

No. 25-7680

IN THE SUPREME COURT OF THE UNITED STATES

MICHAEL WASHINGTON AND LAVONNE WASHINGTON, Petitioners,

v.

UNITED STATES, ET AL., Respondents.

PETITIONERS' SUPPLEMENTAL BRIEF UNDER RULE 15.8

Michael Washington, Petitioner Pro Se
6210 East 113th Avenue
Temple Terrace, FL 33617
(813) 751-6464

LaVonne Washington, Petitioner Pro Se
5205 79th Street
Tampa, FL 33619
(813) 765-6257

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Pursuant to Supreme Court Rule 15.8, Petitioners submit this Supplemental Brief to bring to the Court's attention a critical, intervening procedural development that occurred on July 14, 2026, which demonstrates a coordinated effort by the lower courts to bypass appellate review, override active motions, and enforce a legally defective injunction.

1. Intervening Matter and Clerical Error Below

On July 14, 2026, the Clerk of the U.S. Court of Appeals for the Eleventh Circuit abruptly issued its Mandate in the companion case, Appeal No. 25-12299. This clerical release occurred despite the fact that Petitioners had a fully compliant, active **Appellants' Corrected Emergency Motion to Stay the Mandate and to Not Tax Costs** pending on the circuit docket since May 28, 2026. The automatic issuance of the mandate completely bypassed this unadjudicated emergency request, resulting in a severe administrative failure.

2. Undecided Structural and Consolidation Motions

In addition to ignoring the pending Motion to Stay the Mandate, the lower court pushed forward its closure while multiple substantive motions remained unaddressed. These include an Emergency Motion to Consolidate 25-12299 with Case No. 25-10872 (which is currently pending docketing before this Court). Those pending filings expose systemic manipulation of case histories, including the deployment of a specific system user ("GPH user") to artificially inflate local case metrics across separate case files.

3. Irreparable Harm and Deepening Intra-Circuit Conflict

The lower court's rushed administrative closure exposes an absurd and conflicting procedural landscape. In the parallel matter (No. 25-10872), a separate panel of the Eleventh Circuit (Luck, Lagoa, and Black, JJ.) explicitly detailed the operation of the circuit's "Anomalous Rule," confirming provisional appellate jurisdiction over the denial of intervention rights.

By automatically issuing the mandate in 25-12299 under an absolute "lack of jurisdiction" theory while the parallel "Anomalous Rule" evaluation remains live, the lower courts have engineered an irreconcilable intra-circuit conflict on the doorstep of this Court. They have fundamentally misapplied *Marino v. Ortiz*, 484 U.S. 301 (1988), utilizing a narrow standing rule to enforce a restrictive filing injunction against nonparties while locking the appellate door to their intervention.

4. Necessity of Supreme Court Intervention

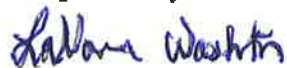
Under *Griggs v. Provident Consumer Discount Co.*, 459 U.S. 56 (1982), once a higher court's jurisdiction is properly invoked, lower administrative or clerical maneuvers cannot disrupt the higher court's ultimate power to remedy a constitutional defect. If the lower courts are permitted to execute these unadjudicated mandates while this Court weighs certiorari, it creates an irreversible, confusing result. It allows a clerical oversight below to insulate a structural due process violation from meaningful federal review.

CONCLUSION

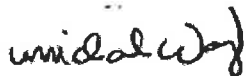
The hasty, unauthorized issuance of the mandate below underscores the urgent need for this Court to grant the Petition for Writ of Certiorari or, at minimum, issue a temporary stay on the application of the Middle District of Florida's injunction to nonparties.

Dated: July 14, 2026

Respectfully submitted,



LaVonne Washington, Petitioner Pro Se
5205 79th Street
Tampa, FL 33619
(813) 765-6257



Michael Washington, Petitioner Pro Se
6210 East 113th Avenue
Temple Terrace, FL 33617
(813) 751-6464