

In the Supreme Court of the United States

M.W.,

Applicant,

v.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES, N.G., AND O.A.,

Respondents.

To the Honorable Elena Kagan,
Associate Justice of the Supreme Court of the United States
and Circuit Justice for the Ninth Circuit

**EMERGENCY SUPPLEMENTAL BRIEF REGARDING
REQUEST FOR ADMINISTRATIVE STAY**

Applicant M.W. hereby submits this emergency supplemental brief to apprise the Court of intervening developments that heighten the urgency of her request for an administrative stay of the California judgment at issue in this Application. M.W. explained in her application that relief was urgently needed because Respondents N.G. and O.A. could attempt to remove Baby G. from the hospital as soon as September 17, 2026. However, that date appears to have been too conservative, and **an administrative stay is now needed by 1:00 EST tomorrow.**

M.W. learned today that just after this Court requested a response from the Commissioning Parties by September 18, 2026, the guardian ad litem in the Texas court filed an emergency motion to immediately modify that court's order for life-saving care described in the Application. That motion, which the Commissioning Parties appear to have joined, requests that the Texas court immediately permit the

Commissioning Parties to remove Baby G. from the hospital and from the State of Texas. A copy of the motion and related correspondence has been furnished to the Court in camera.

At the urging of the Commissioning Parties, the Texas court has set the hearing on the guardian ad litem's motion for **tomorrow, September 15, at 2:30 pm EDT**. Because M.W. has been dismissed from that case with prejudice, the Commissioning Parties are maintaining that M.W. may not be heard in connection with their request. That is one of the core irreparable harms described in the Application.

The Commissioning Parties appear to now seek this relief in an attempt to moot the Court's jurisdiction to decide the Application. The Texas court's orders have hinged on its grant of full faith and credit to the California judgment as to which M.W. requests a stay, and a stay would thus nullify the core premise of its rulings. But if the Commissioning Parties remove Baby G. from Texas first, it risks making any ruling by this Court ineffective.

For these reasons, M.W. hereby renews her request for an immediate administrative stay to preserve the child's life, the status quo, and this Court's jurisdiction.

Dated: September 14, 2026

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PROOF OF SERVICE

A copy of this emergency supplemental brief was served by U.S. mail to the parties or their attorneys listed below in accordance with Supreme Court Rule 22.2 and 29.3:

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