

No. 26A_____

In The

Supreme Court of the United States

Shalini Ahmed,

Applicant,

v.

Securities & Exchange Commission,

Respondent.

APPLICATION TO EXTEND TIME TO
FILE PETITION FOR A WRIT OF CERTIORARI

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To the Honorable Justice Sonia Sotomayor, as Circuit Justice for the United States Court of Appeals for the Second Circuit:

Pursuant to Rules 13.5 and 30.3 of this Court, *pro se* Applicant Ms. Shalini Ahmed respectfully requests that the time for her to file a Petition for a Writ of Certiorari be extended sixty days, from May 19, 2026, to and including July 18, 2026. The court of appeals denied Applicant's petition for a writ of mandamus on February 18, 2026, in No. 25-3030 (see Appendix A). This application is timely because it is filed at least ten days before the current due date. See S. Ct. R. 13.5, 30.2. This Court would have jurisdiction pursuant to 28 U.S.C. § 1254(1).

This case presents important and recurring questions concerning the Seventh Amendment, the required sequencing of jury-trial adjudication under *Beacon Theatres*, and the extent to which federal courts may resolve disputed historical facts affecting property rights before adjudicating a timely jury demand. An extension is warranted for the following reasons:

A. The Case Involves Complex and Interrelated Proceedings

This case arises from a decade-long SEC enforcement action and related receivership proceedings in the District of Connecticut. In the course of post-remand proceedings, the district court addressed disputed issues concerning tracing, commingling, ownership, and the "availability" of assets belonging to Relief Defendants to satisfy a judgment against another party. Applicant then sought a writ of mandamus in the Second Circuit to prevent the district court from resolving disputed factual issues before adjudicating a timely Seventh Amendment jury

demand. The mandamus petition expressly argued that the district court had denied the jury demand as “premature” while proceeding to resolve factual matters embedded in the pending Rule 59(e) proceedings.

The legal issues therefore span several intersecting areas, including (1) the Seventh Amendment right to jury trial; (2) the sequencing principle of this Court’s rulings in *Beacon Theatres* and *Dairy Queen*; (3) the distinction between equitable disgorgement and legal money-judgment-type relief where assets are alleged to be commingled; and (4) the treatment of property held by relief defendants and third parties in SEC receivership litigation. The record is extensive and procedurally complex, involving district-court proceedings, remand proceedings, a mandamus petition, motions for stays, and related emergency applications. Additional time is required to prepare a petition that accurately and clearly presents these issues.

B. The Case Presents Questions of Exceptional Importance Concerning the Seventh Amendment

The anticipated petition will present important and recurring questions concerning whether a federal district court may defer ruling on a timely jury demand as “premature,” while simultaneously resolving disputed factual matters that overlap with the issues reserved for a jury. The mandamus petition framed the core issue as whether the district court could make factual findings on commingling, tracing, ownership, and asset availability in connection with the pending Rule 59(e) motion before adjudicating the timely Seventh Amendment jury demand.

These questions are exceptionally important because they concern the structural role of the jury as the initial factfinder and the constitutional limits on judicial factfinding where legal and equitable theories overlap.

C. The Case Raises Important Questions Concerning Relief Defendants and Property Rights

This case also presents an important and recurring question concerning the rights of “relief defendants”—persons not accused of wrongdoing whose assets are nevertheless subjected to federal equitable control. Applicant, her children, and their entities are relief defendants. The mandamus petition argued that the district court’s post-remand approach treated the SEC’s claim as involving a “money judgment” and relied on alleged “commingled” or “mixed” funds rather than strict tracing, thereby implicating legal remedies and a jury-trial right.

The proceedings thus raise significant questions concerning whether property titled to or claimed by relief defendants may be subjected to judicial factfinding and execution without a jury first resolving disputed historical facts concerning ownership, tracing, and commingling.

D. The Case Presents Questions About the Proper Use of Mandamus to Protect the Jury-Trial Right

The anticipated petition will also present an important question concerning when mandamus is available to protect the Seventh Amendment. The Second Circuit denied the mandamus petition, stating that Applicant had not shown a “clear and indisputable” right to the writ or the absence of another adequate remedy. The mandamus petition, however, argued that once the district court made factual

findings on overlapping issues, the jury-trial right would be substantially impaired and could not be meaningfully restored later.

Review of the mandamus denial is warranted because the district court has already resolved disputed factual issues that overlap with legal claims while deferring adjudication of the timely jury demand. Once the district court has acted as the initial factfinder on those issues, the jury's constitutionally assigned role cannot be meaningfully restored on appeal. The denial of mandamus therefore permitted a completed injury to the Seventh Amendment right Applicant sought to protect.

The petition for certiorari will therefore address the relationship between this Court's mandamus precedents and its repeated recognition that the right to jury trial must be protected before judicial factfinding effectively alters the field of decision.

E. Additional Time Is Necessary to Prepare the Petition

Applicant is proceeding *pro se* and all of her assets remain subject to the district court's longstanding asset restraints and receivership orders. Preparing the petition requires careful review of a complex and evolving record spanning many years, including the original enforcement action, post-judgment proceedings, the prior Second Circuit remand, the district court's post-remand rulings, the jury-demand proceedings, the mandamus proceedings, and related stay applications. The mandamus petition itself is substantial and raises multiple doctrinal strands that must be distilled into a concise and effective petition for this Court's review. Additional time is necessary to ensure that the petition is properly prepared and suitable for this Court's review.

F. The Application Is Made in Good Faith

This application is made in good faith and not for purposes of delay. No prior application for an extension of time has been made in this case.

Accordingly, Applicant respectfully requests that an order be entered extending the time for her to file a petition for a writ of certiorari for 60 days, up to and including July 18, 2026.

Dated: April 21, 2026

Respectfully Submitted,

By: /s/ Shalini Ahmed

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Exhibit A

D. Conn.
15-cv-675
Oliver, J.

United States Court of Appeals
FOR THE
SECOND CIRCUIT

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 18th day of February, two thousand twenty-six.

Present:

Amalya L. Kearse,
Eunice C. Lee,
Circuit Judges,
Eric Ross Komitee,
*District Judge.**

In Re: Shalini Ahmed,

Petitioner.

Shalini Ahmed,

Petitioner,

v.

25-3030

United States Securities & Exchange Commission,
Stephen M. Kindseth,

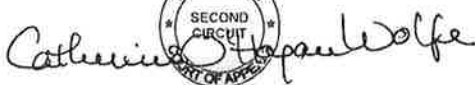

Respondents.

Petitioner, proceeding pro se, petitions for a writ of mandamus, and moves for stays of the district court's consideration of her motion for reconsideration and its order approving the sale of two apartments pending this Court's disposition of the petition.

* Eric Ross Komitee, of the United States District Court for the Eastern District of New York, sitting by designation.

Upon due consideration, it is hereby ORDERED that the mandamus petition is DENIED because Petitioner has not demonstrated that her “right to issuance of the writ is clear and indisputable” or that she has no other adequate remedy available. *Cheney v. U.S. Dist. Ct. for D.C.*, 542 U.S. 367, 380–81 (2004) (internal quotation marks omitted). It is further ORDERED that the motions for a stay are DENIED as moot.

FOR THE COURT:
Catherine O’Hagan Wolfe, Clerk of Court

CERTIFICATE OF SERVICE

I certify that on this 21st day of April, 2026, I served the above document on the following by third party service FedEx.

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/s/ Shalini Ahmed
Shalini Ahmed