ORIGINAL

No. 25-7087

IN THE

SUPREME COURT OF THE UNITED STATES

Norman Lee Scott, Sr., Pro Se PETITIONER
(Your Name)

vs.

Trina Ragsdale — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Supreme Court of New Jersey
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Norman Lee Scott Sr., Pro Se
(Your Name)

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(City, State, Zip Code)

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QUESTION PRESENTED

Whether a state court violates the Fourteenth Amendment's Due Process Clause, as interpreted in Logan v. Zimmerman Brush Co., 455 U.S. 422 (1982), by applying an anti-retroactivity statute to extinguish relief sought in timely filed child support modification motions, where denial of relief resulted from administrative delay in a separate federal disability proceeding not attributable to the litigant.

LIST OF PARTIES

[✓] All parties appear in the caption of the case on the cover page.

[ ] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

TABLE OF CONTENTS

INDEX TO APPENDICES

TABLE OF AUTHORITIES CITED

CASES **PAGE NUMBER**

UNITED STATES SUPREME COURT

NEW JERSEY SUPREME COURT / APPELLATE DIVISION

STAUTES AND RULES

SUPREME COURT RULES
Supreme Court Rule 10
Supreme Court Rule 13
Supreme Court Rule 14

FEDERAL STATUTES

28 U.S.C. § 1257(a)
28 U.S.C. § 1331
42 U.S.C. § 1983

NEW JERSEY STATUTES

N.J.S.A. 2A:17-56.23a
N.J.S.A. 2A:17-56.67
N.J.S.A. 2A:34-23

CONSTITUTIONAL PROVISION

U.S. Const. amend. XIV

IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

[ ] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

[✓] For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[X] is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

JURISDICTION

[ ] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

[ ] No petition for rehearing was timely filed in my case.

[ ] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. __A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

[✓] For cases from **state courts**:

The date on which the highest state court decided my case was 30th DAY OF SEPTEMBER 2025
A copy of that decision appears at Appendix B.

[✓] A timely petition for rehearing was thereafter denied on the following date: 27th DAY OF January, 2026, and a copy of the order denying rehearing appears at Appendix C.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. __A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

JURISDICTIONAL STATEMENT

The Supreme Court of New Jersey denied petitioner's Petition for Certification on 30th DAY OF September, 2025. Reconsideration was denied thereafter. This Court has jurisdiction under 28 U.S.C. § 1257(a).

CONSTITUTIONAL PROVISION INVOLVED

The Fourteenth Amendment to the United States Constitution provides in relevant part:

"No State shall ... deprive any person of life, liberty, or property, without due process of law."

STATEMENT OF THE CASE

Petitioner became medically disabled in 2020 and ceased employment upon medical direction. Beginning in 2021, petitioner filed motions in New Jersey Superior Court seeking modification of child support based on inability to earn income. In support, petitioner submitted over eighteen pages of medical documentation, including physician certifications and disability records later accepted by the Social Security Administration.

At the time of the initial motions, petitioner's federal disability application remained pending. The trial court denied relief, reasoning that Social Security disability benefits had not yet been awarded.

On May 25, 2021, the Social Security Administration ultimately determined petitioner totally disabled retroactive to that date.

Upon subsequent motion, the trial court modified support but declined to apply retroactivity to the earlier filed motions, citing N.J.S.A. 2A:17-56.23a and concluding broader retroactive relief would not be "equitable or appropriate."

As a result, petitioner was held responsible for approximately $29,000 in arrears, rather than approximately $15,000 having modification related back to the earlier pending motions.

The Appellate Division affirmed, concluding, the record did not establish proof of disability sufficient to warrant earlier modification. The Supreme Court of New Jersey denied certification.

REASONS FOR GRANTING THE WRIT

I. The Decision Below Conflicts with Logan v. Zimmerman Brush Co.

In Logan, this Court held that a State may not extinguish a claimant's cause of action because of procedural delay not attributable to the claimant.

Here, petitioner timely filed modification motions supported by medical evidence. Relief was denied pending completion of a federal disability adjudication process over which petitioner had no control.

When disability was later formally determined, the state court refused to relate modification back to earlier filings, holding those motions were no longer "pending" under the anti-retroactivity statute.

The practical effect was forfeiture of retroactive relief due solely to administrative delay.

Under Logan, procedural mechanisms may not operate as traps that nullify substantive rights when the litigant timely invoked judicial process.

The decision below permits precisely that result.

II. Structural Timing Trap Created by Interaction of State and Federal Processes

Social Security disability adjudications frequently require years to complete.

State anti-retroactivity statutes often prohibit modification prior to the filing of a "pending motion."

Where courts deny interim relief while disability proceedings remain unresolved and later refuse retroactive relation-back once disability is established, disabled obligors are structurally barred from meaningful relief.

This recurring interaction between:

- prolonged federal disability adjudication,
- strict anti-retroactivity statutes, and
- dismissal of earlier motions

creates systemic forfeiture risk.

The question presented affects disabled parents nationwide.

III. The Property Interest at Stake Is Significant

Child support arrears result in wage garnishment, credit impairment, license suspension, and enforcement mechanisms.

The difference here—approximately $15,000—is not trivial.

Procedural due process safeguards are especially critical where statutory frameworks interact to create unavoidable financial deprivation.

VEHICLE STATEMENT

This case cleanly presents the federal constitutional question. The issue was raised below as a due process violation and addressed by the appellate court. There are no jurisdictional defects. The record is complete.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Norman L. Scott Jr., Pro Se

Date: 2/26/2026