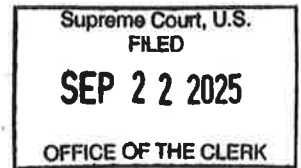


25 A 349

NO. 25-63



IN THE SUPREME COURT OF THE UNITED STATES

Judith Clinton,
Petitioner

v.

Chad Babcock, Lisa Nelson, Regina Foster Bartlett, Caryn Sullivan,
Maria DiMaggio, and
Toastmasters International,
Respondents

On Petition for a Writ of Certiorari to the Supreme Court of Rhode Island

**APPLICATION FOR LEAVE TO FILE AN ENLARGED REPLY BRIEF IN
SUPPORT OF PETITION FOR A WRIT OF CERTIORARI**

Judith Clinton
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APPLICATION FOR LEAVE TO FILE AN ENLARGED REPLY BRIEF IN SUPPORT OF PETITION FOR A WRIT OF CERTIORARI

Petitioner, appearing pro se, respectfully moves pursuant to Supreme Court Rule 33.1(d) for leave to file a Reply Brief in Support of the Petition for a Writ of Certiorari that exceeds the 3,000-word limit by an additional 700 words, for total of 3,700 words.

Grounds for the Application

1. **Respondents' Brief in Opposition ("BIO") exceeds the proper scope** of such a filing. It contains numerous personal attacks and disparaging remarks directed at Petitioner's character. It also devotes substantial space to rearguing the factual record, as though this Court were a forum for fact-based review. Certiorari is not granted to correct factual disputes, but to resolve important questions of federal law. See Sup. Ct. R. 10.
2. **The BIO advances false assertions** that Petitioner failed to raise constitutional violations in the courts below. This is demonstrably untrue. Petitioner repeatedly preserved constitutional objections on the record, including due process and equal protection claims, and pressed those issues on appeal. These appear:
 - ❖ In the trial court (Petition App. 212a–132a),
 - ❖ In appellate briefs (pp.5,8,10,15,16; Supplemental Brief pp. 12–14, 18),
 - ❖ In direct responses to Respondents' motions (App. 34a), and
 - ❖ In the Petition itself (Reasons for Granting Petition X at 19, XI at 20).

That the Rhode Island Supreme Court disregarded them does not erase their preservation. To claim otherwise is disingenuous.

3. Respondents improperly introduce a new question in their BIO, reframing Petitioner’s challenge to procedural anomalies and constitutional violations as a fact-bound dispute over enforcement of a “mutual agreement.” Rule 12.5 makes clear that only a properly filed cross-petition may raise additional or different questions. By embedding a reframed question in their BIO, Respondents sidestep the Rules and prejudice Petitioner, who is limited to a 3,000-word Reply rather than the 9,000 words permitted in opposition to a cross-petition. For clarity, Petitioner includes a side-by-side comparison of the Questions Presented in **Appendix A**, which illustrates how Respondents’ Brief in Opposition reframes the constitutional question into a fact-bound dispute.

4. Additional words are necessary to ensure clarity. The requested enlargement is modest—an additional 700 words—and is narrowly tailored to allow Petitioner to respond fully to the BIO’s improper character attacks, factual mischaracterizations, and jurisdictional misstatements, while keeping the Court’s focus on the constitutional questions properly presented.

WHEREFORE, Petitioner respectfully requests leave to file a Reply Brief in Support of the Petition for a Writ of Certiorari not to exceed 3,700 words.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Judith Clinton", with a long horizontal flourish extending to the right.

Judith Clinton Petitioner, Pro Se
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APPENDIX A

Comparison of Questions Presented

Petitioner's Question Presented in Petition for Writ of Certiorari

Whether a state's highest court violates the Due Process and Equal Protection Clauses of the Fifth and 14th Amendment, demonstrating disparate treatment of Self-represented individuals by affirming the reinstatement of a rescinded dismissal agreement, without notice or hearing, foreclosing trial, a protected constitutional right, based on inapplicable legal theories never raised below, with factual alterations, and complete disregard for arguments by a self-represented litigant.

Respondents' Reformulated Question in Brief in Opposition

Whether the Rhode Island Supreme Court affirming the trial court's decision to enforce a mutual agreement dismissing pro se Petitioner's civil complaint with prejudice violated Petitioner's constitutional rights to petition, civil trial, legal counsel, a neutral and impartial decisionmaker, and further constituted Equal Protection violations based on so-called disparate treatment on the basis of a litigant's representation status, despite none of these constitutional issues being properly raised below, and in the absence of any evidence supporting the underlying allegations.

No. 25-63

**In the
Supreme Court of the United States**

**Judith Clinton
Petitioner,**

v.

**Chad Babcock et al
Respondent.**

ORDER

Upon consideration of Petitioner's Application for Leave to File an Enlarged Reply Brief in Support of Petition for a Writ of Certiorari.

The Application is GRANTED, and Petitioner is permitted to file a Reply Brief in Support of Petition not to exceed 3,700 words.

IT IS SO ORDERED.

Date: _____

By the Court: _____
Clerk of the Supreme Court of the United States

September 22, 2025

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

Sent via Next Day Delivery UPS

Judith Clinton v. Chad Babcock, et al.; S. Ct. No. 25-63

RE: Application for Leave to file an Enlarged Reply Brief in Support of Petition for a Writ of Certiorari

Dear Mr. Harris,

I am the Petitioner in the case referenced above. Enclosed you will find an original plus two copies of Petitioner's Application for Leave to File an Enlarged Reply Brief in Support of the Petition for Writ of Certiorari in the above-captioned case pursuant to Rule 33.1 (d) of the Rules of the Supreme Court of the United States.

Petitioner will be filing a Brief in Support of the Petition for Writ of Certiorari within the time frame allotted prior to distribution of the Petition on November 1, 2025. This Application to Enlarge requests permission to exceed the word limit of 3000 words allowed by the rules for a Reply Brief in Support of the Petition for Writ of Certiorari. To be sure to have ample time to have the Reply printed and delivered to the Court a decision on this Application would be helpful to learn by at the latest October 20, 2025.

Respectfully submitted,



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