NO. ____

IN THE SUPREME COURT OF THE UNITED STATES

NEJLA K. LANE, APPLICANT,

V. ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION OF THE SUPREME COURT OF ILLINOIS, RESPONDENT.

ON APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI TO THE ILLINOIS SUPREME COURT

April 6, 2023

Nejla K. Lane, *Pro Se* Lane Keyfli Law, Ltd. 6041 N. Cicero Ave Chicago, IL 60646 (773) 777-4440 <u>Nejla@LaneKeyfli.com</u>

APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI TO THE ILLINOIS SUPREME COURT

To the Honorable Justice Amy Coney Barrett, Associate Justice of the Supreme Court of the United States and Circuit Justice for the United States Court of Appeals for the Seventh Circuit and the State of Illinois Supreme Court:

Pursuant to Rules 13.5, 21, 22, and 30.2 of this Court, Applicant Nejla Lane respectfully requests that the time to file a petition for a writ of certiorari to the Unites Stated Supreme Court be extended for 60-days, to and including June 16, 2023.

The Illinois Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois (hereinafter "ARDC" or "Administration"), the Administration brought a one-count complaint against the Applicant, charging her with making a false or reckless statement impugning the integrity of a judge; engaging in conduct intended to disrupt a tribunal; and engaging in conduct that was prejudicial to the administration of justice, in violation of Illinois Rules of Professional Conduct. Subsequently, two (2) Reports and Recommendation were issued by the ARDC in favor of suspending Applicant. Suspending Applicant from the practice of law for nine (9) months, with the suspension stayed after six (6) months by a six (6) month further period of probation subject to the conditions as recommended by the Review Board, effective date of suspension on February 7, 2023.

The first Report and Recommendation was issued on November 4, 2021, from the Hearing Board, and the second was on July 12, 2022, from the Review Board (hereinafter "Report and Recommendation"). On October 25, 2022, Applicant filed "Applicant's Verified Petition for Leave to File Exceptions" to the Report and Recommendation of the Review Board.

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On January 17, 2023, the Supreme Court entered an order denying Applicant's Petition for Leave to File Exceptions to the Report and Recommendation of the Review Board. (See Appendix A).

REASONS FOR GRANTING AN EXTENSION OF TIME

Applicant herewith moves this honorable Court for an extension of time of 60 days to filer her Writ of Certiorari for the following reasons:

- On February 6, 2023, there was a terrible catastrophic earthquake in Applicant's birth city, Hatay/Antakya, Turkey. Within a few hours after the disaster, Applicant was informed that her entire family living in Turkey were lost in or was still under the rubble, including her two beloved sisters, among others, which put Applicant in complete psychological and mental shock, and she decided to immediately go to Turkey.
- 2. On February 15, 2023, Applicant flew to Turkey with a return date (open ticket but with possible return date) of March 24, 2023, to help her family in the search of their relatives, and provide financial support, comfort and healing to many, because most of her family was still under the wreckage and rubble.
- 3. Applicant's surviving relatives and younger brother were injured, but they were helping in searching for and finding other relatives' bodies days later, because most of the deceased were buried in makeshift graves, which made everyone's grief unbearable. After the burials and holy prayer ceremonies for some who were found completed, surviving family members relocated to be with other relatives who lived in other cities.
- 4. After few weeks in Istanbul Turkey, many roads to Hatay/Antakya were still closed, Applicant changed her plane ticket to (midnight of 3/5/23), and she returned to the United States. Applicant is traumatized and emotionally, psychologically, and mentally drained.

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She was immediately seen by her primary care physician and prescribed medication to cope with the unbearable situation and/or her previous medication dosage was increased to deal with this trauma; however, these psychotropic medications she takes cause her extreme fatigue, nausea, vomiting, anxiety, insomnia, forgetfulness, and other adverse reactions.

- 5. Due to the trauma of the situation in Turkey, Applicant was mentally, physically, and psychologically unable to file the Petition for Certiorari in a timely manner.
- The mandate from the Illinois Supreme Court has already been issued in this case.
 Consequently, the requested 60-day extension would not delay the issuance of mandate.
- 7. The extension would not prejudice any party because, if this Court Grants the application, this Court will likely hear oral arguments in fall or winter of 2023 and issue its opinion in October 2023 term regardless of whether an extension is granted.

CONCLUSION

For the reasons stated above, Applicant Nejla K. Lane respectfully requests that the time to file a petition for writ of certiorari in this matter be extended by 60 days, from April 17, 2023, through and including, June 16, 2023.

Respectfully submitted,

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APPENDIX

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STATE OF ILLINOIS SUPREME COURT

At a Term of the Supreme Court, begun and held in Springfield, on Monday, the 9th day of January, 2023.

Present: Mary Jane Theis, Chief Justice Justice P. Scott Neville, Jr. Justice David K. Overstreet Justice Lisa Holder White Justice Joy V. Cunningham Justice Elizabeth M. Rochford Justice Mary K. O'Brien

On the 17th day of January, 2023, the Supreme Court entered the following judgment:

M.R.031402

In re:

Nejla K. Lane.

Attorney Registration & Disciplinary Commission

2019PR00074

Petition by respondent for leave to file exceptions to the report and recommendation of the Review Board. <u>Denied</u>. Respondent Nejla K. Lane is suspended from the practice of law for nine (9) months, with the suspension stayed after six (6) months by a six (6) month period of probation subject to the following conditions, as recommended by the Review Board:

- a. Respondent's practice of law shall be supervised by a licensed attorney acceptable to the Administrator. Respondent shall provide the name, address, and telephone number of the supervising attorney to the Administrator. Within the first thirty (30) days of probation, respondent shall meet with the supervising attorney and meet at least once a month thereafter. Respondent shall authorize the supervising attorney to provide a report in writing to the Administrator, no less than once every quarter, regarding respondent's cooperation with the supervising attorney, the nature of respondent's work, and the supervising attorney's general appraisal of respondent's practice of law;
- b. Respondent shall provide notice to the Administrator of any change in supervising attorney within fourteen (14) days of the change;
- c. Prior to the completion of the period of probation, respondent shall attend and successfully complete the ARDC Professionalism Seminar;
- d. Respondent shall comply with the provisions of Article VII of the Illinois Supreme Court Rules on Admission and Discipline of Attorneys and the Illinois Rules of Professional Conduct and shall timely cooperate with the Administrator in providing information regarding any investigations relating to her conduct;
- e. Respondent shall attend meetings as scheduled by the Commission probation officer;
- f. Respondent shall notify the Administrator within fourteen (14) days of any change of address;

- g. Respondent shall reimburse the Commission for the costs of this proceeding as defined in Supreme Court Rule 773, and shall reimburse the Commission for any further costs incurred during the period of probation; and
- h. Probation shall be revoked if respondent is found to have violated any of the terms of probation. The remaining period of suspension shall commence from the date of the determination that any term of probation has been violated.

Suspension effective February 7, 2023.

Respondent Nejla K. Lane shall reimburse the Client Protection Program Trust Fund for any Client Protection payments arising from her conduct prior to the termination of the period of suspension/probation.

As Clerk of the Supreme Court of the State of Illinois and keeper of the records, files and Seal thereof, I certify that the foregoing is a true copy of the final order entered in this case.



IN TESTIMONY WHEREOF, I have set my hand and affixed the seal of said Supreme Court, in Springfield, in said State, this 17th day of January, 2023.

Cynthia A. Grant Clerk.

Supreme Court of the State of Illinois