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IN THE SUPREME COURT OF THE UNITED STATES

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TARON JACQUETT,  
Applicant,

v.

ESTEFANIA JACQUETT, et al.,  
Respondents.

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**EMERGENCY APPLICATION FOR STAY PENDING DISPOSITION OF  
PETITION FOR WRIT OF CERTIORARI  
(Supreme Court Rule 23)**

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**TO JUSTICE CLARENCE THOMAS:**

Applicant respectfully applies for an emergency stay of enforcement of state-court orders and proceedings pending disposition of the Petition for Writ of Certiorari.

**I. JUDGMENT SOUGHT TO BE REVIEWED**

This Application seeks a stay of enforcement of:

1. The July 11, 2024, final judgment, including all financial and enforcement provisions;
2. The October 14, 2025, contempt and enforcement orders, including incarceration-related sanctions;
3. The October 27, 2025, order denying Applicant's motion to vacate the October 14, 2025, orders;
4. The December 17, 2025, hearing and resulting orders, conducted and entered while the trial court lacked subject-matter and procedural jurisdiction, including denial of a stay and continuation of enforcement proceedings; and
5. Any further enforcement proceedings, including the February 17, 2026, hearing threatening arrest.

The Sixth District Court of Appeal affirmed without opinion on October 24, 2025.

The Supreme Court of Florida declined jurisdiction on November 17, 2025, expressly prohibiting rehearing. No further state relief is available.

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SUPREME COURT, U.S.

## **II. WHY RELIEF IS NOT AVAILABLE FROM ANY OTHER COURT**

Relief cannot be obtained from any other court because:

- The Florida Supreme Court declined jurisdiction and barred rehearing under Fla. R. App. P. 9.330(d)(2);
- The intermediate appellate court issued an unexplained PCA, foreclosing merits review;
- Trial-court proceedings continue despite lack of jurisdiction and pending federal review;
- The February 17, 2026, hearing threatens arrest and coercive enforcement before this Court can act.
- On December 17, 2025, the trial court conducted a hearing on Petitioner's emergency motion to stay proceedings and cancel the hearing for lack of jurisdiction while appellate and prohibition proceedings were pending. At that hearing, Petitioner again sought a stay to prevent enforcement and arrest. The trial court denied the requested stay the same day, notwithstanding the pending appellate proceedings and jurisdictional objections. As a result, no relief remains available from any lower court, and enforcement—including a February 17, 2026, hearing threatening arrest—continues absent intervention by this Court.

Absent intervention by this Court, Applicant faces irreparable constitutional injury.

## **III. REASONABLE PROBABILITY THAT CERTIORARI WILL BE GRANTED**

The Petition presents recurring and important federal questions concerning:

- Wealth-based denial of appellate review (*Griffin v. Illinois*, 351 U.S. 12 (1956); *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996));
- Structural foreclosure of review through unexplained per curiam affirmances (*Evitts v. Lucey*, 469 U.S. 387 (1985));
- Deprivation of parental rights without due process (*Santosky v. Kramer*, 455 U.S. 745 (1982); *Troxel v. Granville*, 530 U.S. 57 (2000));
- Incarceration and coercive enforcement without notice, counsel, or ability-to-pay findings (*Turner v. Rogers*, 564 U.S. 431 (2011); *Bearden v. Georgia*, 461 U.S. 660 (1983)).

These issues have never been reviewed on the merits by any state court.

#### **IV. FAIR PROSPECT OF SUCCESS ON THE MERITS**

##### **A. Oral Pronouncement Ignored**

On October 23, 2024, the trial court orally ruled that Applicant's Parenting time would be restored upon completion of a mental-health evaluation. Applicant complied on November 6, 2024. The court nevertheless enforced a conflicting written order drafted by opposing counsel, contrary to settled law that oral pronouncements control.

##### **B. Unlawful Incarceration and Enforcement**

Applicant was subjected to civil contempt enforcement without:

- notice incarceration was possible,
- advisement or appointment of counsel,
- findings of present ability to pay,
- or opportunity to impeach fraudulent financial affidavits.

This violates Turner and Bearden.

##### **C. Interference with Impeachment and Fraud-Tainted Enforcement (October 14, 2025)**

At the October 14, 2025, contempt and enforcement hearing, the trial court affirmatively prevented Applicant from impeaching Respondent regarding a materially false financial affidavit that had been used to calculate child support, equalizing payment, and other financial obligations in the July 11, 2024, judgment. Despite actual notice of the affidavit's falsity, the court relied upon it for enforcement purposes, permitted Respondent's counsel—who had repeatedly submitted misrepresented proposed orders—to draft the operative orders, and awarded attorney's fees to Respondent's counsel.

The resulting order improperly shifted the burden of proving constitutionally required findings from the court to Applicant, contrary to *Turner v. Rogers* and *Bearden v. Georgia*. Enforcement predicated on fraud-tainted financial findings and denial of meaningful impeachment presents a substantial likelihood of success on the merits.

##### **D. Jurisdictionally Void Proceedings and Concealment (December 17, 2025)**

On December 17, 2025, the trial court conducted a hearing noticed for indigency, reallocation of guardian ad litem fees, and reinstatement of parenting time, despite the pendency of a writ of prohibition, a motion to disqualify, and the Florida Supreme Court's prior orders granting Applicant indigency. The court therefore lacked subject-matter and procedural jurisdiction to proceed.

Compounding the jurisdictional defect, the written orders drafted by Respondent's counsel and signed by the court materially misrepresented what was noticed and what actually occurred at the hearing, concealing the court's lack of authority and its refusal to reinstate parenting time. Enforcement flowing from such void proceedings further supports a strong likelihood of success on the merits.

### **E. Suppression of Child-Safety Evidence**

The trial court suppressed medical and forensic evidence of child-abuse disclosures and denied a continuance during an active investigation, denying a fundamentally fair proceeding under *Santosky*.

### **V. IRREPARABLE HARM ABSENT A STAY**

Absent a stay, Applicant will continue to suffer immediate and irreparable constitutional injury that cannot be remedied after the fact.

First, Applicant faces an imminent threat of arrest and incarceration through continued enforcement proceedings, including the February 17, 2026, hearing, based on orders entered without jurisdiction and without the procedural safeguards required by *Turner v. Rogers* and *Bearden v. Georgia*. Loss of physical liberty constitutes irreparable harm per se.

Second—and independently sufficient—Applicant, a fit parent, has been denied all parenting time for more than sixteen months, resulting in ongoing and permanent damage to the parent-child relationship. On October 23, 2024, the trial court orally pronounced that Applicant’s parenting time would be reinstated upon completion of a mental-health evaluation. Applicant fully complied and submitted the evaluation under seal on November 6, 2024. Despite this compliance, the trial court has refused to restore parenting time, relying instead on a conflicting written order drafted by opposing counsel. Continued enforcement of that misrepresented order—rather than the controlling oral pronouncement—has deprived Applicant of any contact with his child for over sixteen months.

The loss of parenting time during a child’s formative period is not compensable by later relief. Each additional day of enforced separation inflicts harm that cannot be undone, even if Applicant ultimately prevails on the merits. The Supreme Court has repeatedly recognized that the loss of parental rights and the integrity of the parent-child relationship constitute irreparable injury of the highest order. *Santosky v. Kramer*, 455 U.S. 745, 753 (1982); *Troxel v. Granville*, 530 U.S. 57, 65–66 (2000).

Finally, absent a stay, enforcement of constitutionally infirm financial orders will continue to compound the harm, coercing compliance through the threat of incarceration while appellate and federal review remain unavailable. Together, these injuries—loss of liberty, destruction of the parent-child relationship, and ongoing coercive enforcement—establish irreparable harm warranting immediate intervention by this Court.

### **VI. BALANCE OF EQUITIES AND PUBLIC INTEREST**

A stay preserves the status quo while federal review is pending and prevents irreversible constitutional injury. The public interest favors lawful enforcement consistent with due process and federal supremacy.

**VII. RELIEF REQUESTED**

Applicant respectfully requests that this Court:

1. Stay all enforcement of the July 11, 2024, judgment, including all financial provisions, pending disposition of the Petition for Writ of Certiorari;
2. Stay enforcement of the October 14, 2025, orders and the October 27, 2025, denial of Applicant's motion to vacate, including any sanctions or obligations imposed thereunder;
3. Stay and prohibit any enforcement proceedings arising from or predicated upon proceedings conducted without subject-matter or procedural jurisdiction, including the December 17, 2025, hearing and any orders or enforcement actions flowing from that hearing;
4. Prohibit the February 17, 2026, hearing and any contempt, arrest, or enforcement actions, pending this Court's disposition;
5. Order restoration of parenting time consistent with the trial court's October 23, 2024, oral pronouncement, pending further order of this Court;
6. Restoration of parenting time is necessary to prevent ongoing irreparable harm during the pendency of this Court's review.
7. Grant such other and further relief as justice requires.

Respectfully submitted,



Taron Jacquett  
Applicant, Pro Se  
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Saint Cloud, FL 34771  
Tel: 214-498-2212  
Email: Tjacquett03@gmail.com

IN THE SUPREME COURT OF THE UNITED STATES

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TARON JACQUETT,  
Applicant,

v.

ESTEFANIA JACQUETT, et al.,  
Respondents.

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**APPENDIX INDEX**  
**EMERGENCY APPLICATION FOR STAY PENDING DISPOSITION OF**  
**PETITION FOR WRIT OF CERTIORARI**  
**Supreme Court Rule 23**

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<b><u>Appendix</u></b>	<b><u>Description</u></b>	<b><u>Page Number</u></b>
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Appendix E	Limited Excerpts of October 23, 2024, Hearing Transcript (Oral Pronouncement Conditioning Reinstatement of Parenting Time on Completion of Mental Health Evaluation; included solely to demonstrate irreparable harm and enforcement conflict, not for merits adjudication) Page 10 Line 23-25, page 11 line 6-8	010 – 011

**SIXTH DISTRICT COURT OF APPEAL  
STATE OF FLORIDA**

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Case No. 6D2024-2519  
Lower Tribunal No. 2021-DR-003477

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TARON JACQUETT,

Appellant,

v.

ESTEFANIA JACQUETT,

Appellee.

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Appeal from the Circuit Court for Osceola County,  
Christy C. Collins, Judge.

October 24, 2025

PER CURIAM.

AFFIRMED. *See Applegate v. Barnett Bank of Tallahassee*, 377 So. 2d 1150, 1152 (Fla. 1979) (“In appellate proceedings the decision of a trial court has the presumption of correctness and the burden is on the appellant to demonstrate error. . . . The trial court should have been affirmed because the record brought forward by the appellant is inadequate to demonstrate reversible error.”); *Robinson v. Robinson*, 50 Fla. L. Weekly D1997, D1997 (Fla. 6th DCA Sept. 5, 2025) (stating that where error appears for first time on final judgment’s face, party must alert trial court to

error through motion for rehearing or some other appropriate motion to preserve it for appeal); *Julia v. Ramos-Baez*, 395 So. 3d 1121, 1123 (Fla. 6th DCA 2024) (“Without the transcript of the relevant proceeding, an appellate court cannot conduct ‘an examination of the entire case’ to determine whether the trial court actually failed to make the required findings.” (quoting § 59.041, Fla. Stat.)).

TRAVER, C.J., and MIZE and BROWNLEE, JJ., concur.

Taron Jacquett, Saint Cloud, pro se.

Ronda Denise Westfall, of The Westfall Law Firm, P.A., Orlando, for Appellee.

NOT FINAL UNTIL TIME EXPIRES TO FILE MOTION FOR REHEARING  
AND DISPOSITION THEREOF IF TIMELY FILED

# Supreme Court of Florida

MONDAY, NOVEMBER 17, 2025

Taron Jacquett,  
Petitioner(s)

v.

Estefania Jacquett,  
Respondent(s)

**SC2025-1735**

Lower Tribunal No(s):

6D2024-2519;

492021DR003477DCXXX

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).

Petitioner's Verified Emergency Motion to Stay Mandate and Enforcement of Lower-Court Orders Pending Supreme Court Review filed in the above styled cause is hereby denied.

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

A True Copy  
Test:

 SC2025-1735 11/17/2025

John A. Tomasino

Clerk, Supreme Court

SC2025-1735 11/17/2025



**CASE NO.: SC2025-1735**

Page Two

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Served:

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OSCEOLA CLERK

HON. CHRISTY CHANEL COLLINS

TARON JACQUETT

RONDA WESTFALL

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR OSCEOLA COUNTY, FLORIDA

CASE NUMBER: 2021-DR-3477-DC  
DIV. 40

TARON JACQUETT,

Petitioner,

and

ESTEFANIA JACQUETT,

Respondent,

**ORDER DENYING PETITIONER'S VERIFIED EMERGENCY MOTION TO STAY  
PROCEEDINGS AND CANCEL HEARING FOR LACK OF JURISDICTION (NON-  
CONSENT) PENDING WRIT OF PROHIBITION**

THIS CAUSE came before the Court in Chambers on Petitioner's "VERIFIED EMERGENCY MOTION TO STAY PROCEEDINGS AND CANCEL HEARING FOR LACK OF JURISDICTION (NON-CONSENT) PENDING WRIT OF PROHIBITION" (FILED 12/14/2025) and the Court having reviewed the Motion and the court file, and being otherwise duly advised hereupon it is **ORDERED AND ADJUDGED** as follows:

1. Petitioner's "VERIFIED EMERGENCY MOTION TO STAY PROCEEDINGS AND CANCEL HEARING FOR LACK OF JURISDICTION (NON-CONSENT) PENDING WRIT OF PROHIBITION" is hereby **DENIED**.

**DONE AND ORDERED** in Kissimmee, Osceola County, Florida on this 17 day of DECEMBER, 2025.

*Laura Shaffer*  
LAURA SHAFFER  
Circuit Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy was delivered to the below parties  
VIA EPORTAL on this 17 day of DECEMBER, 2025.

PETITIONER (PRO SE): TARON JACQUETT (VIA EPORTAL)  
RESPONDENT'S ATTORNEY: RONDA WESTFALL, ESQ. (VIA EPORTAL)

*ALR*

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Judicial Assistant

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P R O C E E D I N G S

THE CLERK: 2021-DR-347, Jacquett versus Jacquett.

THE COURT: All right, good afternoon. We're here today in regards to Petitioner's Motion to Determine Indigency, Strike Supervised Visitation, Waive or Reallocate GAL Fees, and Enforce Reinstatement of Parenting Time.

The parties have scheduled this hearing for 30 minutes. The Court does use a chess clock. Therefore, each side will get 15 minutes. Please use your time wisely and what you want to say, because when your chess clock gets to zero, your case is over.

So if there's any witnesses in the courtroom, please go ahead and wait outside until you are being called. If you're simply a member of the public, you're welcome to watch all the proceedings. However, if you are a witness and you watch the argument, the parties will not be allowed to testify.

All right. We're going to go ahead and start the chess clock, since it's Petitioner's motion, with your opening statement, Petitioner.

1 MR. JACQUETTE: Your Honor, I'm appearing  
2 specially and solely to object to this Court's  
3 jurisdiction. I do not consent to jurisdiction.  
4 I do not waive any objections and I do not seek  
5 any ruling on the merits.

6 THE COURT: All right. So are you  
7 withdrawing your motions?

8 MR. JACQUETTE: (No response.)

9 THE COURT: These are your motions, so if  
10 you want a ruling on the motion, we'll move  
11 forward with the hearing. But if you don't  
12 want a ruling on the motion, are you  
13 withdrawing them?

14 MR. JACQUETTE: Again, I am appearing  
15 solely and specially to object to this Court's  
16 jurisdiction. I do not consent to jurisdiction,  
17 I do not waive any objections, and I do not seek  
18 any ruling on the merits.

19 THE COURT: Okay. This is your motion,  
20 sir, that was set for hearing. So it's your --  
21 it's your chess clock. You can do -- you can  
22 choose how to spend your time.

23 MR. JACQUETTE: Respectfully, I object.  
24 Proceeding would require me to consent to  
25 jurisdiction, which I expressly decline to give.

1 video. You didn't even watch the CPT video.

2 THE COURT: I'm saying during the trial, we heard  
3 these things. And so if you plan to retain another  
4 attorney, which you say you have --

5 MR. JACQUETT: I didn't say I have. I'm looking.

6 THE COURT: -- have them choose or at least give  
7 you some advice on the GAL and why these people are  
8 good. And I would suggest somebody who's reasonably  
9 priced. If there's something else that the court needs  
10 to consider, have their attorney present that to the  
11 court.

12 Part of the reason why I believe, at least in  
13 my purview so far, you have gone through so many  
14 attorneys is because you go against the advice of the  
15 attorneys.

16 MR. JACQUETT: Because they're not protecting my  
17 kids.

18 THE COURT: So based on what you said today, the  
19 attorneys, the police, CPT and DCF and everybody else  
20 has failed to protect the kids and that at least some  
21 of them are conspiring with mom because she's Spanish.  
22 This court doesn't find that reasonable and rational.

23 The court has already ordered a mental health  
24 evaluation. I'm going to reorder that as a condition  
25 of any --

1 MR. JACQUETT: Even though the video showed that  
2 what --

3 THE COURT REPORTER: I'm sorry, I cannot hear.

4 MS. WESTFALL: Your Honor, I didn't hear what you  
5 said.

6 THE COURT: The court's going to order that as a  
7 condition before any reinstating of regular  
8 timesharing.

9 MS. WESTFALL: And, your Honor --

10 THE COURT: I've already ordered that, but I'm  
11 just restating it.

12 MS. WESTFALL: -- I don't think that order has  
13 been entered. I think both attorneys submitted  
14 opposing orders.

15 THE COURT: Well, the court's oral ruling does  
16 count for something, but I will work on it this week if  
17 I can to get those orders along with a couple of other  
18 things that are missing.

19 MR. JACQUETT: Your Honor, may I ask you a  
20 question, please?

21 THE COURT: You may.

22 MR. JACQUETT: If the opposing party is telling  
23 you everything I'm telling you is a lie, what is my  
24 only option other than recording to show you proof that  
25 I'm not lying?

No. \_\_\_\_\_

IN THE  
**SUPREME COURT OF THE UNITED STATES**

---

TARON JACQUETT,  
Petitioner,

v.

ESTEFANIA JACQUETT,  
Respondent.

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**PROOF OF SERVICE**

I, Taron Jacquett, do swear or declare that on this date, January 19, 2026, as required by Supreme Court Rule 29, I have served the enclosed Motion for Leave to Proceed as a Veteran, Emergency Application for Stay Pending Disposition of Petition for Writ of Certiorari, and Petition for a Writ of Certiorari on counsel for Respondent by depositing an envelope containing the above documents in the United States mail, properly addressed and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within three (3) calendar days.

The name and address of the person served are as follows:

Ronda Denise Westfall, The Westfall Law Firm, P.A. P.O. Box 141183, Orlando, Florida 32803, 407.962.9608 Tel, 904.458.8725 Fax, rdwestfall@rwestfall.com pleadings@rwestfall.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 19, 2026.

Respectfully submitted,



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Pro Se Petitioner  
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Tel: 214-498-2212  
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