

In The
Supreme Court of the United States



ANGELA W. DEBOSE,

Petitioner,

v.

UNITED STATES OF AMERICA, ET AL.,

Respondent.



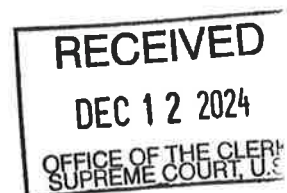
**AMENDED MOTION FOR EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI
PURSUANT TO RULE 13(5)**



To the Honorable Justice Clarence Thomas, Associate Justice of the United States Supreme Court and Circuit Justice for the Eleventh Circuit:

Re: Application for Extension of Time – USA11 23-13380 – Appeal Injunction

1. On October 5, 2024, Petitioner, Angela DeBose, pursuant to Rule 13(5), Rules of the Supreme Court, respectfully requested a sixty (60) day extension of time within which to file her petition for writ of certiorari in this Court. The jurisdiction of this Court was invoked under 28 U.S.C. § 1257. The application was submitted more than ten (10) days prior to the scheduled filing date for the Petition. On October 18, 2024, the Court granted a 30-day extension to December 26, 2024 rather than 60-day extension to January 26, 2025. The Petitioner subsequently asked the Court to grant the full 60 days on November 26, 2024. In a phone call to the Clerk, the Petitioner learned that the Court returned Petitioner's application. It is Petitioner's



understanding that the Court requires an explanation as to why an additional 30 days is necessary under the Rule. Although Petitioner has not yet received the returned mail as of the date of this letter, time is of the essence. Therefore, Petitioner writes in advance of receipt of the letter and says:

The pertinent dates are:

a. **February 8, 2024:** Issuance of written opinion of United States Court of Appeals for the Eleventh Circuit.

b. **March 20, 2024:** Timely motion for rehearing. Note that the United States of America is a party.

c. **August 28, 2024:** Issuance of written order denying rehearing and rehearing en banc.

d. **October 5, 2024:** Application for extension of time within which to file a petition for writ of certiorari in the United States Supreme Court of the Court's February 8, 2024 opinion (and August 28, 2024 denial of rehearing—if permitted).

e. **October 18, 2024:** Letter issued by the Clerk's Office of the Supreme Court of the United States extending the date by 30 days instead of 60 days.

f. **November 26, 2024:** Expiration of time for filing a petition for writ of certiorari in the United States Supreme Court, unless extended.

g. **December 26, 2024:** Expiration of time for filing a petition for writ of certiorari in the United States Supreme Court *as extended* for 30 days, pursuant to the October 18, 2024 letter issued by the Clerk.

2. This is a case in which the district court strayed from Rule 65 and issued an injunction based on the mere existence of litigation—without notice or a showing of immediate and irreparable injury, loss, or damage to the movant before the Petitioner could be heard in opposition. The movant's attorney did not certify in writing any efforts made to give notice and the reasons why it should not be required. There was no injunction hearing nor any proceeding where the Petitioner was heard or had opportunity to challenge. Neither on 2 days' notice nor at any other timeframe has the Petitioner been allowed to appear or dissolve/modify the injunction order. The district court denied the motion to dissolve the injunction, without a hearing. No security was posted. If a Temporary Restraining Order (“TRO”) under Rule 65 was issued rather than an injunction, the TRO expired 14 days after its issuance; however, the district court continues to hold the injunction order out as though it is still in effect. The injunction order has been given the effect of a “universal” injunction against the Petitioner to prevent the regular progression of cases, in federal and state court—offending the standard for issuing such injunctions, articulated in *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008).

Additionally, the subject district judge, while his injunction order is appealed and known actual conflicts, has refused to self-recuse/disqualify from “*any proceeding in which his impartiality might reasonably be questioned.*”¹

¹ Unrelated case *Angela DeBose, Personal Representative, Estate of Patricia Ann Washington versus Primerica Life Insurance Company*, Case No. 8:24-cv-02433-SDM-NHA. The subject judge delayed recusal; therefore. Petitioner filed a motion for disqualification that failed to be ruled upon in more than 30 days—requiring automatic disqualification pursuant to and Florida Rule of General Practice and Judicial Administration 2.330 and 28 USC 455(a). Petitioner is represented in the case.

Petitioner respectfully prays for a 30-day Extension of Time to January 26, 2025. A *pending* petition/motion to recall the mandate is before the Eleventh Circuit based on recent factual and legal developments. See *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008) and *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 100 S. Ct. 1610 (1980). Additionally, Petitioner respectfully asks the Court's consideration of the following reasons:

(1) Petitioner's daughter was recently married around Thanksgiving, taking away time to research and write the petition.

(2) Petitioner is a party to a state court action that set a status conference meeting for December 26, 2024. Rescheduling the status conference meeting took several days and took Petitioner's time away from the petition. On December 6, 2024, the meeting was rescheduled to January 14, 2025.

(3) Petitioner received an inquiry from the Office of Lawyer Regulation ("OLR"), Wisconsin Supreme Court, concerning the complaint by the subject district judge to the Wisconsin State Bar. The Petitioner, a nonpracticing lawyer in good standing, must meet with OLR on December 17 or 18, 2024. OLR is asking Petitioner to respond to the complaint—under a presumption that the appeal is over.

(4) December 25 is a high holy day for Christians. The Petitioner celebrates this holy day and holiday season. Petitioner's family has its annual holiday trip scheduled for December 26, 2024 through the New Year.

(5) The printer used to produce the petition booklet has expressed that staffing may be limited due to Christmas and cannot provide or guarantee any turnaround time or provide a cost until the Petitioner's inbound order is provided and a print ready file is sent in. The cost of expedited printing is not affordable.

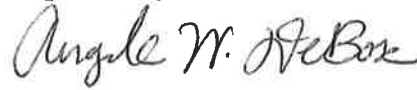
(6) A *pending* Petition for Rehearing/Rehearing En Banc was filed in related case 24-10350, seeking mandamus relief, specifically transfer of the case to an available forum.¹ Petitioner moved the subject district court to file a Third Amended Complaint including a recent charge of post-employment retaliation. Petitioner Title VII complaint with the Middle District of Florida ("MDF") to meet the EEOC deadline but was rejected by the clerk upon contacting the subject district judge. The case was filed in the U.S. Northern District of Florida ("NDF") (Case No. 4:22cv439-RH-MAF) where the court declined jurisdiction because of the injunction order, also administratively closing its case. The Eleventh Circuit has converted the petition for rehearing/rehearing en banc to a motion for reconsideration on the basis that its elaborated Order is not an Opinion. The injunction order did not result in a final judgment in the MDF or the NDF. However, neither court will certify their orders as nonfinal or appealable or allow the case to proceed, knowing the injunction order is expired. This Court must resolve this matter as it concerns

¹ U.S. District Court of the District of Columbia.

the Eleventh Circuit's orders February 8, 2024 Order and Opinion and August 28, 2024 Order Denying Rehearing / Rehearing En Banc, if permitted.

These matters have impacted on the Petitioner's time, focus, and ability to research, write, print, and mail the petition by the December 26, 2024 deadline. Petitioner asks for 30 additional days until January 26, 2025.

Respectfully submitted,



/s/ **Angela W. DeBose**

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Petitioner

December 9, 2024

Certificate of Service

I hereby certify that a copy of the foregoing has been filed via overnight delivery service to the Clerk of the Supreme Court as well as via the Supreme Court's electronic filing system. A copy of the foregoing has been served via email delivery to all counsels of record for Respondents.