

No. \_\_\_\_\_

In the Supreme Court of the United States

**JEAN DOMINIQUE MORANCY,**

Petitioner,

v.

**SABRINA ALEX SALOMON,**

Respondent.

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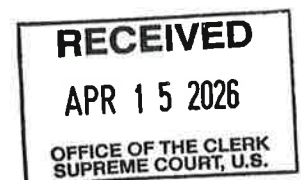
**MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT  
OF CERTIORARI (REFILED TO ATTACH LOWER COURT'S ORDER) -  
UNCONTESTED**

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Petitioner, **Jean Dominique Morancy**, respectfully moves for a 60-day extension of time under Supreme Court Rule 13.5 to file a petition for a writ of certiorari seeking review of the judgment of the District Court of Appeal of Florida, Sixth District, in *Morancy v. Salomon*, Case No. 6D23-3456 ([Exhibit A](#)).

The initial motion ([Exhibit B](#)) was initially mailed on **March 21, 2026**, and, according to a conversation with the Clerk's Office on **April 8, 2026**, was received by the Court on **April 6, 2026**. The Clerk advised that she was unable to locate the lower court's order despite multiple attempts, and therefore the motion could not be docketed. She instructed that the lower court's order must be attached for the filing to be processed.

Separately, Petitioner mailed a renewed motion for extension of time on **April 3, 2026**, because no update had been received regarding the March 21 filing. That renewed motion



suffers from the same defect, as it also did not include the lower court's order. Accordingly, this **second renewed motion** is submitted to correct the deficiency identified by the Clerk.

Opposing counsel stated via email on **March 21, 2026**, that he does not intend to oppose Petitioner's request for an extension.

**1. Date of the Order Below and Current Deadline**

On **January 13, 2026**, the Sixth District Court of Appeal entered an order denying Petitioner's motion for rehearing and clarification and striking the motion for rehearing en banc ([Exhibit C](#)). The order stated:

"Appellant's motion for rehearing and motion for clarification is denied.  
Appellant's motion for rehearing en banc is stricken."

Under Supreme Court Rule 13.3, the deadline to file the petition for writ of certiorari is April 13, 2026. Petitioner seeks a 60-day extension, to June 12, 2026.

**2. Good Cause Exists for the Requested Extension**

Good cause exists because a related appeal is currently pending before the Florida Fourth District Court of Appeal in *Morancy v. Department of Revenue, Circuit 17, Broward Unit DOR*. That case directly concerns the validity and enforcement of the same underlying final order that the Sixth District affirmed via per curiam affirmance.

**A. The Related Case Involves a Jurisdictionally Defective Final Order**

The Florida Department of Revenue certified arrears to the federal government based on a final order that was entered **while interlocutory appeals were pending**, rendering the order jurisdictionally invalid.

The trial court later **re-entered the final order nunc pro tunc to August 14, 2023** in an attempt to correct the jurisdictional defect.

Under *Roman Catholic Archdiocese of San Juan v. Acevedo Feliciano*, 140 S. Ct. 696 (2020), a court **may not use a nunc pro tunc order to retroactively create jurisdiction or validate actions taken without jurisdiction.**

**B. The Fourth DCA’s Decision May Eliminate or Narrow the Issues for Certiorari**

The Fourth District Court of Appeal is reviewing:

- whether the arrears certification was lawful,
- whether the nunc pro tunc re-entry was permissible, and
- whether the underlying judgment remains enforceable.

The Florida Fourth DCA recently issued an opinion on March 25, 2026 ( [https://flcourts-media.flcourts.gov/content/download/2486568/opinion/Opinion\\_2025-0239.pdf](https://flcourts-media.flcourts.gov/content/download/2486568/opinion/Opinion_2025-0239.pdf)).

A motion for clarification was filed on March 31, 2026 seeking clarification regarding the status of the Florida Sixth DCA PCA (the subject of this certiorari proceeding) given that the lower court’s order was entered nunc pro tunc to a period when the court lacked jurisdiction.

A ruling in Petitioner’s favor could:

- reverse or vacate the judgment underlying the PCA,
- materially change the posture of the case, or

- render certiorari unnecessary.

Because the timing of the Fourth DCA's decision is outside Petitioner's control, a **60-day extension** is necessary to ensure that the petition reflects the final posture of the case.

**Note:** Although this second renewed motion may appear to fall within the 10-day window referenced in Rule 13.5, the timing is the direct result of the Clerk's inability to locate the lower court's order and the resulting need to refile the motion with the required attachment.

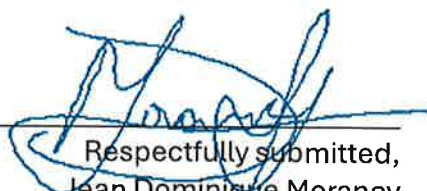
#### **C. The Request Is Made in Good Faith**

Petitioner seeks this extension **not for delay**, but to allow the related appellate proceedings to conclude so that the petition presented to this Court is accurate, complete, and potentially narrower.

- No prejudice will result to Respondent.

#### **D. Length of Extension Requested**

Petitioner respectfully requests a 60-day extension, from April 13, 2026 to June 12, 2026, or any later date the Court deems appropriate.

  
Respectfully submitted,  
Jean Dominique Morancy  
13096 SW 53rd St., Miramar, Florida, 33027  
(786) 523-3179  
[ubmojedo@yahoo.com](mailto:ubmojedo@yahoo.com)

## CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2026, I served a copy of the foregoing Motion for Extension of Time to File Petition for Writ of Certiorari on counsel for Respondent by first-class U.S. mail, postage prepaid, addressed as follows.

**Nicholas A. Shannin, esq**  
Fla Bar No. 0009570  
Shannin Law Firm, P.A.  
214 South Lucerne Circle, Suite 200  
Orlando, Florida 32801  
[nshannin@shanninlaw.com](mailto:nshannin@shanninlaw.com)  
[service@shanninlaw.com](mailto:service@shanninlaw.com)

I further certify that the foregoing document was deposited in the United States mail on the date indicated above.

  
Respectfully submitted,  
Jean Dominique Morancy  
13096 SW 53rd St., Miramar, Florida, 33027  
[ubmojedo@yahoo.com](mailto:ubmojedo@yahoo.com) / (786) 523-3179

**EXHIBIT A**  
**SIXTH DISTRICT COURT OF APPEAL**  
**STATE OF FLORIDA**

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Case No. 6D2023-3456  
Lower Tribunal No. 2019-DR-016766

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JEAN DOMINIQUE MORANCY,

Appellant,

v.

SABRINA ALEX SALOMON,

Appellee.

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Appeal from the Circuit Court for Orange County.  
Elaine A. Barbour, Judge.

December 9, 2025

PER CURIAM.

AFFIRMED.

WOZNIAK, MIZE and GANNAM, JJ., concur.

Jean Dominique Morancy, Miramar, pro se.

Nicholas A. Shannin, of Shannin Law Firm, P.A., Orlando, for Appellee.

NOT FINAL UNTIL TIME EXPIRES TO FILE MOTION FOR REHEARING  
AND DISPOSITION THEREOF IF TIMELY FILED

**EXHIBIT B**

Jean Dominique Morang  
13096 SW 53rd St  
Miramar FL 33027



Clerk of the Supreme Court  
of the United States  
1 First Street, NE  
Washington, DC 20543



# EXHIBIT C

## IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA SIXTH DISTRICT

January 13, 2026

JEAN DOMINIQUE MORANCY,  
APPELLANT(S),

**CASE NO.: 6D2023-3456**  
L.T. NO.: 2019-DR-016766

V.

SABRINA ALEX SALOMON,  
APPELLEE(S).

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### BY ORDER OF THE COURT:

Appellant's motion for rehearing and motion for clarification is denied.  
Appellant's motion for rehearing en banc is stricken.

I hereby certify that the foregoing is a true copy of the original court order.

6D2023-3456 January 13, 2026

  
Stacey Pectol  
Clerk



PANEL: WOZNIAK, MIZE and GANNAM, JJ.

cc:

ANGELA L. LAMBIASE, ESQ.  
JEAN DOMINIQUE DOMINIQUE  
MORANCY

TIFFANY RUSSELL, CLERK  
NICHOLAS A. SHANNIN, ESQ.  
GERALD F. ZNOSKO, ESQ.