FILED

SEP 02 2026

CLERK OF SUPREME COURT OF WISCONSIN

SUPREME COURT OF WISCONSIN

Office of Lawyer Regulation,

Complainant,

v. **Case No. 2024AP2045-D**

Angela W. DeBose,

Respondent.

_____/

RESPONDENT'S NOTICE OF SUPPLEMENTAL AUTHORITY

Respondent, Angela W. DeBose, proceeding pro se, respectfully submits this Notice of Supplemental Authority to bring to the immediate attention of the Court and the appointed Referee an intervening, controlling milestone issued in a parallel federal appellate track.

1. On August 28, 2026, the Clerk of Court for the United States Court of Appeals for the Eleventh Circuit officially issued the formal letter and judgment form as the final Mandate of the Court in companion appeal track *LaVonne Washington, et al. v. USA, et al.*, Appeal No. 25-10872-HH (attached hereto as Exhibit A).
2. This finalized federal Mandate establishes as the permanent, unappealable law of the circuit that the pre-existing filing restrictions and injunctions imposed on Respondent do not apply to third parties Michael Washington or LaVonne Washington, and that Respondent's legal capacity to serve as personal representative and protect her family estate interests remains completely unaffected.
3. This intervening authority is highly relevant to the pending scheduling and jurisdictional issues in this proceeding. It establishes as a matter of law that Respondent possesses active, unclouded legal capacity to execute her fiduciary duties, directly refuting any claims of administrative preclusion or unauthorized filing activity raised by opposing parties.

Dated: August 30, 2026.

Respectfully submitted,



Angela W. DeBose, Respondent Pro Se
1107 West Kirby Street
Tampa, FL 33604
Telephone: (813) 230-3023
Email: awdebose@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of August, 2026, a true and correct copy of the foregoing Respondent's Notice of Supplemental Authority, with the attached final federal mandate, was served via electronic mail upon the appointed Referee, the Honorable Michael Tobin, and Counsel for the Office of Lawyer Regulation, Attorney John Payette; and the original paper document has been dispatched via FedEx Overnight Courier to the Clerk of the Supreme Court of Wisconsin, 110 East Main Street, Madison, WI 53703, for formal filing.

Angela W. DeBose

Angela W. DeBose, Respondent Pro Se

EXHIBIT A

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING
56 Forsyth Street, N.W.
Atlanta, Georgia 30303

David J. Smith
Clerk of Court

For rules and forms visit
www.ca11.uscourts.gov

August 28, 2026

Clerk - Middle District of Florida
U.S. District Court
801 N FLORIDA AVE
TAMPA, FL 33602-3849

Appeal Number: 25-10872-HH
Case Style: LaVonne Washington, et al v. USA, et al
District Court Docket No: 8:21-cv-02127-SDM-AAS

The enclosed copy of the judgment is hereby issued as mandate of the court. The court's opinion was previously provided on the date of issuance.

A copy of this letter, and the judgment form if noted above, but not a copy of the court's decision, is also being forwarded to counsel and pro se parties. A copy of the court's decision was previously forwarded to counsel and pro se parties on the date it was issued.

Clerk's Office Phone Numbers

General Information:	404-335-6100	Attorney Admissions:	404-335-6122
Case Administration:	404-335-6135	Capital Cases:	404-335-6200
CM/ECF Help Desk:	404-335-6125	Cases Set for Oral Argument:	404-335-6141

Enclosure(s)

MDT-1 Letter Issuing Mandate

In the

United States Court of Appeals

For the Eleventh Circuit

No. 25-10872

ANGELA W. DEBOSE,

Plaintiff,

LAVONNE WASHINGTON,
MICHAEL WASHINGTON,

Intervenor Plaintiffs-Appellants,

versus

UNITED STATES OF AMERICA,
THIRTEENTH JUDICIAL CIRCUIT,
CHIEF JUDGE, THIRTEENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA,
ELIZABETH GADDY RICE,
individually and/or in her official capacity,
GREGORY P. HOLDER,
individually and/or in his official capacity, et al.,

Defendants-Appellees.

Appeal from the United States District Court
for the Middle District of Florida
D.C. Docket No. 8:21-cv-02127-SDM-AAS

JUDGMENT

It is hereby ordered, adjudged, and decreed that the opinion issued on this date in this appeal is entered as the judgment of this Court.

Entered: May 21, 2026

For the Court: DAVID J. SMITH, Clerk of Court

ISSUED AS MANDATE: August 28, 2026

NOT FOR PUBLICATION

In the
United States Court of Appeals
For the Eleventh Circuit

No. 25-10872
Non-Argument Calendar

ANGELA W. DEBOSE,

Plaintiff,

LAVONNE WASHINGTON,
MICHAEL WASHINGTON,

Intervenor Plaintiffs-Appellants,

versus

UNITED STATES OF AMERICA,
THIRTEENTH JUDICIAL CIRCUIT,
CHIEF JUDGE, THIRTEENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA,
ELIZABETH GADDY RICE,
individually and/or in her official capacity,
GREGORY P. HOLDER,
individually and/or in his official capacity, et al.,

Defendants-Appellees.

Appeal from the United States District Court
for the Middle District of Florida
D.C. Docket No. 8:21-cv-02127-SDM-AAS

Before LUCK, LAGOA, and BLACK, Circuit Judges.

PER CURIAM:

Appellants Michael and LaVonne Washington, proceeding pro se, appeal the district court's denial of their Rule 24(a) motion to intervene as of right. Angela DeBose, the plaintiff in this case, is subject to a filing injunction on her future filings regarding her employment at the University of South Florida without the signature of an attorney barred in Florida or the Middle District of Florida. Appellants assert they have an interest in the underlying litigation because they are beneficiaries to Patricia Washington's estate, and DeBose, the personal representative of Patricia Washington's estate, cannot fully protect their interest in the estate because DeBose is subject to this filing injunction. After review,[1] we dismiss this appeal.

A district court must permit intervention as of right under Rule 24(a) if an entity "(1) is given an unconditional right to inter-

[1] We review a district court's denial of intervention of right under Fed. R. Civ. P. 24(a) de novo, with subsidiary factual findings subject to review for clear error. *See Salvors, Inc. v. Unidentified Wrecked & Abandoned Vessel*, 861 F.3d 1278, 1294 (11th Cir. 2017).

vene by federal statute; or (2) claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest, unless existing parties adequately represent that interest." Fed. R. Civ. P. 24(a). We have distilled four elements that must be met to satisfy the second subsection: (1) the application to intervene must be timely; (2) there is an interest relating to the property or transaction which is the subject of the action; (3) disposition of the action may impede or impair the intervenor's ability to protect that interest; and (4) that interest is represented inadequately by the existing parties to the suit. *Stone v. First Union Corp.*, 371 F.3d 1305, 1308–09 (11th Cir. 2004). The second element is met only if the interest asserted by the intervenor is "direct, substantial, and legally protectable." *Huff v. Comm'r of IRS*, 743 F.3d 790, 796 (11th Cir. 2014) (quotation marks and alteration omitted). "[T]he intervenor must be at least a real party in interest in the transaction which is the subject of the proceeding." *Id.* (quotation marks omitted). In deciding whether a party has a protectable interest, however, a court "must be flexible" and "focus on the particular facts and circumstances" of each case. *Id.* (quotation marks omitted).

Appellants fail to show clear error in the district court's finding that they lacked a cognizable interest in the property or transaction which was the subject of the action, because they do not show how their interests as estate beneficiaries are affected by DeBose's employment lawsuit even if she is the personal representative of the estate. Any judgment won or liability imposed in

the underlying employment suit would only affect DeBose in her individual capacity. Furthermore, the filing injunction imposed by the district court on DeBose only applies to her employment dispute and the defendants involved in it. Accordingly, despite Appellants' contentions to the contrary, DeBose's ability to administer the estate is unaffected by the underlying case. Because the district court did not err in denying intervention as of right under these circumstances, we apply the anomalous rule[2] and **DISMISS** this appeal for want of jurisdiction.[3]

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[2] Under our "anomalous rule," we have appellate jurisdiction to determine whether a denial of intervention as of right is proper under Rule 24(a). *Davis v. Butts*, 290 F.3d 1297, 1299 (11th Cir. 2002). If we determine that the district court's decision to deny intervention as of right was correct, our "jurisdiction evaporates and we must dismiss the appeal for want of jurisdiction." *Id.* (quotation marks omitted).

[3] Appellants' motion to supplement the record and take judicial notice is DENIED.