

No.

**In The
Supreme Court of the United States**

ROBYN ABRAHAM

Applicant,

v.

ABBY LEIGH, AS EXECUTRIX OF MITCH LEIGH ESTATE, ET AL.

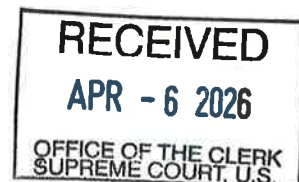
Respondents.

**UNOPPOSED MOTION TO FILE PETITION FOR
WRIT OF CERTIORARI ON THE UNITED
STATES COURT OF APPEALS FOR THE SECOND CIRCUIT
OUT OF TIME DUE TO EXTRAORDINARY CIRCUMSTANCES**

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March 25, 2026



**PETITIONER'S UNOPPOSED MOTION FOR LEAVE TO FILE WRIT OF
CERTIORARI OUT OF TIME DUE TO EXTRAORDINARY
CIRCUMSTANCES OF EPSTEIN FILE RELATED RETALIATION
IMMINENT DANGER and DEATH THREATS**

Pursuant to Supreme Court Rules 21, Petitioner respectfully moves the Court for Leave to Grant Petitioner's Unopposed Motion to File Writ of Certiorari Out of Time Due to Extraordinary Circumstances of Imminent Danger which include but are not limited to the threatened Florida Abduction, the Intentional Deprivation of Lifesaving Medications and facilitated Florida DNR Order Against Petitioner's formerly healthy Mother Joyce Olshen Abraham and Recurring Dozens of Death Threats Against Petitioner Following the November 2025 Announcement of the Release of the EPSTEIN Files :

1. The deadline for filing the Petition for Writ of Certiorari was February 2, 2026.
2. Due to extraordinary circumstances of Imminent Danger to Petitioner, a Domestic Violence survivor of repeated severe physical attacks requiring surgeries and hospitalizations, and which circumstances include but are not limited to the New York threatened Florida Abduction, Deprivation of Lifesaving Medications and Florida DNR Order Issued Against Petitioner's formerly healthy Mother Joyce Abraham Directly Causing Joyce Abraham's Death and Recurring Dozens of Weekly and Often Daily Death Threats Against Petitioner Related to the November 2025 Announcement of the Release of the EPSTEIN Files in which

Petitioner's violent multimillionaire ex-husband Dr. Philip Dolin and his Florida, and New York accomplices are named for child sex trafficking, the FBI advised that Petitioner should leave her California state of residence and 'keep moving'. Petitioner's Affidavit is attached as **Exhibit 'A'**.

3. Per the FBI's recommendation to 'keep moving' following the premeditated felony murder of Petitioner's mother Joyce Abraham, recurrent retaliatory death threats directly related to the EPSTEIN Files release and due to nationally publicized storm travel delays and storms and power outages resulting in East Coast airport shutdowns and severe flight delays, power outages and travel delays made it impossible to file a Motion to File Late with this Court until January 28, 2026, Just Five (5) days before the Petition deadline.
4. Justice Sotomayer Denied Petitioner's Motion to File Late on February 4, 2026
5. This Unopposed Motion is made in good faith and not for the purpose of delay.
6. The undersigned has contacted Opposing Counsel H. Robert Feibach and Tamar Wise. Neither counsel has opposed this Motion.
7. There is no prejudice to any Party or Opposing Counsel. Granting the relief sought will aid the Court on important national First Amendment and constitutional issues; this case is a matter of widespread public interest.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that an order be entered allowing the filing of this Petition for Writ of Certiorari out of time.

WHEREFORE, Petitioner Robyn Abraham respectfully requests that this Court accept the attached Petition for Writ of Certiorari as timely filed.

Respectfully Submitted,
/s/ Robin Abraham aka
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Dated: March 25, 2026

EXHIBIT A

No.

**In The
Supreme Court of the United States**

ROBYN ABRAHAM

Petitioner

v.

ABBY LEIGH, AS EXECUTRIX OF MITCH LEIGH ESTATE, ET AL.

Respondents.

AFFIDAVIT IN SUPPORT OF UNOPPOSED MOTION

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Counsel For Applicant

March 27, 2026

**AFFIDAVIT IN SUPPORT OF UNOPPOSED MOTION
SUPREME COURT OF THE UNITED STATES**

ROBYN ABRAHAM,
Petitioner,

v.

ABBY LEIGH, AS EXECUTRIX OF MITCH LEIGH ESTATE, ET AL.
Respondents.

STATE OF NEW YORK)

COUNTY OF NEW YORK)

I, Robyn Abraham, an American attorney admitted to practice law in the States of New York, Florida and the District of Columbia, a former law clerk to now Senior 11th Federal Circuit Judge Susan H. Black, and former US SEC Enforcement investigator, after being duly sworn and being over the age of 18 and sui juris, upon my oath deposes and states that:

1. Since President Trump's November 2025 Ordered Release of the EPSTEIN FILES naming my Florida child trafficking former Child Protection Team (CPT) ex-husband Dr. Philip Dolin, his politically powerful Brooklyn uncle Gabriel Krausman, his mother Bella Dolinsky, Florida CPT psychologist Dr. Debbie Day and one of Dr. Dolin's Political Lobbyists Ira Sacks (NYSD Opposing Counsel 17-05429) and which EPSTEIN file includes 1993 Shands Hospital and Law Enforcement reported rape and trafficking of my then Three (3) year old and the related NYSD 17-05429 Partial Settlement Offer the Day of EPSTEIN'S arrest (Composite EXHIBIT A), I have received numerous death threats¹. Given my ex-husband's numerous prior life-threatening attacks against my family and especially against my Mother Joyce Abraham who was abducted and murdered, I am in fear of my life. The FBI advised that I should "keep moving".
2. This is one of Twenty Two (22) Targeted "National Brooklyn Playbook" cases which began with the EPSTEIN file reported June 1993 Florida Abduction, Serial Sexual Assaults and Child Sex Trafficking of my then Toddler by my ex-husband at a Florida Club Med while I was working as lead finance counsel and has since resulted in more than Twenty (20) Targeted attacks, including the parallel New York Opposing Counsel (NYSD 17-05429) Threatened Abduction, Deprivation of Life Saving Medications, Drugging and New York threatened Florida DNR Order against my healthy Mother Joyce Abraham.
3. Just as the now jailed former husband of French domestic abuse survivor Gisèle Pelicot enlisted dozens of men to rape Mrs. Pelicot, similarly, since the 1993 Shands Hospital, Law Enforcement and EPSTEIN File reported rape, abduction and child sex trafficking of my then 3 year old by my violent Florida former husband Dr. Dolin; his Florida child trafficking CPT colleagues and his politically powerful Brooklyn family have enlisted several attorneys, political lobbyists and accomplices and engineered the escalating Twenty Two (22) unprovoked parallel legal, financial and professional attacks while weaponizing the legal system against my family and me to attempt to obfuscate their numerous crimes.

¹ Florida, New York and California court record reflect my violent Florida child trafficking ex-husband Dr. Dolin's repeatedly facilitated unprovoked coast to coast attacks against my family and me including aggravated assaults with motor vehicle, aggravated batteries requiring my full right hip replacement, aggravated batteries necessitating full mouth teeth replacements and incessant unprovoked legal attacks against my family and me. The EPSTEIN files include "The National Brooklyn Playbook" memorialized by the 1997 Florida Federal District filed, *Dolin v. FDLE Agent West*, 97-757-Civ-Orl-18B re: my Toddler's Abduction, Serial Sexual Assaults and Trafficking Former New York Federal Prosecutor Catherine Kassenoff also confirmed that she was a "Brooklyn Playbook" victim (EXHIBIT A)

2 Lower court record reflects that New York Southern District Case 17-05429 Opposing Counsel foreign national Colleen Kerwick (Ni Chairmhaic), DC Lobbyist Marcia Wiss/Wiss Partners who were not my attorneys, committed larceny by extortion of my partial settlement funds and together with and on behalf of New York Opposing Counsel Ira Sacks (my ex-husband's attorney) and H. Robert Feibach (threatened my family and threatened my law licenses) threatened the Abduction and Murder of my mother Joyce Olshen Abraham in this Arnold and Porter filed \$250M case in which Two (2) of the Three (3) serial multimillionaire Defendants settled in my favor. Former Defendant Alan Honig filed a Declaration that remaining serial vexatious litigant Leigh Committed Fraud Against Me in This Case. The District Court sealed, struck and deleted 3000 pages of key evidence. My Motions to Unseal these dispositive documents were Denied.

4. Knowing that I suffer from a life threatening medical condition which is exacerbated by stress, my ex-husband Dr. Dolin and his Team facilitated Twenty-Two (22) retaliatory synchronized national lawsuits which retaliatory lawsuits began with the EPSTEIN file confirmed 1993 University of Florida Shands Hospital reported rape and trafficking of my then Three (3) year old by my violent ex-husband Dr. Philip Dolin and his friends at a Florida Club Med while I was working as lead finance counsel in New York. These escalating attacks since resulted in the New York/Florida Opposing counsel threatened and facilitated Abduction, Deprivation of Lifesaving Medications and DNR Order against my Mother Joyce Abraham.
5. Since June 1993, my attorneys and I have reported my violent ex-husband's and accomplices' rape of my then 3 year old, my ex-husband's and his accomplices' child sex trafficking, his aggravated assaults with motor vehicle, his aggravated batteries and Dr. Dolin's and his colleagues' specific death threats of murdering my family, and specifically Dr. Dolin's and accomplices' threats of the 'Taking' and Murder of my Mother and me.
6. On May 2, 1997, the US Department of Justice Violence Against Women Office faxed the attached USDOJ Letter requesting an investigation of the Shands Hospital reported and EPSTEIN FILE confirmed rape of my then 3 year old and national child sex trafficking to then Florida Attorney General Bob Butterworth². **(EXHIBIT B)**.
7. The State of Florida declined to take action. The USDOJ similarly declined to take action. Per my ex-husband's threats against my family and me, my uncle Jack Olshen; my mother Joyce Olshen Abraham and our friend Sheila Getreider each were Fraudulently Abducted from their Florida homes, Intentionally Deprived of Medications, Drugged and Died.
8. Dr. Dolin and his Club Med child trafficking friends' Shands Hospital's and Law Enforcement reported and FBI documented 1993 rape and trafficking of our then 3 year old reports resulted in Dr. Dolin's, politically powerful Brooklyn family and their enlisted New York/Florida/DC attorneys/lobbyists and accomplices' facilitating Twenty Two (22) nationally synchronized and coordinated filings of retaliatory false SLAPP lawsuits against my Palm Beach Florida multimillionaire Uncle Jack Olshen (resulting in Jack Olshen's death), retaliatory false lawsuits against my Florida based Father and the Palm Beach home I purchased for my Dad (resulting in my Dad's death), the threatened 'Taking' and Murder of my Mother Joyce Olshen Abraham (resulting in the New York/FL attorneys' threatened Taking and 2023 DNR execution of Joyce Abraham) and the series of threatened retaliatory nationally coordinated SLAPP lawsuits coupled with the retaliatory filing of coordinated false Bar Grievances against my flawless Bar Records in all jurisdictions.
9. In furtherance of Dr. Dolin's New York/FL and DC attorneys 'threats to 'sue you to death', after engineering Dr. Dolin's threatened FL pre-meditated felony murder of my Mom, theft of my Mom's new BMW and theft of \$1M in monies, jewelry and assets, Florida estate trafficking attorney Scott Weiss filed frivolous Florida 4th DCA appeal 4D2025-1962, and *is suing me* for Mr. Weiss and accomplices' facilitating the premeditated felony murder of my Mother and theft of our monies, jewelry, gold and assets. There are Ten Florida cases re: New York Opposing Counsels' threats of DNR Order against my medication deprived Mother. **(EXHIBIT B)**
10. On November 19, 2025, President Donald Trump signed the EPSTEIN Transparency Act. Since the EPSTEIN files release, my multimillionaire ex-husband, his powerful New York family and enlisted New York/Florida attorneys and lobbyists facilitated the filing of retaliatory coordinated and synchronized frivolous cases in New York and Florida. These many coordinated frivolous lawsuits, motions and death threats have caused serious deterioration to my health.
11. Due to these FBI reported death threats resulting in my need to constantly relocate through airport delays, cancellations, TSA lines and snowstorms, I have been unavoidably delayed in repeated travel delays, snowstorms and power outages.
12. I respectfully apologize to the Court for the de minimis filing delay caused by extraordinary circumstances and respectfully request that the Court Grant my Unopposed Motion to Late File this Timely Petition for Writ of Certiorari.

² Upon receipt of the May 2, 1997 USDOJ letter **(EXHIBIT B)**, Florida Judge R. James Stroker, who, per **'The Brooklyn Playbook'** assigned himself multimillionaire Dr. Dolin's *case w/ sole custody and sanctions demands against me* following Shands Hospital's rape report against Dr. Dolin, Judge Stroker prohibited me from all contact with my raped, trafficked and traumatized Toddler.

This Affidavit is filed in Good Faith with all Due Respect to the Court.

Date: March 14, 2026

State of California

County of Los Angeles




Robyn Abraham

Sworn and Subscribed before me on this _____ day of March 2026.

Notary Public, State of California

My Commission Expires:

See Attached Certificate

03-14-2026 

_____ Personally Known or

_____ Produced Identification

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of LOS ANGELES

Subscribed and sworn to (or affirmed) before me on this 14TH
day of MARCH, 2026, by KEVIN STILES

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.



(Seal)

Signature

A handwritten signature in black ink, appearing to be 'KEVIN STILES', written over a horizontal line.

This Affidavit is filed in good faith.

Dated: March 25, 2026

State of New York
County of New York

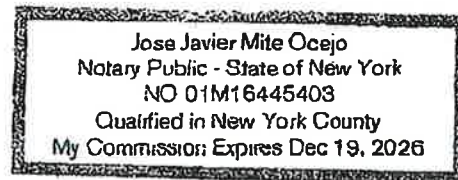


Robyn Abraham

Sworn and Subscribed before me on this 25th day of March 2026



Notary Public, State of New York



My Commission expires 12/19/2026

Personally Known to Me W

or Produced Identification W/ passport

**Additional material
from this filing is
available in the
Clerk's Office.**