
CASE No. 24A261
IN THE
Supreme Court of the United States

LILIA BELKOVA.,

Petitioner.

v.

PNC BANK, N.A.,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME
WITHIN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**

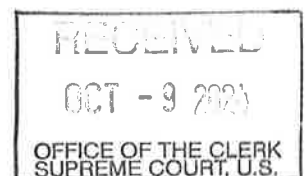
TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE EVENTH CIRCUIT:

Pursuant to Supreme Court Rule 13.5, Petitioner, Lilia Belkova Russo, f/k/a/ Lilia Belkova respectfully requests a 30-day extension of time, to and including Sunday, November 17, 2024, within which to file a petition for writ of certiorari to review the Opinion of Eleventh Circuit Court of Appeals affirming United States District Court' for the Middle District of Florida Dismissal as moot of her fully briefed Appeal from Summary Judgement in Bankruptcy Court's Adversary proceeding.

Opinion of Eleventh Circuit Court of Appeals dated June 20, 024, *Lilia Belkova, v. PNC Bank NA., Case No: 22-13786* is attached as Exhibit "A" to Applicant's first motion for Extension of time.

The jurisdiction of this court will be invoked under 28 U.S.C. §1254(1).

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1. Petitioner is a permanently disabled person, who has been determined to meet the Threshold of Incapacity according to the official "Personal Incapacity Assessments" for purposes of receiving State benefits in England since April 20, 2021.(Please see attached as Exhibit "A" the official letter issued by Incapacity benefits Center in Halifax, England to the Ministry of Justice of Russian Federation for the purpose of being filed in her father's probate case.)

2. Petitioner's Incapacity is caused by chronic mercury poisoning since childhood which manifested in multiple physical ailments including chronic fatigue, which greatly diminishes her physical and mental stamina and productivity Additionally, because English is a foreign language for petitioner and she is a 58 years old who was educated before computers came into use, it takes her a lot of time to draft legal documents.

3. On August 29th, 2024, Petitioner unexpectedly suffered complication of her physical condition, which resulted in an accidental laceration to her right foot deep to the bone, which completely severed her extensor tendon in her right foot.

4. The undersigned mailed an Application for Extension of Time to file Petition for Writ of Certiorari to this Court with attached hospital and surgical documentation, including the Doctor's Note given to her by her operating surgent, advising that Patient "has been strict NWB (non-weight-bearing) to the right foot due to surgical repair right foot extensor tendon. Patient to be excused from work/legal proceedings until October 26, 2024. Remain NWB", and requested a 60-day extension of time to November 17th, 2024 to file Petition for Writ of Certiorari. The Court graciously granted an extension of time, but only until September 18th, 2024.

5. Accordingly, the undersigned made every effort to meet the deadline but she is struggling to care for her basic needs as she does not have an accommodation suitable for a non-walking person, no ability to drive or carry anything in her hands while she is using her

hands to get herself moving around. Petitioner has no disability or SSI income to be able to hire any physical or legal help and lives alone in rural area without public transportation and without any relatives and friends. On September 26th, 2024 being hit by major Hurricane Helena Petitioner lost power and internet for nearly a week and when the power finally came on, she discovered that a huge fallen tree damaged her well pump equipment and she is still without running water now. Yet another major Hurricane Milton is approaching, expected to hit the area on Wednesday October 9th at night.

6. Because upon her injury the first hospital failed to immediately saw the ends of severed tendon in her foot together, but instead only suturing the wound closed, the proximal end of the severed tendon retreated into the ankle taking infection up the leg with it. Consequently, the surgeon, who operated Petitioner the day after the accident in another hospital, had to cut tendon sheath open all the way up the ankle to trace and retrieve the end of the tendon to bring it back down to the foot and then he had to rap the cadaver implant tissue around the tendon instead of the sheath in the hopes that the tendon will be eventually moving. Unfortunately, the tendon had formed adhesions to the surrounding tissues and now restricts the movement in the ankle joint. So the Petitioner had been scheduled for yet another surgical procedure at North Florida Foot and Ankle Specialists of HCA Florida North Florida Hospital in Gainesville on October 14th, 2024.

7. Because chronic mercury poisoning resulted in liver fibrosis Petitioner has to avoid taking pain killers and sleeping pills to protect her damaged liver, suffering through pain and the sleepless nights after surgery and keeping the foot elevated at all times to reduce pain.

8. Accordingly, Petitioner requires the additional requested time to prepare an appropriate petition for consideration by this Court. Respondent will not be prejudiced by the

requested extension.

For the foregoing reasons, Petitioner hereby requests that an extension of time, to and including November 17th, 2024, be granted within which she may file a petition for writ of certiorari.

Respectfully submitted this 7th Day of October, 2024.



LILIA BELKOVA RUSSO
14701 NW 83RD PL
MORRISTON, FLORIDA 32668
TEL (561) 800-9596
SERVICE EMAIL: DrLiliaBelkova@gmail.com

EXHIBIT "A"

Our Address

Jobcentre Plus,
Crossfield House,
St. James Road
HALIFAX
HX1 1PE

Jobcentreplus

Our phone number
My extension number
If you have a text phone
Date
Reference Number
Fax Number

01422 305000
5138
01422 305251
April 21, 2005
PX268231D
01422 305100

Ministry of Justice
Of the Russian Federation

Justice Administration
Of the City of Moscow

Notary in the City of Moscow
Surtsukova Nina Vladimirovna
117279
Moscow, Mikhlukho-Maklaja Str., 38

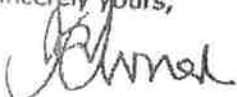
Dear Surtsukova Nina Vladimirovna:

INCAPACITY BENEFIT

Pursuant to your letter of December 10, 2004, we hereby confirm that Ms. Lilia Belkova has been receiving the incapacity benefit since April 20, 2001. For Ms. Belkova to be eligible for said benefit, the Department's doctors examined Ms. Belkova and agreed with her doctor that she is Incapable of working. Further, Ms. Belkova is no longer required to provide sick notes to support her claim for State benefits. This determination was reached based upon the findings of the Medical Doctor - Consulting Physician, specially appointed to determine Ms. Belkova's meeting the Threshold of Incapacity according to the official "Personal Capability Assessment" for purposes of receiving State benefits. The next annual Personal Capability Assessment of Ms. Belkova is scheduled to be conducted by means of an ordinary examination on October 5, 2005.

I understand that the purpose of this letter is to be filed in the Probate Case record No. 193/2004, Nazarov Galizian Gavrilovich, who died on February 17, 2004. I hope this will satisfy your requirements.

Sincerely yours,



JOHN TURNER
Incapacity Benefits Section

JOBCENTRE PLUS
CROSSFIELD HOUSE
ST JAMES ROAD
HALIFAX
HX1 1PE

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