextBookDiscrimination.com/Files/USFLMD/20000905_AAC_20211104_230439.pdf">TextBookDiscrimination.com/Files/USFLMD/20000905_AAC_20211104_230439.pdf</a> |
| <b>Video</b> | <a href="https://youtu.be/e3mgBPHesXg">https://youtu.be/e3mgBPHesXg</a>  |

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[TextBookDiscrimination.com/Files/USFLMD/20000905\\_NGEN\\_20240710\\_105527.pdf](http://TextBookDiscrimination.com/Files/USFLMD/20000905_NGEN_20240710_105527.pdf)

### SERVICE LIST

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*(defendant's trial lawyers)*

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7/10/2024  
24-11336-J

# ATTACHMENT A

Court Filing in the 'Appellate Case'

|                   |   |
|-------------------|---|
| Court:            | US Circuit Court of Appeals, 11 <sup>th</sup> Circuit |
| Case Number:      | 24-11336-J  |
| Case Number (LT): | 3:20-cv-00905-MMH-LLL (USFLMD)                        |
| Caption:          | Makere v Allstate                                     |

|            |   |
|------------|---|
| Type:      | 42 USC §1981; 42 USC §1985; EPA; FCRA; Title VII; |
| Appellant: | Elias Makere, FSA, MAAA                           |
| Appellee:  | Allstate Insurance Company                        |

|             |   |
|-------------|---|
| Document:   | <i>Appellant's Notice of his Forthcoming Motion to Set...</i>   |
| Date Filed: | Wednesday, July 20, 2024  |
| Link:       | <a href="https://TextBookDiscrimination.com/Files/CA11/24011336_NGEN_20240710_093139.pdf">TextBookDiscrimination.com/Files/CA11/24011336_NGEN_20240710_093139.pdf</a> |

[entire document]

UNITED STATES COURT OF APPEALS  
ELEVENTH CIRCUIT

|                            |   |  |
|----------------------------|---|--|
| ELIAS MAKERE, FSA, MAAA    | ) | <u>CASE NUMBER</u>   |
| Appellant/Plaintiff        | ) | <b>24-11336-J</b>  |
|                            | ) |  |
| v.                         | ) |  |
|                            | ) |  |
| ALLSTATE INSURANCE COMPANY | ) | <u>(LT)</u>  |
| Appellee/Defendant         | ) | 3:20-cv-00905-MMH-LLL<br>US District Court, Florida, Middle District |

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**APPELLANT’S NOTICE OF HIS FORTHCOMING  
MOTION TO SET ASIDE THE CLERK’S DEFAULT<sup>1/</sup>**

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PLEASE TAKE NOTICE that Appellant, ELIAS MAKERE, on this 10<sup>th</sup> day of July 2024, has begun to prepare a *Motion to Set Aside Default*. He will file that motion pursuant to Rule 42-2(e) 11<sup>th</sup> Cir. R. (also see Rule 42-3(e) 11<sup>th</sup> Cir. R.); and within the time specified. According to that rule’s prescribed 14-day window, Appellant has until Monday, July 22, 2024 to do so.<sup>2/</sup>

Of course, Appellant’s motion will be aimed at curing multiple fallacies in the Clerk’s default. Briefly stated, the Clerk entered his default:

- (a) on a false basis; and
- (b) without providing [required] notice.

Moreover, the facts/records show that Appellant has never failed to: (i) comport with a court rule; (ii) comport with a federal rule; and/or (iii) comport with a court-order/clerk-directive.

In fact, Appellee was the [only] litigant who failed to comport with this tribunal's direct orders<sup>3/</sup>.

So, in other words, the 11<sup>th</sup> Circuit Clerk punished Appellant for Appellee's shortcomings. A punishment for which this Clerk has [thereafter] enticed the lower court to use [as ammo] to further disenfranchise Appellant. These elements - and more - will be detailed in Appellant's forthcoming motion.<sup>4/</sup>

#### **CONCLUSION**

WHEREFORE, Appellant respectfully asks this Court to await Appellant's forthcoming '*Motion to Set Aside Clerk Default*'. Because - in addition to it being false - the Clerk has weaponized it to loom peril onto Appellant's cause of action.

Dated this 10<sup>th</sup> day of July 2024.

Respectfully submitted,

/s/ Elias Makere

**ELIAS MAKERE, FSA, MAAA**, Appellant

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Hobart, IN 46342

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**CERTIFICATE OF COMPLIANCE**

I certify that the size and style of type used in this document is Courier New 12-point font (contents); thus complying with the font requirements of Local Rule 1.08.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of July 2024, I electronically filed the foregoing with the Clerk of Courts by using its online filing page. A notice - via CM/ECF - will be sent to the attached service list.

**/s/ Elias Makere**

**Endnotes:**

<sup>1/</sup> Appellant files this Notice pursuant to Rule 2-1 11<sup>th</sup> Cir. R. (also see Rule 1(a)(2) Fed. R. App. P.; and Local Rule 1.01(a) USFLMD)

<sup>2/</sup> Please see Rule 26 Fed. R. App. P. for the calculation of time (also see Rule 6 Fed. R. Civ. P.).

<sup>3/</sup> On May 31, 2024, this tribunal directed Appellee (ie, Allstate Insurance Company) to cure one of Appellee's deficiencies. In other words, this tribunal never directed Appellant to cure any conceivable filing deficiency.

<sup>4/</sup> One detail is the fact that the Clerk – just hours after entering his erroneous default – went on a week's long sabbatical. Thereby delaying corrective action (and fastening court intervention).

Link to Underlying Complaint ([HTML](#), [PDF](#), [Video](#))

|              |  |
|--------------|--|
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| <b>PDF</b>   | <a href="http://TextBookDiscrimination.com/Files/USFLMD/20000905 AAC 20211104 230439.pdf">TextBookDiscrimination.com/Files/USFLMD/20000905 AAC 20211104 230439.pdf</a> |
| <b>Video</b> | <a href="https://youtu.be/e3mgBPHesXg">https://youtu.be/e3mgBPHesXg</a>  |

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Orlando, FL 32801-2366  
*(defendant's trial lawyers)*

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# CIP

United States Court of Appeals  
Eleventh Circuit

24-11336-J  
*Makere v Allstate*

{unchanged}

UNITED STATES COURT OF APPEALS  
ELEVENTH CIRCUIT

*Makere v Allstate, 24-11336-J*

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**CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

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Lower Tribunal:

Lambert, Laura

Magistrate

Howard, Marcia

District Judge

Parties:

Allstate Insurance Company

(NYSE: ALL)

Makere, Elias (FSA, MAAA)

Appellant

Appellant is not a subsidiary/affiliate of a publicly owned corporation. Pursuant to Rule 26.1-2 11<sup>th</sup> Cir. R., Appellant does not know of any other entities that have interest in this case. Appellant hereby certifies that this CIP is complete.