

SCHAERR DUNCAN LLP

June 22, 2018

Scott S. Harris, Clerk of the Court
Supreme Court of the United States
Washington, D.C. 20543-0001

Re: No. 17A1375, Roman Catholic Archdiocese of San Juan, Puerto Rico, et al.,
Applicants v. Yali Acevedo Feliciano

Dear Mr. Harris:

On behalf of Applicants and pursuant to Supreme Court Rule 22.4, I submit a renewed application for a stay pending the filing and disposition of a petition for a writ of certiorari, directed to Justice Alito. Justice Breyer denied the initial application late yesterday afternoon. Emergency action is needed: Absent a stay by Monday, June 25, at 8am, the Puerto Rico Supreme Court is scheduled to issue a mandate authorizing the seizure of millions of dollars of assets from all Catholic entities in Puerto Rico. Under the mandate, the Sheriff of Puerto Rico is authorized to seize not just bank accounts, but religious works of art, property presently used to house priests, nuns, seminarians, and students, and other assets.

As the application explains, Applicants will petition for review of the final decision (and subsequent mandate) of the Puerto Rico Supreme Court, issued on June 11, 2018. App. A-1. Among other things, that decision reinstated a preliminary injunction issued by the Puerto Rico Court of First Instance on March 16, 2018. This case is unquestionably final: If issued, the mandate will (1) conclusively deprive the Applicants of “legal capacity” or personhood; and (2) conclusively authorize the seizure of \$4.7 million from Applicants that they will not see again. See, *e.g.*, 28 U.S.C. 1258; *Org. for a Better Austin v. Keefe*, 402 U.S. 415, 418 n.* (1971) (preliminary injunction is “final order” for purposes of Supreme Court review under 28 U.S.C.1257 when decision below finally adjudicates rights, even if additional proceedings remain).

Applicants sought a stay of the Puerto Rico Supreme Court’s decision on June 12, which that court denied on June 14. Accordingly, the relief requested here is not available from any other court.

As required by Rule 22.4, I submit ten copies of (1) our application, (2) the reply brief supporting the application, and (3) the appendices to both submissions.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gene C. Schaerr", written in a cursive style.

Gene C. Schaerr
Counsel for Petitioners/Applicants

cc: José R. Rivera-Morales
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