

No. A-_____

IN THE SUPREME COURT OF THE UNITED STATES

Marina Burroughs - Petitioner, Applicant, and

Robert Burroughs - Petitioner, Applicant

Vs.

Texas Department of Family and Protective Services - Respondent

(In The Interest of K.B., a Child)

ON this August 6, 2026

**APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION FOR A WRIT OF
CERTIORARI TO THE SUPREME COURT OF TEXAS**

Application of Petitioners To The Honorable Samuel A. Alito, Jr.,

Associate Justice of the Supreme Court of the United States

Circuit Justice for the Fifth Circuit

Supreme Court of the United States

1 First Street, NE

Washington, DC 20543

I. INTRODUCTION AND BACKGROUND

Petitioners Marina Burroughs and Robert Burroughs in the above named case respectfully file this joint APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF TEXAS due to complexity of the case, large volume of the records, absence of counsel and personal hardship.

On October 17, 2025 County Court At Law # 2, Henderson County, Texas signed the original Order for Termination for the Cause No. **FAM24-0598-CC2**, named: **In the Interest of K.B., a child**, which is an action for termination of parental rights brought up by the **Texas Department of Family and Protective Services vs. Marina Burroughs and Robert Burroughs**.

The Supreme Court of Texas issued its opinions on **May 22, 2026**.

We, Marina and Robert Burroughs, have been together for 7 years and married for 5. The action brought up against us by the Texas Department of Family and Protective Services was instigated and manipulated till the end by the adult actors from previous failed relationships. They have succeeded in planting and combining new and old fake allegations to confuse the Jury.

Representatives of the State of Texas bluntly ignored their own regulations, Texas State Law and The Constitution of the United States of America, denying us almost all of the rights of the

citizens of the United States and negligently, willingly and intentionally taking away all of our rights as citizens of this free country.

Specifically: our religious beliefs were questioned in the process, we were not allowed to speak freely neither in Court nor during the process of services, we were retaliated against for petitioning the government for a redress of grievances, our second amendment rights were quashed, we were not allowed to be secured in our persons, our house, our papers and effects, unreasonable multiple searches were conducted on our property in order to harass and intimidate us and our daughter was seized without a warrant while our whole family, present in this Henderson County, was standing on the parking lot not being allowed to de-escalate the situation.

During the Trial hearing we were made to answer for fake criminal allegations in a civil court setting where allegations were presented as facts by the prosecuting attorney Rebecca Ray without any criminal investigations, Grand Jury Indictment or due process.

The representatives of the State of Texas knowingly, willingly, negligently and intentionally disregarded all of our rights and defamed our character individually and as a married couple.

But the worst of all we were and we have been deprived of the right of every citizen of the United States of America to "life and liberty" with our child, Katherine Burroughs, who is only 5 years old right now.

The Eighth Amendment of the Bill of Rights states that no cruel and unusual punishments shall be inflicted upon citizens of the United States - there is no bigger punishment for a parent than losing the child.

The main purpose of the Bill of Rights is to protect basic personal freedoms, such as free speech, religion, and the right to a fair trial, while limiting government power. Government power of authority and government overreach in our case stripped us of most of those rights.

The trial was long and had nothing to do with our only daughter together, who lost both mom and dad due to this cruel heartrending trek.

The power to birth a child was given to the parents, not to the States and the power to raise a child shall remain with the parent, unless both parents are deceased or incarcerated and there is no living relative willing to take that child in.

October 6 through October 14 was the long excruciating trial that piled up into approximately 1000 pages of libelous record. Due to Henderson County, Texas, not affording legal help to parents whose rights were terminated passed Supreme Court of Texas, and the Supreme Court of Texas Denying both of our appointed legal counsels' Petitions for Review, **we ask that the Supreme Court of the United States grants us the maximum allowed by law 60 day extension to prepare our joint Petition for a Writ of Certiorari.**

In accordance with Supreme Court Rules, Rule 13.5, for good cause the Justice may extend the time to file a Petition for a Writ of Certiorari not to exceed 60 days. We are kindly asking for a 60 day extension to prepare this complicated document ourselves while seeking the possibility of legal advice in this matter.

This Court has Jurisdiction over Constitutionally protected rights which are codified in Title 28 of the U.S. Code, Chapter 81; we have identified the Judgement sought to be reviewed with copies attached of the: State of Texas Supreme Court's opinion letter, denial of the New Trial from Henderson County, Texas County Court at Law #2, the Opinion of the 12th Circuit Court of Appeals and the original Order for Termination.

This application is being prepared and addressed in accordance with Supreme Court Rules: Rule 22 (addressing the Applications to Individual Justices), Rule 29 (proof of service to parties) , Rule 33.2 (the original and two copies to be sent), and Rule 30 (computation of the deadlines for the Petition for a Writ of Certiorari, deadline for the Application for Extension and the Deadline for the Extension).

In light of this brief history we, Marina Burroughs and Robert Burroughs, **pray** that the Supreme Court of the United States grants us maximum allowed **60 day extension of the current due date of August 20, 2026 to file Petition for a Writ of Certiorari to be extended up to and including October 19, 2026.**

II. JURISDICTION AND DATES

The Supreme Court of the United States has jurisdiction over this case. **Title 28 of the US Code, Chapter 81, section 28 U.S.C. § 1257** permits Supreme Court review of final judgments from the highest court of a state via a writ of certiorari when constitutional rights are drawn into question.

The original Order for Termination from County Court #2, Henderson County, Texas was signed on October 17, 2025. Nunc Pro Tunc order of Termination was signed October 23, 2025.

Twelfth Court of Appeals District of Texas Judgment affirming the order of the lower Court was issued on or about March 18, 2026.

On May 22, 2026 the Supreme Court of Texas denied the petitions for review in the above-referenced case filed by Allen B. Boswell (court appointed appellate attorney for Marina Burroughs) and Christopher D. Tinsley (court appointed appellate attorney for Robert Burroughs). No reason was given for the denial. Both attorneys sent us letters of completion of their representation in this matter.

Allen Boswell later stated in the email communications that “the Court here will not appoint an attorney for a federal appeal” and “the local court considers the case completed.”

This convenient Henderson County, Texas policy serves great injustice to the common economically disadvantaged and otherwise discriminated by the local government citizens of the United States of America. As of right now a minimum of 5 citizens have been stripped of their rights protected by the Constitution of the United States of America without any just cause: Marina Burroughs, Robert Burroughs, Katherine Burroughs, Avery Bleeker and Aleksander Bleeker lost their constitutionally protected right to "life and liberty" with each other.

Again we pray that the Supreme Court of the United States can help us put an end to this injustice by at this time letting us have more time to prepare a Petition for a Writ of Certiorari.

Counting from the date of the Supreme Court of Texas denial, without counting the actual date of May 22, 2026, in accordance with Rule 30, the current deadline for filing Petition for a Writ of Certiorari (90 days) is **August 20, 2026**. Coming from that date the deadline for Application for Extension to file a Petition for a Writ of Certiorari is August 10, 2026.

Coming from those dates the new **deadline to file Petition for a Writ of Certiorari sought by us**, if the Extension is kindly approved, is - **October 19, 2026**.

III. REASONS FOR GOOD CAUSE

We, Marina Burroughs and Robert Burroughs, are not seeking this extension to cause a delay in the legal process but so we can try to more properly prepare and draft needed documents.

As our court appointed appellate representatives have advised us that they no longer represent us in this matter we have no choice but to continue the legal process Pro Se and seek any legal venue we can take to cure State of Texas Representatives' violations of our Constitutional rights to be with and to raise the only child we birthed together.

As neither one of us has a legal degree the preparation of these documents is a new, very stressful and time consuming effort.

The trial record in this case is in the region of 1000 pages, which is exceptionally voluminous even for an experienced attorney, requiring extensive review to properly frame the constitutional questions presented in this case, on top of the fact that this trial record is going over a lifetime of two individuals who are a middle aged couple together consisting of over a century of personal experiences, distorted by opinions of the State Representatives who have no knowledge of our character and distorted by the lies of our adversaries.

Intentionally, no service providers that worked with us were called to the stand to testify but one, who did not say anything bad about us. We have been painted into the "boogy men" by State authorities' opinions stated as facts. To find all these untrue statements we need more time to read this voluminous document. My husband, Robert Burroughs, is a disabled 62 year old man and I, Marina Burroughs, is a first generation immigrant from Ukraine. It takes us time to comprehend the words and complexity of the paperwork we have to deal with in this case, and even though we know we will never fully grasp everything, we have to put our best foot forward to try to get our daughter back home.

In addition to all that: money is of the essence, as my husband is and has been disabled for years and I have lost my income in 2025 due to my rental property being put on fire by the arsonist. I, Marina Burroughs, am an immigrant, with a heavy frown upon in East Texas accent and I do not have many opportunities coming my way. Having to juggle preparation of these documents, taking care and supporting each other both physically and emotionally and taking minimum wage contracting jobs is not an easy task.

This extension is sought for good cause and in an attempt to prevent a manifest injustice, due to errors of facts and abundance of evidence of wrongdoings and discrimination by the State of Texas Representatives within the trial transcript itself towards us, Respondents: Marina Burroughs and Robert Burroughs.

The opposing party has been hostile and discriminatory from the beginning. It was revealed during the trial hearing that the opposing party has started the adoption process of our daughter as early as 4 (four) months into their possession of our child and has been heavily pushing to adopt our child ever since; so **it is unknown if the opposing party objects or consents to this extension.**

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondents Robert Burroughs and Marina Burroughs pray that upon considering this Application and Appendixes submitted with it the Supreme Court of the United States grants us maximum allowed 60 day extension of the current

due date of August 20, 2026 to file Petition for a Writ of Certiorari to be extended up to and including October 19, 2026 and any other relief to which we are entitled.

V. ATTACHMENTS

1. **Appendix A.** Supreme Court of Texas Denial. May 22, 2026
2. **Appendix B.** Allen B. Boswell letter of completion of appellate representation. May 26, 2026
3. **Appendix C.** Allen Boswell and Marina Burroughs (Gaponenko) final communications. May 30, 2026 through June 1, 2026
4. **Appendix D.** Nunc Pro Tunc Order of Termination. October 23, 202
5. **Appendix E.** Order Denying Motion for a New Trial to Marina Burroughs. October 23, 2025.
6. **Appendix F.** Order Denying Motion for a New Trial to Robert Burroughs. October 23, 2025
7. **Appendix G.** Twelfth Court of Appeals District of Texas Judgment. March 18, 2026
8. **Appendix H.** Proof of Service to parties involved.
9. **Appendix I.** Original Order for Termination. October 17, 2025

VI. CONCLUSION

For the foregoing reasons, Petitioners request that the time to file a writ of certiorari in the above-captioned matter be extended 60 days to and including October 19, 2026.

Respectfully submitted,



Signature of Petitioner (mother)

Marina BURROUGHS

Printed Name

Address: 7192 Shallowater Rd,

Mabank, TX, 75156

Email: marina.aleksandra.888@gmail.com

Telephone: (903) 519 - 2249



Signature of Petitioner (father)

Robert Burroughs

Printed Name

Address: 7192 Shallowater Rd,

Mabank, TX, 75156

Email: robertburroughs1st@gmail.com

Telephone: (903) 519 - 2249

Date: August 6, 2026

Appendix A

**Supreme Court of Texas Denial
May 22, 2026**

FILE COPY

RE: Case No. 26-0381

COA #: 12-25-00281-CV

DATE: 5/22/2026
TC#: FAM24-0598-CC2

STYLE: PT CASE: IN RE K.B., A CHILD

Today the Supreme Court of Texas denied the petitions
for review in the above-referenced case.

MR. ALLEN B. BOSWELL

* DELIVERED VIA E-MAIL *

Appendix G

Twelfth Court of Appeals District of Texas Judgment

March 18, 2026



COURT OF APPEALS
TWELFTH COURT OF APPEALS DISTRICT OF TEXAS
JUDGMENT

MARCH 18, 2026

NO. 12-25-00281-CV

IN THE INTEREST OF K.B., A CHILD

Appeal from the County Court at Law No 2
of Henderson County, Texas (Tr.Ct.No. FAM24-0598-CC2)

THIS CAUSE came to be heard on the appellate record and briefs filed herein, and the same being considered, it is the opinion of this court that there was no error in the judgment.

It is therefore ORDERED, ADJUDGED, and DECREED that the judgment of the court below **be in all things affirmed**, and that this decision be certified to the court below for observance.

James T. Worthen, Chief Justice.
Panel consisted of Worthen, C.J., Hoyle, J., and Davis, J.

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

Appendix H

Proof of Service to Parties Involved

No. A- pending

Marina Burroughs - Petitioner, Applicant, and

Robert Burroughs - Petitioner, Applicant

Vs.

Texas Department of Family and Protective Services - Respondent

(**I**n The Interest of K.B., a Child)

AFFIDAVIT OF SERVICE

We, Marina Burroughs and Robert Burroughs, hereby certify that a true and correct copy of the **A**PPPLICATION FOR EXTENSION OF TIME TO FILE A PETITION FOR A WRIT OF **C**ERTIORARI TO THE SUPREME COURT OF TEXAS was served via certified mail on the following parties on August 6, 2026:

REBECCA RAY

Attorney for the Petitioner,

Department of Family and Protective Services

Henderson County Attorney's Office

100 E. Tyler Street

Athens, Texas 75751

Penny La Plant

Casa of Trinity Valley

Attorney Ad Litem for the Child

P.O. Box 2259

Athens, TX, 75751

Karen Bretzke

Attorney for the Child

The Bretzke Law Firm

520 S. Bonner Ave.,

Tyler, TX, 75702



Signature of Petitioner (mother)

Marina Buzzroughs

Printed Name

Address: 7192 Shallowater Rd,

Mabank, TX, 75156

Email: marina.aleksandra.888@gmail.com

Telephone: (903) 519 - 2249



Signature of Petitioner (father)

Robert Buzzroughs

Printed Name

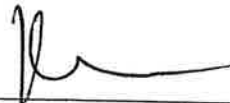
Address: 7192 Shallowater Rd,

Mabank, TX, 75156

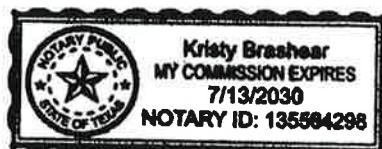
Email: robertburroughs1st@gmail.com

Telephone: (903) 519 -2249

Sworn to and subscribed before me this 6th Day of August, 2026.



Notary Public





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