## IN THE SUPREME COURT OF THE UNITED STATES

Palanikumar Gnanam, et al., Petitioner(s)

Application No. 25A442

v.

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

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

# SECOND 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<sup>1</sup> entitling them to liberal construction, file this MOTION, titled "SECOND MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI".

MOTION FOR EXTENSION OF TIME

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OFFICE OF THE CLERK SUPREME COURT, U.S.

<sup>1 &</sup>quot;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, <u>Haines v. Kerner, 404 U.S. 519 (1972)</u>. In <u>Erickson v. Pardus. 551 U.S. 89 (2007)</u>, 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 again.

## MOTION FOR EXTENSION OF TIME

To the Honorable Clarence Thomas, Associate Justice of the Supreme

Court of the United States and Circuit Justice for the Eleventh Circuit:

Petitioners, appearing process, respectfully, move pursuant to Pulo 12.5 of the Pulo

Petitioners, appearing pro se, respectfully move pursuant to Rule 13.5 of the Rules of this Court for a further extension of time to file their Petition for Writ of Certiorari, up to and including January 16, 2026, to review the judgment of the Supreme Court of Florida entered August 18, 2025, in Gnanam v. Keita, No. SC2025-0657.

#### 1. Prior Extension

- a) On Petitioners' earlier Rule 13.5 application, Justice Clarence Thomas extended the filing deadline from November 17, 2025, to December 16, 2025.
- b) Petitioners now seek a final thirty-day extension to January 16, 2026.

## 2. Basis for Further Extension

Since the first extension was granted, the trial-court record has materially changed due to ongoing post-judgment proceedings involving fraud on the court and concealment of bankruptcy.

The Duval Courty Court (Case No. 16-2024-CC-000687) remains actively engaged in hearings and filings arising from concealment of Plaintiff Nathaniel Keita's Chapter 7 bankruptcy, which was undisclosed during the state proceedings. The issues under active consideration include:

MOTION FOR EXTENSION OF TIME

- i. Motions to vacate the judgment as void for violation of 11 U.S.C. §§
   362(a) and 524(a)
- ii. Motions and judicial-notice filings detailing fraud on the court resulting from false representations and nondisclosure of the bankruptcy during the trial and appeal.
- iii. Requests for judicial disqualification and sanctions directed to counsel's participation in the concealment
- iv. Ongoing rulings and hearings (September-November 2025) confirming that the matter remains procedurally and substantively active in the lower court.

Copies of the latest docket pages containing the title page and pages 21 through 26 are attached as **Exhibit C**. This demonstrates the active nature of the trial Court and the recent proceedings.

### 3. Good Cause and Diligence

- a) The continuing proceedings in the Duval County Court directly impact the federal issues intended for review—specifically:
  - i. Fraud on the court and deprivation of due process
  - ii. Jurisdictional defects caused by the concealed bankruptcy and enforcement during an active stay

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- iii. Conflict between federal bankruptcy protections and state-court enforcement actions
- b) Petitioners are fully pro se. The Supreme Court docket mistakenly listed Mullairani Gnanam as an attorney, but she is not an attorney and has never represented anyone. Petitioners, fully pro se, must prepare the petition on their own, without legal assistance, while also managing the expanding record from the ongoing trial-court proceedings. Additional time is needed for them to complete the petition properly.
- c) A short additional extension will permit Petitioners to include the most current record, which is actively in progress, ensuring that the Petition accurately reflects the full scope of the proceedings and avoids piecemeal or duplicative filings.
- d) This request is made in good faith, not for purposes of delay, and is absolutely necessary in this case.

#### 4. Exhibits

- a) EXHIBIT A Florida Supreme Court Order (August 18, 2025)
- b) EXHIBIT B Fifth District Court of Appeal PCA Order (August 12, 2025)
- c) EXHIBIT C Copies of the latest docket pages containing the title page and pages 21 through 26

#### 5. Relief Requested

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Petitioners respectfully request that the time to file their Petition for Writ of Certiorari be extended thirty (30) days, from December 16, 2025, to and including January 16, 2026.

Dated: November 16, 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 November 16, 2025:

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

OR

Kyle Peters, KP LAW, PLLC 221 N. Hogan Street, #375 Jacksonville, FL 32202

/s/ Palanikumar V Gnanam

Palanikumar V Gnanam Pro Se Petitioner/Appellant/Defendant 904-472-1198 (phone) Email: <u>pk\_gnanam@yahoo.com</u>

/s/ Mullairani Gnanam

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

CERTIFICATE OF SERVICE
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## EXHIBIT A - SCOFL Order

Florida Supreme Court Order Dated August 18, 2025

## Supreme Court of Florida

MONDAY, AUGUST 18, 2025

Palanikumar Gnanam, et al., Petitioner(s)

SC2025-0657

V

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

Nathaniel Chibuzor Keita, et al.,

Respondent(s)

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:

2026-0857.8/18/2025

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

KS

CASE NO.: SC2025-0657 Page Two

Served:

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

## EXHIBIT B - 5DCA Order

Fifth District Court of Appeals Orders Dated August 12, 2025

EXHIBIT B - 5DCA Order
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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, 2026

PER CURIAM

AFFIRMED.

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

EXHIBIT B-5DCA Order
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Not final until disposition of any timely and authorized motion under Fla. R. App. P. 9.330 or 9.331.

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

Palanikumar V. Gnanam and Mullairani Gnanam,

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

Appellant(s),

V

Nathaniel Chibuzor Keita and Lana Paige Tompkins,

Appellee(s).

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.

SANDRA B. WILLIAMS, CLERK



Panel: Judges Makar, Soud and Kilbane

CC:

Duval Clerk Mullairani Gnanam Palanikumar V. Gnanam Kyle Peters

EXHIBIT B - 5DCA Order
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# EXHIBIT C - Title Page and Pages 21-26

#### Case 16-2024-CC-000687-AXXX-MA

Department	County Civil	Division	CC-F
Case Status	CLOSED	File Date	1/9/2024 2:38:05 PM
Judge Name	Lee, Shayla	Officer	
Private Attorney	Peters, Kyle		

	Parties	
Name /-DOB / DL / ID #	Party Type Race / Sex	Address
NATHANIEL CHIBUZOR KEITA	PLAINTIFF /	8104 SUMMERGATE COURT JACKSONVILLE, FL32256
LANA PAIGE TOMPKINS	PLAINTIFF /	8104 SUMMER GATE CT JACKSONVILLE, FL32256
PALANIKUMAR V. GNANAM	DEFENDANT /	10597 E CRESTON GLEN CIR JACKSONVILLE, FL32256
MULLAIRANI GNANAM	DEFENDANT /	10597 E CRESTON GLEN CIR JACKSONVILLE, FL32256

The second of th	Attorneys	
Attorney	Address	For Parties
<u>Peters, Kyle</u> Private Attorney (91941)	221 N Hogan St # 375 Jacksonville, FL32202-4201	NATHANIEL CHIBUZOR KEITA (PLAINTIFF)

	Fees			
Date	Description	Assessed	Paid	Balance
09/05/2024	Copy/Certification Fee - County Civil	\$2.00	\$2.00	\$0.00
08/27/2024	CIR/APPEAL (Circuit to Appellate) 07/01/2019	\$100.00	\$100,00	\$0.00
10/28/2024	APPEAL PREP/Index-Nbr/# of Instr	\$395.50	\$395,50	\$0.00
10/31/2024	CO/GARNISHMENT PROCEED(writ)(G) 7/1/2014	\$85.00	\$85.00	\$0.00
10/28/2024	COPY FEE/CERTIFICATION FEE	\$7.00	\$7.00	\$0.00
01/13/2024	SUMMONS(\$10/ea) 07/01/2023 (County)	\$10.00	\$10.00	\$0.00
01/13/2024	CO/CLAIMS >\$2500 <=\$15,000 1/1/2020	\$300.00	\$300.00	\$0.00
03/19/2024	SUMMONS(\$10/ea) 07/01/2023 (County)	\$10.00	\$10.00	\$0.00
08/06/2024	Copy/Certification Fee - County Civil	\$7.00	\$7.00	\$0.00
03/19/2024	SUMMONS(\$10/ea) 07/01/2023 (County)	\$10.00	\$10.00	\$0.00

		Court Ev	ents	6	
Date	Time	Туре	Location	Courtroom	Cancelled
7/30/2024	1:00 PM	NOTICE OF TRIAL	CHAMBERS	723	- Salvedied
10/17/2025	10:00 AM	ORDER SETTING HEARING	(Video Conference)	Zoom Session	
10/17/2025	11:00 AM	ORDER SETTING HEARING	(Video Conference)	Zoom Session	
12/4/2025	3:00 PM	ORDER TO SHOW CAUSE	(Video Conference)	Zoom Session	-

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Line / Document	Count	Effective Entered	Description	Pages	Image	Certif / Selec
					Ready to view	
175 D178		8/12/2025 8/12/2025	DCA ORDER GRANTING APPELLE'S MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS	1	VOR, Ready to view	
176 D179		8/18/2025 8/18/2025	SUPREME COURT ORDER DENYING PETITION FOR REVIEW- SC2025-0657	2	VOR, Ready to view	
177 D181	-	9/1/2025 9/3/2025	MOTION TO TERMINATE/VACATE FINAL JUDGMENT , ORDERS, MOTIONS AS VOID FOR VIOLATION OF THE AUTOMATIC STAY	10	Available  VOR, Ready to view	
178 D180		9/2/2025 9/2/2025	MOTION TO RELEASE GARNISHED FUNDS POST BANKRUPTCY AND MISREPRESENTATION	36	VOR, Ready to view	
179 D182		9/2/2025 9/4/2025	MOTION (PLAINTIFF'S) TO LIFT STAY AND RENEWED MOTION FOR FIANL JUDGMENT OF GARNISHMENT	7	VOR, Ready to view	
180 D183		9/2/2025 9/4/2025	RESPONSE (PLAINTIFF'S) IN OPPOSITION TO DEFENDANTS' MOTION TO VACATE JUDGMENT, ORDERS, AND MOTIONS AS VOID FOR VIOLATION OF THE AUTOMATIC STAY	4	VOR, Ready to view	
181 D184	-	9/2/2025 9/4/2025	MOTION (PLAINTIFFS') FOR JUDICIAL NOTICE OF SANCTIONS ENTERED AGAINST DEFENDANTS	11	VOR, Ready to view	
182 D185	-	9/2/2025 9/4/2025	MOTION FOR ATTORNEY'S FEES (PLAINTIFFS'/APPELLEES') FOR AWARD OF APPELLEE ATTORNEYS' FEES AND COSTS	3	VOR, Ready to view	
183 D186		9/3/2025 9/5/2025	NOTICE OF SERVICE OF PLAINTIFF'S DECLARATIONS IN SUPPORT OF PLAINTIFFS'/APPELLEES' MOTION FOR AWARD OF APPELLEE ATTORNEY'S FEES AND COSTS	2	Available VOR,	

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184 D187		9/3/2025 9/5/2025		2	VOR, Ready to view	
185 D188	•	9/3/2025 9/5/2025	DECLARATION OF APPELLEES' ATTORNEYS' FEES	12	Available  VOR,  Ready to  view	
186 D189		9/5/2025 9/5/2025	MANDATE AFFIRMED BOOK 21610 PAGE 1525-1527	3	VOR, Ready to view	
187 D190		9/8/2025 9/8/2025	NOTICE OF GARNISHMENT	14	Available  VOR, Ready to view	
188 D191	-	9/8/2025 9/8/2025	MANDATE AFFIRMED BOOK 21610 PAGE 1525-1527 RECORDED DOCUMENT	3	Available  VOR, Ready to view	
189	-	9/8/2025 9/8/2025	MOTION TO SET ASIDE FINAL JUDGMENT (SUPPLEMENT TO AMENDED) AND VACATE)	151	VOR, Ready to view	0
190 193		9/8/2025 9/9/2025	NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING	2	VOR, Ready to view	
.91 194		9/9/2025 9/9/2025	NOTICE OF FILING "OPPOSING COUNSELS EMAILS REGARDING SERVICE ACCEPTANCE FOR NATHANIEL KEITA"	19	Available  VOR, Ready to view	
92 195		9/9/2025 9/9/2025	NOTICE OF FILING "UNITED STATES BANKRUPTCY COURT RECORDS OF PLAINTIFF NATHANIEL CHIBUZOR KEITA"	133	Available  VOR,	

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193 D196	-	9/10/2025 9/10/2025		2	VOR, Ready to view	0
194 <sup>-</sup> D197		9/10/2025 9/10/2025		144	VOR, Ready to view	
195 D198		9/11/2025 9/11/2025		13	Available  VOR, Ready to view	
196 D199		9/12/2025 9/12/2025	OBJECTION (DEFENDANTS) TO PROPOSED ORDER GRANTING PLAINTIFFS MOTION TO LIFT STAY AND RENEWED MOTION FOR FINAL JUDGEMENT OF GARNISHMENT	11	VOR, Ready to view	
197 D200	-	9/15/2025 9/15/2025	RESPONSE (DEFENDANT'S) IN OPPOSITION TO PLAINTIFF'S MOTION FOR AWARD OF APPELLEE ATTORNEYS' FEES AND COSTS	17	VOR, Ready to view	
198 D201	-	9/16/2025 9/16/2025	OBJECTION (DEFENDANTS) TO PLAINTIFFS PROPOSED ORDER ENTERING FINAL JUDGEMENT AWARDING APPELLEES ATTORNEYS FEES AND COSTS	15	VOR, Ready to view	0
199 D202		9/17/2025 9/19/2025	RESPONSE DEFT. PALANIKUMAR V. GNANAM	24	Available  VOR, Ready to view	
200 D203		9/29/2025 9/29/2025	NOTICE OF UNAVAILABILITY / NONAVAILABILITY	3	VOR, Ready to view	
201 D204		9/29/2025 9/30/2025	LETTER TO THE COURT REGARDING RECENT DEVELOPMENTS AND HEARING	9	Available  VOR,	

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202 D205	-	9/30/202 10/2/202		3	VOR, Ready to		
203		9/30/202 10/2/202			1		
204 D207	-	9/30/2029	5 ORDER SETTING HEARING	3	Available  VOR, Ready to view		
205		9/30/2025 10/2/2025	ORDER SETTING HEARING 10/17/2025 11:00 AM - ZOOM SESSION (VIDEO CONFERENCE)				
206 D209	-	10/15/2025		6	Available  VOR, Ready to view		
207 D210		10/15/2025 10/16/2025		5	Available VOR, Ready to view		
208		10/22/2025 10/23/2025	MOTION TO SET ASIDE FINAL JUDGMENT (EMERGENCY) AND ALL SUBSEQUENT ORDERS AS VOID DUE TO FRAUD ON THE COURT, VIOLATION OF AUTOMATIC STAY, PERMANENT INJUNCTION, CONSTITUTIONAL DUE PROCESS VIOLATION, AND JURISDICTIONAL VIOLATIONS	38	VOR, Ready to view		
209		10/23/2025 10/23/2025	NOTICE OF FILING (URGENT) EMERGENCY AMENDED MOTION TO VACATE FINAL JUDGMENTS AND ALL SUBSEQUENT ORDERS AS VOID	5	VOR, Ready to View		
213		10/24/2025 10/24/2025	OBJECTION TO PLAINITFFS' THREE PROPOSED ORDERS	7	VOR, Ready to view		
11		10/24/2025 10/24/2025	MOTION TO STAY ENTRY OF ALL PROPOSED ORDER PENDING RULING ON EMERGENCY AMENDED MOTION TO VACATE FOR FRAUD UPON THE COURT, VOID JUDGMENT, AND FEDERAL VIOLATIONS	5	Available VOR,		

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212 D215		10/27/2025		8	Available  VOR, Ready to view	
213 D216		10/27/2025 10/27/2025		5	Available  VOR, Ready to view	
214 D217		10/30/2025 10/31/2025		11	Request  View on request	
215 D218	-	10/30/2025 10/31/2025	NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING	6	Available  VOR, Ready to view	
216 D220		10/30/2025 11/3/2025	RESPONSE (PLAINTIFF'S) IN OPPOSITION TO DEFENDANT'S MOTIONS FOR JUDICIAL NOTICE (DOC#S 215 AND 216)	3	VOR, Ready to view	
217 D219.		10/31/2025 10/31/2025	REPLY (DEFENDANT'S) TO PLAINTIFF'S RESPONSE IN OPPOSITION TO SUPPLEMENT TO AMENDED MOTION TO SET ASIDE AND VACATE FINAL JUDGMENT (COD # D209)	27	VOR, Ready to view	
218 D221		11/3/2025 11/3/2025	MOTION (DEFENDANT'S) FOR JUDICIAL NOTICE 3 - COUNSEL'S LEGAL DUTY OF CANDOR AND NON- DISCLOSURE OF AUTOMATIC STAY	7	VOR, Ready to view	
219		11/6/2025 11/6/2025	MOTION (DEFENDANT'S) FOR SANCTIONS AGAINST PLAINTIFFS' COUNSEL	17	Available  VOR, Ready to view	
220 0224		1/10/2025 1/12/2025	MOTION FOR CLARIFICATION - DEFT	9	Available VOR,	

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221 D223		11/11/2025 11/12/2025		9	Available  VOR, Ready to view		
222 D225		11/12/2025 11/12/2025	RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS AND TO COMPEL	9	VOR, Ready to view		
223 D226	-	11/12/2025 11/13/2025	NOTICE (PLAINTIFFS') OF ORDER GRANTING MOTION TO COMPEL COMPLIANCE WITH RULES 2.420 AND 2.425 AND ORDER TO SHOW CAUSE AND NOTICE OF HEARING	8	VOR, Ready to view		
224 D227		11/12/2025 11/14/2025	ORDER GRANTING MOTION TO COMPEL COMPLIANCE WITH RULES 2.420 AND 2.425 AND DIRECTING FILING OF NOTICES OF CONFIDENTIAL INFORMATION	3	Request  View on request		
225 D228	1	1/12/2025 1/14/2025	ORDER TO SHOW CAUSE AND NOTICE OF HEARING	3	Request  View on request		
226	_ 1	1/12/2025 1/14/2025	ORDER TO SHOW CAUSE 12/04/2025 3:00 PM - ZOOM SESSION (VIDEO CONFERENCE)				

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