

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

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**IN THE SUPREME COURT OF THE UNITED STATES**

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LYNN M. KEUTHAN, *Petitioner(s)*,

v.

GLENN KEUTHAN, et. al., *Respondent(s)*.

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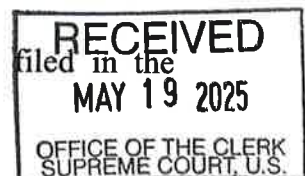
**APPLICATION FOR 60-DAY EXTENSION OF TIME TO FILE PETITION  
FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF  
APPEALS FOR THE ELEVENTH CIRCUIT**

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To the Honorable Clarence Thomas, Associate Justice of the United States  
and Circuit Justice for the Eleventh Circuit:

Petitioner Lynn M. Keuthan prays for a 60-day extension of time to file her  
petition for a writ of certiorari in this Court to and including August 25, 2025.  
The final judgment of the Eleventh Circuit was entered on March 27, 2025, and  
petitioner's time to petition for certiorari in this court expires June 25, 2025.  
This application is being filed more than 10 days before that date.

Copies of the decisions/orders below (including denial of the Motion For  
Rehearing), Petition for Writ of Mandamus and included Petition For Certiorari  
filed in the Florida Supreme Court, and denial of the petition



Florida Supreme Court, are attached hereto as Composite Exhibit A. The jurisdiction of this court is invoked under 28 U.S.C. §1254(1).

As shown by the decisions/orders below and the Petition For Writ of Certiorari filed in the Florida Supreme Court, this case involves fundamental rights under the Bill of Rights and the 14<sup>th</sup> and 5<sup>th</sup> Amendments. The fundamental rights under the Bill of Rights and the 14<sup>th</sup> and 5<sup>th</sup> Amendments have been raised at the trial level and Florida appellant levels, thus preserving the constitutional issues of this case.

In its decisions/orders, the Florida Fourth District Court of Appeal agreed with the Appellee/Respondent that:

(1) Florida Rule of Appellate Procedure 179(e) 'Scope of Review' precludes the timely filing of an Amended Notice of Appeal to include a newly entered order on appeal that was entered after the first initial Notice of Appeal, and also agreed with the Appellee/Respondent that:

(2) Timely appealed, appealable orders under the Florida Rules of Appellate Procedure are not necessarily 'final' orders and the appeal of those orders can be dismissed, notwithstanding the Florida Rules of Appellate Procedure explicitly listing those orders as appealable, and also agreed with the Appellee/Respondent that:

(3) Motions Tolling Rendition of final/appealable orders can be ignored, in spite of the Florida Rules of Appellate Procedure

specifically accounting for motions tolling rendition in the calculation of the time for noticing an appeal.

The core issue of the Petition For Certiorari is the right of citizens to appeal trial orders when that right is established and set forth under the law. In the instant case, the Appellant/Petitioner timely filed an initial Notice of Appeal within 30 days of entry of initial orders on appeal. Further, thereafter, Appellant/Petitioner timely filed an Amended Notice of Appeal within 30 days of a newly entered order and timely filed a Second Amended Notice of Appeal within 30 day of a second newly entered order. Further, Appellant/Petitioner filed a separate new Notice of Appeal, timely appealing the newly entered orders yet a second time, which both have motions tolling rendition.

Florida District Courts of Appeal have often allowed amended notices of appeal to include newly entered orders on appeal. The Fourth District Court of Appeal not allowing this practice is contrary to the long-established practices in Florida appellate courts, and the Fourth District Court of Appeal's conflict with established practices and conflict with other Florida District Courts of Appeal should not deprive the Appellant/Petitioner of the right to an appeal.

Additionally, it has long been established that the Florida Rules of Appellate Procedure enumerate specific types of appealable orders, particularly in regard to probate cases, and appellants have long-exercised their right to an appeal of such appealable orders designated in the Florida Rules of Appellate Procedure. The Fourth District Court of Appeal not allowing an appeal of

timely appealed, appealable orders under the Florida Rules of Appellate Procedure for probate cases is in direct conflict with other District Courts of Appeal and in conflict with the Florida Rules promulgated by the Supreme Court of Florida.

Additionally, the Florida Rules of Appellate Procedure provide that certain motions, such as motions for rehearing, toll rendition of an entered order, and the rules specifically provide that an order is appealable for 30 days of the order actually being in a state of being rendered. Litigants and attorneys have long relied on the effect of motions tolling rendition in the calculation of the due date for timely notices of appeal, and it is inherent for justice that the rules and calculations in the Florida Rules of Appellate Procedure be upheld. The Fourth District Court of Appeal not upholding the rules and calculations in the Florida Rules of Appellate Procedure is in direct conflict with other District Courts of Appeal and in conflict with the Florida Rules promulgated by the Supreme Court of Florida.

In addition, the Florida Fourth District Court of Appeal and the Supreme Court of Florida not upholding the right to take an appeal of trial orders as set out under Florida and U.S. law is in conflict with other states, which uphold this important due process right to the appeal and review of trial court orders, which is a fundamental due process right.

Citizens of the United States have long enjoyed the right to an appeal and review of trial orders and this right has been long established under Florida and

U.S. law. Fundamental due process rights and equal protection rights and justice under the Bill of Rights and Fourteenth and Fifth Amendments to the U.S. Constitution require this fundamental right to an appeal under Florida and U.S. law to be upheld.

A 60-day extension is being requested for the following reasons:

1. Petitioner's trial counsel is not admitted to practice before the U.S. Supreme Court.
2. A professor at a major law school is interested in bringing the petition before the Supreme Court. Petitioner has also found other organizations and attorneys that are interested in the constitutional issues of this potential petition for certiorari. These organizations and attorneys need to become more familiar with the facts of the case, review the record and succinctly summarize the major facts, and perform the necessary legal research so that the questions may be properly framed and argued to this court.

Wherefore, petitioner respectfully requests that an order be entered extending her time to petition for certiorari to and including August 25, 2025.

Dated this 15th day of May, 2025.

Respectfully Submitted,



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*Pro-Se'*

**COMPOSITE  
EXHIBIT A**