

IN THE SUPREME COURT OF THE UNITED STATES

TOIVANIA E. GILL

PETITIONER

v.

TBG FOOD ACQUISITION CORP.

RESPONDENT

On Petition for Writ of Certiorari to the United States Court of Appeals for The Fourth Circuit

**PETITIONER'S APPLICATION FOR EXTENSION OF TIME TO FILE WRIT OF CERTIORARI**

Toivania E. Gill  
1339 Gillette Ave. SE  
Roanoke VA 24014  
540-556-8429  
[toivaniagill@ymail.com](mailto:toivaniagill@ymail.com)

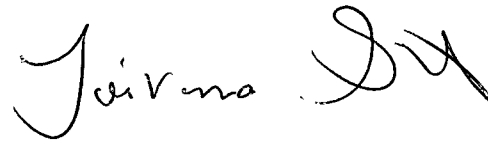
Carrie H. Grundmann (VA State Bar# 76817)  
Spilman Thomas & Battle, PLLC  
110 Oakwood Dr. Suite 500  
Winston Salem, NC 27103  
(336)725-4710 (phone)  
(336) 725-4476 (fax)  
[cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com)  
*Attorney For Defendant*

***To the Honorable John G. Roberts Jr., Chief Justice of the Fourth Circuit***

- 1) Petitioner, Toivania E. Gill, represented Pro SE, respectfully applies and requests an order granting an extension of time from February 21, 2021 to April 24, 2023 (60 day period) to file the petition for a writ of certiorari. This court has jurisdiction under 42 U.S.C 2000e.
  
- 2) The Petitioner requests an extension of time to file the writ of certiorari for the following reasons:
  
- 3) The United States Court of Appeal issued an opinion on November 22, 2022 affirming the District Court's grant of motion for summary judgment for a hostile work environment. The current date for petition for writ for certiorari to be filed is February 21, 2023. The Appeals Court also upheld dismissal of the Constructive Discharge and Retaliation Claim (Case #221446) (District Court Case #7:19cv-00479).
  
- 4) Out of Ms. Gill's case arise significant questions regarding federal law violations under the Title VII of the Civil Rights Act of 1964 and the rights of employees. Ms. Gill's case addresses question relevant to employee's constitutional rights and the violations thereof under 42 U.S.C 2000e and The American's with Disabilities Act.
  
- 5) The Petitioner is within the rules of the court that states that a petitioner can file an extension of time to file a writ of certiorari within 10 days before the date that it is due.
  
- 6) As a Pro Se litigant with no legal background, the Petitioner has limited knowledge as to the guidelines and requirements associated with filing the writ of certiorari. Therefore, the Petitioner requests an extension of time to advise with a professional guidance. At this time, the Petitioner has not been advised and without guidance the petition will not meet the standards

and guidelines required by the court nor will it effectively provide a pro se litigant with an equal opportunity of justice.

- a. Whereas, the Petitioner requests an extension of time from February 21, 2023 to April 24, 2023 and the extension of time is of good cause.

A handwritten signature in black ink that reads "Toivania E. Gill". The signature is written in a cursive style with a large, stylized initial "T".

Respectfully Submitted,

Toivania E. Gill  
Pro Se  
1339 Gillette Ave. SE  
Roanoke VA 24014  
(540)556-8429  
toivaniagill@ymail.com