



SOBIESKI MESSER & ELLEDGE
ATTORNEYS AT LAW

September 8, 2021

Mr. Danny Bickell
Deputy Clerk for Practice and Procedure
United States Supreme Court
One First Street, NE
Washington, D.C. 20543

Re: Nehad Abdelnabi v. Fatma Adel Sekik
U.S. Supreme Court No. 21-201

Dear Mr. Bickell:

Please accept this letter as Respondent's Motion for Extension of Time to respond to Petitioner's Petition for Writ of Certiorari. We request this extension based on the following:

1. Respondent was not served with the Petition for Writ of Certiorari timely. *See* Affidavit of Madison Kind attached hereto.
2. Respondent was not served with the Notice of Docketing timely. *See* Affidavit of Madison Kind attached hereto.
3. Petitioner did not include critical court filings and testimony in the Petitioner's Appendix, making it necessary for Respondent to prepare and file a separate Appendix.
4. Respondent's counsel has been informed by the legal printer that they cannot have the Respondent's Appendix complete in time for filing by the due date, September 13, 2021, much less in time for the Appendix citations to be added to the Response to the Petition for Writ of Certiorari.

September 8, 2021

Based on the foregoing, Respondent respectfully requests an extension of thirty (30) days to file her Response to the Petition for Writ of Certiorari.

Sincerely,

Wanda G. Sobieski

Wanda G. Sobieski
Attorney for Respondent, Fatma Adel Sekik

WGS/jng

Enclosure

cc: Nehad Abdelnabi
Honorable Herbert H. Slatery, III
Fatma Sekik (Via Email)

IN THE SUPREME COURT OF UNITED STATES

NEHAD ABDELNABI – PETITIONER

V.

FATMA ADEL SEKIK – RESPONDENT

AFFIDAVIT OF MADISON L. KIND

STATE OF TENNESSEE)
COUNTY OF KNOX)

I, Madison L. Kind, being of legal age and duly sworn, upon knowledge and belief, do depose and say:

1. I am a legal assistant at Sobieski, Messer, and Elledge and have been working here since January 21, 2020.
2. One of my responsibilities is to collect and distribute mail to the attorneys on Monday, Tuesday, Thursday, and Friday. Jennifer Giles collects and distributes mail to attorneys on Wednesday. I am the one who has opened the documents discussed below.
3. The first document or notice of any kind that we received regarding Petitioner's matter after the Supreme Court of Tennessee's decision in August 2021, was the package that arrived by mail on August 5, 2021, that contained the Petition for Writ of Certiorari.

4. With the Petition for Writ of Certiorari was a letter to the Supreme Court Clerk dated July 23, 2021 and a Certificate of Mailing dated July 26, 2021, signed by Petitioner. *See Exhibit A* attached hereto.

5. The postmark on the box containing the Petition for Writ of Certiorari that was delivered to the office on August 5, 2021, with an origin zip code of 37923 (which is a Knoxville, Tennessee zip code). The package was not mailed until ten (10) days after the signed and dated Certificate of Mailing. *See Exhibit B* attached hereto.

6. The Notice of Docketing was not received in our office until August 24, 2021. It was mailed with a letter from Petitioner dated August 17, 2021, but was not postmarked until August 20, 2021. *See Exhibit C* attached hereto.

7. Our address and contact information have not changed since I began work here.

FURTHER AFFIANT SAITH NOT.

Madison L Kind
Madison L. Kind

Sworn to and subscribed before me this 7 day of September, 2021.

Shannon Parker
Notary Public

My Commission Expires:

September 5, 2022



No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

NEHAD ABDEL NABI - PETITIONER

Vs.

FATMA ADEL SEKIK - RESPONDENT

CERTIFICATE OF MAILING

I, Nehad Abdel Nabi, do swear or declare that I have submitted the enclosed Motion for Leave to Proceed In Forma Pauperis and Petition For Writ of Certiorari for filing with this Court by placing same in the hands of the proper institutional authorities for mailing, with sufficient postage thereon, on this the 26 day of July, 2021.


Nehad Abdel Nabi

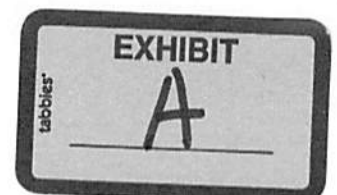
561320

T.C.I.X.

1499 R.W. Moore Memorial Hwy.

P. O. Box 4050

Only, Tennessee 37140-4050





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EXPECTED DELIVERY DAY: 08/06/21

C002

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Knoxville TN 37902-1630

USPS SIGNATURE® TRACKING #



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O-FRB June 2020
ID: 11 x 8.5 x 5.5
OD: 11.25 x 8.75 x 6
ODCUFT: 0.341

FROM: Nehad S. Abdelnabi

561320 TCIX

1499 R.W. Moore Memorial Hwy.

P.O. Box 4050

Only, TN 37140-4050

TO:

Wanda Sobieski, Esq
Attorney for Plaintiff
612 S. Gay St. 5th Floor

Knoxville, TN 37902

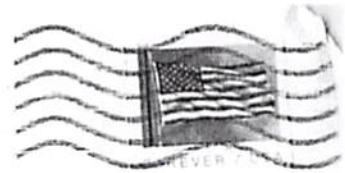
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EXHIBIT
B

Nehad Abdel Nabi
561320
T.C.I.X.
1499 R.W. Moore Memorial Hwy.
P. O. Box 4050
Only, Tennessee 37140-4050

NASHVILLE TN 370

20 AUG 2021 PM 5 L



Privileged
Mail

Wanda Sobieski, Esq.
Attorney for Plaintiff
612 S. Gay Street, 5th Floor
Knoxville, Tennessee 37902

37902-163099



The Department of Corrections
has neither inspected
nor censored and is not
responsible for the contents
of this letter. ~~It is the property of the
Department of Corrections and is to be
returned to the Department of Corrections
upon request.~~

RECEIVED
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U.S. DEPT. OF CORRECTIONS
ALBANY, N.Y.

Nehad Abdel Nabi
561320
T.C.I.X.
1499 R.W. Moore Memorial Hwy.
Only, TN 37140-4050

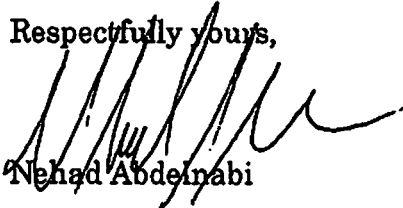
August 17, 2021

Ms. Wanda Sobeiski, Esq.
Attorney for Plaintiff
612 Gay Street, 5th Floor
Knoxville, Tennessee 37902

Ms. Wanda Sobeiski, Esq.,

Enclosed herewith is your Notice pursuant to Rule 12.3 that a petition for writ of certiorari in the above entitled case was filed in the Supreme Court of the United States. Also enclosed is a Waiver for you to fill out and submit to the Court.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Nehad Abdel Nabi', is written over the typed name.

Enc.: Notice & Waiver

NA/jcw

Supreme Court of the United States

Nehad Abdelnabi
(Petitioner)

v.

No. 21-201

Fatma Adel Sekik
(Respondent)

To _____ Counsel for Respondent:

NOTICE IS HEREBY GIVEN pursuant to Rule 12.3 that a petition for a writ of certiorari in the above-entitled case was filed in the Supreme Court of the United States on August 5, 2021, and placed on the docket August 12, 2021. Pursuant to Rule 15.3, the due date for a brief in opposition is Monday, September 13, 2021. If the due date is a Saturday, Sunday, or federal legal holiday, the brief is due on the next day that is not a Saturday, Sunday or federal legal holiday.

Beginning November 13, 2017, parties represented by counsel must submit filings through the Supreme Court's electronic filing system. Paper remains the official form of filing, and electronic filing is in addition to the existing paper submission requirement. Attorneys must register for the system in advance, and the registration process may take several days. Further information about the system can be found at <https://www.supremecourt.gov/filingandrules/electronicfiling.aspx>.

Unless the Solicitor General of the United States represents the respondent, a waiver form is enclosed and should be sent to the Clerk only in the event you do not intend to file a response to the petition.

Only counsel of record will receive notification of the Court's action in this case. Counsel of record must be a member of the Bar of this Court.

Mr. Nehad Abdelnabi
T.C.I.X.
1499 R.W. Moore Memorial Highway
Only, TN 37140-4050

NOTE: This notice is for notification purposes only, and neither the original nor a copy should be filed in the Supreme Court.

W A I V E R

Supreme Court of the United States

No. _____

(Petitioner) v. _____
(Respondent)

I DO NOT INTEND TO FILE A RESPONSE to the petition for a writ of certiorari unless one is requested by the Court.

Please check the appropriate box:

- ☐ I am filing this waiver on behalf of all respondents.
- ☐ I only represent some respondents. I am filing this waiver on behalf of the following respondent(s):

Please check the appropriate box:

- ☐ I am a member of the Bar of the Supreme Court of the United States. (Filing Instructions: File a signed Waiver in the Supreme Court Electronic Filing System. The system will prompt you to enter your appearance first.)
- ☐ I am not presently a member of the Bar of this Court. Should a response be requested, the response will be filed by a Bar member. (Filing Instructions: Mail the original signed form to: Supreme Court, Attn: Clerk's Office, 1 First Street, NE, Washington, D.C. 20543).

Signature _____

Date: _____

(Type or print) Name _____
☐ Mr. ☐ Ms. ☐ Mrs. ☐ Miss

Firm _____

Address _____

City & State _____ Zip _____

Phone _____ Email _____

A COPY OF THIS FORM MUST BE SENT TO PETITIONER'S COUNSEL OR TO PETITIONER IF PRO SE. PLEASE INDICATE BELOW THE NAME(S) OF THE RECIPIENT(S) OF A COPY OF THIS FORM. NO ADDITIONAL CERTIFICATE OF SERVICE OR COVER LETTER IS REQUIRED.

cc: