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November 20, 2025

Clerk of the Court

Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

Re: **Nicholson v. Bank of New York Mellon**, No. ____

Second Circuit Court of Appeals Case 24-586

Request for 60-Day Extension of Time to File Petition for Writ of Certiorari

Current Deadline: December 3, 2025

Requested New Deadline: February 1, 2026

Dear Clerk:

Pursuant to **Supreme Court Rule 13.5**, Applicant **Harriet Nicholson**, pro se, respectfully requests a **60-day extension of time** to file a **Petition for a Writ of Certiorari** in the above-captioned matter. The petition is currently due **December 3, 2025**. Applicant requests an extension to **February 1, 2026**. Good cause exists for the requested relief.

Good Cause for Extension

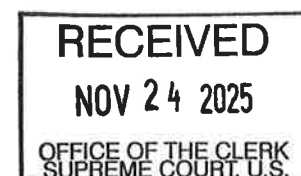
1. Extraordinary procedural and jurisdictional complexity

This case presents an unusually complex record involving:

- a **Texas Amended Final Judgment** restoring Applicant's title and possession;
- a **Second Circuit mandate** recognizing vested possessory rights;
- **conflicting state-court proceedings** that proceeded after federal jurisdiction had attached; and
- multiple ongoing emergency applications before the Supreme Court (Case No. 25A74).

Preparing a certiorari petition that accurately and succinctly presents these federal questions requires additional time.

2. Concurrent emergency litigation affecting preparation time



Since September 22, 2025, Applicant has been actively litigating multiple **emergency filings** in this Court, including:

- an **Emergency Application for Administrative Stay and Interim Relief**,
- a **Renewed Emergency Application under Rule 22.4 and Doe v. Gonzales**, and
- filings related to the **October 29, 2025 state enforcement actions** that occurred **after this Court had assumed jurisdiction**.

These emergency obligations have required immediate focus and have materially reduced the time available to prepare the petition for certiorari.

3. Seizure of home and belongings on October 29, 2025

On October 29, 2025—the **same day the prior application was referred to the full Court**—Texas constables executed a writ of possession, removed Applicant from her federally adjudicated homestead, and displaced her possessions. This has caused severe disruption, ongoing relocation issues, and logistical obstacles that directly affect her ability to complete the petition by December 3.

4. Medical issues constitute further good cause

Applicant suffered a medical crisis during the October 29 enforcement, resulting in emergency medical evaluation and continued recovery complications. This has substantially limited her ability to organize records and draft the petition.

5. The record is voluminous and spans multiple courts

The relevant materials include:

- Texas state-court trial and appellate records;
- federal district court and Second Circuit proceedings;
- extensive land-record filings;
- transcripts;
- emergency filings and constitutional arguments.

Additional time is necessary to collect, organize, and present these materials in a clear and jurisdictionally coherent manner.

No prejudice

This request is made in good faith, is not for delay, and will not prejudice Respondent. Extensions of this length are routinely granted to pro se litigants with significantly less complex circumstances.

Requested Relief

Applicant respectfully requests that the time to file the Petition for Writ of Certiorari be **extended by 60 days, from December 3, 2025 to February 1, 2026.**

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Harriet Nicholson', written over the text 'Respectfully submitted,'.

/s/ Harriet Nicholson

Pro Se Applicant