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In the  
**Supreme Court of the United States**

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SHIRLEY JN JOHNSON

*Petitioner,*

v.

NEW DESTINY CHRISTIAN CENTER CHURCH, INC.

a/k/a Paula White Ministries

a/k/a City of Destiny

PAULA MICHELLE MINISTRIES, INC.,

a/k/a Paula White Ministries

PAULA MICHELLE WHITE

a/k/a Paula Michelle Cain

*Respondents.*

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*ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT*

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**PETITIONER'S REQUEST THAT RESPONDENTS'  
MOTION REQUESTING EXTENSION OF TIME TO  
FILE BRIEF IN OPPOSITION TO  
PETITION FOR A WRIT OF CERTIORARI BE  
SUBMITTED TO THE COURT**

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RECEIVED  
OCT - 8 2019  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

October 5, 2019

**Delivered via Express U.S. Mail**

Scott Harris, Clerk  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

RE: Respondents' Motion for Extension of Time to File Brief  
in Opposition to the Petition for a Writ of Certiorari  
*Shirley Jn Johnson v. New Destiny Christian Center Church, Inc., et al*  
Case No. 19-279

Dear Mr. Harris:

Petitioner respectfully requests that Respondents' request for an extension of time to file their Brief in Opposition to the Petition for a Writ of Certiorari be submitted to the Court for the following reasons:

1. Rule 30.4, provides that:

"A motion to extend the time to file any document or paper other than those specified in paragraph 3 of this Rule may be presented in the form of a letter to the Clerk setting out specific reasons why an extension of time is justified. ..."

The Petition for a Writ of Certiorari was filed with this Court, and emailed to Respondents' Counsel on August 14, 2019, and docketed on September 3, 2019. Respondents did not present their request to Scott Harris, Clerk of the Supreme Court as required by Rule 30.4; instead, one day before the October 3, 2019 deadline, Respondents' request for extension of time was presented to Danny Bickell who is a Deputy Clerk for Practice & Procedure, although the letter was addressed to:

Danny Bickell, Clerk  
Supreme Court of the United States

2. On October 1, 2019, Defense Counsel contacted Petitioner requesting a 30-day extension to file their Motion – stating that they may not need the entire 30 days, but would file their Brief "as soon as it is ready to go". (attached E-mail). There was no mention of a need to secure an outside vendor. Further, Defense has had ample time (since August 14, 2019) to write their brief and secure a "third-party vendor" to print

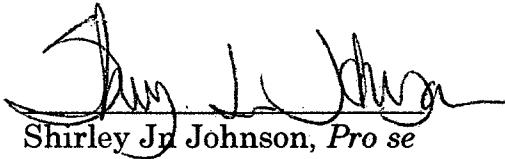
Scott Harris, Clerk  
Supreme Court of the United States  
October 5, 2019  
Page 2

their booklets. Moreover, it would be expected that a long-established firm as large as Wicker-Smith would already have an established business relationship with a viable vendor, or possess the equipment to print its own booklets.

3. Respondents should not be allowed an extension of time simply because they failed to do their due diligence in adhering to the Court's deadline. Respondents' reasons for an extension of time is unjustified, and their Motion should be denied.

Since the deadline of October 3, 2019, had already passed when the Motion was initially granted, it should be deemed that Respondents have automatically waived their right to respond to the Petition for a Writ of Certiorari.

Respectfully submitted:



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No. 19-279

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**CERTIFICATE OF SERVICE  
REQUEST FOR SUBMISSION TO THE COURT**

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## CERTIFICATE OF SERVICE

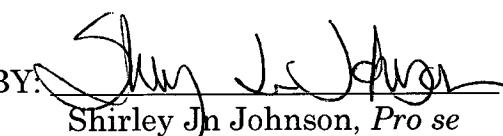
Under penalty of perjury, I declare that an original and eleven (11) copies of the REQUEST FOR SUBMISSION TO THE COURT were sent via Express U.S. Mail to the Clerk of the Court, and three (3) true and correct copies were served via Express U.S. Mail and by electronic mail to:

Michael R. D'Lugo, Esquire  
mdlugo@wickersmith.com

Krista N. Cammack, Esquire  
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Wicker Smith O'Hara McCoy & Ford, P.A.  
P.O. Box 2753  
Orlando, FL 32802

Executed on October 5, 2019

BY:   
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