

IN THE SUPREME COURT OF THE UNITED STATES

No. 26A535

JESSICA TERESA GRIFFIN

Applicant / Petitioner

v.

ROBERT LEE ISAAC III, et al.

Respondents

**APPLICATION FOR STAY PENDING FILING AND DISPOSITION OF PETITION
FOR A WRIT OF CERTIORARI**

To the Honorable Clarence Thomas,
Associate Justice of the Supreme Court of the United States
and Circuit Justice for the Eleventh Circuit

From the District Court of Appeal of Florida, Fourth District
Case No. 4D2025-3843
Lower Tribunal Case No. 502024CP004954XXXXMB

Jessica Teresa Griffin

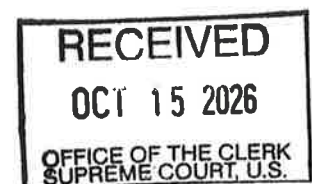
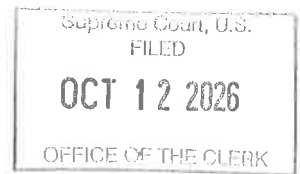
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September 23, 2026



APPLICATION FOR STAY PENDING FILING AND DISPOSITION OF PETITION FOR A WRIT OF CERTIORARI

To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

Applicant Jessica Teresa Griffin, proceeding pro se and serving as the court-appointed Personal Representative of the Estate of Niyoka G. Isaac, respectfully submits this Application pursuant to 28 U.S.C. § 2101(f) and Supreme Court Rules 22 and 23. Applicant seeks a temporary stay of enforcement of the state-court judgment sought to be reviewed, and such related stay of mandate as may be necessary to make that relief effective, pending the timely filing and disposition of her Petition for a Writ of Certiorari.

I. INTRODUCTION

1. This Application presents a request for interim preservation, not a request for final adjudication of Florida probate or real-property law. Applicant asks the Circuit Justice to preserve the status quo long enough for this Court to determine whether to review the federal due-process questions identified in her contemplated Petition for a Writ of Certiorari.
2. Applicant was appointed Personal Representative of the Estate of Niyoka G. Isaac. In that fiduciary capacity, she maintained that the Wellington property at issue in the proceedings below belonged to the Estate and raised objections concerning the disputed deed, notice, service, evidence, and the procedures through which ownership was adjudicated.
3. The Circuit Court ultimately determined that the property passed outside probate. The Fourth District Court of Appeal affirmed without written opinion on July 30, 2026, as shown by the decision incorporated herein as Exhibit A.
4. Applicant timely pursued post-decision relief. The Fourth District denied her motions for rehearing, clarification, written opinion, and certification on September 2, 2026, as reflected in Exhibit B.
5. Applicant then sought the same essential interim protection in the court below. On September 15, 2026, she filed a Motion to Stay Issuance of Mandate pending contemplated certiorari review, incorporated herein as Exhibit D. On September 18, 2026, the Fourth District denied that request, as reflected in Exhibit E.
6. Applicant therefore comes to this Court only after first seeking a stay below. The September 18 order is supporting documentation establishing that the requested relief was sought and denied; it is not the present Application.
7. The stay requested here is limited. Applicant does not ask the Circuit Justice to declare the disputed deed invalid, award title, administer the Estate, decide the merits of separate litigation, or make findings of judicial misconduct or retaliation. She asks only for interim relief sufficient to preserve meaningful access to certiorari review.

II. PARTIES TO THE PROCEEDING

8. Applicant Jessica Teresa Griffin was the Appellant in the District Court of Appeal of Florida, Fourth District, Case No. 4D2025-3843. She is also the court-appointed Personal Representative of the Estate of Niyoka G. Isaac.

9. Respondent Robert Lee Isaac III was an Appellee in the proceedings below and asserted an interest in the disputed Wellington property under the deed that became the subject of the ownership determination.

10. The Estate of Niyoka G. Isaac was also designated as an Appellee in the proceedings below.

11. Other interested persons appearing in the state proceedings include Cressie M. Griffin and Dorthenia Griffin. The September 2, 2026 appellate order incorporated as Exhibit B reflects service upon those interested persons.

12. The underlying probate proceeding is Estate of Niyoka G. Isaac, Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, Probate Division, Case No. 502024CP004954XXXXMB.

III. JURISDICTION AND AUTHORITY FOR THE APPLICATION

13. Under 28 U.S.C. § 2101(f), when a final judgment of a state court is subject to review by this Court on writ of certiorari, execution and enforcement of that judgment may be stayed for a reasonable time to permit the aggrieved party to seek certiorari.

14. Supreme Court Rule 23.2 permits a party to a judgment sought to be reviewed to present to a Justice an application to stay enforcement of that judgment. Rule 23.3 requires the applicant to identify the judgment, explain specifically why a stay is justified, and ordinarily seek the requested relief first in the appropriate court below.

15. Supreme Court Rule 22 governs applications to individual Justices. Because this matter arises from Florida, the Application is directed to the Circuit Justice allotted to the Eleventh Circuit.

16. Applicant identifies the judgment sought to be reviewed as the Fourth District Court of Appeal's July 30, 2026 per curiam affirmance in Case No. 4D2025-3843, incorporated herein as Exhibit A, together with the September 2, 2026 order denying timely post-decision relief, incorporated herein as Exhibit B.

17. Applicant has satisfied the requirement of first seeking a stay below because her September 15, 2026 stay motion, incorporated as Exhibit D, was denied by the Fourth District on September 18, 2026, as shown by Exhibit E.

IV. FACTUAL BACKGROUND

18. The controversy arose during administration of the Estate of Niyoka G. Isaac. Applicant was appointed Personal Representative and thereby undertook fiduciary responsibilities concerning identification, protection, and administration of property she maintained belonged to the Estate.

19. The principal property dispute concerned the residence located at 1241 Jackpine Street, Wellington, Florida 33414.

20. Applicant maintained that the property was subject to Estate administration and challenged the legal effect and validity of a 2014 Quit Claim Deed relied upon to assert that the property passed outside probate.
21. The dispute included issues that Applicant describes as involving deed validity, execution and notarization, legal-name discrepancies, asserted corrective-deed deficiencies, notice, service, preservation, and the opportunity to obtain meaningful consideration of evidence and objections.
22. The Circuit Court conducted a final hearing on December 10, 2025 and thereafter filed a Final Order Determining Ownership of Property on December 15, 2025. That order, incorporated herein as Exhibit C, determined that the disputed property passed outside probate.
23. Applicant maintains that the manner in which the ownership issue was adjudicated affected not only her asserted interests but also her ability to perform the responsibilities placed upon her as Personal Representative.
24. Applicant further maintains that the relevant procedural events must be evaluated cumulatively rather than as isolated adverse rulings. Her contemplated Petition therefore frames the issue as one of federal procedural due process rather than a request for this Court to decide Florida deed law in the first instance.

V. PROCEDURAL HISTORY

25. Applicant timely appealed the Final Order Determining Ownership of Property to the District Court of Appeal of Florida, Fourth District, where the matter was assigned Case No. 4D2025-3843.
26. Applicant presented objections concerning the procedures affecting the asserted Estate property and her ability to protect interests she maintained were subject to Estate administration.
27. On July 30, 2026, the Fourth District entered a per curiam affirmance without a written opinion. Exhibit A.
28. Applicant thereafter filed timely motions for rehearing, clarification, written opinion, and certification.
29. On September 2, 2026, the Fourth District denied each of those motions. Exhibit B.
30. Applicant then prepared to seek review in this Court. Her contemplated Petition presents federal due-process questions and expressly limits the requested review so that this Court is not asked to function as a general appellate tribunal over Florida probate or property law.
31. On September 15, 2026, before applying to this Court for emergency relief, Applicant asked the Fourth District to stay issuance of its mandate pending the contemplated Petition for a Writ of Certiorari. Exhibit D.
32. On September 18, 2026, the Fourth District denied the stay request. Exhibit E.
33. Applicant now proceeds promptly with this Application and intends to file her Petition for a Writ of Certiorari within the period permitted by this Court's rules.

VI. RELIEF WAS FIRST SOUGHT AND DENIED BELOW

34. Rule 23.3 provides that, except in the most extraordinary circumstances, an application for a stay will not be entertained unless the requested relief was first sought in the appropriate court below.

35. Applicant complied with that requirement. Her September 15, 2026 motion specifically sought a stay of issuance of mandate pending contemplated certiorari review. Exhibit D.

36. The Fourth District denied that request on September 18, 2026. Exhibit E.

37. Accordingly, the state appellate court has already been afforded an opportunity to provide the requested interim protection and declined to do so. Applicant has no further stay relief available from that court on the motion already presented.

38. The present Application therefore supplies the lower-court denial required by Rule 23.3 and explains why relief from the Circuit Justice is now requested.

VII. GOVERNING STANDARD

39. A stay pending certiorari is extraordinary interim relief. The Court's in-chambers decisions require an applicant to demonstrate a reasonable probability that certiorari will be granted, a fair prospect that the Court will reverse the judgment below, and a likelihood of irreparable harm if a stay is denied. *Maryland v. King*, 567 U.S. 1301, 1302 (2012) (Roberts, C.J., in chambers); *Teva Pharmaceuticals USA, Inc. v. Sandoz, Inc.*, 572 U.S. 1301, 1301 (2014) (Roberts, C.J., in chambers).

40. The Court also considers the traditional stay considerations, including the relative injury to the parties and the public interest. See *Nken v. Holder*, 556 U.S. 418, 434 (2009).

41. These standards are demanding. Applicant does not rely merely upon disagreement with the state courts. She relies upon the federal due-process questions identified in her contemplated Petition, the asserted inability to obtain written resolution of those questions in the state appellate court, and the risk that enforcement before certiorari review may materially alter the interests the Petition seeks to protect.

42. Section 2101(f) specifically contemplates a stay for a reasonable period to enable an aggrieved party to seek certiorari. The requested relief is tailored to that purpose.

VIII. THERE IS A REASONABLE BASIS FOR CERTIORARI REVIEW

43. Applicant recognizes that certiorari is discretionary and that the existence of a federal constitutional allegation does not itself establish that review will be granted.

44. The contemplated Petition nevertheless presents a federal question under the Fourteenth Amendment: whether the procedures afforded Applicant provided a meaningful opportunity to be heard before substantial asserted Estate and property interests were finally determined.

45. Applicant's first question presented concerns whether due process is implicated where a state court determines rights affecting claimed Estate property while the court-appointed Personal Representative maintains that material deed-validity, notice, service, evidentiary, and procedural objections were not afforded meaningful consideration.

46. The second question concerns the constitutional adequacy of the process where substantial objections affecting Estate administration and claimed property rights were presented, no answer brief was filed by Appellees, the state appellate court affirmed without written opinion, and Applicant's requests for rehearing, clarification, written opinion, and certification were denied.

47. The third question concerns whether the cumulative procedural circumstances preserved by Applicant, including an unresolved circumstance in which an adverse litigant possessed specific information concerning Applicant's judicial-misconduct complaints that Applicant maintains she did not disclose, bear upon the fundamental fairness of the adjudicative process.

48. Applicant does not contend that a per curiam affirmance is itself unconstitutional. Nor does she ask this Court to infer misconduct from the confidentiality circumstance. Those matters are identified only as components of the cumulative procedural history.

49. The contemplated Petition therefore attempts to isolate a federal due-process question capable of review without asking this Court to independently construe the Decedent's Will, determine the validity of the deed under Florida law, administer the Estate, or adjudicate Applicant's separate civil claims.

IX. THERE IS A FAIR PROSPECT OF REVERSAL IF REVIEW IS GRANTED

50. The Due Process Clause protects the opportunity to be heard at a meaningful time and in a meaningful manner before protected interests are finally taken or adjudicated. See *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).

51. The Court has repeatedly emphasized that due process requires notice and an opportunity for hearing appropriate to the nature of the case. See *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 313–14 (1950).

52. Applicant's contemplated Petition does not depend upon a claim that every alleged state-law error constitutes a constitutional violation. Rather, she maintains that the combined procedural circumstances prevented meaningful consideration of material objections while she was acting as the fiduciary charged with protecting the Estate.

53. Applicant maintains that, if this Court concludes that the state procedures failed to provide the constitutionally required meaningful opportunity to be heard, the appropriate federal remedy would be to set aside or remand the judgment for proceedings consistent with due process, not for this Court to determine Florida title itself.

54. For stay purposes, Applicant therefore submits that the constitutional theory is sufficiently substantial to warrant preservation of the status quo while the Court determines whether to grant certiorari.

X. DENIAL OF A STAY RISKS IRREPARABLE HARM

55. The third stay factor requires a likelihood of irreparable harm absent interim relief. *Maryland v. King*, 567 U.S. at 1302; *Teva Pharmaceuticals*, 572 U.S. at 1301.

56. Applicant's asserted harm concerns specific property and Estate interests rather than a claim that can necessarily be restored through an ordinary damages award.

57. Applicant remains responsible for lawful Estate administration unless and until relieved or discharged by appropriate order. She maintains that enforcement of the ownership judgment while certiorari review is being pursued may permit changes in possession, control, records, preservation, or the practical condition of interests she contends were adjudicated through constitutionally inadequate procedures.

58. If the relevant property interests or records are transferred, altered, lost, or placed beyond practical preservation before this Court can consider the Petition, subsequent review could become materially less effective.

59. The concern is therefore preservation, not a request for immediate final possession. Applicant asks that the existing situation be maintained for the limited period necessary to seek certiorari.

60. The temporary nature of the requested stay distinguishes it from final relief. Applicant seeks only to prevent the contemplated federal review from being overtaken by events before the Court has an opportunity to decide whether review is warranted.

XI. THE BALANCE OF EQUITIES AND PUBLIC INTEREST SUPPORT A LIMITED STAY

61. A narrowly tailored stay would not determine title, invalidate the disputed deed, or grant Applicant the ultimate relief she seeks through certiorari.

62. Respondents would remain free to defend the judgment and oppose certiorari. The requested stay would postpone enforcement only for the period necessary for this Court to consider the Petition.

63. By contrast, if enforcement materially changes the subject matter before certiorari review can occur, Applicant contends that the resulting harm may be difficult to undo.

64. The public interest also favors orderly judicial review and preservation of the Court's ability to provide effective relief when a properly presented federal constitutional question is pending.

65. Applicant therefore submits that the relative equities favor temporary preservation rather than immediate alteration of the status quo.

XII. THE REQUEST IS NARROWLY TAILORED

66. Applicant does not seek an indefinite stay.

67. She requests relief only pending the timely filing and disposition of her Petition for a Writ of Certiorari.

68. If the Petition is denied, the stay may terminate automatically. If the Petition is granted, Applicant requests that the stay remain in effect until this Court sends down its judgment or otherwise orders.

69. This form of time-limited relief accords with the function of a stay under 28 U.S.C. § 2101(f): preserving the ability of an aggrieved party to seek certiorari before enforcement makes review ineffective.

70. Applicant further requests only such stay of the Fourth District's mandate as is necessary to make the stay of enforcement effective.

XIII. CONCLUSION

71. Applicant first sought interim relief in the Fourth District Court of Appeal and was denied, as established by Exhibits D and E.

72. The contemplated Petition presents federal due-process questions concerning whether Applicant received a meaningful opportunity to protect asserted Estate and property interests before those interests were finally adjudicated.

73. Applicant has limited the federal questions so that this Court need not independently decide Florida deed law, construe the Will in the first instance, administer the Estate, adjudicate separate civil claims, or presume misconduct.

74. The requested stay is correspondingly limited. It would preserve the status quo while Applicant timely files her Petition and while this Court determines whether certiorari review is warranted.

75. For those reasons, Applicant respectfully requests the temporary stay described below.

XIV. RELIEF REQUESTED

WHEREFORE, Applicant Jessica Teresa Griffin respectfully requests that the Circuit Justice enter an order:

A. Staying enforcement of the judgment sought to be reviewed in District Court of Appeal of Florida, Fourth District, Case No. 4D2025-3843, pending the timely filing and disposition of Applicant's Petition for a Writ of Certiorari;

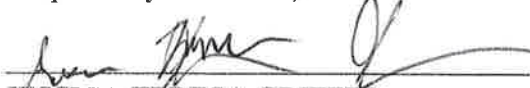
B. Staying issuance or effectiveness of the Fourth District's mandate, or recalling the mandate if necessary and legally appropriate, solely to the extent required to make the stay of enforcement effective;

C. Providing that, if the Petition for a Writ of Certiorari is denied, the stay shall terminate automatically;

D. Providing that, if the Petition for a Writ of Certiorari is granted, the stay shall remain in effect until this Court sends down its judgment or otherwise orders; and

E. Granting such other narrowly tailored interim relief as the Circuit Justice or the Court determines necessary to preserve effective certiorari review.

Respectfully submitted,


JESSICA TERESA GRIFFIN

Applicant / Petitioner, Pro Se

Court-Appointed Personal Representative

Estate of Niyoka G. Isaac

1080 Summit Trail Circle, Unit C

West Palm Beach, Florida 33415

Email: grffnjssc@gmail.com

Date: September 23, 2026

CERTIFICATE OF SERVICE

I certify that on September 23, 2026, a true and correct copy of this Application and its accompanying materials was served upon all parties entitled to service in accordance with the applicable Rules of the Supreme Court of the United States.


JESSICA TERESA GRIFFIN
Applicant / Petitioner, Pro Se

9/23/26

LIST OF EXHIBITS

Exhibit A District Court of Appeal of Florida, Fourth District, Per Curiam Affirmance dated July 30, 2026, Case No. 4D2025-3843.

Exhibit B District Court of Appeal of Florida, Fourth District, Order dated September 2, 2026, denying Applicant's motions for rehearing, clarification, written opinion, and certification.

Exhibit C Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, Final Order Determining Ownership of Property filed December 15, 2025.

Exhibit D Applicant's Motion to Stay Issuance of Mandate pending contemplated Petition for a Writ of Certiorari, filed in the Fourth District Court of Appeal on September 15, 2026.

Exhibit E District Court of Appeal of Florida, Fourth District, Order dated September 18, 2026, denying Applicant's Motion to Stay Issuance of Mandate.

Exhibit F Petition for a Writ of Certiorari prepared for filing in the Supreme Court of the United States.



DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FOURTH DISTRICT

JESSICA TERESA GRIFFIN,
Appellant,

v.

ROBERT LEE ISAAC, III, and Estate of **NIYOKA G. ISAAC,**
Appellees.

No. 4D2025-3843

[July 30, 2026]

Appeal from the Circuit Court for the Fifteenth Judicial Circuit, Palm Beach County; Glenn David Kelley, Judge; L.T. Case No. 502024CP004954XXXXMB.

Jessica Teresa Griffin, West Palm Beach, pro se.

No brief filed on behalf of appellees.

PER CURIAM.

Affirmed.

CIKLIN, CONNER and KLINGENSMITH, JJ., concur.

* * *

Not final until disposition of timely-filed motion for rehearing.

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