

IN THE
Supreme Court of the United States

DEBRA M. BROWN

v.

FEDERAL NATIONAL MORTGAGE ASSOCIATION

*ON PETITION FOR A WRIT OF CERTIORARI
TO THE APPEALS COURT FOR THE
COMMONWEALTH OF MASSACHUSETTS*

PETITION FOR REHEARING

DEBRA M. BROWN, Esq.

Pro se

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Pursuant to Sup. Ct. Rule 44.2 petitioner Debra Brown (“Petitioner”) respectfully petitions this Court to vacate the Court’s November 20, 2023 ruling denying the petition for certiorari and require a response to be filed by the U.S. Solicitor General’s office.

Petitioner submits that the Respondent allowed a private law firm attorney to file a waiver request where a response was required from the U.S. Solicitor General’s office. This request is presented in good faith and not for purposes of delay.

As grounds for this petition for rehearing the Petitioner states the following:

In Montilla,, et al, Petitioners v. Federal National Mortgage Association, et al, S.Ct. No. 21-688 docketed on November 9, 2021 an answer to the petition was filed by the U.S. Solicitor General’s office. (Exhibit A – First Request for Extension filed by U.S. Solicitor General’s Office dated November 23, 2021). The Federal National Mortgage Association as an instrumentality of the U.S. Government allowed a private attorney to file a waiver of response to this petition when a response should have been filed by the U.S. Solicitor General’s Office as was done in Montilla. (Exhibit B)

For the foregoing reason, Petitioner prays that this Court vacate the Court’s November 20, 2023 ruling denying the petition for certiorari; and require an answer to this petition be filed by the U.S. Solicitor General’s office.

Respectfully submitted,

PETITIONER

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APPENDIX

Exhibit A.....	1pr
Exhibit B	3pr

1pr
Exhibit A

U.S. Department of Justice
Office of the Solicitor General

Washington, D.C. 20530

November 23, 2021

Honorable Scott S. Harris
Clerk
Supreme Court of the United States Washington, D.C.
20543

Re: Neris Montill, et al. v.
Federal National Mortgage
Association, et al.

S.Ct. No. 21-688

Dear Mr. Harris:

The petition for a writ of certiorari in the above-captioned case was filed on November 5, 2021, and placed on the docket on November 9, 2021. The government's response is due on December 9, 2021.

We respectfully request, under Rule 30.4 of the rules of this Court, an extension of time to and including January 10, 2022, within which to file the government's response.

This extension is requested to complete preparation of the government's response, which was delayed because of the heavy press of earlier

2pr

assigned cases to the attorneys handling this matter.

Sincerely,
Elizabeth B.
Prelogar Solicitor
General

cc: See Attached Service List

3pr
Exhibit B

WAIVER
SUPREME COURT OF THE UNITED
STATES
No. 23-314

Debra Brown
Petitioner
v.

Federal National Mortgage Association 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):

Federal National Mortgage Association

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.)

4pr

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: Marissa I. Delinks
Date: October 24, 2023

[Type or print] Name Marissa I. Delinks
Ms.

Firm Hinshaw &
Culbertson LLP

Address: 53 State Street, 27th Floor
City & State Boston, MA Zip 02109
Phone (617) 213-7000

Email mdelinks@hinshawlaw.com

A copy of this form must be sent to petitioner's counsel or to petitioner if pro se. Please indicate below the names} of the recipients} of a copy of this form. No additional certificate of service or cover letter is required.

Debra Brown, Pro Se

cc:

CERTIFICATE OF COUNSEL

As counsel, I hereby certify that this petition for rehearing is presented in good faith, not for delay and is limited to the grounds allowed for in S.Ct. Rule 44.2.

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