

Mrs. Deanne Rose Upson Giese
c/o Hoffee Law Firm
132 E. Liberty St., 2nd Floor
Wooster, OH 44691
P 330-288-0555

December 10, 2023

Supreme Court of the United States
1 First Street, N.E.
Washington, DC 20543-0001

Re: Request for Extension to File Petition for Writ of Certiorari from the Supreme Court of Maryland
Petition Docket No. 136, September Term, 2023, (No. 1805, Sept. Term, 2022, Appellate Court of
Maryland), (Cir. Ct. No. C-15-FM-22-003006)

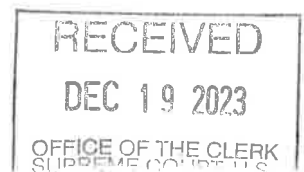
Dear Clerk,

I am writing to request an extension of time under Rule 30 to file my Petition for Writ of Certiorari,
extending beyond 90 days. My order from the Supreme Court of Maryland is attached.

My appeal from the Supreme Court of Maryland to the Supreme Court of the United States involves
issues of first impression regarding the ratification and enforcement of the 28th Amendment to the
United States Constitution, known as the Equal Rights Amendment. The Supreme Court of Maryland
erred in failing to assert their judicial discretion regarding Maryland's Equal Rights Amendment
contained in the Maryland Constitution that involves strict scrutiny. Moreover, the case involves
interpretation of the Equal Rights Amendment as incorporated in the Constitutions of the District of
Columbia and the Commonwealth of Virginia. All three jurisdictions refused to address their own Equal
Rights Amendments or issues regarding level of scrutiny as applicable to the crux of the issues of the
cases. As all three jurisdictions have an Equal Rights Amendment in their Constitutions with differing
levels of scrutiny, the abuse of discretion by the 3 jurisdictions' regards the important federal question
the conflicts between the 3 state jurisdictions. Importantly, as Maryland has the strongest protections
with strict scrutiny in the Maryland Constitution, the failure of the Maryland courts' discretion should
cause the Supreme Court of the United States great concern regarding the character of how these states
have failed this innocent mother and innocent child.

This is the second time that these cases have been brought before the Supreme Court of the United
States, with the first time in case No. 10-11020, Title: Deanne Rose Upson, Petitioner v. William E.
Wallace, III, Docketed: June 15, 2011, Lower Ct: District of Columbia Court of Appeals, Case Nos.: (07-
FM-572, 08-FM-435, 08-FM-436, 08-FM-1278, 08-FM-1279, 09-FM-1151), Decision Date: September 9,
2010, Rehearing Denied: January 14, 2011.

This is the second time this set of cases has come before the United States Supreme Court regarding the
same set of issues made worse by a complete severing of all ties between this fit mother and her abused
child for over 17 years of kidnapping and concealment by the rapist (William Earl Wallace III) from



Mother's home in the District of Columbia. The current set of cases arises out of the Maryland Supreme Court. Among the most significant change of circumstances, aside from the extraordinarily lengthy time period, is that the Equal Rights Amendment (the 28th Amendment to the United States Constitution) is now ratified, in effect, and enforceable because this Mother and the Child now has standing and harm because under the United States Constitution because they are now persons entitled to relief with Constitutional rights and protections afforded to full citizens. Moreover, this child has endured severe child abuse of all types from the rapist and his family – including human trafficking – and is gender confused going by the name "Anthony" and therefore is a vulnerable young 19 year old that the State of Maryland has jurisdiction they failed to assert under their statutes for the protection of vulnerable persons in Maryland where this child has registered to vote in Maryland.

While this Case arises from domestic and family issues, errors in prior judgments and rulings place this squarely into matters that should be decided by the US Supreme Court. Issues of equity and rule of law are at the heart of the matter. Ms. Upson Giese's daughter, DOB May 30, 2004, has been kidnapped and concealed by the biological father, William Earl Wallace III (rapist), for over 17 years "under color of law" of a foreign, unregistered, and unvalidated Virginia custody order lacking jurisdiction resulting from an improper filing, improper hearings and trials, and an unnoticed *ex parte* proceeding for which the court refused to ever hold subsequent hearing on, without any court accepting responsibility to end this complete severing of all ties between this fit Mother and Child. The original child support and child custody case was first filed in the District of Columbia Superior Court on August 16, 2004, and no formal leave of court has ever been granted to move any proceedings to any other state. This child is the result of his internet sexual predation and rape of Ms. Upson Giese by Mr. Wallace. Ms. Upson Giese has been denied any state or federal forum to seek relief after the illegally forum shopped Virginia order was finalized.

Therefore, the rulings of the prior cases in all 3 state courts directly conflict with the now ratified Equal Rights Amendment, that is in effect and enforceable when there is standing and harm in this case. As this is a case of first impression for the Supreme Court of the United States regarding the Equal Rights Amendment as the 28th Amendment to the United States Constitution, this Court should use its discretion to grant an extension. Also, the rulings of the 3 state courts and resultant deprivation of basic civil and human rights – along with criminal felonies committed by the rapist but failed to be prosecuted by the states – characterize an important federal question in a way that conflicts with each states varying levels of scrutiny and with the now ratified Equal Rights Amendment (28th Amendment to the US Constitution) as well as well established relevant decisions of this Court regarding criminal law. This is especially egregious in this appeal from the Supreme Court of Maryland because the Maryland Circuit Court did not perform any function as a trier of facts and erred in granting an unserved motion to dismiss by the rapist. Therefore, the Maryland courts have so far departed from the accepted and usual course of judicial proceedings as to call for an exercise of this Court's supervisory power.

Moreover, this case involves a conflict between the rulings of the United States Federal District Court for the District of Columbia and the rulings of the United States Federal District Court for Southern Maryland in Greenbelt. While Mrs. Upson Giese was prevented from pursuing a forum and relief in the United States Federal District Court for the District of Columbia, the rapist was improperly granted a forum and fraudulent relief in the United States Federal District Court for Southern Maryland in Greenbelt regarding same circumstances contained in matters in state proceedings in all 3 state cases. Therefore, these

federal cases directly conflict with one another on these important matters that involve important federal questions.

Importantly, all 3 states have enacted the Uniform Child Custody Jurisdiction and Enforcement Act, as well as the Uniform Interstate Family Support Act, but have significant differences in the language and implementation of these Acts in their statutes and court decisions. Notably, the rapist illegally forum shopped out of the District of Columbia Superior Court to the courts of Alexandria, Virginia, to give himself an advantage of a *de novo* 2nd custody trial as well as lower child support as admitted to on transcript by Judge Nolan Dawkins. Judge Dawkins admitted on transcript to being bribed by the rapist to demand the case be heard in Virginia.

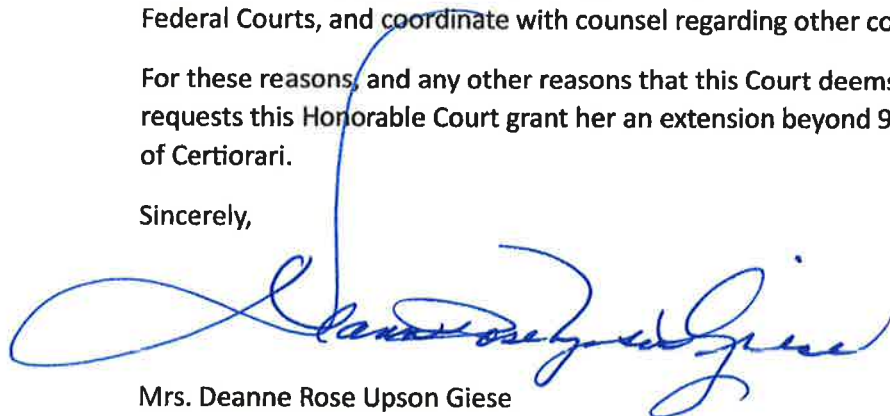
Mrs. Upson Giese also will ask this Honorable Court to review this Court's prior rulings striking Title V of the Violence Against Women Act, as it now violates the now ratified Equal Rights Amendment – the 28th Amendment to the United States Constitution. Moreover, given the now 28th Amendment, the ruling of the Supreme Court of the United States in *Reed v. Reed* 1971 must be overturned given the now 28th Amendment and Mrs. Upson Giese asserts that this Honorable Court erred in denying her prior case before this Honorable Court because she should not have been treated unequally as these cases involve federal felonies by the rapist, his family, and the District of Columbia Metropolitan Police Department (e.g., interstate kidnapping, concealment, human trafficking).

Therefore, this case does not involve simply erroneous factual findings or misapplication of a properly stated rule of law. Rather, it involves profound federal questions demanding this Court's discretion given the character of the history of these cases wherein criminal acts by the rapist and malfeasance by the judges are plainly wrong and errors of inconsistent and conflicting laws and rulings across 3 states and 2 federal courts. Additionally, new issues of first impression are the crux of the issues of these cases as the 28th Amendment – the Equal Rights Amendment – has been ratified and this Honorable Court should rule on the status of the Equal Rights Amendment at this time.

Mrs. Upson Giese requests this Court to grant her an extension because she has just found counsel this past Friday to represent her and needs additional time to revise her Petition for Writ of Certiorari with counsel input, obtain official legal filings in support of her case from the National Archives and the Federal Courts, and coordinate with counsel regarding other court filings under consideration.

For these reasons, and any other reasons that this Court deems meet and just, Mrs. Upson Giese requests this Honorable Court grant her an extension beyond 90 days for her to file her Petition for Writ of Certiorari.

Sincerely,

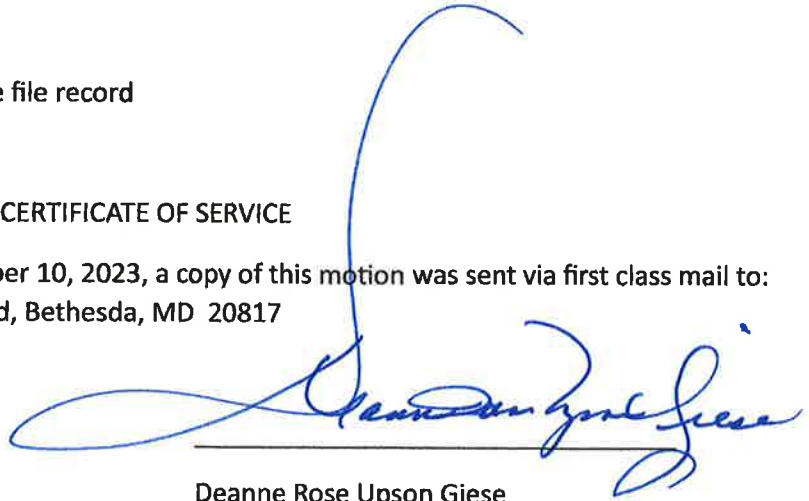


Mrs. Deanne Rose Upson Giese
c/o Hoffee Law Firm
132 E. Liberty St., 2nd Floor
Wooster, OH 44691
P 330-288-0555

Attachments:
Supreme Court of Maryland ruling
Supreme Court of the United States case file record

CERTIFICATE OF SERVICE

I HEREBY certify that on December 10, 2023, a copy of this motion was sent via first class mail to:
William Earl Wallace III, 7109 Darby Road, Bethesda, MD 20817



A handwritten signature in blue ink, reading "Deanne Rose Upson Giese", is written over a horizontal line. A large, decorative blue flourish extends from the top of the signature, arching over the text and extending to the left.

Deanne Rose Upson Giese