

No. _____

**THE SUPREME COURT
OF THE UNITED STATES**

**LEONARDO SOCCOLICH AND MILA SOCCOLICH
Applicants-Defendants**

v.

**WILMINGTON SAVINGS FUND SOCIETY, FSB,
Not in its Individual Capacity, but Solely as TRUSTEE
For PRIMESTAR-H FUND I TRUST
Respondent-Plaintiff**

**Application of Leonardo Soccolich and Mila Soccolich
to Extend Time to File Petition for Writ of
Certiorari to Review Judgment of the Second
District Court of Appeal of the State of Florida,**

Mila Soccolich
Pro Se
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201-836-1990

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SUPREME COURT, U.S.

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SUMMARY

The Respondent-Plaintiff obtained a final judgment of foreclosure on residential property owned by the Applicants-Defendants on February 7, 2017. The Appeal of the Appellant-Defendants to the Second District Court of Appeal was denied *per curiam*. Motion for rehearing *en banc* was thereafter denied without written opinion, and the ninety-day period for filing the petition for writ of certiorari commenced on February 12, 2018.

On this same date, February 12, 2018, the Appellant-Defendants' legal counsel, James J. Armstrong, fell during the recovery period for a hip replacement in December of 2017. The fall resulted in a spiral fracture of the femur which required surgical repair of the femur and partial replacement of the hip prosthetic. Despite extended residence in a rehabilitation center and continuing home physical therapy, the injured leg remains extremely weak, painful, and unstable. The medical condition of Mr. Armstrong has materially precluded the rendering of legal services during the

standard ninety-day period for filing a petition for writ of certiorari. See attached medical documents.

BACKGROUND

Appellants-Defendants continuously represented themselves *pro se* during the original lender's case, which was dismissed with prejudice on March 11, 2013. The case here concerned is identical to the previously adjudicated original lender's case, except only this second case was filed on July 10, 2014, by a purported assignee of the original lender's mortgage.

ARGUMENT

The final judgment of foreclosure rendered in the second case here concerned is of great public importance. The requested sixty-day extension is predicated on the serious injury to the Applicants-Defendants' attorney which has prevented legal representation by the attorney already familiar with the applicable facts and law. Granting the requested extension is not detrimental to rights of the Respondent-Plaintiff. Conversely, denial of the extension is inordinately prejudicial to the Applicants-Defendants, the efficacy of the Bill of Rights, and the preservation of fundamental elements in the

administration of justice. The importance of the Court's review of this case on its merits is founded upon in the need for these United States to be a country ruled by law.

CONCLUSION

For the foregoing reasons, Leonardo Soccolich and Mila Soccolich, respectfully ask for an extension of time within which to prepare and file a petition for writ of certiorari commensurate with the importance of the case. The Soccolichs request that the deadline be extended by sixty days to and including July 13, 2018.

Respectfully submitted by,



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On behalf of,

James J. Armstrong, Esq.

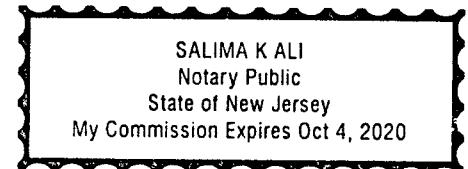
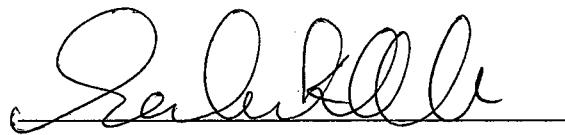
Texas Bar # 01321000

The foregoing instrument was sworn to and

subscribed before me this 9th day

of May 2018 by Milana Papic Soccolich

who [] is personally known to me or [✓] has
produced valid ID. New Jersey Drivers License



Notary Public

State of New Jersey

expires on 10/04/2020 My commission