

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

IN THE SUPREME COURT OF THE  
UNITED STATES

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MARTHA MOGAJI, PETITIONER

v.

TOM CHAN; ROSA CHAN & TRC TRUST, RESPONDENT

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On Petition For A Writ of Certiorari From  
The United States Appeals Court  
First Circuit

**MOTION TO DIRECT THE CLERK TO FILE PETITION FOR  
WRIT OF CERTIORARI OUT OF TIME**

Martha I. Omorodion Mogaji  
P.O. Box 2073, Westford MA 01886  
Voicemail: (978) 799-0920  
MsMMogaji@gmail.com

**MOTION TO DIRECT THE CLERK TO FILE PETITION FOR  
WRIT OF CERTIORARI OUT OF TIME**

COMES NOW, Martha Mogaji herein, "Petitioner" in the above referenced matter, and submits that this Honorable Court grant her motion to file petition for writ of certiorari out of time due to extenuating circumstances beyond her control.

Pursuant to U. S. C. 13.5, "For good cause shown, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding 60 days from denial. An application to extend the time to file shall set out the basis for jurisdiction in this Court, identify the judgment sought to be reviewed, include a copy of the opinion and any order respecting rehearing."

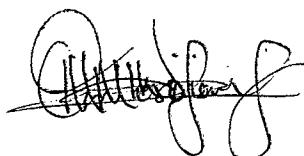
In support thereof Petitioner state as follows:

1. On June 17, 2024, this honorable courts denied Petitioners Application for a writ of certiorari.
2. These cases were delayed due to COVID; Court scheduling, and Post Office delivery. I have been experiencing extreme hardship, and losses due to the proceedings.
3. Petitioner is currently being sued at different courts, and litigating other pleadings at Superior Court No: 2181CV01067; Land Court with Case No: 22MISC000128; MCAD: No. 23BPA02574, and MCAD: No. 22BPA02322. Petitioner has been experiencing overlapping court scheduled dates both for hearing and filing of pleadings.
4. Petitioner had made several efforts to comply with the rules including obtaining legal assistance to no avail. In addition, due to Petitioners pre-existing debilitating medical condition including memory loss. Petitioner requires extended time to compose any pleadings. Petitioner could obtain a more recent doctors letter if required. Please see Petitioners doctors letter attached herein as **Exhibit A-D**.

WHEREFORE, Petitioner pleads that this Honorable Court would grant her motion to direct the Clerk to file this petition for writ of certiorari out of time due to extenuating circumstances beyond her control.

Respectfully submitted  
Petitioner Pro se,

Dated: July 26, 2024



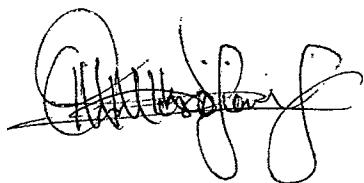
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Martha I. Omorodion Mogaji

**PETITIONERS AFFIDAVIT**

Under penalty of perjury, I, Martha Mogaji, declares that all the facts listed in the above statements are true, and correct to the best of my personal knowledge.

Respectfully submitted  
Petitioner Pro se,



Dated: July 26, 2024

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Martha I. Omorodion Mogaji  
MsMMogaji@gmail.com  
5 W. Prescott St. Unit 2073  
Westford MA 01886

# EXHIBIT A

AYOBAMI OJUTALAYO, M.D.  
ACCESS PRIMARY CARE

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242 SUTTON STREET, NORTH ANDOVER, MASSACHUSETTS 01845  
PHONE: (978) 655-1987 FAX: (978)655-3363

9/5/2023

To whom it may concern,

Martha Mogaji is a patient at Access Primary Care . Due to patient's medical diagnosis, patient requires longer length of time for her to submit work.

If you have any question or concerns, please do not hesitate to contact our office .



Lilian Ojutalayo, NP

Ref: Please see Patients file for Ladefara Gem

## **EXHIBIT B**



Le Santha Naidoo,  
198 Littleton Road  
Westford, MA 01886  
978-323-0312  
978-323-0344

Friday, September 28, 2018

Re: MARTHA OMORODION MOGAJI

To Whom It May Concern:

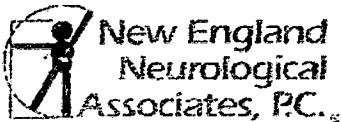
This is to certify that MARTHA OMORODION MOGAJI is currently under my care. She has undergone a Neuropsychology evaluation on 3/28/2017. Based on the results of this test, patient requires special accomodations for work and school purposes. She may require more time to comprehend and process verbal and written instructions. She needs to work at a slower pace and in a quiet space to assist her in processing information presented.

Sincerely,

  
Westford Family Medicine:

Dr. Christen Fragala  
Dr. Katherine Powers  
Dr. LeSantha Naidoo  
Dr. Catherine Trinh  
Kelly Hargett, FNP  
Jill Geoffroy, FNP

## **EXHIBIT C**



Riverwalk  
354 Merrimack Street  
Lawrence, MA 01843  
(978) 687-2321  
Protected Health Information Fax: (978) 722-7287  
[www.nencuro.com](http://www.nencuro.com)

March 20, 2017

RE: Martha Omorodion-Mogaji  
D.O.B.: [REDACTED]

**Division of Neurological Surgery**  
Howard M. Gardner, M.D., F.A.C.S.  
Fosinder / Medical Director  
Peter J. Grillo, M.D., F.A.C.S.  
William P. McCann, M.D., F.A.C.S.  
Bruce R. Cook, M.D., F.A.C.S.  
Henry Y. Ty, M.D., F.A.C.S.  
K. Sudashiv Karamth, M.D., F.R.C.S.  
Katharine Crank, M.D., Ph.D.  
Brooke D. Storey, PA-C  
David R. Novicki, PA-C  
Ethan J. Dionne, PA-C

**Division of Orthopedic Spine Surgery**  
Joseph K. Weistroffer, M.D.

**Division of Neurology**  
Neurology  
Jonathan S. Moray, M.D.

Neurology/Epileptology  
Jonathan Ross, M.D.  
Arya Farahmand, M.D.  
Lanny Y. Xie, M.D., Ph.D.

Neurology/Neuromuscular Disorders  
Jennifer Grillo, M.D.  
Min Zhu, M.D., Ph.D.

Neurology/Movement Disorders  
Shabbir A. Abbasi, M.D. MRCP (UK)

Neurology/Neuro-Oncology  
Vladan P. Milosavljevic, M.D.

Neurology/Vascular Neurology  
Andreas P. Schoeck, M.D.  
Jason C. Vierck, M.D., Ph.D.

**Division of Pediatric Neurology**  
Neurology/Clinical Neurophysiology  
Myrta I. Otero, M.D.

**Division of Rheumatology**  
Maosong Qi, M.D., Ph.D.

**Division of Physical Medicine & Rehabilitation**  
Physical Therapy  
Elizardo P. Carandang, M.D.  
Srirangam R. Padmaiahian, M.D.  
Scott R. Masterson, M.D. CHTME  
Thomas P. Cody, M.D.  
Salony M. Majmudar, M.D.

**Division of Pain Medicine**  
Anesthesiology  
Jeffrey A. Norton, M.D.  
Michael C. Connolly, M.D.  
Richard E. Riccardi, M.D.  
Karine N. Ngote, PA-C

**Division of Neuro-Behavioral Medicine**

Psychiatry  
Marc M. Sadowsky, M.D.

Psychology  
Robert A. Moverman, Ph.D.

**Administration**  
Joan T. Faucher  
Administrator/CEO

To Whom It May Concern:

Ms. Mogaji is a patient under my neurological care and was seen for an appointment today. She suffers from debilitating migraine headaches and is unable to work.

If you have any questions or concerns, please contact my office at (978) 687-2321.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan S. Moray, M.D." followed by a stylized signature.

Jonathan S. Moray, M.D.

Serving New England Since 1969

Gateway Center  
10 George Street, Suite 300  
Lowell, MA 01852  
(978) 458-1463

One Parkway  
Haverhill, MA 01830  
(978) 373-9733

Doctors' Office Building  
21 Highland Avenue  
Newburyport, MA 01950  
(978) 465-3033

Medical Arts Building  
168 Kinsley Street  
Nashua, NH 03061  
(603) 882-2114

198 Littleton Road  
Suite 203  
Westford, MA 01886  
(978) 577-1790

## **EXHIBIT D**

**Westford Internal Medicine**  
133 Littleton Road, Suite 202, Westford, MA 01886  
(978)577-1WIM(1946) Fax: (978)692-4716

June 14, 2016

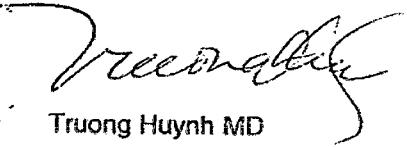
RE:  
Martha Omorodion-mogaji  
PO BOX 320314  
WEST ROXBURY, MA 02132

Patient DOB: ~~02/08/1958~~

To Whom It May Concern:

Ms. MOGAJI is a patient of mine. Over the half a past year, she has had problem with difficulty with concentration and memory loss. As a result, it may take her longer to complete her works. Thus, if possible, please allow her 1 additional hour to do her works. She has been referred to specialist for further evaluation and management. Please feel free to contact me if you have any questions.

Sincerely,

  
Truong Huynh MD