

IN THE SUPREME COURT OF THE UNITED STATES

JEAN COULTER, Petitioner

v.

Case No. : _____

GERRI PAULISICK and
JOSEPH PAULISICK, Respondents

MOTION FOR EXTENSION OF TIME
TO FILE PETITION FOR CERTIORARI

NOW COMES, Petitioner, JEAN COULTER ("Coulter") and files Motion for Extension of Time to File Petition for Certiorari – asking Justice Samuel Alito, circuit justice for the Third Circuit, to grant extension of time to file Petition for Certiorari with this court. In support of this Request, Coulter states :

1.) On June 2, 2021, the Pennsylvania Supreme Court denied Coulter's Petition for Allowance of Appeal (state court docket number 362 WAL 2020).

On June 11, 2021, Coulter filed Application for Reconsideration in the state's highest court.

2.) At some point in early July 2021, Coulter checked the status of this court's rule changes – and noticed that the date for timely filing had not been changed since the original "blanket" extension was issued on March 19, 2020 (in response to the pandemic), which extended the date for filing Petition for Certiorari from 90 days to 150 days.

3.) Coulter more recently noted that on July 19, 2021, that the March 2020 Order (which granted an automatic extension of 60 days for filing Petition for Certiorari) had been rescinded - and a the new Order requires that a Petition of

Exhibit A

Certiorari will again only be considered to have been timely filed, if it is filed within 90 days of any "relevant lower court judgment".

Coulter also noted that in order to timely file Petition for Certiorari related to a judgment issued on or before July 19, 2021, remains at 150 days.

4.) In the Instant Matter, the state's highest court denied Coulter's Application for Reconsideration on July 26, 2021 – just one week after the date on which the "extended" time to file was rescinded by this court. (Exhibit A) Thus Coulter is required to file within 90 days after the denial of reconsideration of her appeal in the state's highest court.

5.) Coulter acknowledges that she negligently failed to repeatedly check for changes in this court's extension of time for filing Petition for Certiorari. However, Coulter believes that this is because, where Coulter has been recently staying (at her "family home" in Western Pennsylvania (Butler County)), Coulter has not seen any significant reduction in the negative effects of the Coronavirus – despite this reduction in cases/ hospitalizations/deaths occurring in most areas of the country. (Coulter has extended her stay in Western Pennsylvania, in order to permit her to attend the service for a COVID victim on October 16, 2021.)

Indeed, recently, the entire public transit system in that county of Western Pennsylvania was shut down, when essentially every employee in the entire transit system was required to self-quarantine after receiving a Positive COVID test and experiencing symptoms. (The "commuter" routes were able to continue at 50% service, only after the Transit Authority was able to hire a private contractor to

provide both drivers and buses for those trips (as even the transit authority's mechanics had been sickened so even maintenance for the city's fleet was impossible).)

Additionally, because the extremely low rate of vaccination as well as refusals by the majority of the county's residents to comply with mask mandates, Coulter has found it extremely difficult to even utilize the local library. Initially, the library was so severely restricting access, that it only provided 4 chairs for patrons to use indoors – in order to assure Social Distancing". Further, the library cut-off internet access outdoors – apparently as the result of too many people using the library's internet access to download movies, etc. While the library has permitted more indoor seating, it was not until September 7, 2021, that the library finally resumed its "standard" operating hours once again.

6.) Generally, applications for extension of time to file Petition for Certiorari are not favored. However, an especially significant disparity has resulted from the clearly unique situation which this court has had to address because of the effects of COVID.

For Coulter, this disparity has meant that simply because the state's highest court denied her request for Reconsideration (on July 26, 2021), just 7 days after the extension of 60 days was rescinded – that Coulter now struggles to complete her Petition for Certiorari.

WHEREFORE, Coulter requires an extension of time to file Petition for Certiorari from state court docket number 362 WAL 2020, to permit up to 150 days from the date of the dismissal by the state court (on July 26, 2021).

Respectfully Submitted,

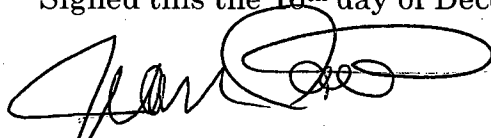
Jean Coulter, Petitioner

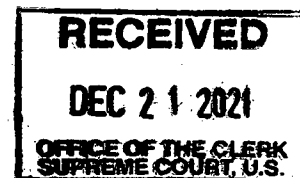
DECLARATION OF TIMELY FILING

I hereby certify that I timely filed Motion for Extension of Time to file Petition for Writ of Certiorari in the matter of Jean Coulter, Petitioner v. Gerri Paulisick, et. al., Respondents – by sending it on October 8, 2021 to the Clerk's Office for consideration by Justice Samuel Alito.

For reasons beyond my control, the Motion was never presented to Justice Alito. So, I have re-sent copies of that Motion to the Clerk's Office and ask that Justice Alito consider the Motion at this time – and permit Coulter's Petition for Writ of Certiorari to the Supreme Court of Pennsylvania to be filed and considered by the full court.

I hereby swear that the facts presented above are true and correct to the best of my knowledge and belief, and I sign this Declaration under Pains and Penalty of Perjury.
Signed this the 16th day of December 2021.


Jean Coulter, Petitioner



IN THE SUPREME COURT OF THE UNITED STATES

JEAN COULTER, Petitioner

v.

Case No. : _____

PAUL LAURENCE DUNBAR, et. al, Respondents

MOTION FOR EXTENSION OF TIME
TO FILE PETITION FOR CERTIORARI

NOW COMES, Petitioner, JEAN COULTER ("Coulter") and files Motion for Extension of Time to File Petition for Certiorari – asking Justice Samuel Alito, circuit justice for the Third Circuit, to grant extension of time to file Petition for Certiorari with this court. In support of this Request, Coulter states :

1.) On July 8, 2021, the Third Circuit denied Coulter's Appeal (Third Circuit docket number 21- 1164).

On July 22, 2021, Coulter filed Application for Reconsideration in the Third Circuit.

2.) At some point in early July 2021, Coulter checked the status of this court's rule changes – and noticed that the date for timely filing had not been changed since the original "blanket" extension was issued on March 19, 2020 (in response to the pandemic), which extended the date for filing Petition for Certorari from 90 days to 150 days.

3.) Coulter more recently noted that on July 19, 2021, that the March 2020 Order (which granted an automatic extension of 60 days for filing Petition for Certiorari) had been rescinded - and a the new Order requires that a Petition of

Exhibit B

Certiorari will again only be considered to have been timely filed, if it is filed within 90 days of any "relevant lower court judgment".

Coulter also noted that in order to timely file Petition for Certiorari related to a judgment issued on or before July 19, 2021, remains at 150 days.

4.) In the Instant Matter, the Third Circuit denied Coulter's Application for Reconsideration on August 9, 2021 (Exhibit A) Thus Coulter is required to file within 90 days after the denial of reconsideration of her appeal in the federal appellate court.

5.) Coulter acknowledges that she negligently failed to repeatedly check for changes in this court's extension of time for filing Petition for Certiorari. However, Coulter believes that this is because, where Coulter has been recently staying (at her "Mother's home" in Western Pennsylvania (Butler County)), Coulter has not seen any significant reduction in the negative effects of the Coronavirus – despite this reduction in cases/ hospitalizations/deaths occurring in most areas of the country. (Coulter has extended her stay in Western Pennsylvania, in order to permit her to attend the service for a COVID victim on October 16, 2021.)

Indeed, recently, the entire public transit system in Butler County (Western Pennsylvania) was shut down, when essentially every employee in the entire transit system was required to self-quarantine after receiving a Positive COVID test and experiencing symptoms. (The "commuter" routes were able to continue at 50% service, only after the Transit Authority was able to hire a private contractor to provide both drivers and buses for those trips (as even the transit authority's

mechanics had been sickened so even maintenance for the city's fleet was impossible).)

Additionally, because the extremely low rate of vaccination as well as refusals by the majority of the county's residents to comply with mask mandates, Coulter has found it extremely difficult to even utilize the local library. Initially, the library was so severely restricting access, that it only provided 4 chairs for patrons to use indoors – in order to assure Social Distancing". Further, the library cut-off internet access outdoors – apparently as the result of too many people using the library's internet access to download movies, etc. While the library has permitted more indoor seating, it was not until September 7, 2021, that the library finally resumed its "standard" operating hours once again.

6.) Recently, when reviewing this court's Order rescinding the (now expired) "automatic" 60 day extension of time for filing of Petition for Certiorari, Coulter realized that she is not certain whether her case would be eligible for the extension of time for filing based on Coulter's calculation of time based on the date of the initial decision of the appeal, by the Third Circuit (rather than the utilizing the date of denial of reconsideration).

Coulter did file for En Banc Rehearing, but, Coulter believed that she could use the date of the Panel Decision (which was on July 8, 2021 (and therefore prior to July 19, 2021)) as the starting point for the "clock" – and thus, Coulter believed that she would be permitted to file Petition for Certiorari within 150 days of July 8,

2021, rather within than 90 days of August 9, 2021. (Exhibit A) However, Coulter is uncertain of the meaning of this court's July 19, 2021 Order which states :

"... in any case in which the relevant lower court judgment, order denying discretionary review, or order denying a timely petition for rehearing was issued prior to July 19, 2021, the deadline to file a petition for a writ of certiorari remains extended to 150 days from the date of that judgment or order."

7.) Generally, applications for extension of time to file Petition for Certiorari are not favored. However, an especially significant disparity has resulted from the clearly unique situation which this court has had to address because of the effects of COVID, particularly for appeals which were decided during the summer.

For Coulter, this disparity has meant that simply because the Third Circuit affirmed the district court's decision on August 9, 2021 and the July 19, 2021 Order reverses the temporary extension of time for filing petition for Certiorari, the subsequent En Banc denial of the request for Reconsideration means that Coulter now struggles to complete her Petition for Certiorari.

WHEREFORE, Coulter requires an extension of time to file Petition for Certiorari from Third Circuit, to permit up to 150 days from the date of the dismissal by the Third Circuit on August 9, 2021 – or in the alternate, within 150 days of July 8, 2021.

Respectfully Submitted,

Jean Coulter, Petitioner

IN THE SUPREME COURT OF THE UNITED STATES

JEAN COULTER, Petitioner

v.

Case No. : _____

GERRI PAULISICK and
JOSEPH PAULISICK, Respondents

CERTIFICATE OF SERVICE

I hereby certify that I have this day, the 8th day of October 2021, served a true and correct copy of the foregoing Motion for Extension of Time to File Petition for Certiorari, upon Defendants' Counsel at :

larabo@hardinlawpc.net

Jean Coulter, Plaintiff

If you view the **Full Docket** you will be charged for 2 Pages \$0.20

General Docket
Third Circuit Court of Appeals

Court of Appeals Docket #: 21-1164

Docketed: 02/02/2021

Nature of Suit: 4190 Other Contract Actions

Termed: 07/08/2021

Jean Coulter v. Paul Laurence Dunbar Community, et al

Appeal From: United States District Court for the Western District of Pennsylvania

Fee Status: Paid

Case Type Information:

- 1) civil
- 2) private
- 3) Diversity

Originating Court Information:

District: 0315-2 : 2-16-cv-00125

Trial Judge: Arthur J. Schwab, U.S. District Judge

Date Filed: 02/01/2016

Date Order/Judgment:

11/03/2020

Date Order/Judgment EOD:

11/03/2020

Date NOA Filed:

01/27/2021

07/08/2021 18 NOT PRECEDENTIAL PER CURIAM OPINION Coram: CHAGARES, PHIPPS and COWEN, Circuit Judges. Total Pages: 8. (LMR) [Entered: 07/08/2021 10:42 AM]

07/08/2021 19 JUDGMENT, Affirmed. Costs taxed against Appellant.. (LMR) [Entered: 07/08/2021 10:44 AM]

07/22/2021 20 ECF FILER: BILL OF COSTS filed on behalf of Appellee Paul Laurence Dunbar Community Center. Certificate of Service dated 07/22/2021. Service made by Email, US mail. [21-1164] (KJH) [Entered: 07/22/2021 02:22 PM]

07/22/2021 23 PETITION filed by Appellant Jean Coulter for Rehearing En Banc and before Original Panel. (LMR) [Entered: 07/26/2021 10:26 AM]

07/23/2021 21 ECF FILER: CORRECTED BILL OF COSTS filed on behalf of Appellee Paul Laurence Dunbar Community Center. Certificate of Service dated 07/23/2021. Service made by Email, US mail. [21-1164] (KJH) [Entered: 07/23/2021 05:21 PM]

07/26/2021 22 REVIEWED Bill of Costs filed. After review, costs will be taxed in the amount of \$108.99. (LMR) [Entered: 07/26/2021 10:25 AM]

08/06/2021 24 ECF FILER: Motion filed by Appellee Paul Laurence Dunbar Community Center filed by Attorney Colleen M. Aracri, Esq. for Appellee Paul Laurence Dunbar Community Center to withdraw as counsel. Certificate of Service dated 08/06/2021. Service made by Email, US mail. [21-1164] (CMA) [Entered: 08/06/2021 03:50 PM]

08/09/2021 25 ORDER (SMITH, AMBRO, CHAGARES, JORDAN, SHWARTZ, KRAUSE, RESTREPO, BIBAS, PORTER, MATEY, PHIPPS and COWEN, Circuit Judges) denying Petition for en banc and panel rehearing filed by Appellant Jean Coulter. Cowen, Authoring Judge. (LMR) [Entered: 08/09/2021 09:31 AM]

08/17/2021 26 MANDATE ISSUED. (LMR) [Entered: 08/17/2021 11:02 AM]

09/01/2021 27 ORDER (COWEN, Circuit Judge) granting Motion by Attorney Colleen M. Aracri, Esq to withdraw as counsel for Appellee Paul Laurence Dunbar Community Center. Cowen, Authoring Judge. (LMR) [Entered: 09/01/2021 02:28 PM]

| PACER Service Center | | | |
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| Transaction Receipt | | | |
| Third Circuit - 10/08/2021 13:45:13 | | | |
| PACER Login: | jc7048 | Client Code: | |
| Description: | Case Summary | Search Criteria: | 21-1164 |
| Billable Pages: | 1 | Cost: | 0.10 |

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| <input type="checkbox"/> | Joyce, Ronald .. Eliza | RENEWED Motion for Special Relief Exhi | Oct 14 |
| <input type="checkbox"/> | Joyce, Ronald, charli | Jim and Paulisick exhibits B, C, D and E | Oct 14 |
| <input type="checkbox"/> | Joyce, Ronald .. Eliza | Coulter v. Paulisick Exhibits B, C, D and E | Oct 14 |
| <input type="checkbox"/> | Jeanecoult., me, Eliza | Photos for location of tree before it was | Oct 14 |
| <input type="checkbox"/> | Jeanecoult., me, Eliza | JIM nad PAULISICK Special Relief RECUS | Oct 14 |
| <input type="checkbox"/> | contact@landsurvey | Questions about who actually surveyed 6 | Oct 14 |
| <input type="checkbox"/> | rolsen@ols., Jeaneco | STOP WORK | Oct 14 |
| <input type="checkbox"/> | Jeanecoult., me, Eliza | JIM & PAULISICK To-Do List | Oct 13 |
| <input type="checkbox"/> | Jeanecoulter | (No Subject) | Oct 13 |
| <input type="checkbox"/> | me, Jeanecoult. .. chr | PAULISICK CERT Questions Presented | Oct 13 |
| <input type="checkbox"/> | charliewil., me .. Eliza | Please note this is NOT complete! | Oct 12 |
| <input type="checkbox"/> | me, Jeanecoult., Eliza | JIM and PAULISICK asking again for ident | Oct 12 |
| <input type="checkbox"/> | info@delish.com | UNSUBSCRIBE me already! | Oct 12 |
| <input type="checkbox"/> | charliewil., me .. Eliza | Sorry its taking so long | Oct 12 |
| <input type="checkbox"/> | Printandgo | EXHIBITS 604 N. McKean St. | Oct 12 |
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| <input type="checkbox"/> | Linette, me .. Elizabe | Fw: DUNBAR Motion for time to file CER | Oct 8 |
| <input type="checkbox"/> | Joyce, me .. Elizabet | Fw: PAULISICK DOCKET AND MOTION fo | Oct 8 |
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| <input type="checkbox"/> | Staples | DUNBAR Appellate Docket for EXTENSIO | Oct 8 |
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| <input type="checkbox"/> | me, Jeanecoult., Eliza | TATANANNI Contract (Client Agreement) | Sep 30 |

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Exhibit C

PAULISICK DOCKET AND MOTION for extension for CERT for mailing 10082021

jeanecoulter@ya.../Sent



JEAN COULTER <jeanecoulter@yahoo.com>
To: Staples <print.marketing0680@staples.com>

Oct 8 at 2:23 PM

2 Files | 381.8kB



PAULISICK Extension of time to file to 150 days from July 26 FOR FILING 10082021.pdf
236kB



PAULISICK docket for EXTENSION of time for CERT for mailing 10082021.pdf
145kB

Exhibit D

DUNBAR Motion for time to file CERT

jeanecoulter@ya.../Sent



JEAN COULTER <jeanecoulter@yahoo.com>
To: print.marketing0680@staples.com

Oct 8 at 2:05 PM

1 File | 238.3kB



DUNBAR Extension of time to file CERT for mailing 10082021.pdf
238kB

Exhibit E

Fw: PAULISICK DOCKET AND MOTION for extension for CERT for mailing 10082021

jeanecoulter@ya.../Sent



JEAN COULTER <jeanecoulter@yahoo.com>

To: Linette Arabo <larabo@hardinlawpc.net>

Bcc: JEAN COULTER <jeanecoulter@yahoo.com>, Jeanecoulter <jeanecoulter@gmail.com>,
Elizabeth Coulter <jeancsemail@gmail.com>

Oct 8 at 7:16 PM

----- Forwarded Message -----

From: JEAN COULTER <jeanecoulter@yahoo.com>

To: Staples <print.marketing0680@staples.com>

Sent: Friday, October 8, 2021, 02:23:11 PM EDT

Subject: PAULISICK DOCKET AND MOTION for extension for CERT for mailing 10082021

2 Files | 381.8kB



PAULISICK Extension of time to file to 150 days from July 26 FOR FILING 10082021.pdf
236kB



PAULISICK docket for EXTENSION of time for CERT for mailing 10082021.pdf
145kB

Exhibit F

IN THE SUPREME COURT OF THE UNITED STATES

JEAN COULTER, Petitioner

v.

Case No. : _____

GERRI VOLCHKO PAULISICK and

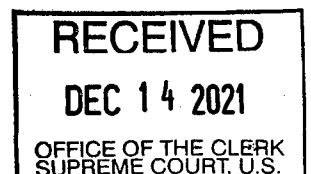
JOSEPH R. PAULISICK, Respondents

MOTION TO DIRECT THE CLERK TO FILE THE **REPLACEMENT** MOTION
FOR EXTENSION OF TIME TO FILE PETITION FOR CERTIORARI

NOW COMES, Petitioner, JEAN COULTER ("Coulter") and files Motion to Direct the Clerk to File the Motion to Direct the Clerk to File the **Replacement** Motion for Extension of Time to File Petition for Certiorari, as this Honorable Court retains Jurisdiction in this matter, because on the date of Coulter's delivery of the documents to UPS, 150 or fewer days had passed since the Denial of Allowance of Appeal by the State's Highest Court – and thus This Court's Jurisdiction existed at the time of "filing".

In Support of this Request, Coulter states :

- 1.) The Pennsylvania Supreme Court denied Allowance of Appeal in this matter, on June 2, 2021, and denied Reconsideration on July 26, 2021.
- 2.) This Court's Order of July 19, 2021 which rescinds the extension of the deadline to file petitions for writs of certiorari in all cases to 150 days from the date of the lower court judgment, order denying discretionary review, or order denying a timely petition for rehearing, is worded in such a manner that Coulter believed that she could file Petition for Certiorari under the terms of the March 19, 2020 extension of the deadline to 150 days as well as the July 19, 2021 rescission of that March 2020 Order :



"... IT IS FURTHER ORDERED that, in any case in which the relevant lower court judgment, order denying discretionary review, or order denying a timely petition for rehearing was issued prior to July 19, 2021, the deadline to file a petition for a writ of certiorari remains extended to 150 days from the date of that judgment or order. In any case in which the relevant lower court judgment, order denying discretionary review, or order denying a timely petition for rehearing was issued on or after July 19, 2021, the deadline to file a petition for a writ of certiorari is as provided by Rule 13. ..."

3.) Nevertheless, Coulter still chose to file a timely Motion for Extension of Time to File the Petition for Writ of Certiorari (Exhibit A). Indeed, a Motion for Extension of Time to File in the Instant Matter was mailed in the same envelope as Coulter's Motion for Extension of Time in *Coulter v. Dunbar* (a case from the District Court) (*Exhibit B*) – and This Court granted extension of Time to File in *Coulter v. Dunbar* on November 4, 2021 at 21A127.

However, for whatever reason, Coulter's Motion for Extension in relation to the Instant Matter, was never filed in This Court. Thus Coulter was never granted Extension of Time to File to permit Coulter to file Petition for Writ of Certiorari in this matter within 150 days of the date of denial of Reconsideration on July 26, 2021 – so, Coulter filed her Petition for Writ of Certiorari within 150 days from *June 2, 2021* (the date of the initial denial of Allowance of Appeal in the state's highest court).

4.) Coulter was/is anxious for This Honorable Court to "review" the Instant Matter, as this case was dismissed by a State (Trial) Court exclusively based on Unconstitutional limitations produced by a retired state court judge, in an unrelated matter. And, due to a similarly Unconstitutional Order from the state's

Intermediate Appellate Court, the Trial Court's dismissal has never been reviewed by any jurist.

5.) Coulter believes that the wording of the July 19, 2021 order permits Coulter's Petition for Writ of Certiorari to be considered timely filed, as it was filed within 150 days of June 2, 2021 (the date of Denial of Allowance of Appeal, as Coulter believes is permitted by both the March 202 Order and the July 19, 2021 rescission of the March 2020 Order).

6.) *The Clerk has not been able to locate Coulter's (first) Motion for Extension of Time to File the Petition for Writ of Certiorari in the matter of Coulter v. Paulisick, despite the fact that it was sent to This Court in the same envelope as the Motion for Extension of Time to File the Petition for Certiorari in Coulter v. Dunbar.*

7.) *Coulter has attached copies of evidence of Coulter's timely filing of Motion for Extension of Time to File the Petition for Writ of Certiorari in the matter of Coulter v. Paulisick - which includes :*

a. *The pertinent portion of "sent" mail from Coulter's email account (Exhibit C)*

b.) *Copies of the email sent by Coulter on October 8, 2021 at 2:23 pm to the "printer" at print.marketing0680@staples.com for Coulter v. Paulisick (Exhibit D) and the email sent to the same address at 2:05 pm for the matter of Coulter v. Dunbar (Exhibit E)*

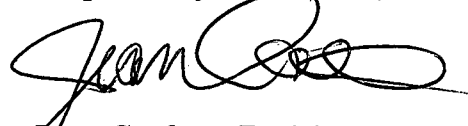
c.) *A copy of the email sent later on October 8, 2021 (7:16 pm) to Paulisicks' counsel, to provide service to Counsel of Coulter's filing of motion for*

"Extension of time to file to 150 days from July 26 FOR FILING 10082021.pdf"

(Exhibit F)

WHEREFORE, Coulter respectfully requests This Honorable Court consider the Issues raised in the accompanying Petition for Writ of Certiorari. Otherwise, it is believed that the state courts will chose to similarly silence any and all other citizens who also wish to seek recovery from those who have injured them, despite having problems finding paid counsel willing to take any case against a particularly powerful subset of local citizens.

Respectfully Submitted,



Jean Coulter, Petitioner

On November 16, 2021, Counsel for Respondents was served with a copy of this Motion to Direct the Clerk to File the Petition Out of Time.

*On December 10, 2021 Counsel for Respondents was served with a copy of this Motion to Direct the Clerk to File the **Replacement** Petition Out of Time.*