

No. 19-279

Supreme Court, U.S.
FILED

OCT - 5 2019

OFFICE OF THE CLERK

In the
Supreme Court of the United States

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.

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

**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**

Shirley Jn Johnson, *Pro se*

P.O. Box 58818

Seattle, WA 98138

(253) 846-6805

Email: theremnantsjnj@yahoo.com

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

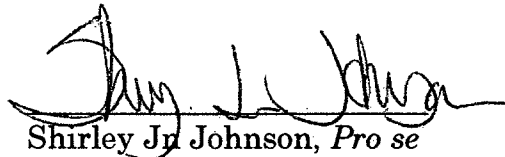
Scott Harris, Clerk
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Page 2

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:

A handwritten signature in black ink, appearing to read "Shirley J. Johnson", is written over a horizontal line.

Shirley J. Johnson, *Pro se*
P.O. Box 58818
Seattle, Washington 98138
(253) 846-6805
theremnantsjnj@yahoo.com

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

Shirley Jn Johnson, *Pro se*

P.O. Box 58818

Seattle, WA 98138

(253) 846-6805

Email: theremnantsjnj@yahoo.com

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:

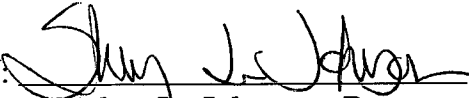
Michael R. D'Lugo, Esquire
mdlugo@wickersmith.com

Krista N. Cammack, Esquire
kcammack@wickersmith.com

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

Executed on October 5, 2019

BY:



Shirley Jh Johnson, *Pro se*

P.O. Box 58818

Seattle, WA 98138

(253) 846-6805

theremnantsjnj@yahoo.com