

APP NO.

IN THE SUPREME COURT OF THE UNITED STATES

NATALIE ANDERSON,

Petitioner,

v.

NEW HAMPSHIRE PROFESSIONAL CONDUCT COMMITTEE, ET. AL.,

Respondents.

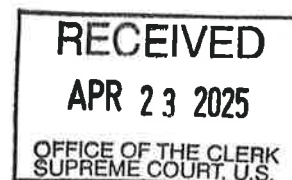
On Application for an Extension of Time to File Petition for Writ of Certiorari
with respect to the New Hampshire Supreme Court

**PETITIONER'S APPLICATION TO EXTEND TIME TO FILE PETITION FOR WRIT
OF CERTIORARI**

Submitted by the petitioner, pro se

Natalie Anderson
101 Middlesex Turnpike, #270
Burlington, MA 01803
(617) 710-7093

Monday, April 21, 2025



To the Honorable Ketanji Brown Jackson,
Associate Justice of the Supreme Court of the United States and Circuit Justice for the First
Circuit:

I. INTRODUCTION

1. Pursuant to Supreme Court Rules 13.5, 22, 30.2, and 30.3, the petitioner Natalie Anderson (“Petitioner”), proceeding pro se, respectfully requests a 60-day extension of time, up to and including Monday, June 30, 2025, within which to file a petition for a writ of certiorari (“petition”) to review the judgment of the New Hampshire Supreme Court (“NHSC”) in Case: Natalie Anderson v. New Hampshire Professional Conduct Committee, et. al, Case No. 2021-0604.
2. The New Hampshire Supreme Court issued its judgment on December 24, 2024. See **Exhibit 1**.
3. The New Hampshire Supreme Court then issued its final order denying a timely filed motion for reconsideration on January 30, 2025. See **Exhibit 2**.
4. Absent an extension, the petition would be due on April 30, 2025.
5. Petitioner is filing this application 9 days before that date, pursuant to Rule 13.5 of the Rules of this Court.
6. The petition will challenge this decision of the NHSC. Because this appeal is from a state supreme court and implicates petitioner's rights under the U.S. Constitution (including but limited to the Due Process Clause, the Equal Protection Clause of the Fourteenth Amendment as well as the First Amendment), the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, 42 U.S.C. § 1983, and other federal laws, this Court would have jurisdiction over the judgment. The jurisdiction of this Court is thus invoked under 28 U. S. C. 5 1257(a).

II. TIMELINESS OF EXTENSION REQUEST

7. This application is being filed one day less than 10 days before the petition's due date.
8. The 10-day deadline fell on or about April 20, 2025, a Sunday, which was Easter Sunday, as part of a major religious holiday weekend. Note: Friday, April 18, 2025 was also Good Friday.
9. Petitioner was unable to prepare and file this request earlier due to the Petitioner having undergone a medical procedure recently with multiple medical appointments over the past few weeks, further constraining Petitioner's ability to prepare this request or the petition itself, prior to now.
10. These circumstances constitute good cause justifying the timing of this application (See Shapiro et al., Supreme Court Practice §6.5(b) (11th ed. 2019)).
11. Moreover, this application has been sent via special courier services, to arrive on Monday, April 21, 2025, ensuring its arrival to the court before the petition's due date (which 9 days is within a reasonable time prior to the deadline¹).
12. Petitioner respectfully requests expedited processing and an urgent ruling on this time-sensitive matter.
13. This constitutes good cause that justify filing on April 21, 2025.

III. REASONS FOR GRANTING EXTENSION OF TIME

14. The petitioner intends to file a petition for writ of certiorari and now apply for an extension of time to do so. An extension to file the writ of certiorari in this case is needed to permit petitioner to file a petition that fully and adequately addresses important issues. The issues to be presented are somewhat intricate and nuanced, and so more time is needed to present

¹ Petitioner hopes that this extension request can be decided by or before the deadline.

the best advocacy to this Court. Petitioner thus seeks a 60-day extension to file the petition for writ of certiorari on the following grounds:

A. Pro Se Status and Pursuit of Legal Representation:

15. The petitioner is in the process of securing legal counsel and has not yet obtained counsel to file a petition for certiorari. Legal counsel is needed to assist the petitioner with fully assessing the legal issues in the case with a view to preparing and filing a petition for certiorari. Because petitioner is currently acting pro se, she may not be able to present these issues and arguments in as legally skilled manner as a trained lawyer could, especially as it pertains to the requirements for US Supreme Court jurisprudence. The requested extension is warranted to permit petitioner, an African-American female with limited resources, to obtain counsel to represent her in the US Supreme Court, and to permit such counsel to familiarize themselves with the history of this litigation and the legal issues to be presented, and also to allow counsel an opportunity to narrow the questions presented for this Court's consideration. Conversely, should petitioner ultimately be unable to secure legal representation, the petitioner would require additional time to become more acquainted with this Court's Rules, and to prepare a petition towards this Court's just, accurate and fair adjudication. Furthermore, more time is needed to allow potential amici to be filed in this case.

16. Thus, as a pro se litigant navigating complex legal issues, Petitioner requires additional time to either secure legal representation or obtain legal advice to prepare a compelling petition. The extension would allow for consultation with potential counsel and proper petition preparation.

B. Complex and Novel Legal Issues:

17. The underlying case involves potentially novel questions of law, among other things, likely presenting issues of first impression for this Court. The complexity and significance of these

issues warrant additional time for thorough research and articulation (See Supreme Court Rule 10(c)).

C. Interests of Justice:

18. Granting this extension would serve the interests of justice by allowing for a well-prepared petition that fully articulates the important legal issues at stake, thereby aiding the Court in its consideration of whether to grant certiorari.
19. Given these compelling reasons, the requested 60-day extension is both reasonable and necessary to ensure that the petition for writ of certiorari is prepared with the diligence and thoroughness that this Court and the important issues involved deserve.

IV. FURTHER GROUNDS FOR REVIEW

20. The petition that petitioner plans to file with this court relates to a decision rendered by the NHSC, which is the highest court or the court of last resort for the state of New Hampshire.

A. Public Access and First Amendment Issues

21. The underlying case in the NHSC involves important constitutional issues, including but not limited to, right-to-know and right to public access issues and the right to hold government accountable. The issues are novel because these have not been presented to or ruled on by the NHSC before and thus represents a case of first impressions and it goes to critically important rights for all citizens, whether from New Hampshire (“NH”) or from outside of NH (including from neighboring states like Massachusetts where its citizens of travel to, work in, conduct business or interact in the state of NH), and is thus a consequentially important public interest case. It should be of particular importance how citizens of other states, such as the petitioner, are treated in NH and whether they are being systematically stripped and deprived of their federally protected civil rights because they interact with the state of NH. It further goes to the squelching and chilling of first amendment rights in seeking

to criticize government and the attendant right to access government public records in order to be able do so. This case further implicates the retaliation by government against those who seek to hold it accountable by shining the light of exposure to government records that the government seeks to keep hidden from the public eye.

22. This is a citizen statesman case, a public interest case, and the plaintiffs are advocating not only for their rights but for the rights of all similarly-situated persons.

B. Denial of Due Process:

23. The NHSC deprived petitioner of due process and of proper notice before making adverse rulings against petitioner in this case. This should not be. Petitioner feels as though as African American pro se litigant, she is being shut out of fair participation and access to the courts and the legal system. This will be elaborated on in the petition.

C. Further Examples of Issues To Be Presented To This Honorable Court

24. The petitioner will present to this Honorable Court further constitutional issues involving due process, equal protection, and federal questions.

i. Right to An Impartial Judge:

25. The petitioner contends that the constitutional principle of the right to an impartial judge and fair trial was violated in this case. Article 35 of the NH Constitution's Bill of Rights declares: *"that there be an impartial interpretation of the laws, and administration of justice. It is the light of every citizen to be tried by judges as impartial as the lot of humanity will admit."* This principle is also codified within the Due Process clause of the 14th amendment. There are justices of the NHSC who refuse to address serious conflicts of interest. This bias impaired Petitioner's right to a fair and impartial tribunal. Out of the five justices on the NHSC, two have been recused for conflict or bias. Other justices have conflicts and bias as well, but refuse to recuse themselves. They have refused to address

concerns raised in more than one motion to recuse. The petitioner cannot obtain a fair and impartial trial without a fair and impartial judge to make the proper fact or legal determinations. Proof of the above will be provided in the petition. Judicial recusal is a crucial mechanism for safeguarding both the reality and perception of judicial integrity. This implicates the due process clause of the Constitution and contradicts precedents set by this court. This will be elaborated on in the petition.

ii. Right to A Fair Process/Trial:

26. The petitioner also believes that due process was violated and that the NHSC's decision has resulted in the unjust deprivation of property/property rights without due process of law. The petitioner also believes this case implicates the equal protection provisions of the Fourteenth Amendment to the U.S. Constitution. This will be elaborated upon in the petition.

iii. Arbitrary & Capricious Application of the Rules/Law:

27. The petitioner also believes that due process was violated because the NHSC did not follow its own rules. The petitioner believes that the NHSC decision is also self-contradictory and arbitrary. This will be elaborated upon in the petition.

iv. Violations of the ADA:

28. In a particularly egregious example of violations of the petitioner's right, the petitioner here states that the NHSC has violated several key aspects of the ADA, in the course of the litigation prior to, leading up to and including in the rendering of judgment.

29. The NHSC has engaged in discriminatory practices, including:

- a. Refusing to grant reasonable accommodations;
- b. Delaying and avoiding ruling on ADA requests;
- c. Failing to provide an opportunity to submit medical documentation;
- d. Threatening to expose private medical information;

- e. Retaliating for raising ADA concerns;
- f. Engaging in unwarranted stereotyping and bias against Petitioner;
- g. Failing to follow its own ADA policy and the requirements of the ADA law.

30. The NHSC has engaged in a pattern of conduct that demonstrates bias and animus against Petitioner, including denying nearly every motion or request filed by Petitioner while granting similar requests by other parties, and imposing onerous procedural requirements on Petitioner not applied to other litigants, among other things.

31. The NHSC failed or refused to provide reasonable accommodations to Petitioner in violation of the ADA, which thus constitutes disability discrimination. The NHSC's actions constitute discrimination in violation of Title II of the ADA, 42 U.S.C. § 12132, and its implementing regulations at 28 C.F.R. pt. 35. The NHSC has violated and continues to violate the ADA and, accordingly, has injured the petitioner by (a) administering and delivering its services in a manner that denied petitioner the proper opportunity to participate in the benefits of state services as a result of medical disabilities, and (b) failing to reasonably modify its administration and delivery of these services in a manner that would avoid discrimination against the petitioner and of such individuals with said medical disabilities.

32. These violations will be further explained in the petition.

33. It should be noted that the NHSC is engaging in a pattern of such conduct against other African American pro se petitioners seeking disability accommodation from the NHSC. This makes this a high priority for this Honorable Court to resolve, similar to the 1960s civil rights situation where state courts were not enforcing federal law that were intended to protect citizens federally protected civil rights.

v. Other Violations of Law:

34. Note: There are a number of other violations and irregularities that will be elaborated upon in the petition but with which the petitioner needs the assistance/advice of a lawyer to properly or effectively articulate.

V. CONCLUSION

35. For the foregoing reasons, Petitioner respectfully requests that the time to file a petition for writ of certiorari in this case be extended for 60 days, and that an order be entered extending the time to file a petition for a writ of certiorari in this case to and including Monday, June 30, 2025.

Respectfully submitted,

/s/ Natalie Anderson

NATALIE ANDERSON

101 Middlesex Turnpike, # 270

Burlington, MA 01803

Tel: 617-710-7093

Email: liberty_6@msn.com