

No. _____

IN THE SUPREME COURT OF THE UNITED STATES OF AMERICA

ERIC MANUELIAN,
Petitioner,

vs.

JENNIFER STARR, individually and in the Capacity as Trustee of the
Kirkland Trust Dated 3/10/05 and in the Capacity as Trustee of the
Starr Trust

And

Kirkland Ranch, Inc., a Florida Corporation and R.L.E. Ranch, Inc., a
Florida Corporation,
Respondents.

APPLICATION FOR EXTENSION OF TIME
IN WHICH TO FILE PETITION FOR A WRIT OF CERTIORARI

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

Pursuant to United States Supreme Court Rule 13.5, Petitioner
requests a sixty (60) day extension of time in which to file his Petition for
a Writ of certiorari in this Court, up to and including January 13, 2025

(sixty (60) days from the current deadline of November 14, 2024). In support of this Application, Mr. Manuelian states:

1. Petitioner, Eric Manuelian is a citizen of the State of South Carolina. This case arises from litigation in Florida over Mr. Manuelian's mother's trust and the implication of his mother's South Carolina final order of dissolution of marriage. The question to be presented is whether the Florida Courts violated the Full Faith and Credit Clause, Article IV, Section 1 of the United States Constitution with regard to his mother's South Carolina final order of dissolution of marriage.

2. Mr. Manuelian seeks review in this Court of the decision of the Second District Court of Appeal of the State of Florida ("Second DCA") affirming through a Per Curiam Affirmance rendered without opinion or citation ("PCA") the final order of the Circuit Court of the Sixth Judicial Circuit of the State of Florida granting summary judgment to Respondent Jennifer Starr.

3. The judgment of the Second DCA was entered on May 1, 2024.

4. Mr. Manuelian's timely motion for clarification, written opinion, rehearing *en banc*, and other relief, was considered, and denied, by the Second DCA on August 16, 2024.

5. Mr. Manuelian's time in which to petition this Court for a Writ of Certiorari expires on November 14, 2024 (90 days calculated from August 16, 2024).

6. Pursuant to United States Supreme Court Rule 13.5, this Application is being filed more than ten days before November 14, 2024.

7. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §1257. While the Florida Supreme Court has no jurisdiction to review a PCA from a Florida district court of appeals rendered without opinion, *Grate v. State*, 750 So. 2d 625, 626 (Fla. 1999) ("Regardless of how a petition seeking review of a district court decision is styled, this [c]ourt does not have jurisdiction to review per curiam decisions rendered without opinion . . .") the United States Supreme Court does have that jurisdiction, *Davis v. State*, 953 So. 2d 612, 614 (Fla. 2d DCA 2007), *The Florida Star v. B.J.F.*, 530 So. 2d 286, 288 n.3 (Fla. 1988) ("This Court does not, however, have subject-matter jurisdiction over a district court opinion that fails to expressly address a question of law, such as opinions issued without opinion or citation. Thus, a district court decision rendered without opinion or citation constitutes a decision from the highest state court empowered to hear the cause, and appeal may be taken directly to the United States Supreme Court.").

8. Counsel requests an extension in this case because of the unforeseen implications of two hurricanes, Hurricane Helene and

Hurricane Milton, which impacted Florida's west coast during September and October of 2024. Counsel lives in St. Pete Beach, Florida, Counsel's residence was flooded and rendered uninhabitable, Counsel's property sustained substantial damage, and recovering from these hurricanes has resulted in the necessity of Counsel to expend unforeseen time and energy in cleaning, repairs, insurance adjustment issues, and other time consuming issues. While Counsel has attempted to avoid making Counsel's problems a reason for extensions, in this case, this Motion is unavoidable.

9. Counsel avers that this Application is made in good faith and not for purposes of delay.

10. This Application seeks an extension as to all Respondents, that is, Jennifer Starr, individually and in the Capacity as Trustee of the Kirkland Trust Dated 3/10/05 and in the Capacity as Trustee of the Starr Trust, Kirkland Ranch, Inc., a Florida Corporation and R.L.E. Ranch, Inc., a Florida Corporation.

Wherefore, Mr. Manuelian requests respectfully that an order issue establishing the due date for Petitioner's Petition for a Writ of Certiorari on **January 13, 2025**.

Dated October 25, 2024.

Respectfully Submitted,
/s/Donald J. Schutz
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