

No. _____

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

Veronica W. Ogunsula,

Applicant

v.

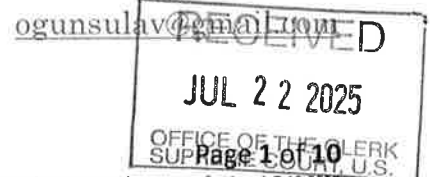
Trooper First Class Michael Warrenfeltz,

Respondent

To Honorable John G. Roberts, Chief Justice of the Supreme Court of the United
States and Circuit Justice for the Fourth Circuit

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

Veronica W. Ogunsula, Pro Se
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To the Honorable John G. Roberts, Chief Justice of the Supreme Court of the United States and Circuit Justice for the United States Court of Appeals for the Fourth Circuit:

Pursuant to this Court's Rules 13, 21, 22, 30.2 and 30.3, Petitioner Veronica W. Ogunsula respectfully request that the time to file her Petition for Writ of Certiorari in this matter be extended for 42 days from the original due date of July 28, 2025 to September 8, 2025. The Court of Appeals for the Fourth Circuit issued its final judgment Order on March 6, 2025. (See Appendix 1, page 12) and denied Rehearing and Rehearing en banc on April 29, 2025. (See Appendix, page 13) Applicant is filing this Applicant ten days before the original due date for the Petition for Writ of Certiorari in accordance with Rule 13.

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PARTIES TO THE PROCEEDINGS AND RELATED PROCEEDINGS

The parties to this civil matter are Veronica W. Ogunsula, Applicant/Petitioner, a citizen of the United States and resident of the State of Maryland, who files this Application for an Extension of Time to file a Petition for a Writ of Certiorari in the Supreme Court of the United States. The Applicant/Petitioner is currently prosecuting this case Pro Se.

The Respondent is Trooper First Class (TFC) Michael Warrenfeltz, a law enforcement officer the Maryland State Police. TFC Michael Warrenfeltz is represented by the Attorney General of Maryland, Anthony G. Brown and Assistant Attorney General Amy E. Hott. This Office does not consent to an extension.

Defendants to the original civil complaint in the U.S. District Court of Maryland include the Maryland State Police Superintendent who was represented by the Maryland Attorney General's office as stated above. Other parties/Defendants were the Warden of Harford County Detention Center and unnamed correctional officers at the Harford County Detention Center. The Harford County parties/defendants were represented by the Office of Harford County Department of Law led by the County Attorney whose office is located in Bel Air, Maryland. The current County Attorney is Jefferson Blomquist and Margaret K. Hartka is the Deputy County Attorney.

JURISDICTION

This Court has jurisdiction under 28 U.S.C. 1254 (1)

QUESTIONS TO BE PRESENTED (AS CONCEIVED TO DATE):

1. Are officials or law enforcement officers covered by or entitled to a defense of Qualified Immunity whether or not they provide a truthful justification for the act or an “after-the-fact” justification?
2. Is a Roseboro vs. Garrison or Rule 12/56 notice require for Pro Se litigants at the Summary Judgment stage of a case?

BACKGROUND

The original complaint was filed in the U.S. District Court of Maryland in 2020 for an unlawful traffic stop that occurred in August 2017. The Applicant filed the complaint under 42 U.S.C. § 1983 to challenge the traffic stop’s constitutionality under the 4th Amendment. The Applicant was driving a lawfully rented vehicle on 95 North in Maryland, about 10-20 minutes beyond the Fort McHenry toll booth. This portion of the interstate is a Maryland highway. TFC Warrenfeltz initiated a traffic stop for a cell phone traffic violation. Based on the traffic stop, Ms. Ogunsula also asserted a 14th Amendment claim against the law enforcement officer. The traffic stop resulted in an arrest for an outstanding warrant of which Ms. Ogunsula had no knowledge. The warrant was subsequently withdrawn by the issuing agency, the Washington Airport Authority Police Department. The Harford Maryland County State’s Attorneys Office dropped all charges related to the arrest.

Additionally, in the original complaint, Ms. Ogunsula included 8th Amendment claims against the Harford County Maryland Detention Center Warden and unnamed correctional officers who continued to hold her in custody more than 48 hours after a County Circuit Court Judge had granted bail and more than 24 hours after the bail had been paid. The correctional officers disputed the Court's grant of bail in the case threatening to extradite Ms. Ogunsula to Virginia under the jurisdiction of the Washington Area Airport Authority Police. Further, she was told by the correctional officers that the extradition could take up to 90 days. She was finally released after 72 hours in custody.

A lawful traffic stop of a moving vehicle in the road way, according to this Court's precedent (Terry, 392 U.S. at 27, 88 S.Ct.1868) requires that the officer observe or witness a traffic violation (paraphrasing United States v. Sprinkle, 106 F.3d 613, 617, 4th Cir.1997) or have "*reasonable suspicion*" or a "*particularized and objective basis for suspecting the particular person stopped of criminal activity.*" [(Quoting United States v. Feliciano, 974 F.3d 519, 523, 4th Cir. 2020) (cleaned up) (quoting Terry, 392 U.S. at 27, 88 S.Ct.1868) Emphasis added.] An after-the-fact justification, that is false, added to a police report as the reason for the stop is not sufficient to turn an unlawful traffic stop into a lawful one. If the traffic stop is unlawful from its inception, it cannot be justified or turned into a legal one by adding additional text to a police report. And while according to this Court's precedent the motivation of the officer for a stop is inconsequential, "a reasonable cause to believe that a traffic violation occurred" (Whren vs. U.S., 517 U.S. 806,

1996) is a required and necessary element of the legal case. Lastly, if the traffic stop was unlawful from its inception and a false justification was submitted in a police report after the fact, is Qualified Immunity applicable if the officer intentionally and knowingly violated the 4th Amendment rights of the driver.

The District Court granted Summary to the Defendants while there were still outstanding Discovery Motions and issues related to discovery disputes. And while this may seem normal course under everyday court procedures and proceedings for an attorney and judicial personnel, for a Pro Se litigant who expects the Court to address and resolve outstanding discovery disputes and Motions by the Plaintiff and Defendant, it is not expected that the Court would rule on Summary Judgment before providing sufficient notice and/or warning to the opposing party the Court would rule based on the filings submitted to the Court by the Defendant. In this specific instance, the Court (the judge nor the Clerk's office) issued the standard Rule 12/56 notice. No notice was provided by the Court that would sufficiently satisfy the Roseboro requirement. (Roseboro v. Garrison, 528 F.2d 309, 4th Cir. 1975)

REASONS FOR GRANTING AN EXTENSION

The Applicant has suffered significant life challenging and altering events related to physical and mental health, and economic loss in the past 6-9 months. Her ability to timely and adequately respond to the Petition for Writ of Certiorari's deadline in this case is negatively impacted. In the past two weeks, she was able to

move into a more stable environment and secure part-time employment. She requires additional time as she manages her physical and economic recovery.

CONCLUSION

Applicant request that the time to file a Petition for a Writ of Certiorari in this case be extended 42 days up to and including September 8, 2025.

Dated this 18th day of July, 2025.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Veronica Ogunsula", with a small "V.O." monogram to the right.

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