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**VIA ELECTRONIC FILING**

Honorable Scott S. Harris, Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

**Re: U.S. Supreme Court No. 19-1262**  
*Steven E. Greer, M.D., Petitioner v. Dennis Mehiel, Robert Serpico, The Battery Park City Authority, Respondents*  
**Application for Extension of Time to File Brief in Response to Petition for Writ of Certiorari**

Dear Mr. Harris:

I am the *pro se* petitioner, Steven E. Greer, MD, and am writing this opposition to the respondent's letter motion for an extension of time to file their response brief. Pursuant to Rule 30.4 of the Rules of the United States Supreme Court, I request that a Supreme Court Justice adjudicate this motion and opposition.

I am still very much a journalist and activist on New York City and State matters. For example, I am the leading voice on national radio and television exposing how Governor Cuomo's decision to force virus-infected elderly back into nursing homes resulted in the murder of thousands. I am a weekly guest on *The Joe Piscopo Show* on AM 970, *Bernie & Sid* in the Morning on 77 WABC radio, as well as Rudy Giuliani's show also on 77 WABC. I also appear on OANN television (links to these segments can be found on GreerJournal.com).

However, as a result of the Battery Park City Authority's (BPCA) retaliatory eviction, I am now living in Florida. My ability to report on the BPCA has been stifled, by design, because I cannot attend public board meetings from Florida. If I finally prevail in this case, I will promptly return to Lower Manhattan and resume reporting on the BPCA and other matters of muckraking.

As this Court will learn upon reading my *writ certiorari*, the BPCA retaliated against me in response to my coverage in the press of their scandals. They barred me from public meetings, violating my First Amendment right to equal access. They also colluded with a wealthy real estate owner of numerous apartment buildings who rents land from the BPCA to evict me from my home of 14-years. No reason was given for the initial non-renewal of lease other than to claim that the apartment was not rent-protected and they could decline renewal at will. Only years later, after I filed this federal case, did a new team of lawyers dream up the probable cause excuse that I was somehow erratic in

rent payments (the real estate defendants settled with me and were removed from the case). The lower courts incorrectly agreed with that argument despite the 2019 Supreme Court case of *Lozman* that makes probable cause arguments not strong enough to defeat a First Amendment claim (The 2d Cir. ignored my *Lozman* argument entirely in clear error).

Every day that transpires is adding to the harm caused by the BPCA. My income-earning businesses require me to be in New York to optimally operate them. My local knowledge of Lower Manhattan becomes more and more obsolete. I no longer have the ability to find original stories and muckrake. In these trying times, good local news reporting is more vital than ever before.

Also, the BPCA simply does not deserve the extension of time. They are in this pickle due to willful negligence. They waited until three days before the expiration of their 30-days to reply to the *writ* to make this motion. They chose to make the bizarre decision to change law firms at the last hour despite their previous law firm, *Sher & Tremonte*, prevailing in the lower courts and knowing the case best. Senior partner Justin Sher is admitted to the Supreme Court bar. However, the BPCA makes no effort to explain why they changed law firms. The lawyer assigned from the new firm of *Vorys, Sater, Seymour and Pease LLP*, Pamela Bresnahan, does not appear to be any sort of Supreme Court specialist other than having bar privileges.

Finally, I am very concerned that a 30-day delay in the case will cause the decision on this *writ certiorari* to be handled by the next term of the Supreme Court, which will not begin until the Fall. Perhaps that is the real strategy in play here; my opponents want to shift this case to a new session and delay it six-months.

For all of the above reasons, if this motion is granted, it will subject me to serious prejudice and more harm. Please do not grant their motion. If this Court does grant the motion, please grant only a 10-day extension.

Respectfully submitted,



Steven E. Greer, MD