

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

SABRINA GIBSON,

Plaintiff-Petitioner,

vs.

THOMAS F. ROUPAS, JR. and
PARR INVESTMENTS, LLC,

Defendants-Respondents.

APPLICATION TO EXTEND TIME TO FILE PETITION FOR WRIT OF
CERTIORARI

COMES NOW, Petitioner, Sabrina Gibson, via Pro Se submission, who hereby requests that the Supreme Court grant Petitioner an extension of time to file her Petition for Writ of Certiorari after the Court-imposed 90-day timeframe. For the reasons and good cause shown herein, Petitioner submits that extraordinary circumstances existed that prevent Petitioner from filing said Petition on or before January 22, 2024.

1. The United States District Court of Appeals for the Fourth Circuit gave Notice of its Judgment dismissing Petitioner's claims on October 23, 2023. *See "Exhibit A."*

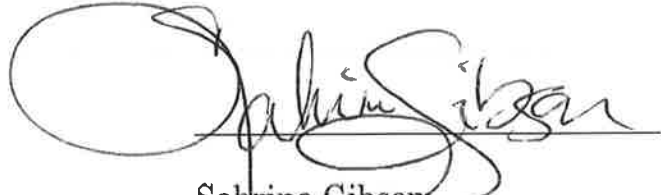
2. Said Notice of Judgment was not received by Petitioner until several days later.
3. Supreme Court Rule 13.5 provides in relevant part: “For good cause, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding 60 days. An application to extend the time to 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, and set out specific reasons why an extension of time is justified. The application must be filed with the Clerk at least 10 days before the date the petition is due, **except in extraordinary circumstances...**” (emphasis added).
4. Additionally, 28 U.S. Code § 2101(c) provides, in relevant part: “A justice of the Supreme Court, for good cause shown, may extend the time for applying for a writ of certiorari for a period not exceeding sixty days.”
5. The jurisdiction of this Court is invoked under 28 U.S.C. §1257(a), which states that “Final judgments or decrees rendered by the highest court of a State in which a decision could be had, may be reviewed by the Supreme Court by writ of certiorari where the validity of a treaty or statute of the United States is drawn in question or where the validity of a statute of any State is drawn in question on the ground of its being repugnant to the Constitution, treaties, or laws of the United States, or where any title, right, privilege, or immunity is specially set up or claimed under the Constitution or the treaties

or statutes of, or any commission held or authority exercised under, the United States.”

6. The instant case presents a question for review on how the Court interpreted Rule 12(b)(6) and applied the established legal standards under that rule. The term “sufficiently alleged” has been a very subjective term in the context of 12(b)(6) motions, and here, the Court of Appeals wrongfully imposed a much higher standard than what is legally necessary in testing the sufficiency of Petitioner’s claims. Review is necessary to set a uniform standard as to what constitutes “sufficiently alleged.”
7. Over the last several years, and in particular, the last several months, the ongoing pattern of harassment, stalking, and other retaliatory behavior on the part of Respondents has caused Petitioner great emotional harm and distress. Petitioner has been damaged by all of the acts and conduct as described in the underlying action. Petitioner has lost income from work, has been followed and tracked, has had personal information stolen and used in unknown manner, has had to move multiple times, has been in fear, and has lost stability and security in her life, all due to the actions and misconduct on the part of Respondents and their agents. It is difficult to articulate Petitioner’s true experience on paper.
8. Extraordinary circumstances existed for Petitioner which prevented her from filing said Petition for Writ of Certiorari prior to the date of the instant Application.

WHEREFORE, Petitioner respectfully requests that this Court grant a 60-day extension of time to file the Petition for Writ of Certiorari.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sabrina Gibson". The signature is written in a cursive style with a large, looping initial "S".

Sabrina Gibson
32 Carmine Place
Hampton, VA 23666
Email: pablob981@yahoo.com
Phone: 1.757.327.8499
Pro Se Petitioner

UNPUBLISHED

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

No. 23-1259

SABRINA GIBSON,

Plaintiff - Appellant,

v.

THOMAS F. ROUPAS, JR.; PARR INVESTMENTS, LLC,

Defendants - Appellees.

Appeal from the United States District Court for the Middle District of North Carolina, at Greensboro. William L. Osteen, Jr., District Judge. (1:22-cv-00517-WO-JLW)

Submitted: October 19, 2023

Decided: October 23, 2023

Before KING and WYNN, Circuit Judges, and TRAXLER, Senior Circuit Judge.

Affirmed by unpublished per curiam opinion.

Sabrina Gibson, Appellant Pro Se. Taniya Donyale Reaves, LAW OFFICE OF TANIYA D. REAVES, PLLC, Browns Summit, North Carolina; Robert J. King, III, Kasi Wahlers Robinson, BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD, LLP, Greensboro, North Carolina, for Appellees.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

Sabrina Gibson appeals the district court's order dismissing her civil action for failure to state a claim upon which relief could be granted and denying as moot her request for a temporary restraining order. We have reviewed the record and find no reversible error. Accordingly, we affirm the district court's judgment. *Gibson v. Roupas*, No. 1:22-cv-00517-WO-JLW (M.D.N.C. Feb. 9 & Mar. 15, 2023). We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

AFFIRMED

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

SABRINA GIBSON,

Plaintiff-Petitioner,

vs.

THOMAS F. ROUPAS, JR. and
PARR INVESTMENTS, LLC,

Defendants-Respondents.

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

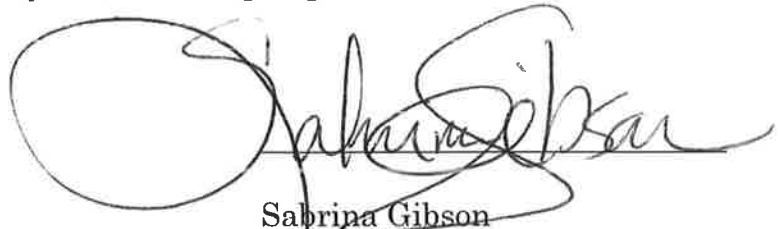
I, Sabrina Gibson, do swear or declare that on this date, January 18, 2024, as required by Supreme Court Rule 29 I have served the enclosed Application to Extend Time to File Petition for Writ of Certiorari on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Kasi W. Robinson
BROOKS, PIERCE, McLENDON HUMPHREY & LEONARD, LLP
PO Box 26000
Greensboro, NC 27420

Taniya D. Reaves
1420 Miltonwood Road
Browns Summit, NC 27214

I declare under penalty of perjury that the foregoing is true and correct

A handwritten signature in black ink, appearing to read 'Sabrina Gibson', written over a horizontal line. The signature is fluid and cursive, with a large loop at the beginning.

Sabrina Gibson
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Pro Se Petitioner