

**James Seaman  
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Garnet Valley, PA 19060  
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September 17, 2018

U.S. Supreme Court  
1 First Street Northeast  
Washington, DC 20543

Re: Seaman, J., Pet. v. Westfield Medical Center, et. al.  
Supreme Court of PA: 73 MM 2018  
Superior Court of PA: 2955 EDA 2017  
Trial Court Docket No: 2016-C-1397

Dear U.S. Supreme Court:

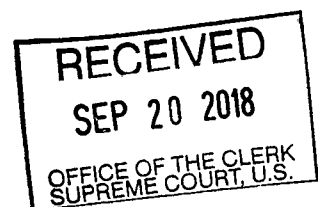
I would like to thank the Clerks Office and Michael Duggan for their assistance on the telephone this morning. Pursuant to my conversation with Mr. Duggan, I am attaching the following:

- 1) Application to Extend Time for 60 Days
- 2) A Description of the Case
- 3) Reason for the Extension Request
- 4) A Copy of the Supreme Court of PA's Denial Order

I respectfully request that the U.S. Supreme Court review my attached "Application to Extend Time for 60 Days" along with the requested and attached supporting documents noted above. I also respectfully request that you gain a full understanding and background of my case and the unfortunate circumstances that I have been through as a Pro Se Petitioner. Again, I truly appreciate all of your time and effort to help me obtain Justice.

Very truly yours,

*James Seaman*  
James Seaman  
Pro Se Petitioner/Appellant



### Description of the Case

I, James Seaman, Pro Se Petitioner/Appellant, filed a Civil Action lawsuit vs. Westfield Medical Center, LP., Elizabeth Kahn and Yasin Khan, Defendants/Appellees (WMC) in 2016. Pro Se Petitioner/Appellant hired an attorney to file the claim vs. WMC at the Court of Common Pleas in Delaware County, where all services were performed. Due to a suspected error on my attorney's behalf, the case was moved from Delaware County to Lehigh County at the request of the Defendants counsel. The Defendants and their Counsel are also based in Lehigh County which turned out to be a major factor in this case.

Somehow, and unbeknownst to me, my attorney was able to Withdraw from my case without my prior knowledge at the Lehigh County Court of Common Pleas. I am not an attorney but have been informed that the Withdrawal should not have been permitted without my prior knowledge and/or consent? Subsequently, I sent 14 requests to the Lehigh County Court of Common Pleas noted below that were all Denied with no explanation:

- 1) Initial Application for Continuance.
- 2) Second Application for Continuance.
- 3) Answer to and Request for Denial on Defendants Motion for Default Judgment
- 4) Request for an Extended Continuance
- 5) Motion for Re-Consideration
- 6) Petition for Extraordinary Relief
- 7) Rescind the Order to Return Discovery Items
- 8) Response to Motion for Summary Judgement
- 9) Petition for Leave to Proceed Informa Pauperis
- 10) Motion to Re-Instate Appeal Rights Nunc Pro Tunc
- 11) Notice of Appeal
- 12) Motion to Re-Instate Notice of Appeal
- 13) Motion for Extraordinary Relief
- 14) Motion for Re-Consideration

I then filed an Appeal at the Superior Court level. During the Superior Court level appeal process, I did not receive any hard correspondence whatsoever from the Superior Court in Philadelphia, PA. I was informed that I was a "PAC" filer and therefore needed to go online to retrieve all documentation. Unfortunately, I wasn't able to access any Superior Court appeal documentation online and was on the telephone numerous times with the Prothonotary's office and the IT Help Desk with no success. At this moment, I have no documentation to send to you from the Superior Court of PA.

The only form of communication from the Superior Court of PA is what they sent to me via email on February 6, 2018. I received an email notice on such date titled "Order Denying Application for Reconsideration of Order." As noted, I cannot open or access any Superior Court information online after spending many hours trying to resolve the Information Technology (IT) issue. Therefore, Pro Se Petitioner/Appellant did not have a fair appeal attempt at the Superior Court of PA.

I was then initially informed by the Supreme Court of PA that I had to file an appeal at the Supreme Court by March 8, 2018 in order to comply with the Reconsideration Denial on February 6, 2018 at the Superior Court level. However, that appeal was returned with a March 14, 2018 letter informing me that I had to file a Petition for Leave to File a Petition for Allowance of Appeal Nunc Pro Tunc. The appeal was filed Nunc Pro Tunc due to the fact that the case was "quashed" without my knowledge due to the IT system problems with the Superior Court of PA.

This is my last hope in holding onto a matter in my life that has not only been an overwhelming blow to me financially but also mentally. The failure of not only the Trial Court, but also the State Superior and State Supreme Courts due to technicalities has not served Justice to date. As this case has moved forward, I have exhausted all of my efforts in a failing attempt to achieve Justice.

My confidence in the Judicial system at the Trial, State Superior and State Supreme Court levels has been lost and justice and righteousness has not been served. I am therefore attempting to appeal this case at the U.S. Supreme Court. I am not and do not claim to be a lawyer but just doing the best that I can to preserve my case and to try to achieve a just outcome.

I performed third party Healthcare Financial Accounting and Consulting services for WMC and Dr. Khan. I have signed contracts from their CFO that were not paid. They not only had a restoration in their Federal payments on my behalf, but also gained State payments and kept their operating license on my behalf. Kr. Khan later sold WMC to Lehigh Valley Medical Center for a large sum of money. Why can't Dr. Khan pay his signed contracts in full when small contractors like me are the resources that he utilized to make such a significant gain from the sale? Isn't this called "Unjust Enrichment?"

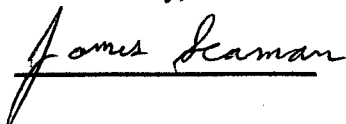
#### **Reason for Extension Request**

I, James Seaman, Pro Se Petitioner/Appellant, left my full time work duties in 2010 to take care of my ailing Father. After taking care of my Father when he passed away in 2012, I have taken care of my Mother who has full blown Dementia for the last 6 years. Therefore, I have not been able to work on a full time basis since 2010. That noted, it has been not only difficult but completely exhausting and unsuccessful to date to gain Counsel in support of my case. As noted above, I had Counsel who was permitted to Withdrawal from my case without my knowledge and previously made an error in permitting the case to be moved jurisdiction wise from Delaware County, PA to Lehigh County, PA.

All Attorneys that I ask to help me with this case want a large sum of money that I cannot afford right now. I haven't been able to find an attorney who will take this case on a contingency basis. Therefore, I have struggled immensely during the Trial, State Superior and State Supreme Courts to preserve this case on my own. As noted above, the State Superior and State Supreme Appeal Courts have quashed this case due to technicalities unbeknownst to me. Please find an attached "Exhibit A" dated July 11, 2018 to the Supreme Court of PA.

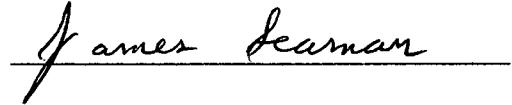
Therefore, I would sincerely appreciate any guidance or support in finding Counsel who can take on my case on a Contingency basis. In the meantime, I will continue to search for Counsel who will represent me in this case during the Extension period requested for 60 Days. I thank you very much for your understanding and any Counsel support that you can lead me to on a Contingency basis. Thank You

James Seaman, Pro Se Petitioner/Appellant  
124 South Valentine Drive  
Garnet Valley, PA 19060



### **VERIFICATION**

I, James Seaman, hereby verify that I am the Pro Se Petitioner/Appellant in this matter, and that the facts set forth in the foregoing *Application to Extend Time for 60 Days* are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

A handwritten signature in cursive script that reads "James Seaman". The signature is written in black ink and is positioned above a horizontal line.

James Seaman, Pro Se Petitioner/Appellant

Dated: September 17, 2018