

IN THE SUPREME COURT OF
THE UNITED STATES

CASE NO: _____

ELICH VARGAS
PETITIONER / APPELLANT

V.

JOHN MC MAHON
RESPONDENT / APPELLEE

APPLICATION FOR LEAVE
OF ENLARGEMENT OF
PAGES FOR PETITIONER'S
PETITION OF WRIT OF
CERTIORARY

PETITIONER ELICH VARGAS HEREIN APPLIES TO THE COURT
FOR LEAVE TO ENLARGE THE NUMBER OF PAGES PERMITTED
FOR THE ENCLOSED PETITION FOR WRIT OF CERTIORARI
AND PURSUANT TO U.S. SUP CT R. 33.1 (d).

THE GROUNDS FOR THIS MOTION ARE THAT THE PETITIONER
IS A PRO-SE / PRO-PER PLAINTIFF UNDER EXTRA ORDINARY
RESTRICTIONS OF CONFINEMENT WHOM IS FORCED TO HAND
WRITE HIS LEGAL DOCUMENTS. THAT SIGNIFICANTLY AFFECTS
THE AMOUNT OF PAGES THAT HE REQUIRES IN ORDER TO
EFFECTIVELY LITIGATE AND ARGUE THE GROUNDS THAT MERIT
THE RELIEF REQUESTED AND WITHOUT ALLOWING AN
ENLARGEMENT OF PAGES THEN HE WILL BE UNFAIRLY AND
PREJUDICIALLY RESTRICTED FROM PROPERLY PRESENTING
HIS PETITION FOR WRIT OF CERTIORARY.

1 THIS MOTION IS BASED ON THIS NOTICE ON THE FOREGOING
2 DECLARATION AND ON ANY OTHER DOCUMENTS FILED WITH THE
3 COURT ON THIS CASE.

4
5 DECLARATION

6 I Ilich Vargas am the petitioner and I hereby declare
7 the following:

8 1. I am a proper criminal defendant in custody subject
9 to extremely restrictive conditions of confinement.

10 2. I do not receive adequate and sufficient time to
11 access the "Law Library" in the jail facility and the
12 computer or typing equipment

13 3. I am reduced to having to write my legal papers and
14 pleadings by hand

15 4. Generally I am able to type by computer on one
16 page what it takes me to hand write in two or three
17 pages of paper.

18 5. Due to extensive amount of legal writing I must write
19 I suffer from pain to my hands and fingers and I
20 cannot write any smaller without sacrificing legibility
21 and causing me great pain to my fingers and hand.

22 6. The issues that I am presenting for review raise
23 extremely important questions of law that urgently
24 require guidance as they affect the public interest
25 to adequate, fair and effective administration and
26 dispensation of justice in the state of California.

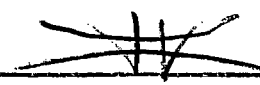
1 6. BECAUSE THE LOWER COURT MADE NUMEROUS FACTUAL AND
2 LEGAL ERRORS I MUST BE CAREFUL TO PIN POINT THE MANY
3 APPARENT ERRORS AND HAVE HAD TO RAISE MANY LEGAL
4 QUESTIONS AND MAKE NUMEROUS LEGAL POINTS THAT
5 I BELIEVE REQUIRE ATTENTION AND THEREFORE I REQUIRE
6 TO SUPPORT EACH POINT WITH THE ADEQUATE LEGAL BASIS
7 TO SHOW THE IMPORTANCE OF THE REVIEW BY THE COURT.
8 7. MOREOVER, BECAUSE OF THE SERIOUSNESS OF THE ISSUES AND
9 THE CIRCUMSTANCES PRESENTED ARE QUITE EXCEPTIONAL
10 AND REQUIRE PARTICULAR CAREFUL ANALYSIS AS THEY
11 DEAL WITH THE EXEMPTIONS TO ABSTENTION RULES.
12 8. SOME OF THE QUESTIONS PRESENTED IN THE CONTEXT OF THIS
13 CASE MAY BE OF FIRST IMPRESSION IN THE SUPREME COURT
14 THEREFORE IT IS IMPORTANT FOR ME TO SET FORTH SUFFICIENT
15 SHOWING TO JUSTIFY THE IMPORTANCE FOR GRANTING REVIEW.
16 9. WITHOUT THE GRANTING OF AN ENLARGEMENT OF PAGINATION
17 I SINCERELY BELIEVE I WILL BE PREJUDICED AND PREVENTED
18 FROM FULLY SETTING FORTH AND ARGUING THE JUSTIFIABLE CAUSE
19 FOR GRANTING REVIEW AND I WILL BE DEPRIVED OF A
20 MEANINGFUL OPPORTUNITY TO FULLY AND EFFECTIVELY PLEADING
21 THE GROUNDS THAT CONSTITUTE THE GRANTING OF RELIEF.
22 10. WITHOUT MEANINGFUL ACCESS TO JUSTICE AND THE IMMEDIATE
23 INTERVENTION ON BEHALF OF THE UNITED STATES SUPREME
24 COURT FOR REDRESS, RECOGNITION AND VINDICATION OF THE
25 CONSTITUTIONAL TRANSGRESSIONS BEING PRESENTED THEN I
26 WILL BE SUBJECT TO GREAT IMMEDIATE IRREPARABLE
27 DAMAGES AND BECAUSE THE UNCONSTITUTIONAL CONDITIONS
28 UNDERMINE THE STRUCTURAL INTEGRITY OF THE CRIMINAL PROCEDURE

1 FROM BEGINING TO END INCLUDING APPEAL FOR THOSE REASONS.
2 EQUITABLE RELIEF IS ABSOLUTELY NECESSARY IN THIS CASE.
3 11. BECAUSE THE STATE HAS REFUSED AND/OR FAILED TO PROVIDE
4 ANY OBJECTIVELY EFFECTIVE AND ADEQUATE SPEEDY REMEDY,
5 REDRESS AND/OR VINDICATION OF PROTECTED CONSTITUTIONAL
6 CIVIL RIGHTS DURING THE COURSE OF THE PENDING CRIMINAL
7 PROSECUTION AND THAT WILL INHERENTLY AFFECT MY RIGHTS
8 TO A FAIR TRIAL, IT IS EXTREMELY IMPORTANT FOR ME TO
9 EFFECTIVELY PLEAD AND SUPPORT THE REASONS WHY THE
10 U.S. SUPREME COURT SHOULD GRANT MY PETITION FOR
11 CERTIORARI AND PROVIDE MEANINGFUL REDRESS AND A
12 REMEDY TO THE CONFLICTS AND CONTROVESIES PRESENTED
13 FOR REVIEW AND TO PREVENT ANY FURTHER AND POTENTIAL
14 GREAT IMMEDIATE IRREPARABLE DAMAGES.

15
16 WHEREFORE, THE FOREGOING REASONS I RESPECTFULLY PRAY THAT
17 THE COURT WILL GRANT LEAVE FOR ENLARGEMENT OF PAGES FOR
18 THE ENCLOSED PETITION FOR WRIT OF CERTIORARI AND GRANT
19 REVIEW OF MY PETITION.

20
21 I ILLICH VARGAS CERTIFY UNDER PENALTY OF PERJURY THAT
22 THE FOREGOING DECLARATION IS TRUE AND CORRECT.

23
24
25 DATED: 6/10/2018


ILLICH VARGAS IN PRO-SE