

No. 25-1184

IN THE
SUPREME COURT OF THE UNITED STATES

ANGELA W. DEBOSE,
Petitioner,

v.

FLORIDA POLYTECHNIC UNIVERSITY BOARD
OF TRUSTEES,
Respondent.

On Petition for a Writ of Certiorari to the
Supreme Court of Florida

SUPPLEMENTAL BRIEF FOR PETITIONER

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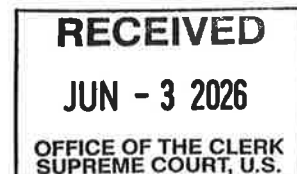


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TABLE OF AUTHORITIES

Cases:	Booklet Page(s)
<i>Angela W. DeBose, et al. v. United States of America, et al.</i> , No. 25-10872 (11th Cir. May 20, 2026)	1, 2
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Supreme Court Rule 33.1(g)(iv)	i, 4

SUPPLEMENTAL BRIEF FOR PETITIONER

Pursuant to Supreme Court Rule 15.8, Petitioner Angela W. DeBose respectfully submits this Supplemental Brief to bring to the attention of this Court a binding, dispositive legal development that occurred *after* the primary briefing in this matter was distributed for the Court's June 4, 2026 Conference.

INTERVENING MATTER OF GRAVE SUBSTANTIALITY

On May 20, 2026, the United States Court of Appeals for the Eleventh Circuit issued a binding *per curiam* opinion and final mandate in *Angela W. DeBose, et al. v. United States of America, et al.*, Case No. 25-10872 (attached hereto as Exhibit “A”). **(App. 5).**

This intervening federal appellate decision directly adjudicates and resolves the central structural premise upon which the lower state courts relied to delete Petitioner's case records, strike pleadings, and refuse the entry of mandatory double defaults.

ARGUMENT IN SUPPORT OF THE PETITION

The Respondent, Florida Polytechnic University Board of Trustees, successfully secured threshold dismissals and blocked the enforcement of mandatory state-court double defaults by presenting a distorted, overbroad narrative regarding a historical federal pre-filing injunction. The state courts adopted this narrative, treating an employment-bound federal restriction as a blanket, universal civil lockdown.

The Eleventh Circuit's May 20, 2026 order explicitly demolishes this overbroad application as a matter of federal law. The three-judge federal panel made the following explicit, binding determinations:

1. **Hyper-Narrow Tailoring:** The federal pre-filing restrictions entered in Middle District of Florida Case No. 8:21-cv-02127-SDM-AAS apply *solely* and exclusively to future *pro se* filings that directly arise out of past employment disputes at the University of South Florida. (**App. 5**).
2. **Preservation of Core Filing Capacity:** The Eleventh Circuit definitively established that these historical restrictions do not impact, restrict, or paralyze Petitioner's structural capacity to act as a Personal Representative, protect estate beneficiaries, or litigate separate, independent state civil actions. (**App. 5**).
3. **Evisceration of the State Court Defense:** Because the claims against Respondent Florida Polytechnic University Board of Trustees are entirely distinct from any historical USF employment grievances, the federal record confirms that Petitioner has always retained full, uninhibited capacity to litigate this action. (**App. 5**).

The state courts' use of an inapplicable federal order to completely extinguish a litigant's threshold access to state court—without conducting the mandatory evidentiary hearings required by Florida's Vexatious Litigant Statute (§ 68.093, Fla. Stat.)—constitutes a severe departure from the essential requirements of law and an active violation of the Fourteenth Amendment's Due Process Clause.

This intervening federal appellate mandate provides the exact clarification needed to resolve this dispute. It demonstrates that the state courts committed a fatal jurisdictional error by allowing a defaulting counterparty to use a narrow federal agency screening mechanism as a shield against its own un-cleared defaults. **(App. 5-6).**

CONCLUSION

For the reasons stated above and in the primary Petition, the Petition for a Writ of Certiorari in Case No. 25-1184 should be granted.

Respectfully submitted,

/s/ Angela W. DeBose



Angela W. DeBose, Petitioner Pro Se

Dated: May 22, 2026

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that this Supplemental Brief for Petitioner is prepared in a clear, 12-point Century Schoolbook font with 2-point leading, and contains exactly **476** words, excluding the cover elements, tables, and certificates, which is well within the 3,000-word limitation mandated by Rule 33.1(g)(iv).

/s/ Angela W. DeBose *Angela W. DeBose*
Angela W. DeBose, Petitioner Pro Se

PROOF OF SERVICE

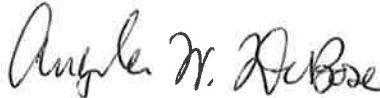
I, Angela W. DeBose, do hereby certify that on this 22nd day of May, 2026, as required by Supreme Court Rule 29, I have served a true and correct copy of the foregoing Supplemental Brief for Petitioner on the Respondent by depositing three copies of the same in the United States Postal Service, with first-class postage prepaid, addressed to Counsel of Record for the Respondent:

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*Counsel for Respondent Florida Polytechnic University
Board of Trustees*

I further certify that an electronic copy of this filing has been transmitted to counsel via email at *drobinson@kttlaw.com*.

/s/ Angela W. DeBose



Angela W. DeBose, Petitioner Pro Se

APPENDIX

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Exhibit “A”: *Angela W. DeBose, Lavonne Washington, and Michael Washington v. United States of America, et al.*, No. 25-10872 (11th Cir. May 20, 2026) (Per Curiam Opinion and Final Mandate)

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NOT FOR PUBLICATION

**In the
United States Court of Appeals
For the Eleventh Circuit**

No. 25-10872
Non-Argument Calendar

ANGELA W. DEBOSE,
Plaintiff,
LAVONNE WASHINGTON,
MICHAEL WASHINGTON,
Intervenor Plaintiffs-Appellants,

versus

UNITED STATES OF AMERICA,
THIRTEENTH JUDICIAL CIRCUIT,
CHIEF JUDGE, THIRTEENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA,
ELIZABETH GADDY RICE,
 individually and/or in her official capacity,
GREGORY P. HOLDER,
 individually and/or in his official capacity, et
 al.,
Defendants-Appellees.

Opinion of the Court

Appeal from the United States District
Court for the Middle District of Florida
D.C. Docket No. 8:21-cv-02127-SDM-
AAS

Before LUCK, LAGOA, and BLACK,
Circuit Judges.

PER CURIAM:

Appellants Michael and LaVonne Washington, proceeding pro se, appeal the district court's denial of their Rule 24(a) motion to intervene as of right. Angela DeBose, the plaintiff in this case, is subject to a filing injunction on her future filings regarding her employment at the University of South Florida without the signature of an attorney barred in Florida or the Middle District of Florida. Appellants assert they have an interest in the underlying litigation because they are beneficiaries to Patricia Washington's estate, and DeBose, the personal representative of Patricia Washington's estate, cannot

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fully protect their interest in the estate because DeBose is subject to this filing injunction. After review,¹ we dismiss this appeal.

A district court must permit intervention as of right under Rule 24(a) if an entity “(1) is given an unconditional right to intervene by federal statute; or (2) claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest, unless existing parties adequately represent that interest.” Fed. R. Civ. P. 24(a). We have distilled four elements that must be met to satisfy the second subsection: (1) the application to intervene must be timely; (2) there is an interest relating to the

¹ We review a district court’s denial of intervention of right under Fed. R. Civ. P. 24(a) de novo, with subsidiary factual findings subject to review for clear error. *See Salvors, Inc. v. Unidentified Wrecked & Abandoned Vessel*, 861 F.3d 1278, 1294 (11th Cir. 2017).

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property or transaction which is the subject of the action; (3) disposition of the action may impede or impair the intervenor's ability to protect that interest; and (4) that interest is represented inadequately by the existing parties to the suit. *Stone v. First Union Corp.*, 371 F.3d 1305, 1308–09 (11th Cir. 2004). The second element is met only if the interest asserted by the intervenor is “direct, substantial, and legally protectable.” *Huff v. Comm’r of IRS*, 743 F.3d 790, 796 (11th Cir. 2014) (quotation marks and alteration omitted). “[T]he intervenor must be at least a real party in interest in the transaction which is the subject of the proceeding.” *Id.* (quotation marks omitted). In deciding whether a party has a protectable interest, however, a court “must be flexible” and “focus on the particular facts and circumstances” of each case. *Id.* (quotation marks omitted).

Appellants fail to show clear error in the district court's finding that they lacked a cognizable interest in the

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property or transaction which was the subject of the action, because they do not show how their interests as estate beneficiaries are affected by DeBose's employment lawsuit even if she is the personal representative of the estate. Any judgment won or liability imposed in the underlying employment suit would only affect DeBose in her individual capacity. Furthermore, the filing injunction imposed by the district court on DeBose only applies to her employment dispute and the defendants involved in it. Accordingly, despite Appellants' contentions to the contrary, DeBose's ability to administer the estate is unaffected by the underlying case. Because the district court did not err in denying intervention as of right under these circumstances, we apply the anomalous

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rule ² and **DISMISS** this appeal for want of jurisdiction.³

² Under our “anomalous rule,” we have appellate jurisdiction to determine whether a denial of intervention as of right is proper under Rule 24(a). *Davis v. Butts*, 290 F.3d 1297, 1299 (11th Cir. 2002). If we determine that the district court’s decision to deny intervention as of right was correct, our “jurisdiction evaporates and we must dismiss the appeal for want of jurisdiction.” *Id.* (quotation marks omitted).

³ Appellants’ motion to supplement the record and take judicial notice is **DENIED**.