

No. _____

IN THE SUPREME COURT OF THE
UNITED STATES

MARTHA MOGAJI, PETITIONER

V.

TOM CHAN; ROSA CHAN & TRC TRUST, RESPONDENT

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.

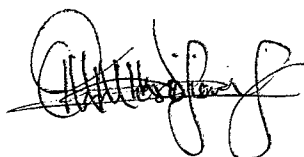
Pursuant to U. S. C. 13.5, "For good cause shown, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding 60 days from denial. An application to extend the time to file shall set out the basis for jurisdiction in this Court, identify the judgment sought to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



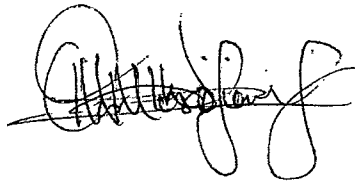
Dated: July 26, 2024

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,

A handwritten signature in black ink, appearing to read 'Martha I. Omorodion Mogaji', with a large, stylized flourish at the end.

Dated: July 26, 2024

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**

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 .

A handwritten signature in black ink, appearing to read 'Lilian Ojutalayo', with a stylized flourish at the end.

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:

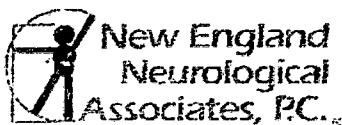
This is to certify that MARTHA OMORODION MOGAJI is currently under my care. She has undergone a Neuropsychology evaluation on 3/28/2017. Based on the results of this test, patient requires special accommodations for work and school purposes. She may require more time to comprehend and process verbal 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

March 20, 2017

RE: Martha Omorodion-Mogaji
D.O.B.: ~~REDACTED~~

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,



Jonathan Moray, M.D.

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Founder / Medical Director
Peter J. Grillo, M.D., F.A.C.S.
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Arya Farahmand, M.D.
Larry Y. Xue, M.D., Ph.D.

Neurology/Neuromuscular Disorders
Jennifer Grillo, M.D.
Hsin 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.

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Administration
Joan T. Faucher
Administrator/CEO

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Lowell, MA 01852
(978) 458-1463

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

Doctors' Office Building
21 Highland Avenue
Newburyport, MA 01950
(978) 463-3033

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: ~~02/24/1978~~

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