

No. _____

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

Angela Campbell,

Petitioner,

v.

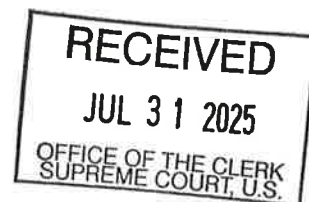
**Governor Tony Evers, Associated Bank, N.A., Aaron J. Foley, Scott Austin,
John Miller, Michael Greiber, and Jeffrey Mark Mayer,**

Respondents.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For
The Seventh Circuit

**MOTION FOR LEAVE TO FILE AN OUT-OF-TIME PETITION FOR A WRIT
OF CERTIORARI**

ANGELA CAMPBELL,
PETITIONER PRO PER
600 Volk Street
Portage, WI 53901
(608) 628-9006



Angela Campbell (“Campbell”), Petitioner *pro per*, respectfully moves this Court for leave to file Campbell’s Petition for a Writ of Certiorari out of time, pursuant to Rule 13.5 of the Rules of the Supreme Court of the United States.

In support of this motion, Campbell states:

1. The judgment of the United States Court of Appeals for the Seventh Circuit was issued on March 28, 2025, and under Supreme Court Rule 13.1, the petition was due no later than June 26, 2025.
2. Campbell made every effort to timely prepare and submit Campbell’s Petition for a Writ of Certiorari. However, Campbell relied in good faith on the informal assistance of a non-practicing attorney who was aiding in the preparation and formatting of the writ and associated documents. This individual misunderstood or miscalculated the filing deadline. *See* Campbell’s Declaration (Exhibit A) and Donna Patik’s Affidavit (Exhibit B).
3. The miscalculation of the filing deadline was neither intentional nor negligent on the part of Campbell, but rather the result of an honest mistake in calculating the 90-day period from the date the rehearing was denied.
4. Courts have recognized that where an out-of-time filing results from attorney error – especially when committed by individuals offering informal assistance – relief may be warranted under compelling circumstances. *See Bowles v. Russell*, 551 U.S. 205 (2007) (recognizing the strict limits on appellate deadlines but highlighting the tension between rigid timeliness and equitable considerations); *cf. Holland v. Florida*, 560 U.S. 631 (2010) (equitable tolling available in *habeas corpus* proceedings for reasonable reliance on counsel’s miscalculation).
5. Campbell is a non-prisoner *pro per* litigant who paid the full civil filing fee, and whose petition raises urgent constitutional questions of judicial recusal, procedural due process, and access to justice for unrepresented litigants. These are matters of national significance and structural concern, particularly given the record showing financial conflicts and undisclosed relationships affecting the presiding judge in the district court.
6. Campbell acted with diligence throughout the preparation and filing process. Campbell submitted this Motion for Leave to File an Out-of-time Petition for a Writ of Certiorari as soon as the error was discovered with minimal delay. No prejudice would result to the Respondents or the Court by granting this motion.

Conclusion

For these reasons, Campbell respectfully requests that this Court grant leave to file Campbell's Petition for a Writ of Certiorari out of time and docket the Petition as submitted.

Respectfully submitted,



Angela Campbell, Pro Per

600 Volk Street

Portage, WI 53901

(608) 628-9006

alckytyke@yahoo.com

Dated: July 25, 2025

No. _____

**IN THE
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v.

**Governor Tony Evers, Associated Bank, N.A., Aaron J. Foley, Scott Austin,
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Respondents.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For
The Seventh Circuit

**DECLARATION PURSUANT TO 28 USC 1746
IN SUPPORT OF MOTION FOR LEAVE TO FILE AN OUT-OF-TIME
PETITION FOR A WRIT OF CERTIORARI**

ANGELA CAMPBELL,
PETITIONER PRO PER
600 Volk Street
Portage, WI 53901
(608) 628-9006


I, Angela Campbell, declare that:

1. Your Declarant is Angela Campbell and the Petitioner in the above-entitled action.
2. Your Declarant is competent to testify.
3. Your Declarant is not one day learned in the law.
4. Your Declarant is coming as a *pro per* petitioner in writing this writ and motion.
5. Your Declarant was working in good faith with a non-practicing former attorney to prepare and inform and instruct regarding the rules for a Petition for a Writ of Certiorari.
6. The non-practicing former attorney miscalculated the 90 days and miscalculated by 24 hours.
7. The non-practicing former attorney agreed to assist me in writing a Motion for Leave to File an Out-of-Time Petition for a Writ of Certiorari.
8. The former attorney did not have the date correct, as well, so I needed to rely on my own research.
9. When searching for my information, AI automatically provided the information.
10. Along with my Declaration, I am sending an affidavit of Donna Patik (Exhibit B) who witnessed the non-practicing former attorney providing the wrong calculation for the due date of my Petition for a Writ of Certiorari and for the Motion for Leave to File an Out-of-time Petition for a Writ of Certiorari.

Please accept my apologies.

I am requesting the United States Supreme Court to accept my Petition for a Writ of Certiorari as it is to protect the public's interest.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 25, 2025.


Angela Campbell, Pro Per

600 Volk Street
Portage, WI 53901
Telephone: (608) 628-9006
Email: alckytyke@yahoo.com

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Respondents.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For
The Seventh Circuit

**AFFIDAVIT OF DONNA PATIK
IN SUPPORT OF ANGELA CAMPBELL'S MOTION FOR LEAVE TO FILE
AN OUT-OF-TIME PETITION FOR A WRIT OF CERTIORARI**

ANGELA CAMPBELL,
PETITIONER PRO PER
600 Volk Street
Portage, WI 53901
(608) 628-9006

Donna Patik, being first duly sworn on oath deposes and says:

1. I am an adult resident of the State of Wisconsin.
2. I am a long time, close friend of Angela Campbell, Petitioner in the above action.
3. I am competent to testify.
4. I have firsthand knowledge of the facts herein.
5. Angela Campbell is not a learned attorney.
6. Angela Campbell is acting *pro per* in writing this writ and motion.
7. Angela Campbell was working in good faith with a non-practicing former attorney to prepare, instruct, and guide concerning the rules in writing and filing her petition.
8. The non-practicing former attorney miscalculated the 90-day due date by one day.
9. Angela Campbell in good faith filed her Petition for A Writ of Certiorari according to the due date provided by the non-practicing former attorney.
10. Angela Campbell first learned of the error upon receipt of the returned writ.
11. The non-practicing former attorney agreed to help Angela Campbell in writing a Motion for Leave to File an Out-of-Time Petition for a Writ of Certiorari.
12. The non-practicing former attorney did not have the date correct for the motion, as well, so Angela Campbell had to rely on her own research.
13. When Angela Campbell searched for information, AI automatically provided the information.

Donna Patik
Donna Patik

Subscribed and sworn to before me
this 25 day of July, 2025

Malachy Mortenson
Notary Public, State of Wisconsin
My Commission expires: 11/1/26



