Pamela S. Julian 11 Loveland Road Brookline, MA 02445

Email: pamelasjulian@yahoo.com

Phone: 617-694-3797

November 13, 2024

Clerk of the Court Supreme Court of the United States 1 First Street, NE Washington, DC 20543

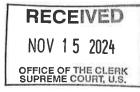
RE: Request/Motion for Extension of Time to File Writ of Certiorari

Dhurata and Arian Ametaj vs. Pamela Julian Massachusetts Supreme Court Docket No. FAR 29789

#### Dear Clerk:

Pursuant to Rule 30, I, Pamela Julian, pro se petitioner, respectfully request that the time for filing a petition writ of certiorari be extended by 60 days up to and including February 6, 2025. The petition writ of certiorari is due on December 6, 2024. According to the online MA Supreme Court docket, this petitioner's exigent motion for leave of the denial of the Further Appellant Review is pending review pursuant to Rule 27 of the Rules of the Massachusetts Supreme Court. Good cause exists for the requested extension. The pro se petitioner is financially eligible for legal assistance. However, this petitioner has not at this time retained the essential

November 13, 2024, Page 1.



necessary legal assistance in order to submit a substantially compliant brief to this Court for consideration. In addition, this petitioner is diagnosed with hypertension and stress requiring this petitioner to obtain this necessary legal assistance and extension. Whereas this petitioner is actively seeking such essential timely legal representation to assist this petitioner. The extension will allow this Petitioner to devote substantial amounts of time to adequately prepare the petition and work with experienced counsel. Counsel will require sufficient time to familiarize counsel with the relevant legal issues. In addition, the petition must be reviewed by legal counsel within the legal service agency. This requested extension of time would better enable preparation that would be most helpful to this Court.

Accordingly, this petitioner respectfully requests that the time for filing a response to the petition for writ of certiorari be extended by 60 days up to and including February 6, 2025. This petitioner is not aware if the respondents oppose this motion at this time.

Sincerely and respectfully submitted under the pains of penalty of perjury by

Pamela S. Julian, Pro Se

#### CERTIFICATE OF SERVICE

I, Pamela S. Julian serve a copy of this above captioned request/motion to extend the petition writ of certiorari due date to the Respondents' Dhurata and Arian Ametaj Counsel, Eric Nadeau Esquire by email as agreed to <a href="mailto:enadeau@dfllp.com">enadeau@dfllp.com</a> and by U.S. Postal Service to Dalton & Finegold LLP, 34 Essex Street Andover, MA 01810 by email on November 13, 2024

Pamela S. Julian Pro Se

11 Loveland Road

Brookline, MA 02445

Email: pamelasjulian@yahoo.com

Phone: 617-694-3797

November 13, 2024

11/13/24

PATRICIA RAMOS-DONES

Notary Public, Commonwealth of Massachusetts
My Commission Expires October 18, 2030

1 MA511

# FAR-29789 - Notice: FAR denied

From: SJC Full Court Clerk (sjccommclerk@sjc.state.ma.us)

To: psjnorfolk2022@yahoo.com

Date: Friday, September 6, 2024 at 07:42 AM EDT

Supreme Judicial Court for the Commonwealth of Massachusetts

Telephone

RE: Docket No. FAR-29789

**DHURATA AMETAJ & another** 

vs.

PAMELA JULIAN

Appeals Ct-Single Justice No. 2022-J-0373 / 1982CV01401 A.C. No. 2022-P-0721

NOTICE OF DENIAL OF APPLICATION FOR FURTHER APPELLATE REVIEW

Please take note that on September 5, 2024, the application for further appellate review was denied.

Very truly yours, The Clerk's Office

Dated: September 5, 2024

To: Eric C. Nadeau, Esquire

Pamela S. Julian

# FAR-29789 - Notice of docket entry

From: SJC Full Court Clerk (sjccommclerk@sjc.state.ma.us)

To: psjnorfolk2022@yahoo.com

Date: Friday, October 18, 2024 at 10:00 AM EDT

Supreme Judicial Court for the Commonwealth of Massachusetts

Telephone

RE: No. FAR-29789

**DHURATA AMETAJ & another** 

vs.

PAMELA JULIAN

NOTICE OF DOCKET ENTRY

Please take note that on October 17, 2024, the following entry was made on the docket.

DENIAL of petition to reconsider denial of FAR application.

Very truly yours,

The Clerk's Office

Dated: October 17, 2024

To:

Eric C. Nadeau, Esquire

Pamela S. Julian

#### SUPREME JUDICIAL COURT for the Commonwealth Case Docket

#### DHURATA AMETAJ & another vs. PAMELA JULIAN THIS CASE CONTAINS IMPOUNDED MATERIAL OR PID FAR-29789

CASE HEADER

Case Status

FAR denied; recon denied

Status Date

10/17/2024

Nature

Corporate/business

**Entry Date** Appeals Ct Number

04/29/2024

Response Date

2022-P-0721 08/05/2024

Appellant Applicant

Defendant

Citation

Defendant 494 Mass. 1106

Case Type

Civil

Full Ct Number

TC Number Lower Court Lower Ct Judge 2022-J-0373 / 1982CV01401 Appeals Ct-Single Justice

Rosemary Connolly, J.

INVOLVED PARTY

Arian Ametaj

ATTORNEY APPEARANCE

Plaintiff/Appellee

Eric C. Nadeau, Esquire

Dhurata Ametaj Plaintiff/Appellee Eric C. Nadeau, Esquire

Pamela S. Julian

Pro Se Defendant/Appellant

#### DOCKET ENTRIES

Entry Date	Paper	Entry 16	JΧS

### 04/29/2024

Docket opened.

04/29/2024 #1

Motion to file FAR application late filed by Pamela S. Julian. (9/5/2024:See entry 4).

04/29/2024 #2

(IMPOUNDED) MOTION to waive filing fee filed by Pamela S. Julian. (ALLOWED. The affidavit appears regular and complete on its face and indicates that the applicant is indigent.)

MOTION to file FAR application late filed by Pamela S. Julian. (9/5/2024:See entry 4).

05/22/2024 #3 07/05/2024 #4

MOTION to file FAR application late filed by Pamela S. Julian. (9/5/2024:The Motion to file late is Allowed).

07/22/2024 #5

FAR APPLICATION filed by Pamela S. Julian.

09/05/2024 #6

DENIAL of FAR application.

09/19/2024 #7

Motion for reconsideration filed by Pamela S. Julian.

10/17/2024 #8

DENIAL of petition to reconsider denial of FAR application.

11/08/2024 #9

Exigent Motion for leave of denial of motion for reconsideration filed by Pamela S. Julian.

As of 11/08/2024 3:20pm

## Certificate of Service

I, Pamela S. Julian, serve this above referenced letter and attachments to the Respondents' Dhurata and Arian Ametajs' Counsel Eric Nadeau by email as agreed to <a href="mailto:enadeau@fllp.com">enadeau@fllp.com</a> and by U.S. Postal Service First Class Mail to: Dalton and Finegold LLP, 34 Essex Street, Andover,

MA 01890 on November 23, 2024.

Pamela S. Julian, Pro Se

11 Loveland Road

Brookline, MA 02445

Email: pamelasjulian@yahoo.com

Phone: 617-694-3797

November 23, 2024

PATRICIA RAMOS-DONES

Notary Public, Commonwealth of Massachusetts

My Commission Expires October 18, 2030

M4511

November 23, 2024, page 2.