

No. 25-3507

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**IN THE**  
**SUPREME COURT OF THE UNITED STATES**

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In Re Sara Murray  
Petitioner(s),

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On Petition for a Writ of Mandamus to the  
United States District Court for the Western District of Washington,  
United States District Court for the Northern District of California,  
the United States Court of Appeals for the Ninth Circuit, et Al.,

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**PETITIONER'S RULE 15.8 SUPPLEMENTAL FILING**

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Sara Murray  
Petitioner Pro Se  
ACP 0111-22 PO Box #1108  
Salem, OR 97308  
[sara.c.murray@gmail.com](mailto:sara.c.murray@gmail.com)  
(206) 910-8991

*Pro Se Petitioner*

**To the Honorable Justices of the Supreme Court of the United States:**

Pursuant to Supreme Court Rule 15.8, Petitioner respectfully submits this supplemental filing to advise the Court of new and material developments occurring in the Ninth Circuit Court of Appeals in connection with the matter presently before this Court.

**1. Procedural posture in Ninth Circuit Case No. 25-1016.**

On July 18, 2025, a Ninth Circuit panel (Silverman, Lee, VanDyke) dismissed Petitioner's constructive denial appeal in No. 25-1016 for lack of jurisdiction. This Court has been presented with the underlying record and Respondents have been served with the pending Petition for Writ of Mandamus in this matter.

**2. Complete obstruction of FRAP 40/41 rehearing rights.**

Following the July 18 order, Petitioner sought to timely file a petition for rehearing en banc. The Ninth Circuit:

- Blocked all paper-mailed filings in No. 25-1016.
- Disabled the electronic "File" function for the 25-1016 docket following dismissal.
- Refused emailed filings to the Ninth Circuit's official pro se filing account, directing Petitioner to "e-file" despite the e-filing function being disabled.

These actions prevented Petitioner from filing any petition for rehearing en banc, thereby foreclosing the right to seek suspension of mandate under FRAP 41(d).

**This obstruction extended beyond Case No. 25-1016.**

Petitioner's ability to seek rehearing was blocked in all related Ninth Circuit appeals identified in the pending SCOTUS petition (Nos. 25-1016, 25-2090, 25-2738, 25-3183, 25-3506). These coordinated actions ensured no avenue for correction existed in any docket tied to the federal defendants' waiver and abandonment of defenses in 25-1016. That waiver, procedurally established and uncontested in the record, remains binding and is now before this Court for review; the issuance of mandate does not and cannot cure it.

**3. Issuance of mandate during active SCOTUS review.**

On August 11, 2025 — after the Ninth Circuit had been served with the current and active Petition for Writ of Mandamus in this case (No. 25-5307) — the Ninth Circuit issued a formal mandate in 25-1016.

- The mandate was issued without acknowledgment of Petitioner's attempted en banc filing.
- The mandate was issued by judges who are named Respondents in this live proceeding.

#### **4. Implications for this Court's review.**

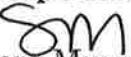
These developments bear directly on the issues presented in the pending Petition, including:

- **Conflict of interest:** Ninth Circuit judges acting *sua sponte* in a case where they are named SCOTUS respondents.
- **Procedural interference:** Active obstruction of Petitioner's ability to perfect the record and pursue mandatory appellate steps.
- **Jurisdictional overreach:** Lower court finalizing its own judgment while under this Court's order to respond (due Sept. 8, 2025).

#### **5. Relief requested.**

Petitioner respectfully requests that this Court take notice of the above developments as further evidence of the extraordinary circumstances and structural bias warranting this Court's exercise of its supervisory and mandamus authority.

Respectfully submitted,

  
Sara Murray

**Pro Se Petitioner**  
State of Oregon

**Dated: August 11, 2025**  
ACP 0111-22 PO Box #1108  
Salem, OR 97308  
(206) 910-8991  
[sara.c.murray@gmail.com](mailto:sara.c.murray@gmail.com)

#### **EXHIBIT LIST**

Exhibit A: Ninth Circuit mandate issued August 11, 2025, in Case No. 25-1016.....1a
Exhibit B: Ninth Circuit docket sheet for Case No. 25-1016 (showing attempted en banc rehearing filing missing and mandate issued).....2a
Exhibit C: Email from Ninth Circuit rejecting Petitioner's paper-filed en banc petition and directing to e-file despite e-file access being disabled.....4a

## APPENDIX

**FILED**

UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT

AUG 11 2025

MOLLY C. DWYER, CLERK  
U.S. COURT OF APPEALS

SARA MURRAY, as guardian on behalf of  
minor G.E.M. minor C.M.M.,

Plaintiff - Appellant,

v.

KING COUNTY SUPERIOR COURT; et  
al.,

Defendants - Appellees.

No. 25-1016

D.C. No.  
2:24-cv-00239-JNW

Western District of Washington,  
Seattle

MANDATE

The judgment of this Court, entered July 18, 2025, takes effect this date.

This constitutes the formal mandate of this Court issued pursuant to  
Rule 41(a) of the Federal Rules of Appellate Procedure.

FOR THE COURT:

MOLLY C. DWYER  
CLERK OF COURT

PACER Fee: Exempt

**ACMS Case Summary**  
**United States Court of Appeals for the Ninth Circuit**

**Court of Appeals Docket #:** 25-1016**Docketed:** 02/18/2025**Nature of Suit:** 3446 Americans w/Disabilities Act-Othr

Murray v. King County Superior Court, et al.

**Appeal From:** Seattle, Western Washington**Fee Status:** IFP**Case Type Information:**

- 1) Civil
- 2) Private
- 3)

**Originating Court Information:**District: Western District of Washington : [2:24-cv-00239-JNW](#)

Trial Judge: Jamal N. Whitehead, District Judge

Date Filed: 12/15/2023

Date Order/Judgment:  
01/17/2025Date Order/Judgment EOD:  
01/17/2025Date NOA Filed:  
02/17/2025Date Rec'd COA:  
02/17/2025

05/21/2025	<a href="#">40</a>	<b>MOTION</b> for Judicial Notice filed by Appellant Sara Murray. [Entered: 05/21/2025 04:46 PM]
05/25/2025	<a href="#">41</a>	<b>DEFECTIVE --- STATUS REPORT</b> filed by Appellant Sara Murray. (Attached to DE 12) [Entered: 05/25/2025 12:47 PM] [Edited: 05/29/2025 11:30 AM]
05/25/2025	<a href="#">42</a>	<b>DEFECTIVE --- STATUS REPORT</b> filed by Appellant Sara Murray. (Attached to DE 43) [Entered: 05/25/2025 12:48 PM] [Edited: 05/29/2025 11:30 AM]
04/21/2025	<a href="#">43</a>	<b>REPLY BRIEF</b> submitted for filing by Appellant Sara Murray.--[COURT ENTERED FILING of to correct DE 31] [Entered: 05/29/2025 11:26 AM]
05/30/2025	<a href="#">44</a>	<b>RESPONSE</b> to Motion for Judicial Notice (DE 40) filed by Appellee David Starks, Appellee Liz Hoffman, Appellee Timothea Hannatty, Appellee Lindsey Androsko, Appellee McKinley Irvin Law Firm. [Entered: 05/30/2025 11:19 AM]
06/02/2025	<a href="#">45</a>	<b>REPLY</b> to Response to Motion for Judicial Notice (DE 44) filed by Appellant Sara Murray. [Entered: 06/02/2025 03:36 PM]
06/09/2025	<a href="#">46</a>	<b>DEFECTIVE</b> - Miscellaneous Pro Se Filings Filed [COURT UPDATE: requests for PACER exemption are not docketed; instead are handled by the Clerk of Court; filing will be forwarded to the Clerk] [Entered: 06/11/2025 03:35 PM] [Edited: 06/12/2025 08:56 AM]
07/18/2025	<a href="#">47</a>	<p><b>ORDER FILED.</b> SILVERMAN, LEE, and VANDYKE, Circuit Judges.</p> <p>This court lacks jurisdiction over this appeal because the February 17, 2025 notice of appeal does not challenge a final or immediately appealable order entered by the district court. See 28 U.S.C. § 1291. This appeal is therefore dismissed. See 9th Cir. R. 3-6(b) (if court determines it lacks jurisdiction, court may dismiss appeal without notice or further proceedings).</p> <p>To the extent the February 17, 2025 notice of appeal challenges the district court's September 11, 2024 order denying injunctive relief, the notice of appeal is untimely. See 28 U.S.C. § 2107(a); United States v. Sadler, 480 F.3d 932, 937 (9th Cir. 2007) (requirement of timely notice of appeal is jurisdictional).</p> <p>To the extent the February 17, 2025 notice of appeal requests mandamus relief, the request is denied. See <i>In re Mersho</i>, 6 F.4th 891, 897 (9th Cir. 2021) ("To determine whether a writ of mandamus should be granted, we weigh the five factors outlined in <i>Bauman v. United States District Court</i>."); <i>Bauman v. U.S. Dist. Court</i>, 557 F.2d 650 (9th Cir. 1977).</p> <p>All pending motions are denied as moot.</p> <p>No further filings will be entertained in this case.</p> <p>DISMISSED in part; DENIED in part. [Entered: 07/18/2025 05:09 PM]</p>
08/08/2025	<a href="#">48</a>	Document received in this closed case after court order stating that no further filings will be entertained. Order and docket sheet sent to filer. [Entered: 08/08/2025 01:10 PM]
08/11/2025	<a href="#">49</a>	<b>MANDATE ISSUED</b> Barry G. SILVERMAN, Kenneth K. LEE, Lawrence VANDYKE [Entered: 08/11/2025 09:50 AM]

3a



Sara Murray &lt;sara.c.murray@gmail.com&gt;

## Murray v. King County Superior Court, et al. 25-1016 - 048 - No Further Filings Document

1 message

ACMS@ca9.fedcourts.us <ACMS@ca9.fedcourts.us>  
To: sara.c.murray@gmail.com

Fri, Aug 8, 2025 at 1:11 PM

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

### United States Court of Appeals for the Ninth Circuit

#### Notice of Docket Activity

The following transaction was entered on 08/08/2025 1:09:04 PM PDT and filed on 08/08/2025

**Case Name:** Murray v. King County Superior Court, et al.

**Case Number:** 25-1016

#### Docket Text:

Document received in this closed case after court order stating that no further filings will be entertained. Order and docket sheet sent to filer. [Entered: 08/08/2025 01:10 PM]

**Document:** Document

#### Notice will be electronically mailed to:

Sara Murray ; sara.c.murray@gmail.com  
Jeremy F. Wood ; jwood@fisherphillips.com, tweisser@fisherphillips.com  
Suzanne Kelly Michael Esquire; smichael@fisherphillips.com, tweisser@fisherphillips.com  
Mr. Andrew H. Gustafson ; AGustafson@williamskastner.com

#### Case participants listed below will not receive this electronic notice:



Sara Murray &lt;sara.c.murray@gmail.com&gt;

**RE: 25-2090: Document submitted via US Mail**

1 message

**Questions CA09Operation** <questions@ca9.uscourts.gov>  
To: Sara Murray <sara.c.murray@gmail.com>

Wed, Aug 6, 2025 at 4:38 PM

Per your response, you will remain an electronic filer. To file a document, please log-in here.

Thank you, and have a great day.

**From:** Sara Murray <sara.c.murray@gmail.com>  
**Sent:** Wednesday, August 6, 2025 4:05 PM  
**To:** Questions CA09Operation <questions@ca9.uscourts.gov>  
**Subject:** Re: 25-2090: Document submitted via US Mail

**CAUTION - EXTERNAL:**

See the email just sent. I am not agreeing to become a paper filer in response to obstructive conduct by this Court. I maintain my position: I require filing access to this Court that functions. This Court may correct its conduct and appoint me counsel as an ADA accommodation and resolve this issue through that counsel.

Sara Murray

On Wed, Aug 6, 2025 at 4:03 PM Questions CA09Operation <questions@ca9.uscourts.gov> wrote:

What do you mean that there is no visible option to submit the documents electronically?

If you are unable to file electronically, please send the error message that you are receiving so the court can troubleshoot.

Pro se litigants must either (1) file electronically using the case management system or (2) be a paper filer. You are registered as an electronic filer (1) so you must file using the case management system so we must troubleshoot whatever issues are you are having. The other option is ~~for~~ you to deactivate your efilings account and you will be a paper filer.

Thank you.

**From:** Sara Murray <sara.c.murray@gmail.com>  
**Sent:** Wednesday, August 6, 2025 3:30 PM  
**To:** Questions CA09Operation <questions@ca9.uscourts.gov>  
**Subject:** Re: 25-2090: Document submitted via US Mail

**CAUTION - EXTERNAL:**

**Subject:** ADA Access Obstruction – Denial of Filing Access in Appeals 25-1016, 25-2090, 25-3506, 25-2378, 25-3183

**To:**  
Stephanie – Operations Supervisor  
Molly C. Dwyer – Clerk of Court  
ADA Coordinator – U.S. Court of Appeals for the Ninth Circuit  
**Email:** ADA@ca9.uscourts.gov

**Sara Murray**  
ACP 0111-22  
PO Box 1108  
Salem, OR 97308  
sara.c.murray@gmail.com  
(206) 910-8991  
August 6, 2025

Dear Ninth Circuit Court Officials,

This is a formal notification of an **ADA and constitutional access obstruction** concerning my pro se appellate filings in Ninth Circuit cases **25-1016, 25-2090, 25-3506, 25-2378, and 25-3183**.

On **August 6, 2025**, I received an email from your office rejecting my **timely mailed Petitions for Rehearing En Banc**. The email stated that I must file electronically due to ECF registration. However, this position misrepresents the functional access I have to this Court.

Although I am listed as registered for electronic filing, I have been **effectively barred** from filing:

1. Each relevant docket has been **administratively closed** to me for purposes of filing post-dismissal petitions.
2. There is **no visible option in the Case Management system** for me to submit the documents electronically.
3. I have **no ADA accommodation** in place to assist with navigating the procedural contradictions now created by the Court.
4. I am under the protection of the **U.S. Department of Justice Address Confidentiality Program (ACP)** and proceeding **in forma pauperis**, without regular access to the technical infrastructure ECF requires.

As a result, I am **fully denied access to both paper and electronic filing**, and no alternative route has been made available or explained. This creates an unconstitutional and discriminatory bar to appellate access, in direct violation of:

- **Title II of the ADA**, 42 U.S.C. § 12132;
- **Section 504 of the Rehabilitation Act**, 29 U.S.C. § 794;
- **28 C.F.R. § 35.130(b)(7) and (d)** (obligation to modify procedures to ensure access);
- **The First and Fifth Amendments** to the U.S. Constitution;
- **Tennessee v. Lane**, 541 U.S. 509 (2004).

This email serves as a formal **ADA complaint and urgent access request**. I respectfully request the following:

1. That my Petitions for Rehearing En Banc in all four cases be **accepted nunc pro tunc** as of the postmarked mailing date;
2. That the Court **confirm in writing** that it will accept **paper filings**, unless and until a valid, accessible electronic option is actually made available to me;
3. That the Court **provide ADA procedural accommodation** and designate an **access path** (paper or electronic) that I can reasonably use, given my disability, DOJ ACP status, and IFP standing.

This matter is urgent and prejudicial, as the issues involved are concurrently under review by the Supreme Court of the United States in *Murray v. U.S. District Court for the Western District of Washington*, where the Ninth Circuit is a named Respondent.

Please respond by **August 8, 2025** to avoid further due process harm and to mitigate continued ADA violations.

Sincerely,  
**Sara Murray**  
Pro Se Litigant  
DOJ ACP Protected / IFP  
ADA-Qualifying Disability

On Wed, Aug 6, 2025 at 2:33 PM Questions CA09Operation <questions@ca9.uscourts.gov> wrote:

The US Court of Appeals for the Ninth Circuit is in receipt of the attached documents, sent to the court via US Mail. However, you are registered for electronic case filing with the Ninth Circuit. As such, you must file all documents via efilings. The court will not file the attached documents. Please log into the court's case management system here and file the any relevant documents.

For more information on how pro se litigants can file in the Ninth Circuit, please review the website here:  
<https://www.ca9.uscourts.gov/forms/pro-se-litigants/>

Best,  
Stephanie  
Operations Supervisor

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

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