

IN THE
SUPREME COURT OF THE UNITED STATES

No. A-18-12144

Docket No. 4:17-cv-00116-WTM-GRS

LAKESHA SMITH,
Applicant,

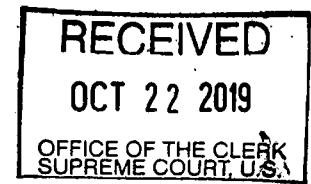
v.

ST. JOSEPH'S/ CANDLER HEALTH SYSTEM, INC.,
Respondent.

**APPLICATION TO THE HONORABLE JUSTICE CLARENCE THOMAS,
FOR A MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI**

I, Lakesha Smith, respectfully requests an extension of time to file my Petition for Writ of Certiorari. I am requesting for an extension of time of 60 days, to attain the proper counsel necessary to represent me in a fair manner. My former attorney, Christopher Daly, represented me during my workers' compensation claim (WC#2014-014843). The contract with Attorney Christopher Daly was signed on July 10, 2014. I was assured by Attorney Christopher Daly that my wrongful termination claim would be settled with my workers' compensation claim. A claim to the U.S. District Court was never filed by Attorney Christopher Daly. I filed a claim to the U.S. District Court on June 30, 2017. Attorney Christopher Daly resigned from my worker's compensation case on August 9, 2016. It was difficult to find counsel in the state of Georgia to represent me. Attorneys informed me that it would be difficult to prove willful wrongful termination. As a lay person, I represented myself for both my workers' compensation's claim and my wrongful termination claim.

The U.S. Court of Appeals for the Eleventh Circuit has informed me that this claim is a matter the court have never governed over. A petition for rehearing and for rehearing en banc were filed to the United States Court of Appeals for the Eleventh Circuit. The petition for rehearing and rehearing en banc were denied on July 29, 2019. I have found this case challenging to plea because there is no definition for willful wrongful termination and there are no merits stated in which to defend my plea.



I would like the court to review the fact that there were discrepancies with my FMLA documentation filed with the court from St. Joseph's/ Candler Health System concerning the FMLA hours calculated. St. Joseph's/ Candler Health System also terminated my medical benefits on May 23, 2014 when my leave had an ending date of June 27, 2014. A fit- for- duty certificate was mandatory for me to return to work. I could not present St. Joseph's/ Candler Health System with this certificate because I did not have benefits to complete necessary therapy the neurologist requested nor the neurologist. Problems with my paperwork did not surface until I requested a FMLA leave. I have worked for St. Joseph's/ Candler Health System from the age of 20. Problems never arose from this company until I experienced a slip and fall in wax while performing job related duties. I have worked for this company from October of 1998 until July 3,2014. I am respectfully requesting the court to extend the time of 60 days to file the Writ of Certiorari.

1. The date within which a petition for Writ of Certiorari would be due, if not extended, is October 28, 2019.
2. An extension of time will allow the petitioner, Lakesha Smith, the time to seek proper counsel to review the Court of Appeals for the Eleventh Circuit's opinion to fairly represent me in this matter. It will allow me the opportunity to seek counsel outside of the state of Georgia.
3. Counsel attained will be able to subpoena pertinent documentation needed to pursue this claim to ensure due process take place if the time is extended.
4. If the time is extended to file the Writ of Certiorari, counsel will be able to respectfully present the issue of the merits concerning any case of willful wrongful termination to the Supreme Court of the United States.

For the foregoing reasons, petitioner hereby respectfully requests that an extension of time to file the Writ of Certiorari be granted.

Respectfully submitted,



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Pro se Applicant

October 19, 2019