

**EXTENSION OF TIME REQUEST FOR  
A PETITION FOR WRIT OF CERTIORARI**

No. \_\_\_\_\_

In The Supreme Court of The United States

Sharon T. Thomas, Petitioner

v.

The Salvation Army Southern Territory  
et al., Respondent(s)

**APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT**

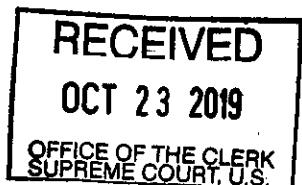
To the Honorable Justices of the United States Supreme Court

Pursuant to Rules 13.5 and 30.2 of this Court, Petitioner, Sharon T. Thomas respectfully requests a 60-day extension of time, up to and including December 15, 2019 to file a writ of certiorari for case number(s) 3:17-cv-00246-FDW-DSC, U.S. District Court; and No. 19-1315, U.S. Court of Appeals for the Fourth Circuit.

This matter was dismissed from the United States Court of Appeals of the Fourth District on July 18, 2019 and a request for a rehearing was denied on August 8, 2019.

Attached to this application are the Orders, of the U.S. District Court and the U.S. Court of Appeals dismissing this matters respectively on February 28, 2019, July 18, 2019 and denial of a rehearing on August 9, 2019.

Petitioner, Sharon T. Thomas seeks possible access to the U. S. Supreme Court's consideration of whether lower courts, violated any of these or other pertinent Laws, or rules, misapplied, neglected or made any vital legal errors in their affirming of the District Court's Decision of this Petitioner claims



in any way the issues that were to be addressed including, but not limited to the Americans With Disabilities Act (ADA) and 504 Rehabilitation Act of 1973 (RA), Fair Housing Act claims and the Dismissal of all the other claims involved.

The reasons for the request for extension of time are in good faith and are within the required time frame. The reasons are that; the Petitioner has experienced chronic and long term homelessness, since May 26, 2019 to date. All time and energy have been an exhaustive and diligent search and solution for available affordable housing and resources.

Petitioner suffers from physical and chronic mental and physical illnesses and has had to access treatment from medical providers as well as financial hardship with car repairs that is necessary for maintaining reliable transportation for earnings and savings for prospective housing search, securing housing, and earning income. Her car is also shelter and a resource when she is required to be out of the shelter based on the organization's established policy and procedures.

Petitioner is also seeking counsel, and consultation through the affordable and available legal resources and educational institutions that are available and will require extra time to secure.

With the appointment of housing benefits, prospective employment, and affordable and available legal and advocacy resources it is the expectation of this petitioner that she will be able to file her writ of certiorari on or before December 15, 2109 extension request.

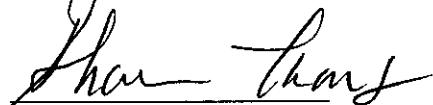
## **CONCLUSION**

For the foregoing reasons and good cause shown, Applicants respectfully request that this Court

grant this application for an extension of time to file a petition for writ of certiorari.

DATED: October 16, 2019

Respectfully submitted,



Sharon Thomas, Petitioner  
401 W. Cabarrus Street  
Raleigh, NC 27601

#### PROOF OF SERVICE

I Sharon T. Thomas, do swear or declare that on this date, October 16, 2019, as required by Supreme Court Rule 29 I have served the enclosed Application FOR EXTENSION OF TIME TO FILE A PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing in an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party Commercial carrier for delivery within 3 calendar days. The names and addresses of those served are as follows:

Matthew D. Lincoln  
Moore and Van Allen, PLLC  
100 North Tryon Street  
Suite 4700  
Charlotte, NC 28202-4003

Victory Christian Center, Inc.  
Marilyn Ann Gool, Registered Agent  
7224 Old Pineville Rd.  
Charlotte, NC 28217

Church in The City Ministries  
Robyn Gool, Registered Agent  
7224 Old Pineville Rd.  
Charlotte, NC 28217

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 16, 2019

  
Signature