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UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

ORIGINAL

No. 18-2188

Valentina L. O'Connor

Case No. 14-cv-10263

Plaintiff – Appellant,

Judge John Darrah (departed)

v.

Judge Sharon Coleman

Magistrate Judge Susan E. Cox

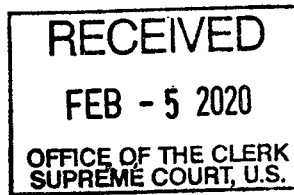
Chicago Board of Education and Nia Abdullah,

individually and as an agent for the Defendant

Chicago Board of Education,

Defendants – Appellees

Type of Dismissal: 28 USC § 1915 (e)(2)(A)



**To: Justice Bret Kavanaugh, Associate Justice of the Supreme Court of the United States and  
Circuit Justice for the Seventh Circuit**

Pursuant to Title 28, United States Code, Section 2101 (c) and Rule 13 of the Rules of the Supreme Court of the United States, **application is made for an extension of time within which to file a petition for a Writ of Certiorari, from January 29<sup>th</sup>, 2020, to February 29<sup>th</sup>, 2020** in the Appeal to the District Court's 5/24/2018 ORDER of dismissal with prejudice of the case *Valentina L. O'Connor v. Chicago Board of Education and Nia Abdullah, individually and as an agent for the Board of Education* – See attached.

The judgement/Order sought to be reviewed was entered on October 29th, 2019, when appellant's request for a review of the Court of Appeals' decision to AFFIRM the District Court's 5/24/2018 Order – was denied.

The time allowed by law to file a petition for a Writ of Certiorari will expire on January 29th, 2020 .

Copies of the judgement/order of the U.S. District Court of Northern District of Illinois, Eastern Division and of the Seventh Circuit Court of Appeals are appended.

- The judgement /Order sought to be reviewed is that of the Seventh Circuit Court of Appeals that **AFFIRMED the District Court's 5/24/2018 Order of dismissal with prejudice of the plaintiff/appellant O'Connor's FMLA Retaliation case, based on an unreliable Court demeanor test that validated the Defendants' Attorney C. Jaremus' falsification of factfinding obtained through *ex parte* meetings of attorneys who are not District Court's bar members but who, nevertheless, have been allowed to write their dispositive motions and to persuade the district court to excessively punish plaintiff/appellant and to dismiss her meritorious FMLA Retaliation case with prejudice.**

• The Court records- **D 142**, stating falsely that O'Connor made "false poverty pleadings" – are based on untrue allegations, e.g. that O'Connor "still lives" in "their house" that her husband owns and that, allegedly, O'Connor did not disclose in her IFP Affidavit of February 2<sup>nd</sup>, 2016.

• This allegation is belied by O'Connor clearly having marked in her Affidavit that all the **answers to the questionnaire are "the same"** as when she filed her first IFP application, in 2015, when she marked "real estate" for the house that her husband owns, that also is underwater due to overwhelming debts of " more than the house is worth."

- Other **than attorney Kolb and attorney C. Jaremus,- not Court's bar members, yet allowed to *ex parte* meetings and doing an obviously biased investigation, there is no proof of any investigation that the Court made into the financial situation of O'Connor's husband, before taking a decision in regard to O'Connor's assets based on her husband's assets.**

O'Connor's husband sought to testify, but he was not called when he was directed to appear in Court. Otherwise, O'Connor separated from her husband ten years ago, she lived temporarily in shelters with her children when they were younger, and she paid/pays rent

to her husband so that their son who is petitioner's ward also, will have a house to live in, preventing him from homelessness. He is presently homeless.

• The D142 Court docket also falsely states that O'Connor did not disclose that two months after she applied for her 2016 IFP legal representation, she started collecting social security benefits of \$450.00/month. O'Connor asked her Court appointed attorney about her social security benefits whether she is supposed to inform the court directly, but her attorney L. Zabele said that this is not a significant amount and that it does not have to be declared.

• Upon vigorously opposing the Board's attorney's deceitful Motion to Compel(O'Connor's mental health records, to deceitfully claim, after they already had a Meet and Confer conference and agreed to settle the case) that O'Connor suffers from mental illness/depression and that consequently her claims are invalidated, **O'Connor's first Court appointed attorney by Judge John Darrah, was asked by the consecutive district court of Judge Sharon Coleman to withdraw and as she was threatened with sanctions, she withdrew as the Court required her to do.**

• The first Court appointed attorney 's withdrawal from the case has nothing to do with O'Connor making false pleadings of anything because one year after the court allowed the Defendants' Motion to Compel(plaintiff/appellant O'Connor's mental health records, since the Defendants sought to initially discredit O'Connor's credibility through claiming that she is "crazy", that "she has a propensity for untruthfulness, so her claims must be untrue"), on 3/09/2018, the same second Court validated O'Connor's

• first Court appointed attorney's warning that the Defendants' claims are inapposite and that the Defendants, though their Compelling Order, tried to backdoor a defense to the plaintiff's FMLA claims thus to circumvent the FMLA statute and violating the plaintiff's rights by privacy invasion, by compelling plaintiff's medical records, over two years after the case was initiated and unduly delayed after Defendants already agreed and negotiated a settlement, Defendants immediately jettisoned their agreement and demanded an absurd Compelling Order after Judge Darrah's departure, Judge Darrah having been the Court who granted plaintiff the Court appointed attorney representation.

- The fundamental trait of this case is that the first District Court who granted plaintiff her IFP Affidavit, Judge Darrah, suddenly departed, after he issued from his deathbed three ORDERS of reassigning the case to a different Judge, Judge StEve.
- The second District Court who, contrary to Judge Darrah's Orders, took the case from Judge Darrah's Court, did not apply the Deference Doctrine to Judge Darrah's sound judgment (*res judicata*) regarding the granting of IFP attorney representation, and, two and a half years after the discretionary grant of IFP representation, permitted Defendants and successive attorneys to question the IFP award and through abuse of Discretion, to reverse Judge Darrah's judgment and to excessively punish the petitioner for Judge Darrah's discretion to grant her the IFP attorney representation.
- Judge Darrah's Orders were not deferred to and the lack of deference to Judge Darrah's Orders extended to reversing Judge Darrah's discretion (of appointing a Court appointed attorney) which is abuse of discretion on the part of the Court who took the case.
- Despite Judge Darrah's Orders, the case was transferred by Chief Judge Castillo, to Judge Coleman, who should have recused herself from taking the case because she had previously taken O'Connor's son's *Writ of Habeas Corpus* ,No. 1-15-cv-0964.
- In addition to the District Court's expected recusal and to the Deference Doctrine that should have applied to the first Court's sound judgment (*res judicata*) discretionary granting of IFP legal representation, there are two most important aspects of this case:
  - 1. The question of whether an attorney who is not a member of the district court's nor of the Court of Appeals' bars, could be allowed to make important decisions in the case through *ex parte* meetings and through writing dispositive motions which the court accepted, regardless of the attorney's misrepresenting the facts in order to obtain an undeserved victory through fabricated evidence that the Court accepts without investigating.
  - 2. The Court of Appeals mistakenly stated that the Court who granted plaintiff/appellant the IFP legal representation is the same with the District Court who took it away and excessively punished the plaintiff/appellant. In fact, the distinction between the first departed Court and the Court who should have recused herself from taking the case, but

instead exercised an **Abuse of Discretion, are distinctly different Courts(Judges)** who also seem to have different approaches to the issue of the case. Judge Darrah stood up holding O'Connor's son's photos of his torture/excessive force used against him in Court because he tried to explain why his case is unconstitutional. Judge Darrah asked the lawyers in his Court, "Can anyone help this boy?" while Judge Coleman in 2/26/2018 interrogation of the plaintiff/appellant, although she granted O'Connor's son's *Writ of Habeas Corpus*, called his state court case three times on the same page 13, 14, 15 of the transcript, "criminal charges" despite the fact that the statute on the basis of which he was charged, is *ab initio* facially unconstitutional.;

- Judge Darrah automatically assumed that the boy is indigent due to his incarceration (which is true) and after inquiring into O'Connor's living arrangements, "So you live in a house that your husband owns", and, upon her discharge from her employment, which was the only asset she ever had, granted plaintiff her IFP Court appointed attorney who wrote **the Second Amended Complaint -See attached,**

- while Judge Coleman was drawing negative inferences from O'Connor's non responsive answers, e.g. stating that "the Court accepts your apology for making false statements" when O'Connor apologized for the Board mis using the tax payers money intended for the students' education, by arresting a four year old litigation at the pleading stage instead of addressing the FMLA claims of O'Connor's suit and/or following up on the April 2017 promise to settle the case.

- Unfortunately Judge Darrah departed and justice for the plaintiff/appellant and her son seem to have departed with him.

- In contradiction with **the deference doctrine (*res judicata*)**, two and a half years later, the new Court (who should have recused from taking this case) permitted the Defendants to jettison their agreement for Settlement and to demand a Compelling Order for the plaintiff's mental health records. Instead of a valid defense to the FMLA Retaliation suit, **Defendants constantly sought to thwart O'Connor's FMLA Retaliation claims and to circumvent the FMLA statute by raising inapposite claims, of which the most deceitful one was Defendant's claimed IFP statute, 28 USC § 1915 ( e)(2)(A).**

• After one more year of undue delay, the second Court agreed to the first Court appointed plaintiff's attorney's pointing out that the Defendants' claims are inapposite, that plaintiff's intermittent FMLA "has never been granted", despite over eight years of Plaintiff's requests for it. The case thus survived. Defendants filed then the third demand for Summary Judgment, but sadly, the court paid heed only to the Defendants attorneys after **the Court asked the first Court appointed attorney to withdraw from the case under the threat of sanctions.**

• Again, even if the plaintiff has nothing to do with her attorney's withdrawal, she was blamed for it and the words "false pleadings" were attached to her name unjustly.

• **The second court appointed another attorney whose mission, per the magistrate Judge Cox, was "to dismiss the case".** He refused to defend the petitioner against the Defendants' attacks at her credibility.- See attached pp. 28, 29 of the appellant's brief.

• **The second Court appointed attorney compelled the plaintiff to acquiesce to "dropping Abdullah" from the case or else "Judge Coleman is going to throw out the case unless you drop Abdullah from the case, he compelled the petitioner. The following day after the attorney filed a stipulation for dismissal, the second Court dismissed the case with prejudice ( February 13, 2018),** but at the attorney's advice, reinstated it again, for a short period of time.

• Plaintiff's ordeal reached its peak when **on 2/26/2018, attorney Kolb- another non - member of the Courts 'bar- demanded in an ex parte meeting with the Court, an interrogatory of the plaintiff, which took place on February 26, 2018.**

• **Accused of lacking candor,** under her own attorney's accusations, plaintiff was escorted by two Marshalls as the **Court was drawing negative inferences from the terrified plaintiff's answers and false accusations of "misrepresentations"** which have been published in *animus* driven defamation, in the Court's docket, **D 42**, defamations from which her second Court appointed attorney refused to protect the plaintiff- See **Appellant's brief, pp.28, 29** that frighten any attorney from taking the case of a "liar", as the Board's attorney resorted to name calling the plaintiff, "She repeatedly lied in front of this Court", **D 163, p.8**, without naming any lie that allegedly the plaintiff said. See **Appellant's brief, p.1.**

- **Name calling and constant attack not at the plaintiff's claims, but at the plaintiff's person, *ad hominem* attacks have also been permitted by the second District Court in this case, the Court seeming to favor the Defendants' attorneys "doing their job".**
- **Plaintiff doubts that an attorney's job is to forge evidence in support of a false claim especially since in this case the Defendant's attorneys obstructed justice, fabricated evidence, committed fraud on the Court by presenting as genuine documents that have been forged, and unduly delayed the case for over three years instead of 120 days, per the School Code – See attached plaintiff's message to the Board's attorneys asking permission to at least be allowed to resign in order to apply for her pension benefits to provide for her son/ward's sustenance.**
- **The irony in this case is that the Defendant Board prevailed on the basis of its fabricated evidence and after wrongfully terminated and consequently further punished plaintiff by denying her even her resignation, Defendant Board was granted an undeserved victory by using the utter poverty into which it had pushed plaintiff and her son/ward, to falsely claim that the Plaintiff made "false poverty pleadings".**
- **Thus, by thwarting the IFP statute also to eradicate the due process of finding if there is cause to sanction the plaintiff, if plaintiff had the intention to hide assets, to "misrepresent" her finances or to "be evasive to mislead the court", Defendant only found a most powerful pretext in the IFP statute to inflict in the plaintiff's meritorious FMLA case a fatal blow, to demand that plaintiff be excessively punished with dismissal with prejudice of her FMLA case, a demand that the District Court granted excessively. See attached 5/24/2018 Order and Memorandum.**
- **The Court, who asked plaintiff during the Oral Arguments, what are her professional qualifications, held plaintiff's answer against her by finding that the way she is "touting her qualifications in front of the court, proves that she[the plaintiff] lacks credibility".**
- **It does not seem reasonable to justify such a harsh punishment, but the Seventh Circuit Court of Appeals decided that the District Court did not err in its fact findings (although it was based on Defendant's forged cut and pasted text excerpts taken out of context and imbued with a distorted meaning that supported Defendant's wrong allegation that**

plaintiff had paid all her life savings- her IRA two accounts- AFTER she filed her Affidavit for IFP Court appointed attorney representation when, in fact plaintiff exhausted her two IRA accounts BEFORE she applied for IFP legal representation.147-1 Tr., pp. 10, 11, 12, 13,

- The Seventh Circuit Court of Appeals also found that the District Court did not abuse its discretion in granting Defendant even more than they asked, as there was still in Defendant's demand for dismissal, some doubt whether the punishment should be dismissal with or without prejudice.
- Besides not even taking notice that there were two distinct District Courts involved in managing the case, the second Court owing deference to the first one (*res judicata*),the Court of Appeals did not address the need for recusal of the Court that was already in the process of dismissing plaintiff's son's *Writ*, without an investigation and without an injunction for his liberty from under a facially unconstitutional statutory charge.
- The Seventh Circuit Court of Appeals did not address the Defendants' private Attorney's lack of membership to the District Court's bar and to the Seventh Circuit Court of Appeals, hired by the Defendant on 3/09/2018, the same day when the second District Court decided that the Defendant "never granted plaintiff's intermittent FMLA' for more than eight years since when plaintiff started requesting it.
- The Seventh Circuit Court of Appeals did not address the Defendant Board's constant omission of a Disclosure Statement in its brief, and, contrary to the Court's Rules, allowed attorneys who are not members of the Court's bar to influence the Court's decisions, through *ex parte* meetings and through options that were highly considered despite their misleading content.
- The Defendant's allegations were that plaintiff "still lives" in "their house", that her husband owns, and that plaintiff allegedly did not mark the house as real estate in the respective rubric of the IFP Affidavit, despite the fact that plaintiff marked that all the answers are "the same " as her answers in her first 2015 application for Court appointed Attorney, and despite the fact that Judge Darrah questioned plaintiff about it ("So you live in a house that your husband owns"),and -here the first Court's appointed attorney prediction became true, that unless Defendants were "estopped" from circumventing the



**FMLA statute, their privacy invasion of the plaintiff will cause further violation of the plaintiff's FMLA (when the FMLA statute is meant to avoid such privacy invasion),**

- **As plaintiff having been forced to go through the excruciating pain of sharing her marriage situation i.e. she always had to pay rent to her husband, she separated from him ten years at the time of her FMLA suit, and she still continues to be forced to pay rent in order to avoid her afflicted son/ward's to be thrown out as homeless. Presently he is homeless.**
- **Another Defendant's allegation was that plaintiff allegedly spent all her life savings, two IRA saving accounts, - over \$80,000 in paying three criminal defense attorneys to defend her son and to give him a jury trial (which has been continually denied since there was no evidence of the color of crime with which he was charged). Defendant's attorney claimed wrongly that plaintiff spent these money **AFTER** she filed her Affidavit for Court appointed attorney representation while the reality belies the Defendant's statement, since plaintiff clearly stated and she did pay the criminal defense attorneys **BEFORE** she applied for her IFP attorney representation. 147-1, pp. 12, 13, 14, 15.**
- **The allegation that plaintiff had two undeclared bank accounts when she applied for IFP representation, - is also inaccurate because the plaintiff 's son's last attorney, Mr. S. Richards, unbeknown to plaintiff, deposited a bounced check of \$1,200 in the plaintiff's account without plaintiff's knowledge of it.**
- **About the \$2,200 in her saving account, which was frozen since September 2014: plaintiff was under excessive stress due to her son's desperate situation and also due to her hostile work environment that started immediately after her first FMLA suit.**
- **She simply forgot nor did she notice that a remnant of one of the two IRA savings account was still in the bank. Had she known about it, considering the extreme scarcity that she and her ward were subjected to, she would have used it for his much needed treatment and care. But she simply did not know about it and when the Hibbler *pro bono* attorney advised her in 2018 to bring to the Court copies of all her bank records, she simply followed his advice as she did not know that she should have done so before. The Defendant and her second Court appointed attorney framed her as "lacking candor". Plaintiff did not lack any candor, she was simply too overwhelmed to be thinking proactively and unable to focus due**

to her son's PTSD that affected her as well. Plaintiff appealed to the Court's "just merci", but found a lack of moral support and an unwillingness to understand a mother's despair.

- **Nevertheless , neither the District court, nor the Seventh Circuit Court of Appeals were willing to at least concede a possibility that plaintiff might be telling the truth, and**
- **Based on a subjective and unreliable Court demeanor test, dismissed plaintiff's case with prejudice as a severe punishment for plaintiff's alleged "intention to mislead the court", which is nothing further from the truth.**
- **Plaintiff also presented, during the 5/08/2018 Oral Arguments, the Defendants' coercive response to plaintiff's request for permission to resign so she could apply for pension as her son who was reduced to indigency, desperately needed treatment for his Traumatic Brain injury that became chronic with memory and cognitive abilities significant losses, and with frightening changes of his personality.**
- **To the brutal infringement of plaintiff's FMLA rights by the wrongful termination of plaintiff's employment, a drastic last resort sadistic punishment was added, by plaintiff being denied FMLA altogether since her employment is terminated. Plaintiff's supervisor sat continuously, "You don't need to work. You should stay home and take care of your son."**
- **But this is not the law and unless the misapplication of the law is corrected, Defendants in this case will continue to abuse the law undeterred, while the District Court docket will perpetually spread out frightening defamations of plaintiff/appellant's character barring her from Court and from protection against the unequal justice under law. The Court docket, D 142, lists all of the above Defendant's wrongful allegations against the plaintiff and despite plaintiff's repeated requests, the published misinformation has never been corrected.**
- **The district court erred and committed CLEAR ERROR when it relied on the Defendants' wrong and fabricated evidence that O'Connor "lied"<sup>1</sup> and that she had the intention to lie to deceive the court, but the Seventh Circuit Court of Appeals did not consider Defendant's**

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<sup>1</sup> These insinuations were in line with the Defendant's line of defense by impugning petitioner's character that started immediately after Judge Darrah departed. See pp. 28, 29 of the Appellant's Brief-attached.

forged documents -See attached three column text in which plaintiff tried showing visually what did the Defendant omit in its "cut and paste" version the transcript, 147-1, pp. 10,11,12,13,14,15.

Plaintiff/appellant believes that the district court's subjective court demeanor test is violating plaintiff's right to Court, right to due process and to equal justice. See attached graph where the unreasonable placement of plaintiff in the company of Hayyiim who did not declare more than \$300,000 and a monthly income, yet she has been invited by Judge Holderman to bring her suit again after she pays the \$300.00 Court filing fee. O'Connor paid the \$400.00 Court filing fee on December 22, 2014, when she filed her complaint, yet the District Court who dismissed her case claimed in the 5/24/2018 Memorandum, for more than a page, that O'Connor did not pay the Court filing fee. This is an example of the Court's clear error and it also challenges the constitutionality of the District Court's application of the 28 USC § 1915 ( e)(2)(A) used by the Defendants as a tool to dismiss indigent plaintiffs' complaints.

• Plaintiff/appellant has been harmed by the Court's unconstitutional finding of plaintiff's "court demeanor" test, as "she is touting her qualifications in front of the court, which proves that she lacks credibility". Plaintiff/appellant believes that her case is symptomatic of the way the Seventh Circuit treats self - represented *pro se* litigants, "like trash, unworthy of a federal court judge's time"(per Judge R. Posner).

Plaintiff /appellant also believes that her case is of public interest due to the application of the 28 USC § 1915 ( e)(2)(A) to dismiss the *pro se* cases, which is far from the purpose that Congress in 1892 intended the IFP support to be, but for the sake of equal justice provided to the indigent . Also, using 28 USC § 1915 ( e)(2)(A) for the purpose of dismissal of *pro se* litigants' cases is far from uniformly applied, as plaintiff, once she was reduced to indigency by her employers wrongly terminating her employment, and ended up applying for IFP representation, was thrown into the pool of the *pro se* litigants because she was victimized by her son's attorney depositing \$1,200 in her bank account , to concoct the scheme of the dismissal of her FMLA case, and only to cash over \$29,000 without ever allowing justice to prevail in plaintiff's son's case.

- Plaintiff would not have gone through such painful privacy invasion nor would her case have been dismissed with prejudice, nor would she have been consistently mocked by the Board's attorneys, if she had not been reduced to poverty by her employers only for her employers to hire the non bar members attorneys to file dispositive motions to dismiss her FMLA Retaliation case by circumventing the FMLA law and by pretending instead that she "lied" about her assets. The only asset she ever had was her employment salary.
- Another question of public interest is the Defendant's constant refusal to file a Disclosure statement, which might have revealed the hidden connections between plaintiff's second court appointed attorney and the Defendant's attorney.
- By reasonable inference, plaintiff's son was targeted to be unjustly punished , incarcerated and inflicted permanent brain damage immediately after the District Court's decision in petitioner's first FMLA Retaliation case, *O'Connor v. Board of Education of Chicago*, No. 1-2011-C-0673, where Judge StEve rebutted Defendant's claim that O'Connor did not need FMLA to care for her "adult alcoholic son"(Michael was 18 years old and a highly functional professional with bipolar) The Judge stated that, even if he might suffer from addiction, "he is primarily bipolar", thus petitioner did qualify for FMLA and thus the Board interfered and retaliated against petitioner's FMLA rights. **The drastic reversal of the district court's decision in Michael's state court, i.e. that he "MIGHT" do something because he is bipolar, - amount to blatant constitutional violations of Michael's rights** and it sounds in FMLA retaliation actions against petitioner and her son, in conflict with the Title VII prohibiting retaliation against employees who file suits and against their families.
- Petitioner sought the reversal of the 5/24/2018 ORDER in her case, but, instead of at least having her Appeal and Reply Brief read, the Court referenced to her "parse [English] writing" . Petitioner knows that this is not what justice looks like. Petitioner is convinced that the decision of the Seventh Circuit Court of Appeals is not what justice so requires because it seems to her that despite her "parse writing", the Court of Appeals did not read her appeal since **important questions of fact and law were not addressed in the Court of Appeals' answer**. This is why she renewed her Appeal and her reply brief, hoping that the

Court of Appeals will read her text, but her **motion for reconsideration of her appeal was denied also.**

Plaintiff/appellant O'Connor is confident that the U.S. Supreme Court will offer guidance to the Seventh Circuit Court of Appeals' decisions on her appeal and on other *pro se* appellants whose cases are similar to her case, and that she will find answers to her deeply disturbing questions about **the District Court's use of summarily Court demeanor test to gain visionary like immediate insight into the plaintiff's inner thoughts especially to determine whether the plaintiff whose case is about to be dismissed by the Defendant corporation's clever but Not Bar Members attorneys, had a *mens rea* component to his/her alleged attempt to deceive the Court by "hiding assets" in the Affidavit for IFP legal representation. The injustice of the lack of uniformity of application of 28 USC § 1915 (e)(2)(A) statute reduced to be used as a tool to dismiss poor litigants' cases, instead of granting them equal access to the Court and to justice, is also in contradiction with the intention of the Congress when it created the IFP statute.**

**Uniformity of the application of the law is also affected by Seventh Circuit District Court who refuses to investigate whether the plaintiff's husband's assets have to be considered and what specifically is the husband paying for from his income, whether IFP applicants had a *mens rea* component of their inaccurate reporting, or in the case they do not, they should be absolved of such harsh punishment as dismissal with prejudice of their complaints that would only deter the victims of rights violations and not the perpetrator employer who will continue to omit its Disclosure Statement and continue to invest the tax payers money intended for the students' education in superfluous and revengeful denial of employees rights protected by the law.**

To avoid being misled by clever Defendants' lawyers, the District Court should base its decisions on its own investigation like in the case of petitioner's son's *Writ* that was dismissed without any investigation nor much hoped for Injunction to release a fundamentally innocent young man who suffers from mental illness and needed treatment, not being incarcerated and tortured for no cause and on the basis of a facially unconstitutional statute. But the District

court refused to investigate and instead took petitioner's FMLA case to dismiss it with prejudice and without providing any remedy for its wrongly inflicted damages.


O'Connor prays Justice Kavanaugh for an extension of the deadline to submit her Writ of Certiorari and for legal representation to avoid her unfortunate "parse" presentation of the issues involved in this case.

The reason for requesting an extension of the submission deadline is that presently, Petitioner/Appellant is overwhelmed with her son's mental health deterioration as she had to transport him to local hospitals and then to Madden Hospital from where, three days prior to this Petition, her son had been transferred to Chester Illinois State Inpatient treatment Hospital, due to his aggravated mental illness and addiction that rendered him a danger.

Therefore, based on the above reasons, Appellant is respectfully imploring Justice Kavanaugh for an extension of the deadline for submission of her *Writ of Certiorari*.

Respectfully submitted,

Valentina O'Connor

  
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