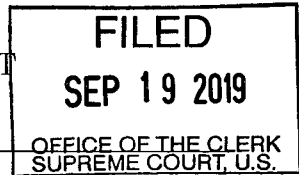


BEFORE THE UNITED STATES SUPREME COURT
No. 19A-130



IN THE MATTER OF
STEVEN ROBERT LISSE,
Debtor

Seventh Circuit of Appeals Nos.
18-1866 and 18-1889

APPEALS OF
WENDY ALISON NORA

Steven Robert Lisse,
Debtor-Appellant

Originating Case Number:
United States District Court
for the Western District of Wisconsin
3:16-cv-00617-wmc

v.

HSBC Bank USA, National Association
for the Benefit of ACE Securities Corp.
Home Equity Loan Trust, Series 2006-NC3,
Asset Backed Pass-Through Certificates,¹
Claimant-Appellee

THIRD
MOTION FOR EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI UNDER
28 U.S.C. SEC. 1254(a) AND SUPREME COURT RULE 13.3
FROM SEPTEMBER 24, 2019 TO SEPTEMBER 30, 2019

TO: The Honorable Brett Kavanaugh
Circuit Justice for the Seventh Circuit
1 First Street, NE
Washington, DC 20543

JURISDICTIONAL STATEMENT

Wendy Alison Nora ("Movant") intends to file a Petition for Writ of Certiorari to the Seventh Circuit Court of Appeals under 28 U.S.C. sec. 1254(a) and Supreme

¹ The true identity of the Respondent is Select Portfolio Servicing, Inc. ("SPS").

Court Rule 13.3.

This Motion is brought pursuant to Rules 21 and 22 of the Rules of the United States Supreme Court. Movant seeks an extension of time to file the Petition for Writ of Certiorari (the “Petition”) from September 24, 2019 to September 30, 2019 under Rule 13.5 of the Rules of the United States Supreme Court for good cause shown.

The Petition for Writ of Certiorari will seek to have this Court review the April 1, 2019 Decision of the Seventh Circuit Court of Appeals attached to the Second Motion for Extension of Time to File Petition for Writ of Certiorari (the “Second Motion”) hereto as Exhibit 1 and entered by the Judgment on that same date (Exhibit 2 attached to the Second Motion).

The actual Respondent is Select Portfolio Servicing, Inc. (SPS). The attorney representing SPS finally admitted by Declaration filed on April 15, 2019 that he was representing SPS while proceeding in the name of HSBC Bank USA, National Association for the Benefit of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3, Asset Backed Pass-Through Certificates (attached to the Second Motion as Exhibit 3).

Movant’s Petition for Panel Rehearing or Rehearing En Banc was filed effective April 15, 2019. Movant’s Petition for Panel Rehearing or Rehearing En Banc was denied on May 3, 2019 (attached to the Second Motion as Exhibit 4) and Mandate was issued on May 13, 2019 (attached to the Second Motion as Exhibit 5). The deadline for Movant to file her Petition for Writ of Certiorari under 28 U.S.C.

sec. 1254(a) and Supreme Court Rule 13.3 was August 1, 2010, but was extended by the Court granting her initial and Second Motion for Extension of Time to File the Petition for Writ of Certiorari to September 24, 2019. Movant now requests an extension of an additional six (6) days.

GROUNDS FOR THE PETITION

Movant's Petition is of great significance to her, her former clients as well as homeowners and former homeowners throughout the nation² who are seeking judicial redress of their grievances arising from the use of fabricated evidence in judicial and nonjudicial foreclosure proceedings. The issues for which Movant seeks review involve a monetary sanction and discipline imposed on her as punishment for her efforts to expose the use of a forged document purporting to be the original Note in the United States Bankruptcy Court for the Western District of Wisconsin (Bankruptcy Court) contrary to *Bordenkircher v. Hayes*, 434 U.S. 357, 363, 98 S.Ct. 663, 668, 54 L.Ed.2d 604 (1978) which holds, "To punish a person because he has done what the law plainly allows him to do is a due process violation of the most basic sort."

On October 5, 2016, Movant filed a mandatory report under 18 U.S.C. sec. 4 on her own behalf, on behalf Mr. Lisse and the document examiner, based on their

² For over a decade, the identity of the parties entitled to the remedy of foreclosure has been a mystery in countless judicial and nonjudicial foreclosure cases. The CEO of just one third party document preparation vendor, DOCX, admitted that over a million false documents have been filed in the public land records (Exhibit 6 attached to the Second Motion).

personal knowledge of bankruptcy fraud, a federal felony in violation of 18 U.S.C. secs. 152(4) and 157(2). The Mandatory Report filed under 18 U.S.C. sec. 4 required the Chief Judge of the United States District Court for the Western District of Wisconsin (the District Court) to report probable cause to believe that federal bankruptcy crimes had been committed to the United States Attorney under 18 U.S.C. sec. 3057(a). The Mandatory Report under 18 U.S.C. sec. 4 was filed by the Movant, Mr. Lisse and the forensic document examiner who concluded that the purported original Note was a forgery beyond “any reasonable doubt.” See Exhibit 7 attached to the Second Motion (ECF No. 2 through 2-5 in WIWD Case No. 16-cv-617³).

Movant sought to establish that Wells Fargo Bank, N.A. (Wells Fargo), as master servicer, acting through Select Portfolio Servicing, Inc. (SPS) as “subservicer”, proceeded in the pretended name of “HSBC Bank USA, National Association for the Benefit of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3, Asset Backed Pass-Through Certificates” to obtain relief in the Chapter 13 proceedings of Steven Robert Lisse (“Mr. Lisse”) on the basis of possession of a forged document purporting to be the original Note, upon which the claim for

³ Exhibit C to Exhibit 7 attached to the Second Motion for Extension (the Designation of Record filed by the purported creditor designates the copy of the June 28, 2005 Note in the record on appeal) and is highlighted for emphasis. Pages 11, 16, 17, 1, 19, 20, 21, 38, and 46 of Exhibit D to Exhibit 7 to the Second Motion for Extension (the Transcript of the July 18, 2016 Hearing in the United States Bankruptcy Court for the Western District of Wisconsin) have been highlighted to demonstrate that the forged instrument purporting to be the original Note was uttered by counsel for the purported creditor at the July 18, 2016 Hearing.

payment was being made (Exhibit 7, Exhibit B, Proof of Claim No. 2 in WIWB Case No. 16-10395, attached to the Second Motion for Extension).

Movant, on behalf of Mr. Lisse, then sought summary reversal of the Bankruptcy Court's sua sponte order dismissing Mr. Lisse's Chapter 13 Petition on November 7, 2016 based on the lack of standing of the entity purporting to be the "Creditor"⁴ (ECF Nos. 16 and 17, Supplemental Exhibits 10 and 11 submitted herewith) because the document upon which the "Creditor" claimed standing to proceed was found by the forensic document examiner to be a forgery "beyond any reasonable doubt"⁵ (Exhibit 7 submitted with the Second Motion for Extension). Counsel for the purported "Creditor" opposed the Motion for Summary Reversal on November 14, 2016 (ECF No. 18, Supplemental Exhibit 12 submitted herewith) and to which Mr. Lisse replied on November 15, 2016 (ECF No. 19, Supplemental Exhibit 13 submitted herewith).

The misidentified party represented by the attorney retained by SPS based

⁴ Movant believed in good faith that the party directing use of the name of "HSBC Bank USA, N.A. for the Benefit of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3, Asset Backed Pass-Through Certificates might be Wells Fargo Bank, N.A. in the capacity of "Master Servicer" of the ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3, based on publicly available evidence from the Securities and Exchange Commission (SEC) at https://www.sec.gov/Archives/edgar/data/1380884/000114420406049985/v058926_424b5.htm (Exhibit 7 in WIWB Case No. 16-10395 filed on July 8, 2016 as Doc. 46-7). It is now established, by admission in the Seventh Circuit Court of Appeals of the attorney who appeared in WIWB Case No. 16-10395 that he represents SPS (Exhibit 3 attached to the Second Motion for Extension), which claims to be "Subservicer" of the ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3.

⁵ The expert opinion of the forensic document examiner has not been challenged or rebutted in any way.

its standing to seek relief on the claim of possession of the original Note by HSBC Bank USA, N.A. in its capacity as Trustee of the ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3. It should be beyond controversy that possession of a forged instrument conveys no legal or equitable rights. See *Marshall v. Holmes*, 141 U.S. 589, 601, 12 S.Ct. 62, 35 L.Ed. 870 (1891). See also, e.g., Wis. Stat. sec. 401.201(jm) and (w) and Wis. Stat. secs. 403.301 and 403.305(b).

Over a million forged documents have admittedly been filed in public land records by just one third party document preparation vendor known as DOCX (Exhibit 6 to the Second Motion for Extension: United States of America v. Lorraine Brown, Middle District of Florida, Case No. 3:12-CR-198-J-25-MCR, page 19). DOCX was a subsidiary of the former Lender Processing Services, Inc. (LPS). LPS and DOCX entered into a Consent Order (subsequently identified as Order # 2011-053) with the Federal Reserve Board (FRB), Office of the Comptroller of Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) on April 13, 2011 attached to the Second Motion for Extension as Exhibit 8. LPS was next known as Black Knight Financial, LLC and is now known as ServiceLink, Holdings, LLC (ServiceLink). ServiceLink entered into a Consent Order (Order # 2017-004) with the FRB, OCC, and FDIC on January 23/24, 2017 which reiterated some of the provisions of Order # 2011-053 and modified other provisions of Order # 2011-053 (Exhibit 9 attached to the Second Motion for Extension).

Movant was assisting her client in exercising his First Amendment Petition Rights in an effort to protect his Homestead against the violation of his Due Process

Rights not to have his property taken based on fabricated evidence, but Movant, Mr. Lisse and the document examiner also had a positive duty to report felony bankruptcy fraud of which they had personal knowledge or they would be guilty of misprision of a felony under 18 U.S.C. sec. 4. It was Movant's duty as a citizen as well as an officer of the Court to report bankruptcy fraud.

Unfortunately, while Mr. Lisse's Motions were pending on the appeal from the Bankruptcy Court case to the District Court under 28 U.S.C. sec. 158(a), on January 17, 2017, Movant fell on ice and hit her head, which resulted in post-concussion syndrome, also known as mild traumatic brain injury (mTBI), for which she sought the equivalent of accommodations under the Americans with Disabilities Act as amended effective January 1, 2009 (the ADAA⁶). On August 23, 2017, the counsel for the purported "Creditor" (who later admitted actually representing SPS) moved to dismiss Mr. Lisse's appeal for failure to prosecute (ECF No. 21, Supplemental Exhibit 14 submitted herewith) and on September 1, 2017, the District Court denied the all pending Motions by the parties (ECF No. 22, Supplemental Exhibit 15 submitted herewith).

Movant's injury resulted in the request for an extension of time to file Mr. Lisse's Opening Brief and referral of Mr. Lisse to other counsel. Other counsel recommended that the Opening Brief, which had been prepared and was pending

⁶ The Seventh Circuit punished Movant for requesting the equivalent of ADAA accommodations, which was a lawful act. Punishment for engaging in lawful conduct is a "due process violation of the most basic sort." *Bordenkircher v. Hayes*, 434 U.S. at 363.

filing, not be filed and that the appeal be dismissed so that Mr. Lisse could continue in the state court proceedings only. Movant concurred with the filing of the Notice of Dismissal which referred to the discovery of new evidence in the bankruptcy proceedings. The District Court entered an Order to Show Cause to Movant only, not to both counsel for Mr. Lisse, calling the truthful statement that new evidence had been discovered since the entry of the Foreclosure Judgment was entered in the State Court foreclosure action “disingenuous”.

It is undisputed that the reference to discovery of new evidence referred to the evidence that the document produced at the July 18, 2016 Chapter 13 Confirmation Hearing was a forgery, based on the forensic examination of the document produced in the Bankruptcy Court and the Expert Report completed on September 15, 2016. See Exhibit A attached to the October 5, 2016 Mandatory Report under 18 U.S.C. sec. 4 which is attached to the Second Motion for Extension as Exhibit 7.

Movant is being punished for reporting federal bankruptcy crimes in violation of 18 U.S.C. secs. 152(4) and 157(2), which she had a duty to report as a citizen under 18 U.S.C. sec. 4. Movant has been punished for assisting her client in reporting defending his Homestead by seeking to make payments in his Chapter 13 Case to the party entitled to receive payments under Wis. Stat. sec. 403.201, which could not be the purported creditor, the claim of which is based on a forged instrument presented in the Bankruptcy Court in violation of 18 U.S.C. secs. 152(4) and 157(2) as required by 18 U.S.C. sec. 4, contrary to *Bordenkircher v. Hayes*, 434

U.S. at 363.⁷

GROUND FOR THE EXTENSION

Movant requires additional time to prepare the Petition for Writ of Certiorari due to its importance, the complexity of the record, and the time required to conform her Appendices to the requirements of Rule 33.

A. The Petition will raise meritorious issues.

The questions for review by this Court and a brief statement of the legal authority in support of the Petition are

1. Whether an attorney may be sanctioned and disciplined for reporting the use of a forged document in bankruptcy proceedings.

In *Bordenkircher v. Hayes*, 434 U.S. 357, 363, 98 S.Ct. 663, 54 L.Ed.2d 604 (1978) the United States Supreme Court held, “To punish a person because he has done what the law plainly allows him to do is a due process violation of the most basic sort . . . and for an agent of the State to pursue a course of action whose objective is to penalize a person’s reliance on his legal rights is “patently unconstitutional.”

2. Whether the *Rooker-Feldman* doctrine, claim preclusion or issue preclusion prevent a federal court exercising its original, exclusive powers in bankruptcy cases to set aside a state court judgment procured by the production of a forged document as the basis for the judgment.

There is a split of authority in the circuits. *Gruntz v. County of Los Angeles*,

⁷ Strangely, Movant has also been punished for seeking ADAA accommodations after having suffered from motor vehicle accident injuries which appears to be a distraction from the real issue before the Court, which Movant’s duty to report and to assist her client in reporting the uttering of a forged document in bankruptcy proceedings by opposing counsel (now admitted to be representing SPS and not the entity purportedly named as the “Creditor”) in violation of 18 U.S.C. secs. 152(4) and 157(2).

(*In re Gruntz*), 202 F.3d 1074 (9th Cir., 2000) and *Sun Valley Foods, Inc. v. Detroit Marine Terminals, Inc.*, (*In re Sun Valley Foods Co.*), 801 F.2d 186, 189 (6th Cir., 1986) are contrary to the position taken by the Seventh Circuit in punishing Movant.

Moreover, the Seventh Circuit's opinion is contrary to the authority of *Pepper v. Litton*, 308 U.S. 295, 60 S.Ct. 238, 84 L.Ed. 281 (1939); *Heiser v. Woodruff*, 327 U.S. 726, 66 S.Ct. 853, 90 L.Ed. 970 (1946); *Vanston Bondholders Protection Committee, Keystone Driller*, 290 U.S. 240, 244-245, 54 S.Ct. 146, 78 L.Ed. 293 (1933); and *Marshall v. Holmes*, 141 U.S. 589, 12 S.Ct. 62, 35 L.Ed. 870 (1891).

Finally, it has long been established that a federal court in its original jurisdiction has the authority to grant relief from a state court judgment procured by the use of a forged document the prevailing party. *Marshall v. Holmes*, supra. Bankruptcy cases are in the original, exclusive jurisdiction of the federal courts under Article One, Section 8, Clause 4 of the *United States Constitution*.

3. Whether the Seventh Circuit decided an issue on appeal from which no appeal was taken and was without jurisdiction to decide the issue.

Movant never appealed from the portion of the District Court's order which imposed reciprocal discipline upon her because she had not exercised her opportunity to seek relief from the Chief Judge of the District Court under Local Rule 1.E and did not appeal from that portion of the April 13, 2018 Order.

The lengthy discussion of reciprocal discipline, from which **Movant did not appeal** is another distraction, like the ADAA issue (footnote 2, above), which conceals the real issue before the Seventh Circuit Court of Appeals: whether an attorney can be punished for reporting bankruptcy crimes. The issue of reciprocal discipline was not before the Seventh Circuit Court of Appeals. Only the discipline arising from Movant's conduct in the opposing relief being granted to the proponent of a forged document was involved in the appeal.

B. The importance of the issues

Movant is not only actually innocent of any misconduct in the District Court case, but the party responsible for producing the forged document is being

rewarded, while Movant is being subjected to a monetary sanction and professional discipline for attempting to expose the production of a forged document as the basis for SPS to claim the right to relief in bankruptcy proceedings in order to oppose Mr. Lisse's appeal. The Petition for Writ of Certiorari provides this Court with the opportunity to address the ubiquitous violations of Due Process Rights arising from the use of forged documents in bankruptcy proceedings which involve civil foreclosure cases which has become standard practice in the mortgage servicing industry which continues unabated to this day.

The Petition for Writ of Certiorari is Movant's opportunity to be present the ubiquitous and ongoing issue of the use of forged documents in civil proceedings involving foreclosure of homes throughout the nation and to establish that the *Rooker-Feldman* doctrine does not prevent federal courts from granting equitable relief from state court judgments procured with forged documents.

C. Due to the complexity of the record, additional time is needed to prepare the Petition for Writ of Certiorari.

Supplemental Exhibit 16 submitted herewith is the Docket Report from the District Court which shows the voluminous nature of the record in the District Court and Supplemental Exhibit 17 submitted herewith is the Docket Report of the proceedings before the Seventh Circuit Court of Appeals. The *Rooker-Feldman* doctrine cannot preclude exercise of original, exclusive federal jurisdiction over bankruptcy proceedings. Defenses arising under the doctrines of issue and claim preclusion (not raised by SPS below and raised for the first time on appeal) and are

complex and fact-specific on which Movant was never allowed to be heard (she had been seeking to overcome misapplication of the *Rooker-Feldman* in multiple bankruptcy cases under the principles of *Pepper v. Litton*, 308 U.S. 295 (1939) and *Heiser v. Woodruff*, 327 U.S. 726 (1946). Each of Movant's bankruptcy cases in which she sought relief for homeowners whether before before and after state court foreclosure judgments arose in a different legal and factual contexts, but all of which involved false pleadings based on false documents, some of which involved false affidavits authenticating false documents in state court foreclosure actions.

D. Additional time is needed to to conform Movant's Appendices to the requirements of Rule 33.

As stated below, Movant's effort to simplify the materials to be produced in her Appendices as required by Rule 14.1(i)(vi), which must be formatted as required by Rule 33.1(g). Due to the Court's issuance of the Supplemental Order to Show Cause on February 15, 2017, eight (8) days before the scheduled hearing, required the Movant to address twelve (12) cases and two (2) appeals to the Seventh Circuit Court of Appeals (ECF No. 66, Supplemental Exhibit 18 submitted herewith) requiring the creation of a voluminous record (ECF No. 74 through 74-28, Supplemental Exhibit 16 submitted herewith).

REASONS FOR GRANTING THE EXTENSION

A. Movant's Petition will raise important issues for review.

Movant seeks to have this Court consider granting the Writ of Certiorari to provide direction to both state and federal courts which have been refusing to

consider allegations that documentary evidence being produced in foreclosure cases is forged. Last term, this Court decided *McDonough v. Smith*, No. 18-485, June 20, 2019 which reiterated the well-established principle that it is a denial of Due Process guaranteed by the Fifth Amendment and Fourteenth Amendments to the *United States Constitution* for a prosecutor to use false evidence in a criminal proceeding or to allow it to stand uncorrected when the use of false evidence comes to the prosecutor's attention. *Napue v. Illinois*, 360 U.S. 264, 269, 79 S.Ct. 1173, 3 L.Ed.2d 1217 (1959).

The requested extension will allow Movant's Petition to be prepared and filed. If the Court believes that the Petition should be granted to address the denial of Due Process Rights by forged evidence in an effort to prove standing to proceed in bankruptcy courts, it will have the opportunity to do so in this case. Moreover, the issue of punishing an attorney for doing what the law requires should be addressed by this Court because some attorneys are being punished or threatened with punishment⁸ for raising the issues of foreclosure fraud and countless others are being intimidated into silence.

⁸ See, e.g. Petition for Writ of Certiorari in *Jose Rodriguez v. Bank of America, N.A.*, No. 18-723, page 26, cert. den. February 19, 2019, rehearing den. April 15, 2019 and Petition for Writ of Certiorari in *Nora v. Wisconsin Office of Lawyer Regulation*, cert. den. December 3, 2018, rehearing den. February 19, 2019.

B. In the course of preparing the Petition for Writ of Certiorari, it was determined that a transcript of the January 14, 2019 Oral Argument before the Seventh Circuit Court of Appeals is necessary to demonstrate the position of the proponent of the forged document and the efforts of the Seventh Circuit Court of Appeals to avoid addressing the forgery issue.

Movant recalled that counsel for the proponent of the forged document (now known to be SPS) argued that the punishment imposed on the Movant should be affirmed or she “will not stop” [trying to expose the use of forged documents as evidence in judicial proceedings]. Movant believed that the simplest and most straight-forward source of the forgery proponent’s position, affirmed by the Seventh Circuit (as opposed to the voluminous documentary record), would have been to present the statement made at Oral Argument. Movant immediately ordered the Transcript which was prepared and the Transcript became available on September 3, 2019.

Unfortunately, counsel for SPS did not make a straight-forward remark, as Movant recalled it. Counsel for SPS completely misrepresented the position Movant’s position on behalf of her client when he stated at Oral Argument on January 14, 2019 at Tr. 13: 4-23:

4 The most important basis, in my opinion, for finding
5 that this appeal was frivolous is simply that the arguments
6 raised on appeal were meritless. Throughout the satellite
7 skirmishes pursued in lieu of filing their brief, their core
8 argument has been that my client isn’t the real party in
9 interest, isn’t the party that’s entitled to enforce the note,
10 and that there is some other entity out there that nobody knows
11 who it is that’s really the entity entitled to enforce.
12 This is a blatant attempt to sidestep the state court
13 judgment that we won back in 2014. Now, it should be a fairly

14 non-controversial, well-established point of law that federal
15 courts are courts of limited jurisdiction and that only the
16 United States Supreme Court can review state court judgments.
17 However, throughout this process, appellants have refused to
18 acknowledge this. And in spite of being ruled against on this
19 issue in this and in other cases, including while attempting to
20 defend herself on the order to show cause, and in her brief
21 before this Court, Attorney Nora continues to insist that this
22 is a valid argument to make in federal court. It's clear to me
23 that she's not going to stop as long as she's practicing.

Movant earlier sought two (2) weeks after receipt of the Transcript to complete her preparation of the Petition for Writ of Certiorari, and received the Transcript seven (7) days before the expected date of September 10, 2019, but the foregoing recitation entirely misstates Movant's position on appeal. Movant is required, once again, to proceed on the voluminous record in the preparation of her Petition for Writ of Certiorari which will require the additional time requested. Movant's position is that the party seeking relief in Bankruptcy Court in interest claimed standing to obtain relief in the Bankruptcy Court on the basis of a forged document purporting to be the original Note . The party proceeding in Bankruptcy Court was not the entity misidentified as "HSBC Bank USA, N.A. for the Benefit of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC3, Asset Backed Pass-Through Certificates", having now admitted to have been SPS.

Fortunately, however, as expected, the Transcript of the January 14, 2019 Oral Argument demonstrates the unfortunate efforts undertaken by Seventh Circuit Court of Appeals to avoid confronting the issue of bankruptcy crimes being committed by the use of forged documents to establish purported creditors' standing

to seek relief and claim rights to payment from bankruptcy estates. Additional time is necessary to incorporate the contents of the Transcript of the January 14, 2019 Oral Argument into her argument in support of granting the Petition for Certiorari and to format the supporting documentation as required by Rule 33.1(g).

C. If the extension is not granted, Movant will lose her opportunity to have her Petition considered by the Court, but the opposing party will not suffer any loss if the extension is granted.

The requested extension of an additional six (6) days to file the Petition is reasonable in view of the significance of the issues and this Court's recent decision in *McDonough v. Smith*, supra. If the extension is not granted, Movant will lose her right to file her Petition which is terminal but if the extension of the additional six (6) days⁹ is granted, the opposing party, now known to be SPS, will not suffer any harm because the rights and interests claimed by SPS are based on a forged document which gives it no rights whatsoever, but SPS has thus far fraudulently benefitted from uttering forgeries into the records of state and federal courts.

CONCLUSION

The Circuit Justice is asked to exercise his discretion to allow Movant to file her Petition on or before September 30, 2019 for good cause shown above, which is within the allowable time period for discretionary extensions under Rule 13.5.

⁹ This Motion for a Third Extension brings the total requested extensions to 149 days.

Dated at Madison, Wisconsin this 19th day of September, 2019.

Respectfully submitted,

AN IMAGE OF THE SIGNATURE BELOW SHALL HAVE THE SAME FORCE AND
EFFECT AS THE ORIGINAL



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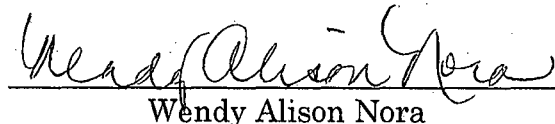
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UNSWORN DECLARATION OF UNDER PENALTY OF PERJURY

Wendy Alison Nora declares, under penalty of perjury of the laws of the United States of America, pursuant to 28 U.S.C. sec. 1746, that the facts set forth above are true of her own personal knowledge, except where stated upon information or belief and where stated upon information or belief, she believes those statements to be true. She further states that the Supplemental Exhibits 10-18 submitted herewith are true and correct copies of what they purport to be.

AN IMAGE OF THE SIGNATURE BELOW SHALL HAVE THE SAME FORCE AND
EFFECT AS THE ORIGINAL



Wendy Alison Nora

**Additional material
from this filing is
available in the
Clerk's Office.**