IN THE SUPREME COURT OF THE UNITED STATES

Palanikumar Gnanam, et al.,
Petitioner(s)
v.
Nathaniel Chibuzor Keita, et al.,
Respondent(s)

Lower Tribunal Case Number(s): SCOFL Case No: SC2025-0657; 5D2024-2417; 162024CC000687AXXXMA
_____/

MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI

Pro se Petitioners/Appellants/Defendants, Palanikumar V. Gnanam, and Mullairani Gnanam, under the protection of US Supreme Court precedent for Pro Se litigants[1] entitling them to liberal construction, file this motion, titled "MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI".

To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

[1] "The U.S. Supreme Court has established that filings by pro se litigants are to be held to less stringent standards than those prepared by attorneys, in recognition of the unique challenges they face in navigating legal procedures without professional assistance, *Haines v. Kerner*, 404 U.S. 519 (1972). In *Erickson v. Pardus*, 551 U.S. 89 (2007), the Court further emphasized that pro se pleadings are to be liberally construed to provide access to justice. Consistent with these principles, courts have a responsibility to ensure that pro se litigants are not prejudiced by their lack of formal legal training and to allow reasonable leniency in procedural requirements to prevent unjust outcomes due to technical legal errors."

Petitioners, appearing *pro se*, respectfully move under **Rule 13.5** of the Rules of this Court for a 60-day extension of time, to and including **January 16, 2026**, within which to file a Petition for Writ of Certiorari to review the judgment of the Supreme Court of Florida entered **August 18, 2025,** in *Gnanam v. Keita*, SC2025-0657.

1. Date of Judgment

The Supreme Court of Florida entered its final order declining discretionary jurisdiction on **August 18, 2025**.

A copy is attached as *Exhibit A.*

2. Current Due Date

Under Rule 13.1, the petition is due **November 17, 2025**.

2. Requested Extension

Petitioners request a 60-day enlargement, up to **January 16, 2026**.

3. Grounds for Extension

a) Ongoing Post-Judgment Proceedings

Following the August 18, 2025, decision, the Respondent's Concealed Bankruptcy was formally brought to light through the Petitioners' September 8 and 10, 2025, trial-court filings, and the October 17, 2025, hearings are expected to address those matters.

The Duval County Court has now scheduled two hearings on **October 17, 2025,** on multiple pending motions—including motions to vacate judgments and orders as void for violation of the bankruptcy automatic stay, and motions to release garnished funds.

These proceedings concern factual and jurisdictional matters that may affect or clarify the record relevant to the anticipated petition.

b) **Complex Concealed Bankruptcy Record**

Respondent Nathaniel Keita's concealed Chapter 7 bankruptcy (Case No. 3:25-bk-00977-BAJ, M.D. Fla.) closed on **August 7, 2025**.

The record contains overlapping federal and state filings that require careful reconciliation to prepare a coherent appendix and statement of facts.

c) **Pro Se Constraints and Due-Process Issues**

Petitioners proceed without counsel and must compile the full record themselves, including exhibits cited in the *Supplemental Notice Regarding 5DCA Mandate, Plaintiff Bankruptcy Record, Automatic Stay, and Due Process* filed September 18, 2025.

Additional time is needed to analyze the new information from the hearing, format the record, ensure compliance with Supreme Court printing rules, and clearly present federal constitutional questions.

d) **Good-Faith Preparation**

Petitioners have acted diligently and have no intent to delay. The requested extension will facilitate accurate presentation of complex jurisdictional and due-process issues arising from simultaneous state and federal proceedings.

5. Relief Requested

For these reasons, Petitioners respectfully request that the time to file the Petition for Writ of Certiorari be extended by **60 days**, to **January 16, 2026**.

6. Exhibits

a) EXHIBIT A – Florida Supreme Court Order (August 18, 2025)

b) EXHIBIT B – Fifth District Court of Appeal PCA Order (August 12, 2025)

Dated: October 14, 2025

Respectfully submitted,

/s/ *Palanikumar V Gnanam*

Palanikumar V Gnanam,
Pro Se Petitioner/Appellant/Defendant
904-472-1198 (phone)
Email: pk_gnanam@yahoo.com

/s/ *Mullairani Gnanam*

Mullairani Gnanam
Pro Se Petitioner/Appellant/Defendant
10597 Creston Glen Cir East
Jacksonville, FL 32256

CERTIFICATE OF SERVICE

I certify that a copy hereof has been furnished by e-mail and mail to the people mentioned below on October 14, 2025:

KP LAW, PLLC
Kyle Peters, Esquire
KPeters@KPeterslaw.com

/s/ *Palanikumar V Gnanam*

Palanikumar V Gnanam
Pro Se Petitioner/Appellant/Defendant
904-472-1198 (phone)
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/s/ *Mullairani Gnanam*

Mullairani Gnanam
Pro Se Petitioner/Appellant/Defendant
10597 Creston Glen Cir East
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EXHIBIT A

Florida Supreme Court Order Dated August 18, 2025

Supreme Court of Florida

MONDAY, AUGUST 18, 2025

Palanikumar Gnanam, et al.,
Petitioner(s)

v.

Nathaniel Chibuzor Keita, et al.,
Respondent(s)

SC2025-0657
Lower Tribunal No(s).:
5D2024-2417;
162024CC000687AXXXMA

This cause having heretofore been submitted to the Court on jurisdictional briefs and portions of the record deemed necessary to reflect jurisdiction under Article V, Section 3(b), Florida Constitution, and the Court having determined that it should decline to accept jurisdiction, it is ordered that the petition for review is denied.

No motion for rehearing will be entertained by the Court. *See* Fla. R. App. P. 9.330(d)(2).

CANADY, LABARGA, COURIEL, FRANCIS, and SASSO, JJ., concur.

A True Copy
Test:

SC2025-0657 8/18/2025

John A. Tomasino
Clerk, Supreme Court
SC2025-0657 8/18/2025

KS

Served:

5DCA CLERK
DUVAL CLERK
MULLAIRANI GNANAM
PALANIKUMAR GNANAM
HON. SHAYLA EN'RIKA LEE
KYLE PETERS

EXHIBIT B

Fifth District Court of Appeals Orders Dated August 12, 2025

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FIFTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA

Case No. 5D2024-2417
LT Case No. 2024-CC-000687

PALANIKUMAR V. GNANAM and
MULLAIRANI GNANAM,

Appellants,

v.

NATHANIEL CHIBUZOR KEITA and
LANA PAIGE TOMPKINS,

Appellees.

On appeal from the County Court for Duval County.
James A. Ruth, Judge.

Palanikumar V. Gnanam, Jacksonville, pro se.

Mullairani Gnanam, Jacksonville, pro se.

Kyle Peters, of KP Law, PLLC, Jacksonville, for Appellees.

August 12, 2025

PER CURIAM.

AFFIRMED.

MAKAR, SOUD, and KILBANE, JJ., concur.

Not final until disposition of any timely and authorized motion under Fla. R. App. P. 9.330 or 9.331.

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Palanikumar V. Gnanam and
Mullairani Gnanam,

Appellant(s),

v.

Nathaniel Chibuzor Keita and Lana
Paige Tompkins,

Appellee(s).

Case No.: 5D2024-2417
L.T. No.: 2024-CC-000687

Date: August 12, 2025

BY ORDER OF THE COURT:

ORDERED that Appellees' Motion for Award of Attorneys' Fees and Costs, filed January 13, 2025, is granted and the above-styled cause is hereby remanded to the trial court, pursuant to Florida Rule of Appellate Procedure 9.400(b), to determine and assess reasonable attorneys' fees for this appeal.

I hereby certify that the foregoing is
(a true copy of) the original Court order.

5D2024-2417 8/12/2025
SANDRA B. WILLIAMS, CLERK

Panel: Judges Makar, Soud and Kilbane

cc:

Duval Clerk
Mullairani Gnanam
Palanikumar V. Gnanam
Kyle Peters

Petitioners are individuals of limited means who are representing themselves without counsel. They are presently unable to pay the filing fee required by Supreme Court Rule 38(a).

Petitioners respectfully request that the Court waive the docketing fee and booklet-format printing requirements so that they may proceed on 8½ x 11–inch paper under Rule 33.2.

Petitioners file this motion in connection with their **Motion for Extension of Time to File Petition for Writ of Certiorari**, seeking additional time to prepare and file their petition.

Dated: October 14, 2025

Respectfully submitted,

/s/ *Palanikumar V Gnanam*

Palanikumar V Gnanam,
Pro Se Petitioner/Appellant/Defendant
904-472-1198 (phone)
Email: pk_gnanam@yahoo.com

/s/ *Mullairani Gnanam*

Mullairani Gnanam
Pro Se Petitioner/Appellant/Defendant
10597 Creston Glen Cir East
Jacksonville, FL 32256

CERTIFICATE OF SERVICE

I certify that a copy hereof has been furnished by e-mail and mail to the people mentioned below on October 13, 2025:

KP LAW, PLLC
Kyle Peters, Esquire
KPeters@KPeterslaw.com

/s/ *Palanikumar V Gnanam*

Palanikumar V Gnanam
Pro Se Petitioner/Appellant/Defendant
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/s/ *Mullairani Gnanam*

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Additional material from this filing is available in the Clerk's Office.