

No. \_\_\_\_\_  
IN THE  
SUPREME COURT OF THE UNITED STATES

TWILA HAYNES,

Petitioner,

V.

ASSETS PROTECTION, INC.,

Respondent,

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Appeal No. 522 EAL 2018  
Court Docket No. 2899 EDA 2017  
Trial Court Trial Court Docket  
September Term No. 2017 No. 2877

APPLICATION FOR EXTENSION OF TIME  
TO FILE PETITION FOR WRIT OF CERTIORARI  
TO THE UNITED STATES SUPREME COURT

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To the Honorable (Justice) of the  
United States Supreme Court

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Petitioner, Twila Haynes request (60) days extension of time to file Writ of Certiorari. Final judgment date was 04/10/2019. The date for Writ of certiorari will expires on 07/09/2019. This application is being filed (10) days prior to the due date. Here is attached copy of appended from Superior Court and Philadelphia County, first Judicial District of Pennsylvania Court of Common pleas. The statue Of Jurisdiction of this court is invoked under 42. Pa. 5524

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## **BACKGROUND**

This is a direct appeal from a final order of the Superior Court of Pennsylvania, Order dismissing petitioner complaint for failure to state a claim upon relief may be granted.

**Rule 8. General Rules of Pleading.**

## **ORDER/DETERMINATION AND QUESTION**

This first order appeal from was entered by the court of Common Pleas 09/09/2017. Dismissing petitioner complaint for failure to state a claim upon relief 09/01/2017 for failure to state a claim upon which relief can be granted was entered by the court of Common Pleas Philadelphia County order is appended hereto.

## **STATEMENT OF QUESTIONS INVOLVED**

When the court dismissed petitioner case, were appellant rights violated?

## **STATEMENT OF THE CASE**

This is an appeal from order for failure to state a claim upon which relief can be granted. **Rule 8. General Rules of Pleading.**

## **FORM OF ACTION AND PROCEDURAL**

Appellant Twila Haynes filed this lawsuit against Respondent, 08/29/2017 in Common Pleas Court of Philadelphia County. A claim for relief state a pleading for relief must contain a short plain statement of the claim showing that the pleader is entitled to relief UNDER violation of law A.D.A and I.F.P. ,when terminated by employer under an medical condition.

## **HISTORY OF THE CASE**

Petitioner commenced this action against Assets Protection Inc. by complaint. Petitioner filed a petition to proceed In Forma Pauperis("IFP") which was assigned to court of common pleas of Philadelphia County. The complaint set forth a series of allegation regarding Petitioners' employment by respondent as an apartment complex security guard from "2012" until her termination in "2014".

### **SUMMARY ARGUMENT**

1. On or about March 17, 2014, Petitioner went to the emergency room, Where petitioner was told she has a upper respiratory infection and was given medicine.
2. On or about April 3, 2014 petitioner was seen by her doctor and was informed her respiratory infection has returned and the doctor gave petitioner a medical profile ( Note)
3. The letter stated, it is medically necessary for petitioner to wear a surgical mask while at work due to the exposures of other ill individual for medical reasons.
4. On or about April 10, 2014 until June 20, 2014 Riverside Presbyterian apartments was fine with petitioner wearing a surgical mask due to her upper respiratory infection.
5. On or about June 20, 2014 Petitioner was ask by Respondent Client (Riverside Presbyterian Apartment Manager), for a doctor note.
6. On or about august 28, 2014 Petitioner arrived at work Riverside Presbyterian apartments around 04:20 pm. And was called into the management and was told , by management to petitioner she no longer works at here at Riverside Presbyterian Apartments.
7. As a result of Riverside Presbyterian apartments Petitioner Breach of Contract and violation of **A.D.A. title 1 (American Disability Act)** petitioners' Civil Rights were violated.

### **ARGUMENT**

The court reviewed the complaint, in conjunction with the petition to proceed In Forma Pauperis, and dismissed the action as frivolous. A frivolous action or proceeding has been defined as one that "lacks an arguable basis either in law or in fact." Pa.R.C.P.No. 240 (j) (1). An action is frivolous if " on its face, it does not set a valid cause of action.

### **CONCLUSION**

Petitioner Complaint states in the summary argument The Facts essential to supporting the claim. the respondent was given notice of the complaint, this is all that is required Under Pa. Rule .240 (J) (1) Under Pa. law the courts must take Petitioner Complaint as factually True.

Reason for Extension of time Petitioner have been having medical issues. Petitioner asking for (60) Day Extension

Date: July 1, 2019

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