

APP No. _____

IN THE SUPREME COURT OF THE UNITED STATES

KARYN M. KELLEY, THE KARYN M. KELLEY REVOCABLE TRUST
AGREEMENT OF JULY 13, 2016

Applicant / Petitioner,

v.

MARY E. FEENEY, COMMISSIONER ATTORNEY CHARLES A. RUSSELL,
GIOVANNI VERANI, JOHN POIRIER, DAVID P. MASCIARELLI, CHRISTY N.
MASCIARELLI, DAVID P. AND CHRISTY N. MASCIARELLI AS CO-TRUSTEES
DAVID AND CHRISTY MASCIARELLI REVOCABLE TRUST DATED MARCH 30,
2021, GRANITE STATE MORTGAGE CORPORATION

Respondent,

Application for an Extension of Time to File Petition for a Writ of Certiorari to the
United States Court of Appeals for the First Circuit to the
Supreme Court of the State of New Hampshire

**APPLICATION TO EXTEND TIME TO FILE PETITION FOR WRIT OF
CERTIORARI**

Attorney Daniel C. Proctor
Counsel of Record for Respondent
Mary E. Feeney
P.O. Box 3544
Concord, NH 03302

Karyn M. Kelley
Karyn M. Kelley, Trustee
Pro Se Applicant/Petitioner
P. O. Box 1706
Merrimack NH 03054
(603) 820-2664

Commissioner Attorney Charles A. Russell Pro Se,
P.O. Box 2124
Concord, NH 03302

Giovanni Verani, Pro Se,
Berkshire Hathaway HS, Verani Realty
1 Verani Way
Londonderry, NH 03053

Attorney John F. Bisson, for John Poirier
Counsel of Record for Respondent
722 Chestnut Street
Manchester, NH 03104

Attorney Timothy E. Britain, for David P. Masciarelli, Christy N. Masciarelli and Granite
State Mortgage Corporation
Counsel of Record for Respondent
2 Capital Plaza 5th Floor
Concord, NH 03301

July 8, 2025

To the Honorable Ketanji Brown Jackson, as Circuit Justice for the United States Court of Appeals for the First Circuit:

**Application For Extension Of Time
And Jurisdiction**

Pursuant to this Court's Rules 13.5, 22, and 30, Applicant/Petitioner Karyn M. Kelley ET AL respectfully requests that the time to file its Petition for Writ of Certiorari in this matter be extended for 60 days up to and including September 19, 2025. The State of New Hampshire Supreme Court issued its order on April 24, 2025 (attached as Exhibit A) and denied a motion for rehearing or reconsideration on March 25, 2025 (attached as Exhibit B). Absent an extension of time, the Petition for Writ of Certiorari would be due on July 22, 2025. Applicant/Petitioner filed this Application more than ten days before that date. See S. Ct. R. 13.5. This Court would have jurisdiction over the judgment under 28 U.S.C. 1254(1). Respondent takes no position on the Applicant/Petitioner's request.

Judgment For Which Review Is Sought

The judgment for which review is sought is Karyn M. Kelley ET AL v. Mary E. Feeney ET AL No. 2024-0369, dated April 24, 2025 (attached as Exhibit A). The Supreme Court of the State of New Hampshire denied Applicant's motion for rehearing or reconsideration on March 25, 2025 (attached as Exhibit B).

Background

This case was filed on February 2, 2023 in the Hillsborough Probate Court, Southern District, which holds jurisdiction for Title dispute to Quiet Title to Real Property under New Hampshire RSA 498:5-a. Hillsborough Probate Court, Southern District has jurisdiction over the subject matter of this action pursuant to New Hampshire RSA 498:5-a to decide disputes in title.

Upon motion for a trial by Jury, pursuant to NH RSA 547:II-d, the Probate Court will transfer to Superior Court to hold the Jury Trial, which the Court that holds jurisdiction is Hillsborough Superior Court, Southern District.

Many Respondents filed motions for a Jury Trial with the Hillsborough Probate Court, Southern District.

On or about May 4, 2023 Hillsborough Probate Court, Southern District Granted a Jury Trial in this matter.

Subsequently, many Respondents filed motions to transfer to Hillsborough Superior Court, Northern District, which lacked jurisdiction, subject matter jurisdiction and venue to decide a dispute in title in the Town of Merrimack.

The Town of Merrimack is served by the Hillsborough Probate Court, Southern District and the Hillsborough Superior Court, Southern District.

The Hillsborough Probate Court, Southern District by err transferred the Probate Complaint to Hillsborough Superior Court, Northern District.

Hillsborough Superior Court, Northern District accepted the Hillsborough Probate Court, Southern District Transfer and docketed the Complaint.

Subsequently, many Respondents filed motions to consolidate the transferred Probate Complaint to a (12) year old tried to conclusion closed case.

Hillsborough Superior Court, Northern District consolidated the Probate Complaint to the (12) year old tried to conclusion closed case in err, which dismissed the Probate Complaint without Hearing, Granted Jury Trial that violated the 14th Amendment, due process moreover, the right to a Jury Trial.

Hillsborough Superior Court, Northern District lacked jurisdiction, subject matter jurisdiction and venue whereby the trial court denied Applicant/Petitioner due process. The questions to be reviewed under Writ of Certiorari are important questions that were determined adversely by the Supreme Court of the State of New Hampshire.

Reasons For Granting An Extension Of Time

The time to file a Petition for a Writ of Certiorari should be extended for 60 days for the following reasons:

1. Applicant is currently Pro Se in this matter, which will take considerable time to accurately prepare a petition for certiorari in accordance with the Rules of this Court.
2. This case was filed with (10) parties, which will take considerable time necessary to complete a cogent and well-researched petition considering the Due Process or Jury Trial rights involved.
3. Applicant continues searching for attorney assistance, Pro Bono, to prepare or assist with the petition for certiorari.
4. This case presents issues of importance to individuals who face potential violations of Constitutional Rights, the 14th Amendment section 1 or due process. Given this case's importance to Constitutional Rights of the 14th Amendment and the right to due process, Applicant requires additional time to ensure that the relevant issues are fully and adequately presented to this Court, whereby a Granted Jury Trial failed to be held.
5. A significant prospect exists that this Court will grant certiorari and reverse the order of Supreme Court of the State of New Hampshire. The Judges ruling directly

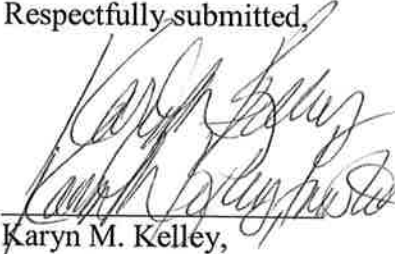
conflicts with 14th Amendment, due process or a Granted Jury Trial which failed to be held.

6. An extension will not cause prejudice to any Respondent.
7. Applicant/Petitioner's Granted Jury Trial was never held which Constitutional and due process rights were violated which Applicant remains homeless, living in a vehicle, in a parking lot with no electricity or internet whereby time to research the Rules of this Court to accurately prepare and print the petition for writ of certiorari is limited as the public library due to several historical heat waves has been closed due to lack of air conditioning.
8. This Application is not for any delay and is filed in good faith.

Conclusion

For the foregoing reasons, Applicant/Petitioner respectfully requests that the time to file the Petition for a Writ of Certiorari in this matter be extended 60 days, up to and including September 19, 2025.

Attorney Daniel C. Proctor
Counsel of Record for Respondent
Mary E. Feeney
P.O. Box 3544
Concord, NH 03302

Respectfully submitted,

Karyn M. Kelley,
Karyn M. Kelley, Trustee,
Pro Se Applicant/Petitioner
P.O. Box 1706
Merrimack, NH 03054
(603) 820-2664

Commissioner Attorney Charles A. Russell Pro Se,
P.O. Box 2124
Concord, NH 03302

Giovanni Verani, Pro Se,
Berkshire Hathaway HS, Verani Realty
1 Verani Way
Londonderry, NH 03053

Attorney John F. Bisson, for John Poirier
Counsel of Record for Respondent
722 Chestnut Street
Manchester, NH 03104

Attorney Timothy E. Britain, for David P. Masciarelli, Christy N. Masciarelli and Granite
State Mortgage Corporation
Counsel of Record for Respondent
2 Capital Plaza 5th Floor
Concord, NH 03301

July 8, 2025

CERTIFICATE OF SERVICE

A copy of this application was served by U.S. mail to the counsels for respondents, Attorney Daniel C. Proctor, for Mary Feeney, P.O. Box 3544, Concord, NH 03302, Commissioner Attorney Charles A. Russell, Pro Se, P.O. Box 2124, Concord, NH 03302, Giovanni Verani, Pro Se, Berkshire Hathaway HS, Verani Realty, 1 Verani Way, Londonderry, NH, 03053 Attorney John F. Bisson, for John Poirier, 722 Chestnut Street, Manchester, NH 03104, Attorney Timothy E. Britain, for David P. Masciarelli, Christy N. Masciarelli and Granite State Mortgage Corporation, 2 Capital Plaza 5th Floor, Concord, NH 03301 in accordance with Supreme Court Rule 22.2 and 29.3.

A handwritten signature in black ink, appearing to read "Karyn M. Kelley", is written over a horizontal line.

Karyn M. Kelley,
Karyn M. Kelley, Trustee, Pro Se
P.O. Box 1706
Merrimack, NH 03054
(603) 820-2664

July 8, 2025