

No. _____

IN THE
Supreme Court of the United States

MARY E. HILL,

Applicant,

v.

CONSANDRA JONES,

Respondents.

**APPLICATION FOR EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF
CERTIORARI**

MARY E. HILL,
Applicant, Pro Se
Post Office Box 6008
Suffolk, Virginia 23433
(757) 685-1730

**APPLICATION FOR EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Chief Justice, John G. Roberts, Jr., Justice
for the United States Court of Appeals for the Eighth Circuit:

Under this Court's Rules 13.5 and 22, Applicant, Mary E. Hill, appearing Pro Se, respectfully requests an extension of sixty (60) days to seek new counsel to file a petition for a writ of certiorari. The petition will seek review of the decision of the Virginia Supreme Court in Mary E. Hill v. Consandra Jones, No. 240625, Court of Appeals No. 0564-23-1, a copy of which is attached to this application. In support of this application, Applicant states the following:

1. On or about November 8, 2023, Sherman C. Smith, counsel, requested the Applicant to submit to his attention records and documents on referenced case.
2. On or about November 8, 2023, Applicant submitted records and documents to counsel.
3. On or about March 14, 2025, Sherman C. Smith, Attorney at Law of Sherman C. Smith, Attorney at Law, was engaged to provide representation in this matter.
4. On April 2, 2025, counsel waived an Oral Argument before

the Honorable Justices of the Supreme Court of Virginia without Applicant prior knowledge.

5. On April 18, 2025, the Supreme Court of Virginia refuses the petition for appeal.

6. On or about May 1, 2025, counsel advised Applicant that counsel will file writ of certiorari for Applicant cases and requested Applicant to submit payment in the amount of \$300.00 for filing fee.

7. On or about June 9, 2025, Applicant paid counsel \$300.00.

8. On July 9, 2025, Applicant received from the U. S. Postal service an incomplete file of cases from counsel with a cover letter dated July 3, 2025, that counsel will not be submitting a writ of certiorari for Applicant cases. See attached copy of the letter.

9. As a direct result of the breach of trust, it is not possible to continue with the former attorney's representation. Therefore, it is essential to obtain new counsel to ensure proper representation in this case.

10. Due to unforeseen and unfortunate circumstances involving a breakdown of trust with Sherman C. Smith, the attorney-client relationship has become irreparable. Rule 1.3: Diligence. Rule 1.4: Communications. Rule 3.2: Expediting Litigation. Picking v.

Pennsylvania R. Co., 151 F.2d 240 (3d Cir.1945).

11. In addition, counsel was aware that Applicant is a disabled Veteran, currently under doctors care for ongoing pain therapy and suffers from PTSD challenges.

12. Additional time is needed to find a suitable new attorney who can adequately represent interests in this complex matter.

13. Without an extension, the petition for a writ of certiorari will be due on July 18, 2025. With the requested extension of sixty days (60) days, the petition would be due on September 8, 2025. This will allow the new counsel sufficient time to become acquainted with the case and prepare to represent the interests.

WHEREFORE, Mary E. Hill respectfully moves this Honorable Court for an order granting an extension of time until September 8, 2025, to secure new counsel in this matter, and for such other relief as the Court deems just and proper.

Respectfully submitted,



MARY E. HILL,
PRO SE
Post Office Box 6008
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757-685-1730

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2025, a copy of this Application was mailed to H. Woodrow Crook, Post Office Box 308, 229 Main Street, Smithfield, Virginia 23431-0308.



MARY E. HILL,
Applicant, Pro Se
P. O. Box 6008
Suffolk, Virginia 23433
757-685-1730

I certify that the foregoing is true and correct this 10th day of July 2025.



Mary E. Hill
Applicant, Pro Se

VIRGINIA:

*In the Supreme Court of Virginia held at the Supreme Court Building in the
City of Richmond on Friday the 18th day of April, 2025.*

MARY E. HILL,

APPELLANT,

against Record No. 240625
 Court of Appeals No. 0564-23-1

CONSANDRA JONES,

APPELLEE.

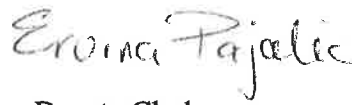
FROM THE COURT OF APPEALS OF VIRGINIA

Upon review of the record in this case and consideration of the arguments submitted in support of the granting of an appeal, the Court is of the opinion there is no reversible error in the judgment complained of. Accordingly, the Court refuses the petition for appeal.

A Copy,

Teste:

By: Muriel-Theresa Pitney, Clerk


Deputy Clerk