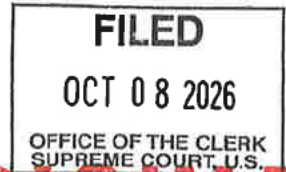

**In The
Supreme Court of the United States**

October Term 2026

C.J.,
Applicant/Petitioner,

v.

N.N.,
Respondent.

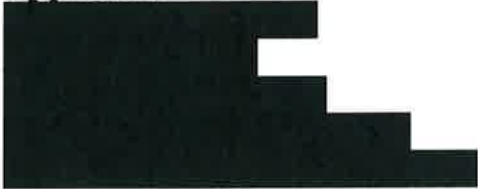


ORIGINAL

**Motion for Leave to File Unredacted Application for Extension of Time
Under Seal**

**To the Honorable John G. Roberts, Jr., Chief Justice of the Supreme Court
of the United States and Circuit Justice for the Fourth Circuit**

**C.J.
Applicant**

A large black rectangular redaction box covering the signature and name of the applicant.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

To conserve judicial resources, and to protect the privacy of the minor children to the greatest extent possible, this matter should only be litigated in this Court if absolutely necessary. It is very possible that the Appellate Court of Maryland could fix the majority of outstanding legal errors shortly after [REDACTED].

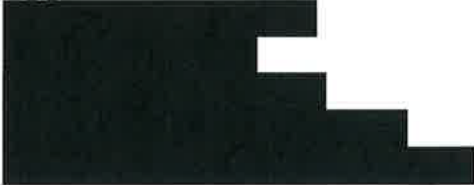
For the foregoing reasons, the motion to file the **unredacted** Application for Extension of Time under seal should be granted.

October 14, 2026

/s/ C.J.

C.J.

Applicant

A large black rectangular redaction box covers the signature and any text that might have been present below the name C.J. Applicant.

IN THE SUPREME COURT OF THE UNITED STATES

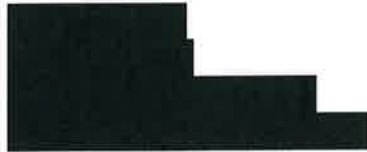
No. _____

C.J.,
Petitioner,
v.
N.N.,
Respondent.

CERTIFICATE OF SERVICE

I, Applicant C.J., hereby certify that on this 14th day of October, 2026, I caused one copy of the foregoing Motion for Leave to File Unredacted Application for Extension of Time Under Seal to be served by first-class mail on the following *pro se* party:

N.N.



Respondent

/s/ C.J.
C.J.



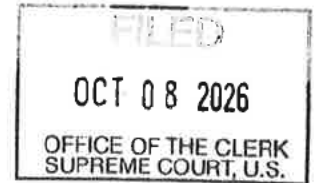
Applicant

No. 26A491

ORIGINAL

In The
Supreme Court of the United States

October Term 2026



C.J.,
Applicant/Petitioner,

v.

N.N.,
Respondent.

**Application for Extension of Time to
File Petition for Writ of Certiorari**

To the Honorable John G. Roberts, Jr., Chief Justice of the Supreme Court
of the United States and Circuit Justice for the Fourth Circuit

C.J.
Applicant

A large black rectangular redaction box covering the signature and name of the applicant.

APPLICATION FOR EXTENSION OF TIME

Pursuant to Supreme Court Rules 13.3, 13.5, and 21, Applicant C.J. ("Father") respectfully requests a 60-day extension of time to file a petition for writ of certiorari, and clarification as to the date from which time runs for Father to file a petition for writ of certiorari with this Court.

BACKGROUND

[REDACTED] the Appellate Court of Maryland denied Father's appeal of a custody dispute.

[REDACTED] the Supreme Court of Maryland denied Father's Petition for Writ of Certiorari for the [REDACTED] denial by the Appellate Court of Maryland.

[REDACTED] the Supreme Court of Maryland denied Father's [REDACTED] Petition for Rehearing.

JURISDICTION

This Court will have jurisdiction over any timely filed petition for writ of certiorari in this case under 28 U.S.C. § 1257. Under Supreme Court Rules 13.1 and 13.3, a petition for a writ of certiorari is currently due to be filed on or before October 19, 2026, at the earliest. However, Father also seeks clarification as to whether the properly tolled due date should be October 19, 2026 or December 28, 2026. This application has been filed at least 10 days before the earliest possible date a petition would be due, *i.e.* October 19, 2026. See Sup. Ct. R. 13.5.

REASONS JUSTIFYING AN EXTENSION OF TIME

1) The decision below is in conflict with existing Supreme Court precedent, *i.e.* *Brinkerhoff-Faris Trust & Savings Co. v. Hill*, 281 U.S. 673 (1930), wherein this Court ruled that a state judiciary may not leverage repeated procedural gymnastics, illogical decisions, and surprise interpretations of existing state law, to deny a citizen any meaningful opportunity to defend their Federal rights. Father is a veteran of the United States military. Many fathers in the State of Maryland, including many military veterans, suffer from similar due process violations depriving them of their constitutional parental rights, derailing the lives and careers of qualified personnel, and causing significant harm to the morale and readiness of the Armed Forces.

2) The Supreme Court of Maryland did not provide any answer to Father's request for clarification as to whether a motion for reconsideration under Maryland Rule 8-605 constitutes a petition for rehearing under U.S. Supreme Court Rule 13.3.

3) All state options have not yet been exhausted in the instant case.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] A 60-day extension of time to file a petition for writ of certiorari should be granted to conserve judicial resources, and to give the Maryland Judiciary an opportunity to correct these legal errors.

4) [REDACTED]

[REDACTED] Maryland law provides that collateral estoppel does not apply to abuse allegations made in previous custody and civil protective order hearings. See *Augustine v. Wolf*, 264 Md. App. 1, 327 A.3d 120 (2024). [REDACTED]

[REDACTED]

[REDACTED] Father still has multiple opportunities to resolve and appeal all pertinent issues at the state level.

5) In *Stachowski v. State*, 416 Md. 276, 281, 7 A.3d 1058 (2010), the Supreme Court of Maryland clarified that it does entertain and sometimes grant motions to reconsider denied certiorari petitions:

After the Court of Special Appeals transferred the three home improvement cases to this Court, Stachowski filed in this Court a “supplemental” certiorari petition, asking the Court to review the Circuit Court’s judgments in the home improvement cases. This Court initially denied the certiorari petition, but, on motion for reconsideration, the Court on August 22, 2007, granted the petition and issued a writ of certiorari in the three home improvement cases.

Even if a motion for reconsideration of a denied certiorari petition under Maryland Rule 8-605 does not always constitute a petition for rehearing under U.S. Supreme Court Rule 13.3, Father contends that the deadline should have been tolled in the instant case. The Supreme Court of Maryland’s denial of Father’s Motion for Reconsideration constituted the final step of a *Brinkerhoff* Trap, wherein a state judiciary denies a citizen any meaningful opportunity to defend their Federal rights. But paradoxically, the current situation is peculiar in that Father also has not fully exhausted his state-level options to correct these issues, as expounded *supra*.

[illegible]

In *Stubbs v. Hall*, 308 Ga. 354, 361 n. 10, 840 S.E.2d 407 (2020), the Supreme Court of Georgia stated:

We note that if a petitioner files a motion for reconsideration, either after the entry of a judgment from this Court or after the entry of an order denying a petition for certiorari in this Court, the period in which a timely petition for certiorari must be sought in the United States Supreme Court is tolled “until rehearing is denied or a new judgment is entered on the rehearing,” *Shapiro et al.*, supra at § 6.3, pp. 394-395, because “a timely petition for rehearing . . . operates to suspend the finality of the state court’s judgment, pending the court’s further determination whether the judgment should be modified so as to alter its adjudication of the rights of the parties,” *Dept. of Banking v. Pink*, 317 U.S. 264, 266 (63 S. Ct. 233, 87 LE2d 254) (1942).

ERRORS

The Maryland Judiciary has repeatedly leveraged procedural gymnastics, illogical decisions, and surprise interpretations of existing state law, to deny Father any meaningful opportunity to defend his parental rights.

In *Santosky v. Kramer*, 455 U.S. 745, 753 (1982), this Court stated:

The fundamental liberty interest of natural parents in the care, custody, and management of their child is protected by the Fourteenth Amendment, and does not evaporate simply because they have not been model parents or have lost temporary custody of their child to the State. A parental rights termination proceeding interferes with that fundamental liberty interest. When the State moves to destroy weakened familial bonds, it must provide the parents with fundamentally fair procedures.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] In response, the Trial Court absurdly claimed that it “did not believe” the police detective’s testimony.

In *Gambino v. State*, 269 Md. App. 85, 122 n.5, 353 A.3d 322 (2026), the Appellate Court of Maryland held:

The 2019 video of Ms. Gambino repeatedly asking one-year-old R whether her father had touched her inappropriately was relevant to the State’s theory of the case in that it helped establish a pattern of behavior that spanned several years and culminated in a chargeable offense in 2023.

In *Forrester v. State*, 224 Md. 337, 349, 167 A.2d 878 (1961), the Supreme Court of Maryland held:

And, as no effort was made to produce the original tape, nor any explanation offered for its nonproduction, the answer called for, if allowed, would have violated the best evidence rule. The best evidence of which the case is capable must be produced, and secondary, or inferior, evidence is only admissible after a proper foundation has been laid, showing good and sufficient reasons for the failure to produce the primary evidence.

In *Gordon v. State*, 204 Md. App. 327, 347, 40 A.3d 1093 (2012), the Appellate Court of Maryland held:

The Best Evidence Rule states a preference for original documents, but does not foreclose use of secondary evidence “after a proper foundation has been laid showing good and sufficient reasons for the failure to produce the primary evidence.”

Maryland Rule 5-1002 provides:

To prove the content of a writing, recording, or photograph, the original writing, recording, or photograph is required, except as otherwise provided in these rules or by statute.

Maryland law clearly provides that the forensic interview video is pertinent evidence, and that the Maryland Judiciary's procedural gymnastics and illogical rulings constitute clear 14th Amendment due process violations.

Gambino was adjudicated in a criminal jury trial because the mother in that case, Jasmine Leah Gambino, had caused her child to be designated as a Child in Need of Assistance ("CINA") with her persistent false allegations and child coaching. See Maryland Code, Courts and Judicial Proceedings § 3-805. Ms. Gambino being held legally accountable for her wrongdoings was an extreme statistical outlier in Montgomery County, Maryland. The Maryland Judiciary has essentially communicated that it will deliberately punish innocent fathers in bench trials unless a mother's false accusations reach the point where a child is designated as a CINA.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Maryland law requires a parent's actions to be reckless or intentional to be designated as child abuse. "Careless" does not meet the threshold.

In *Taylor v. Harford County Department of Social Services*, 384 Md. 213, 229-233, 862 A.2d 1026 (2004), the Supreme Court of Maryland held:

With respect to the case *sub judice* we view gross negligence as something more than simple negligence, and likely more akin to reckless conduct, the kind of conduct specifically contemplated in COMAR 07.02.07.12C(2)(a)(i)...

Therefore, by solely invoking a foreseeability of harm test, a concept inextricably tied to a general negligence analysis, in deciding whether HCDSS's finding of indicated child physical abuse was appropriate, the ALJ applied an improper standard to the facts before him. Accidents do happen, but many accidents are in some ways foreseeable. Simply because injury to another may be a foreseeable consequence of an action, however, does not make it per se reckless conduct...

Another example would be those instances where drivers have run over other persons as they operated vehicles in reverse. The foreseeability of the drivers's actions would be very relevant in a negligence tort context even though there was no intent to injure. However, under the ALJ's analysis, if the driver was a parent and the person injured his or her child, the foreseeability standard of negligence would be transmogrified into intent to injure the child and the parent would forever be branded a child abuser. We do not believe that was the intent of the Legislature...

We hold that the ALJ's determination that appellant's act of kicking a footstool and unintentionally injuring his daughter was to be considered "indicated" child physical abuse was not properly reached. Whereas COMAR 07.02.07.12 contemplates that a parent unintentionally injuring his or her child will generally only be considered to have committed child physical abuse if the act causing the injury can be shown to have been "reckless or deliberate," the ALJ instead accepted HCDSS's argument that when appellant "intentionally kicked the stool in the direction of [L'], it is immaterial whether the Appellant intended to hit [L'] with the stool" (alterations added). In respect to intent, it is material whether there was "intent" to injure "L." There was no direct evidence proffered, other than the act of kicking the footstool, that contradicted the evidence proffered by appellant that he did not intend to injure his daughter. The correct standard therefore was unrelated to intent to injure, but whether appellant's actions were "reckless." Because the ALJ improperly applied a foreseeability standard to infer intent instead of examining appellant's conduct under the correct "reckless" conduct standard, we shall vacate the ALJ's decision and remand the case to the ALJ for further proceedings consistent with this opinion.

The Code of Maryland Regulations ("COMAR") 07.02.07.11C provides:

1. A local department shall make a finding that child abuse is ruled out if the local department finds that child abuse did not occur.

2. The local department may base a finding of ruled out on:

...

c. A finding that the alleged maltreater was not responsible for the injury for reasons including but not limited to:

i. The injury was caused by accidental means and was not caused by a reckless disregard for the child's health or welfare; or...

In *McClanahan v. Washington County Department of Social Services*, 445 Md.

691, 706-707, 129 A.3d 293 (2015), the Supreme Court of Maryland stated:

When expert witnesses testify that a parental action has caused mental injury to a child, the parent's action must be examined in context. As we concluded in *Taylor*, "*it is material* whether there was 'intent' to injure [the child]." ¹⁵ *Id.* at 233, 862 A.2d at 1037 (emphasis in original). Because FL § 5-701(b) does not differentiate between mental injury and physical injury, we do not interpret Subtitle 7 to sanction a regulation in which a parent can be deemed a child abuser for unintentionally causing mental injury but not liable for unintentionally causing physical injury. ¹⁶ The Department offers no reasonable explanation for that distinction.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Taylor* explicitly provides that even a parent who accidentally runs over their child with a vehicle should not “forever be branded a child abuser,” yet the Maryland Judiciary has flippantly imposed this cruel consequence on Father, whose actions were not even careless, much less reckless.

NOTICE TO OPPOSING PARTY AND CONSENT

Respondent N.N. (“Mother”) has been notified of the intent to file this application and was requested to advise if there was any objection to the filing. To date, no objection has been received.

CONCLUSION

Wherefore, Applicant C.J. (“Father”) respectfully requests that an Order be entered extending his time to petition for writ of certiorari by 60 days with this Court, and clarifying whether the original due date for his petition for writ of certiorari with this Court is October 19, 2026 or December 28, 2026.

October 8, 2026

/s/ C.J.
C.J.
Applicant

[REDACTED]

IN THE SUPREME COURT OF THE UNITED STATES

No. _____

C.J.,
Petitioner,
v.
N.N.,
Respondent.

CERTIFICATE OF SERVICE

I, Applicant C.J., hereby certify that on this 8th day of October, 2017, I caused one copy of the foregoing Application for Extension of Time to File Petition for Writ of Certiorari to be served by first-class mail on the following *pro se* party:

N.N.



Respondent

/s/ C.J.
C.J.



Applicant



Supreme Court of Maryland

Robert C. Murphy Courts of Appeal Building
361 Rowe Boulevard
Annapolis, Maryland 21401

Gregory Hilton,
Clerk

(410) 260-1500
(800) 926-2583

July 21, 2026

NOTICE OF ORDER

C. J. v. N. N.
Petition No. 118, September Term, 2026

On July 21, 2026, the Court entered an order:¹ denying the petition in this Court.

/s/ Gregory Hilton
Clerk

Copy to: All counsel of record
Any unrepresented parties
Clerk, Appellate Court of Maryland
Clerk, Circuit Court

¹ The Court's order can be viewed online at <https://www.mdcourts.gov/scm/petitions>.

* IN THE
* SUPREME COURT
PETITIONS FOR WRIT OF CERTIORARI * OF MARYLAND
* September Term, 2025¹

O R D E R

It is this 21st day of July 2026, by the Supreme Court of Maryland,

ORDERED that the following petitions for writ of certiorari are denied:

- Pet. No. 52* – Eric Hemphill, et al. v. Eliza McLaren, et al.
- Pet. No. 57* – Kevin Dudley v. State of Maryland
- Pet. No. 59* – In the Matter of George E. Graefe, III, et al.
- Pet. No. 60* – Zafar Waqar v. Tayaba Aftab, et al.
- Pet. No. 61* – Teriquo Lamont Johnson v. State of Maryland
- Pet. No. 69* – Mariah E. Riedell v. Calvert County Board of County Commissioners, et al.
- Pet. No. 79* – Keith Whack v. Adrian Mabe
- Pet. No. 80* – Jasmine Leah Gambino v. State of Maryland
- Pet. No. 81* – In Re: The Estate of Sam Duraiswamy
- Pet. No. 82* – Larry Odalipupo v. State of Maryland
Petition & Conditional Cross-Petition denied.
- Pet. No. 83* – Robert Malinowski v. Kristine D. Brown, et al.
- Pet. No. 84* – Russell Antonio Geater v. State of Maryland
- Pet. No. 85* – James Makia v. Eziaku Ogbonna
- Pet. No. 90* – John Hollis Reynolds, IV v. State of Maryland

¹ Unless otherwise indicated, all petitions and motions were filed in September Term 2025. Petitions and motions indicated with an “*” were filed in September Term 2026.

Pet. No. 92* – John Doe II v. MedStar Health Inc., et al.

Pet. No. 94* – Jonathan Emden v. Zachary Seidel, et al.
“Petitioner's Motion for Order to Show Cause Why Respondents' Answer Should Not Be Stricken or Disregarded, to Correct Party Alignment, or in the Alternative for Leave to Reply” denied.

Pet. No. 95* – Terance Johnson, Jr. v. State of Maryland

Pet. No. 96* – Kristie Reboulet, et al. v. Kelly Glass

Pet. No. 97* – Anthony Kirnon v. Shane Morris, et al.

Pet. No. 98* – Lionel Lee Prince v. State of Maryland

Pet. No. 99* – In the Matter of Christopher McCann
Motion for waiver of filing fees granted.

Pet. No. 101* – Van Powers v. City of Bowie, et al.

Pet. No. 102* – Christian R. Hurley v. Elicia Paige McCraney Degnan, et al.

Pet. No. 103* – Norman Fisher v. State of Maryland

Pet. No. 104* – In the Matter of Sandra Brown

Pet. No. 106* – In the Matter of The Ferndale Volunteer Fire Company, Inc.

Pet. No. 107* – Jeron Lee v. Justice Powell

Pet. No. 112* – Cephous Vincent v. Emelinda Vincent

Pet. No. 116* – In the Matter of Toni Marie Davis

Pet. No. 117* – Yoseph Seyoum v. Crowley, Hoge & Fein, P.C., et al.,

Pet. No. 118* – C. J. v. N. N.

Pet. No. 121* – Joel Duncan v. State of Maryland

Pet. No. 122* – Estate of Leonard Shand v. City of Hyattsville, Maryland, et al.

Pet. No. 125* – Datuan Blanchard v. State of Maryland
Justice Watts did not participate in the consideration of this matter.

Pet. No. 127* – Earl W. Rose, II v. Motor Vehicle Administration

Pet. No. 131* – Kashiah Harper v. Altus Student Housing, LLC/Altus Towson Row

Pet. No. 132* – Kashiah Harper v. Altus Student Housing, LLC/Altus Towson Row

Pet. No. 133* – Heidi Shamloo v. Kristi Harris

Pet. No. 134* – Drequan Savage v. State of Maryland

Pet No. 140* – Anthony Mickey v. Brittany Walker

Pet. No. 143* – Fausto Gomez v. Vertex TL, LLC, et al.

Pet. No. 144* – Antoinette Marshall-Hamner v. All Purpose Anytime Services LLC

Pet. No. 150* – Great Nation Moving LLC v. Chyrdonna Dean

Pet. No. 151* – Natasha Copeland v. Kiarra Copeland

Pet. No. 152* – Joy Berry, et al. v. Lamar King, et al.

Pet. No. 153* – Ashwani K. Srivastava v. Cherise Nuckols, et al.

And it is further

ORDERED that the following petitions for writ of certiorari are dismissed:

Pet. No. 56* – Geoffrey L. Tibbetts v. Brock & Scott, PLLC
Petition dismissed as untimely filed.

Pet. No. 89* – Tema Luft v. Motor Vehicle Administration
Petition dismissed as untimely filed.

Pet. No. 100* – Miguelina Nieves v. Barry I. Barker
Petition dismissed as untimely filed.

Pet. No. 111* – Cordeaire Davis Gray v. Damon Mores
Petition dismissed for failure to pay required filing fee.

And it is further

ORDERED that the motions for reconsideration filed in the following matters are denied.

Pet. No. 431 – Rabitah Moses v. Alex Vasquez
Justice Killough did not participate in the consideration of this matter.

Pet. No. 504 – Odunayo Ajayi v. Olaide Ogunsade

Pet. No. 36* – Kenneth R. Cunningham v. State of Maryland

Pursuant to the Maryland Uniform Electronic Legal
Materials Act (§§ 10-1601 et seq. of the State
Government Article) this document is authentic.



2026.07.21
10:27:21 -04'00'

Gregory Hilton, Clerk



/s/ Matthew J. Fader
Chief Justice

C. J. v. N. N.

* IN THE
* SUPREME COURT
* OF MARYLAND
* Petition No. 118
* September Term, 2026
*
* (No. 1313, Sept. Term, 2025
* Appellate Court of Maryland)
* (Cir. Ct. No. C-15-FM-22-002562)

O R D E R

Pending before the Court are the following:

1. The "Petitioner's Motion for Reconsideration or, in the alternative, Petition for Rehearing;"
2. The "Petitioner's Motion for Leave to File Supplemental Petition for Writ of Certiorari;"
3. The "Petitioner's Motion for Leave to File an Oversized Motion;"
4. The "Petitioner's Motion to Clarify;"
5. The "Petitioner's Motion to Stay Circuit Court Proceedings Pending Appeal; and"
6. The "Petitioner's Motion to Consolidate Hearing for Active Motions."

Upon consideration of these papers, it is this 29th day of September 2026, by the
Supreme Court of Maryland,

ORDERED that the petitioner's motions are denied.



/s/ Matthew J. Fader
Chief Justice

C.J.

v

N.N.

* IN THE
* SUPREME COURT
* OF MARYLAND
* Petition No. 118
* September Term, 2026

O R D E R

Upon consideration of the “Petitioner’s Motion to File Pseudonymous Proceedings” filed by Petitioner, C.J., in the above-captioned case on May 27, 2026, in which Petitioner requests that parties in this case be listed by pseudonyms and that personally identifiable information be shielded, and noting that no opposition to the motion was filed, it is this 11th day of June 2026,

ORDERED, by the Supreme Court of Maryland, that the motion is GRANTED; and it is further

ORDERED, that the unredacted versions of all documents in this case shall be sealed and shielded from public inspection subject to further order of the Court. The redacted version of papers filed in this case shall be publicly available; and it is further

ORDERED, that this case is captioned as *C.J. v. N.N.*



/s/ Shirley M. Watts
Senior Justice



10M15018362

United States Supreme Court

Recipient:
Clerks Office

Sender:

Processed:
10/8/2026 10:03:38 AM | 579

