

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

**In The  
SUPREME COURT OF THE UNITED STATES**

Christen Robinson Kelley,  
*Petitioner,*

v.

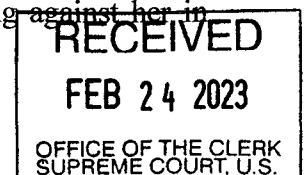
Catherine Howden,  
GEMA/Homeland Security,  
The State of Georgia,  
*Respondents.*

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

**To the Honorable Clarence Thomas, Justice of the Supreme Court of the United States  
and Circuit Justice of the Eleventh Circuit:**

Petitioner, Christen Robinson Kelley, requests an extension of time to file her Petition for Writ of Certiorari. Kelley requests an additional 60 days after the original deadline for the Writ of Certiorari is due on February 27. If approved, April 28 will be the 60<sup>th</sup> day, and will serve as the deadline for Kelley to submit the Writ of Certiorari. Kelley is filing the Application for Extension of Time on February 17, 2023, which is the 10<sup>th</sup> day before the original due date for the Writ of Certiorari. This Court has jurisdiction under 28 U.S.C. §1257. In support of this Application, Kelley states as follows:

Christen Robinson Kelley, petitioner, filed a lawsuit against her supervisor, Catherine Howden, and her employer, the Georgia Emergency Management and Homeland Security Agency (GEMA/HS), defendants, for racially discriminating and retaliating against her in



violation of 42 U.S.C. § 1981; Title VII of the Civil Rights Act of 1964, 42 US.C. §§ 2000e et seq.; and the Fourteenth Amendment.

On November 29, 2022, the United States Court of Appeals for the Eleventh Circuit issued an opinion in Case No. 21-13573 (attached), wherein the Court affirmed the judgment in favor of Howden and GEMA/HS.

Kelley's case raises important questions regarding Howden and GEMA/HS and their failure to follow Georgia law O.C.G.A. § 45-20-1. The failure to follow Georgia law allowed Howden to discriminate against Kelley, and placed Howden and GEMA/HS in violation of illegal conduct.

The 60-day extension will allow Kelley additional time to find a lawyer to write a Writ of Certiorari for her case. It has been difficult to locate and retain a lawyer who can effectively write a Writ of Certiorari. For this reason, Kelley respectfully requests the 60 day extension to obtain a lawyer as her last resort to allow her case to be heard before the U.S. Supreme Court.

WHEREFORE, in the interest of justice and for good cause shown, Kelley respectfully requests that an order be entered extending the time for filing a petition for a Writ of Certiorari in this matter to and including April 28.

This 17<sup>th</sup> day of February 2023.

Respectfully submitted,

Christen Robinson Kelley  
224 Colony Way Apt. 1A, Cornelia, Ga. 30531  
678-628-8831

February 17, 2023

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