

CAUSE NO. _____

TERM 2025

IN THE
UNITED STATES SUPREME COURT

ALANDRIS S. GRIFFIN
Petitioner,

v.

ANGELA M. PHILLIPS
AND JOSEPH M. WYLIE, JR.,
Respondents.

**APPLICATION TO THE HONORABLE BRETT M. KAVANAUGH
AS CIRCUIT JUSTICE FOR THE SIXTH CIRCUIT FOR A 60-
DAY EXTENSION OF TIME WITHIN WHICH TO FILE A
PETITION FOR A WRIT OF CERTIORARI**

To: Honorable Brett M. Kavanaugh, Associate Justice of the Supreme
Court of the United States and Circuit Justice for the Sixth Circuit:

QUESTIONS PRESENTED:

1. Whether a state court violates the Parental Kidnapping Prevention Act (PKPA), 28 U.S.C. § 1738A, by exercising child custody jurisdiction over a non-resident parent after the Clerk of Court had officially closed the docket, and while a federal lawsuit for injunctive relief was pending and in default against state court Petitioners.

2. Whether the Fourteenth Amendment's "Due Process" Clause and the American Disability Act (ADA) are violated when a state court:

(a) Seizes a child from a non-resident without a warrant or pre-deprivation hearing,

(b) Denies a Rule 60.02(3) motion to vacate a void judgment as “untimely” in direct contradiction of established state Supreme Court precedent, and

(c) Refuses to allow a disabled, out of state parent to participate in hearings via remote technology (Zoom/Phone), effectively barring access to the court.

3. Whether a federal court violates the Due Process Clause and FRCP 55 by denying a default judgment where service was effective and unchallenged by the defendants, thereby allowing a state court to bypass the PKPA and seize a child during the federal delay.

60-DAY EXTENSION:

4. Petitioner seeks an extension of time to file a petition for a writ of certiorari to review the judgment of the Tennessee Supreme Court, entered on October 29, 2025 (copy attached).

5. The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a). The 90-day period to file a Petition for a Writ of Certiorari expires on

January 27, 2026. This application is being filed more than 10 days prior to that date.

6. Petitioner respectfully requests a 60-day extension, to and including March 28, 2026.

GOOD CAUSES:

7. Good Causes exist, particularly because:

- “On November 14, 2022, Petitioner filed a federal lawsuit, and the Respondents Wylie and Phillips went into default, specifically on December 16, 2022.
- The petitioner achieved three (3) consecutive effective services on the Respondents (Phillips/Wylie).
- Instead of the defendants challenging service, the Magistrate Judge *sua sponte* (on their own) challenged the validity of the service to protect the defendants from default.
- The District Judge subsequently denied the Default Judgment, ignoring the fact that the defendants had failed to plead or defend after being served multiple times.
- On January 11, 2023, La Vergne Police Officer Reported the child of interest was removed from the arms of Petitioner by the police

officers who intervened at Little Journey Preschool while federal court refused to enter default judgment with knowledge of the pending federal proceeding because they were present when the Respondents were served for the third consecutive time.

- On January 11, 2023, Phillips filed in Tennessee after receiving three (3) federal notices and she was not in the Tennessee for three (3) months prior to January 11, 2023, the date the policer officers allowed her to seek a petition for dependent and neglect the same day the officers seized her child.
- On January 18, 2023, Tennessee Davidson County Juvenile Clerk of Court closed the docket under Phillips's Petition Number PT000274164.
- On March 6, 2023, Magistrate bypassed the closed docket to issue a visitation order between citizens of different states, a non-parent and the Petitioner in this Court, an unwed parent who is the biological mother of the child two months after an alleged dependent and neglect petition.

- On March 7, 2023, Wylie and Phillips petitioned jointly under Petition No. PT000275272 while they concealed and harbored Petitioner’s son since November 28, 2022, in Tennessee.
- On November 13, 2023, Reassigned Magistrate entered a “Final” Judgment specifically under Petition No. PT000274164 without service of the “Final” Judgment—on all parties nor—did the Magistrates take into consideration Motions to Intervene and Motions to Dismiss, but for issuance of a Final Order, that caused Petitioner to be criminally charged for attempting to return her child to her custody.
- On August 13, 2024, under Tennessee Rules for Juvenile Practice and Procedures 310—Tennessee Rules of Evidence 201 and 202 and—Tennessee Rule of Civil Procedures 60.02(3), Davidson County Juvenile Court Judge denied a “Motion For Relief From Unconstitutional and Unlawful Judgments or Orders and Motion Requesting District Judge Sheila Calloway to Take Judicial Notice of Adjudicative Facts and Laws” denied the motion as “untimely,” violating *Turner v. Turner* (which says voidness has no deadline).

- On August 13, 2024, Davidson County Juvenile Court Judge Sheila Calloway, after a timely and reasonable request was made to hold a hearing by contemporaneous means (phone/zoom, etc.), because of the extensive distance and disabilities to participate in the hearings more than 600 miles away from the Court, she refused to provide such services or activities of the Court, despite disabilities and distances to travel for Intervenors, Witnesses and Petitioner or otherwise despite disabilities incurred during active military service as combat veterans.
- The jurisdictional “ruse” extended into the Tennessee Sixth Circuit Court (Division VI). Despite being put on notice of a prior-filed federal action in the Savannah Division—where the litigants were in default—and despite evidence that the Juvenile Court proceeded on a closed docket, Division VI failed to dismiss the action. This allowed the state court to continue exercising authority it lacked under the PKPA.
- This application is necessitated by an extraordinary procedural collision between state criminal proceedings and federal review. It involves exceptional procedural complexity and significant

constitutional issues under the Parental Kidnapping Prevention Act (PKPA) and the Due Process Clause.

- In addition to the Tennessee Supreme Court's denial of jurisdiction, there are currently extraordinary writ proceedings pending in the U.S. Court of Appeals for the Eleventh Circuit (mandamus, prohibition, and/or injunction).
- Furthermore, Petitioner intends to file an Emergency Motion to Recall the Mandate in the Eleventh Circuit on January 16, 2026, regarding its July 17, 2025, issuance.
- Even further, Petitioner, a retired service-connected veteran and resident of Georgia, is currently facing criminal prosecution for Custodial Interference (T.C.A. § 39-13-306) in a General Sessions Court, with a hearing scheduled for February 18, 2026, as provide by Petitioner's second retained attorney.
- Petitioner contends that this prosecution is a bad-faith application of state law arising from an interstate "surrogacy ruse" and parental kidnapping orchestrated by Respondents while Petitioner was on active military duty.

- Because Petitioner is simultaneously seeking an Emergency Recall of the Mandate in the Eleventh Circuit (filing on or about January 16, 2026) to address the lack of federal oversight in this matter, an extension is required to allow the Eleventh Circuit to act. A 60-day extension will ensure that the Petition for Writ of Certiorari reflects the status of Petitioner’s liberty interests and prevents the Tennessee criminal court from proceeding on a jurisdictional foundation that is currently being challenged before this Court and the Eleventh Circuit.
- An extension is necessary to avoid premature or duplicative litigation in this Court while the Eleventh Circuit proceedings remain pending. The requested 60 days will allow Petitioner to properly integrate the outcome of those federal proceedings into the Petition for writ of Certiorari, ensuring comprehensive presentation of the jurisdictional conflicts and the “surrogacy ruse” used to deprive a retired military member of her superior parental rights.
- Moreover, Petitioner further requires this extension because her second retained criminal counsel in Tennessee has provided only

verbal updates regarding the pending charges. Petitioner needs additional time to secure the physical discovery and record evidence from the General Sessions Court to properly document jurisdictional fraud for this Court's review. Petitioner, in an acts of diligence to prepare this filing are further frustrated by a breakdown in the attorney-client relationship. Because of the refusal of physical copies of discovery or other documents that are required to be produced—only verbal summaries that conflict with federal law—including Petitioner's pending litigation in the Eleventh Circuit only adds to the structural breakdown in judicial proceedings. The Petitioner made costly payment to retain more than one counsel and the delay in acquiring evidence only adds to the structural breakdown to ensure a fair presentation of the constitutional violations at issue.

8. Petitioner requires additional time to coordinate the voluminous trial court and appellate records, and video transcripts from the Tennessee lower courts to ensure a concise and accurate presentation to this Court.

9. Petitioner is representing themselves and require additional time to navigate the Court’s procedural rules and Petitioner has a heavy schedule in other matters.

10. For the foregoing reasons, Petitioner respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari by 60 days, up to and including March 28, 2026.”

Date: January 14, 2026.

Respectfully submitted,



Alandris D. Griffin

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Stone Mountain, Georgia 30087
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alandris.griffin@gmail.com

STATE OF GEORGIA §
DEKALB COUNTY §

VERIFICATION

Before me, the undersigned notary, on this day personally appeared Alandris D. Griffin, the affiant, a person whose identity is known to me. After I administered an oath, affiant testified as follows:

“My name is Alandris D. Griffin. I have read the Application to the Honorable Brett A. Kavanaugh as Circuit Justice for the Sixth Circuit for a 60-day Extension of Time Within Which to File a Petition for a Writ of Certiorari. The facts stated in it are within my personal knowledge and are true and correct.”



ALANDRIS D. GRIFFIN

SWORN TO and SUBSCRIBED before me by Alandris D. Griffin on January 14, 2026.



Notary Public in and for the State of Georgia



APPENDIX- A

1. TENNESSEE SUPREME COURT JUDGMENT
FILED DATE: OCTOBER 29, 2025

2. TENNESSEE SUPREME COURT
MANDATE ISSUANCE
NOTICE AND FILE DATE: DECEMBER 12, 2025

IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE

FILED

10/29/2025

Clerk of the
Appellate Courts

IN RE Z [REDACTED] W.

Juvenile Court for Davidson County
No. PT000274164; PT000275272

No. M2024-01293-SC-RDM-JV

ORDER

On October 22, 2025, Alandris D. Griffin filed in this Court a pro se Expedited Motion to Assume Jurisdiction, which is governed by Tennessee Code Annotated section 16-3-201(d) and Tennessee Supreme Court Rule 48. Having carefully considered the motion, the Court concludes that Ms. Griffin's motion does not raise issues warranting the Court's exercise of its authority to assume jurisdiction and the motion is DENIED. To the extent the motion seeks relief on behalf of other parties, the motion is DENIED because a person appearing pro se cannot represent other persons or entities. *See, e.g., Beard v. Branson*, 528 S.W.3d 487, 495 (Tenn. 2017).

PER CURIAM

IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE

IN RE Z [REDACTED] W.

Davidson County Juvenile Court
PT000274164 ; PT000275272

No. M2024-01293-SC-RDM-JV

Date Printed: 12/12/2025

Notice / Filed Date: 12/12/2025

NOTICE - Mandate - Issued

The Appellate Court Clerk's office has issued the Supreme Court mandate in its entirety to the trial court clerk in the above-styled appeal. The mandate consists of certified copies of the judgment, any order as to costs, and a copy of the opinion. This action signifies the end of the appeal.

The Appellate Court Clerk's office will not accept any filing from any parties or their counsel after issuance of mandate except those requesting recall of the mandate, those related to withdrawing the record or portions thereof, and those related to the assessment of costs.

James M. Hivner
Clerk of the Appellate Courts

CAUSE No. _____

**In The
United States Supreme Court**

Alandris D. Griffin,
Petitioner, Pro se

vs.

Angela M. Phillips, and
Joseph M. Wylie
Respondents.

CERTIFICATE OF SERVICE

I certify that on this 14th day of January 2026, as required by Supreme Court Rule 29, I have served the enclosed APPLICATION FOR A 60-DAY EXTENSION OF TIME WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days or by electronic means.

The names and addresses of those served are as follows:

Laura Ann Stewart (Guardian Ad Litem)
LS Law Office
1102 Main Street Nashville,
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Phone: 615-942-7896

Email: laura@lslaw-office.com (or via her firm's portal)

Chelsey Ann Stevenson, Esq. (Counsel for Wylie/Phillips)

Turner Law Office, P.C.

500 Church Street, Second Floor

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Teresa Marie Morgan (Former Appointed-Counsel)

1427 Greenwood Ave.

Nashville, Tennessee 37206

Phone: 615-975-9174

Email: None

BPR Number: 033448

Angela M. Phillips (Respondent)

3505 Seasons Dr.

Antioch, Tennessee 37013

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Joseph M. Wylie, Jr. (Respondent)

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Stefanie Williams-Batiste (Intervenor)

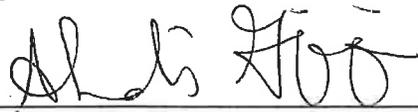
4090 Camaron Way

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Dr. Trent S. Griffin, Sr. (Intervenor)

P.O. Box 1614

Cedar Hill, Texas 75106

A handwritten signature in black ink, appearing to read "Alandris Griffin", written over a horizontal line.

ALANDRIS D. GRIFFIN