

No. _____

In the
Supreme Court of the United States

Sandra A. Zikry, & Jamel Daniels, parents & natural guardians and o/b/o BABY
N.D.
Petitioner,

V.

Respondent

Florida Birth-Related Neurological Injury Compensation Association, St. Joseph's Women's Hospital, Jill
Hechtman, M.D., Gina Washington, M.D., and Sobiah Mallick, M.D.,

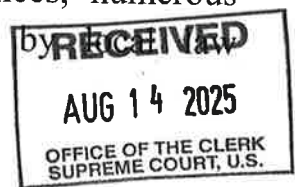
**MOTION FOR EXTENSION OF TIME TO FILE PETITION OF WRIT OF
CERTIORARI**

**FLORIDA FIRST DCA - 1D2023-0997; FLORIDA SUPREME COURT -
SC2025-0562**

**MOTION FOR EXTENSION OF TIME TO SERVE & FILE PETITION OF
WRIT OF CERTIORARI**

Petitioners respectfully request a 30 day extension to serve and file their petition of writ of certiorari and the appendix to be due on September 19th, 2025.

(These parties have had unforeseen difficulties and circumstances, numerous hospital visits, health complications, & is being brutalized by



enforcement agencies as a result of publicly speaking out about this case & related matters. There's now a viral footage of HCSO, Tampa Florida, violating our civil rights for attempting to record law enforcement on private and public property despite being over 25 feet away, has knowledge of these parties legal disputes involving these matters and TPD concealing the sworn affidavits involved in these criminal and civil matters, has knowledge of these parties coordinating a meeting with the state prosecutors office in regards to these matters, and had left serious physical harm as a result. There are pending press conferences in the making, several interviews have been conducted, and ongoing medical care as a result of law enforcement assaulting Sandra Zikry & her husband, who is pregnant with a spinal injury. Judges find no probable cause in this mess.)

On April 22nd, 2025, the Florida Supreme Courts refused to accept jurisdiction on a Notice of Mandatory review due to invalid or unconstitutional statute.

The Florida Supreme Courts made several errors in the proceedings, such as but not limited to, placing the case in the wrong case type. It took 30 days for these parties to speak with the clerk, dispute the errors, and even had to speak with the Staff Attorney about these harmful errors, presenting case law about these errors, in which a corrected order was issued, and the record had to be fixed.

These parties are also dealing with several health issues, hospital visits due to a current pregnancy, while combating injustice before these courts.

Two of the few issues we intend to bring before these courts is whether the ALJ, First DCA of Florida, & the Florida Supreme Courts had proper jurisdiction in the NICA proceedings and secondly, whether it was a civil, constitutional, & federal violation for the court system to intentionally exclude evidence & facts, and rule with fraudulent evidence.

(These parties obtained sworn affidavits that all of the consent forms are forged, the ALJ intentionally excluded this information and testimony that there wasn't consent for procedures, and ruled there was consent & a signature despite sworn

affidavits from two fraud experts, and two physicians who have examined the records and wrote opinions that the basis of the complaint is due to assault

.)

The basis of the child's civil case involves intentional torts for assault, fraud, & battery during his labor and delivery.

The ALJ does not hold jurisdiction in these claims and it should have been dismissed accordingly.

The NICA statute contains a "bad faith" exception which allows the filing of a civil suit in lieu of a NICA petition. Id. § 766.303(2).

Additionally, the Plan does not act as the exclusive remedy in cases "where there is clear and convincing evidence of bad faith or malicious purpose or willful and wanton disregard of human rights, safety, or property." § 766.303(2), Fla. Stat. (R.1366) See Fla. Birth-Related Neurological Injury Comp. Ass'n v. Jimenez

Case study- 08-004917N Monica Cordero And Christian R. Morrill, Sr., On Behalf Of And As Parents And Natural Guardians Of Baby Boy Christian Ross Morrill, Jr., A/K/A Baby Cordero (Deceased) vs. Florida Birth-Related Neurological Injury Compensation Association Summary: ALJ lacks jurisdiction to resolve willful and wanton exception to Plan exclusivity.

Humana of Florida, Inc. v. McKaughan" affirm the order under review because the hearing officer correctly ruled that the allegations of the McKaughans' supplementary petition did not vest him with jurisdiction to determine whether their son suffered a "birth-related neurological injury" as defined by the Plan. see all Prisco v. Fla. Birth-related Neurological, DOAH Case No.: 07-005822N (finding that an oxygen deprivation or mechanical injury that is not "birth-related" is not subject to NICA compensability)

10:32



Supreme Court of Florida

TUESDAY, APRIL 22, 2025

Sandra Zikry and Jamel
Danielson behalf of and as
parents and natural
guardians of N.D., a minor,
Petitioner(s)

v.

Florida Birth-Related
Neurological Injury
Compensation Association, St.
Joseph's Women's Hospital,
Jill Hechtman, M.D., Gina
Washington, M.D., and
Sobiah Mallick, M.D.,
Respondent(s)

CORRECTED ORDER¹

SC2025-0562

Lower Tribunal No(s):

1D2023-0997;

292023CA013187A001HC

Petitioner's "Notice of Mandatory Jurisdiction," seeking review of the order or opinion issued by the 1st District Court of Appeal on January 29, 2025, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. *See Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846

¹ Corrected Petitioner's title of filing from "Petitioner's Notice to Invoke Discretionary Jurisdiction" to Petitioner's "Notice of Mandatory Jurisdiction" on May 20, 2025.

CERTIFICATE OF SERVICE I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been filed through the Florida Court's E-Portal this 6th day of August, 2025, and furnished electronically to: Mindy McLaughlin, Esq., Carissa W. Brumby, Esq., Beytin, McLaughlin, McLaughlin, O'Hara & Bocchino, P.A., 1706 East Eleventh Avenue, Tampa, FL 33605, mmeservice@law-fla.com, lawfla@outlook.com, and Dinah S. Stein, Esq., Hicks, Porter, Ebenfeld & Stein, P.A., 799 Brickell Plaza, 9th Floor, Miami, Florida 33131, dstein@mhickslaw.com, eclerk@mhickslaw.com Counsel for Baycare 3 Health Systems, Inc. d/b/a St. Joseph's Hospital, Inc. d/b/a St. Joseph's Women's Hospital, Pamela Taylor, R.N. and Sandra Valiquette, R.N., Alyssa M. Reiter, Esq., Nichole M. Koford, Esq., Wicker, Smith, O'Hara, McCoy & Ford, P.A., 100 S. Ashley Drive, Suite #1800, Tampa, FL 33602, Jason M. Azzarone, Esquire, Louis J. La Cava, Esq., La Cava Jacobson & Goodies, P.A., 501 E. Kennedy Blvd., Suite 1250, Tampa, FL 33602, llacava@lgllegal.com , jazzarone@ljglegal.com mramirez@ljglegal.com Counsel for Jill L. Hetchman, M.D., Gina Washington, M.D., Sobiah Mallick, M.D., Tampa Obstetrics, P.A. and Exodus Women's Center, Inc. A copy of this motion is being mailed to - Supreme Court of the United States

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