

No.\_\_\_\_

---

In the  
**Supreme Court of the United States**

Sandra A. Zikry, & Jamel Daniels, parents & natural guardians and o/b/o BABY  
N.D.  
*Petitioner,*

V.

*Respondent*

Florida Birth-Related Neurological Injury Compensation Association, St. Joseph's Women's Hospital, Jill  
Hechtman, M.D., Gina Washington, M.D., and Sobiah Mallick, M.D.,

---

**MOTION FOR EXTENSION OF TIME TO FILE PETITION OF WRIT OF  
CERTIORARI**

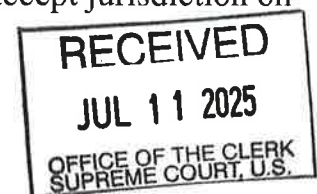
---

**FLORIDA FIRST DCA - 1D2023-0997; FLORIDA SUPREME COURT -  
SC2025-0562**

MOTION FOR EXTENSION OF TIME TO SERVE & FILE PETITION OF  
WRIT OF CERTIORARI

Petitioners respectfully request a 30 day extension to serve and file their petition of  
writ of certiorari and the appendix to be due on August 20th, 2025

On April 22nd, 2025, the Florida Supreme Courts refused to accept jurisdiction on  
a



Notice of Mandatory review due to invalid or unconstitutional statute.

The Florida Supreme Courts made several errors in the proceedings, such as but not limited to, placing the case in the wrong case type. It took 30 days for these parties to speak with the clerk, dispute the errors, and even had to speak with the Staff Attorney about these harmful errors, presenting case law about these errors, in which a corrected order was issued, and the record had to be fixed.

These parties are also dealing with several health issues, hospital visits due to a current pregnancy, while combating injustice before these courts.

Two of the few issues we intend to bring before these courts is whether the ALJ, First DCA of Florida, & the Florida Supreme Courts had proper jurisdiction in the NICA proceedings and secondly, whether it was a civil, constitutional, & federal violation for the court system to intentionally exclude evidence & facts, and rule with fraudulent evidence.

(These parties obtained sworn affidavits that some of the consent forms are forged, the ALJ intentionally excluded this information and testimony that there wasn't consent for procedures, and ruled there was consent & a signature despite sworn affidavits from two fraud experts, and two physicians who have examined the records and wrote opinions.)

CERTIFICATE OF SERVICE I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been filed through the Florida Court's E-Portal this 9th day of July, 2025, and furnished electronically to: Mindy McLaughlin, Esq., Carissa W. Brumby, Esq., Beytin, McLaughlin, McLaughlin, O'Hara & Bocchino, P.A., 1706 East Eleventh Avenue, Tampa, FL 33605, mmeservice@law-fla.com, lawfla@outlook.com, and Dinah S. Stein, Esq., Hicks, Porter, Ebenfeld & Stein, P.A., 799 Brickell Plaza, 9th Floor, Miami, Florida 33131, dstein@mhickslaw.com, eclerk@mhickslaw.com Counsel for Baycare 3 Health Systems, Inc. d/b/a St. Joseph's Hospital, Inc. d/b/a St. Joseph's Women's Hospital, Pamela Taylor, R.N. and Sandra Valiquette, R.N., Alyssa M. Reiter, Esq., Nichole M. Koford, Esq.,

Wicker, Smith, O'Hara, McCoy & Ford, P.A., 100 S. Ashley Drive, Suite #1800, Tampa, FL 33602, Jason M. Azzarone, Esquire, Louis J. La Cava, Esq., La Cava Jacobson & Goodies, P.A., 501 E. Kennedy Blvd., Suite 1250, Tampa, FL 33602, llacava@lglllegal.com , jazzarone@ljglegal.com mramirez@ljglegal.com Counsel for Jill L. Hetchman, M.D., Gina Washington, M.D., Sobiah Mallick, M.D., Tampa Obstetrics, P.A. and Exodus Women's Center, Inc. A copy of this motion is being mailed to - Supreme Court of the United States

1 First Street, NE

Washington, DC 20543

Sandra A. Zikry Cell: (813)-203-3879 Email: lionlakestar@gmail.com Address: 11248 PADDOCK MANOR AVE, RIVERVIEW FL 33569

# Supreme Court of Florida

TUESDAY, APRIL 22, 2025

Sandra Zikry and Jamel  
Danielson behalf of and as  
parents and natural  
guardians of N.D., a minor,  
Petitioner(s)

v.

Florida Birth-Related  
Neurological Injury  
Compensation Association, St.  
Joseph's Women's Hospital,  
Jill Hechtman, M.D., Gina  
Washington, M.D., and  
Sobiah Mallick, M.D.,  
Respondent(s)

CORRECTED ORDER<sup>1</sup>

**SC2025-0562**

Lower Tribunal No(s).:

1D2023-0997;

292023CA013187A001HC

---

Petitioner's "Notice of Mandatory Jurisdiction," seeking review of the order or opinion issued by the 1st District Court of Appeal on January 29, 2025, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. *See Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846

---

<sup>1</sup> Corrected Petitioner's title of filing from "Petitioner's Notice to Invoke Discretionary Jurisdiction" to Petitioner's "Notice of Mandatory Jurisdiction" on May 20, 2025.

**CASE NO.: SC2025-0562**

Page Two

So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

No motion for rehearing or reinstatement will be entertained by the Court.

A True Copy

Test:

SC2025-0562 4/22/2025

John A. Tomasino

Clerk, Supreme Court

SC2025-0562 4/22/2025



TD

Served:

JASON MICHAEL AZZARONE  
CARISSA WHEELER BRUMBY  
1DCA CLERK  
HILLSBOROUGH CLERK  
JAMEL DANIELS  
STEPHEN ALEXANDER ECENIA  
LOUIS JACK LA CAVA  
ANETA KOZUB MCCLEARY  
JOHN STEPHEN MENTON  
JOHN NEWTON  
DINAH STEIN  
TANA STOREY  
SANDRA ZIKRY