

No. _____

PARTHA A.RAI CHOWDHURI – (202) 276-7168 (Mobile) – 13714 Bidwell Place,
Bristow, VA 20136

IN THE Supreme Court of the United States

PARTHA A. RAI CHOWDHURI,

Petitioner Pro Se,

v.

SGT INC./ KBR WYLE INC. 7700 GREENBELT ROAD STE 400 GREENBELT MD
20770

and

CYBERDATA TECH. 455 SPRINGPARK PLACE STE 300 HERNDON VA 20170

Respondents.

On Petition for a Writ of Certiorari to the United States

Court of Appeals for the Fourth Circuit

APPLICATION FOR EXTENSION OF TIME TO FILE A PETITION
FOR WRIT OF CERTIORARI

PARTHA A. RAI CHOWDHURI

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* Pro Se

27 October, 2019

**TO THE HONORABLE JOHN G. ROBERTS, CHIEF JUSTICE
OF THE SUPREME COURT OF THE UNITED STATES AND
CIRCUIT JUSTICE FOR THE FOURTH CIRCUIT:**

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner respectfully requests a 30-day extension of time, up to and including December 24, 2019, to file a petition for a writ of certiorari to the United States Court of Appeals for the Fourth Circuit to review that court's decision in No. 18-2319, PARTHA A. RAI CHOWDHURI v. SGT Inc., CYBERDATA TECHNOLOGIES Inc. (included as Exhibit A). It issued its denial of re-hearing in the matter on August 27, 2019 (included as Exhibit B). Petitioner intends to file a petition seeking review of this judgment under Supreme Court Rule 12.4. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will expire without an extension on November 25, 2019. This application, filed by the Petitioner, is timely because it has been filed more than ten days prior to the date on which the time for filing the petition is to expire.

1) Petitioner is self-represented and hasn't been able to get the services of an Attorney to help or represent Petitioner, although Petitioner has made efforts through August and September 2019.

Petitioner's previous Attorneys never informed Petitioner that legal fees for discrimination cases are exempt from income taxes. Petitioner is now having

to attempt remediation of previous tax returns beginning from 2015 in order to get income tax on Attorney fees refunded, so Petitioner can attempt to pay for legal help or representation.

2) The back of Petitioner's vehicle had been rear-ended and severely damaged on 10 August at exit 64A on I-66 E by two motorists insured through GEICO P and C. One of them has a consistent record of over-speeding by more than 20 mph in low-speed areas, including school zones, for many years – he hit the vehicle behind Petitioner's at around 55 mph, demolishing that vehicle and his own vehicle and damaging Petitioner's vehicle. Petitioner's left shoulder and upper arm on the side of the working hand (left hand) and back were injured in the accident. Petitioner wasn't able to do simple things like locking/unlocking a door with Petitioner's left hand and arm which are Petitioner's working hand and arm. The pain responded to physiotherapy only in the third week of October 2019. The medication used for the treatment has increased the symptoms from Petitioner's gastric ulcers. Physiotherapy is continuing and has been interrupted because of 3) and 4) below.

Petitioner doesn't have means to buy a new vehicle. Petitioner was informed that Petitioner will have to bring suit against the responsible

parties, who are from Alexandria and Springfield, VA, and probably their insurance company, at District Court in Fairfax County, VA.

Petitioner hasn't been able to get the services of an attorney to represent Petitioner, although three attorneys had contacted Petitioner.

The insurance company of the responsible parties has paid nearly nothing and offered to pay little for the accident caused by their insured.

All vehicles which were in front of or behind Petitioner's vehicle, at the time of accident, were insured through GEICO P and C.

GEICO P and C provided a rented vehicle for Complainant only upto a week, much after the above accident. GEICO P and C incorrectly informed the car rental company that the claim had been settled and the car rental company took the rental car back. Petitioner's vehicle has to be repaired, leading to a minimum repair time of three weeks, which couldn't begin yet because Petitioner will have to get the parts. A repair technician is still hospitalized following serious motorcycle accident on September 15.

GEICO P and C were earlier the insurers for Petitioner's vehicle and had declared Petitioner at fault for earlier accidents for reasons which turned out to be incorrect, whereas the party which caused the accident didn't disclose accurate accident information. One such claim was also re-opened for Petitioner, and now one more insurance company(Trexis) is involved in

addition to GEICO P and C. Complainant's previous experience is that dealing with insurance companies and healthcare companies – which Complainant is also currently dealing with – is accompanied by unsolicited email, mail, erratic social and professional networking contacts and solicitations, telephone calls , and sms text, and effects from these, which are happening. Complainant has also suffered because of mismanagement of Complainant's information arising from defects in provider software. The most conspicuous was a problem in web software used on the McAfee website leading to an erroneous McAfee notification email into Complainant's iCloud account late on 26 August which shouldn't have happened and of which Complainant became aware only following 1 September 2019. Complainant hadn't used Complainant's McAfee account anywhere near the time the above erroneous notification email happened, or taken an action to cause a notification email. More recently, there were problematic incidents on 1 and 2 November in Complainant's social networking account and Gmail, which would have been caused by web software malfunction, including disclosure of Complainant's Gmail addresses from other unrelated web properties, and for which Complainant is having to file complaints.

3) Because of 2), and pre-existing deformity and pain in the bones of Petitioner's feet – Hallux valgus and Plantar Fascitis – which doesn't allow Petitioner to do all types of work, Petitioner has been having difficulty seeking employment. Employers are reluctant to hire a person known to be ill or incapacitated, or to retain a person involved in a complicated legal matter. Recruiters, from their experience, have suggested that Petitioner apply through them when Petitioner is fully recovered. Hiring Managers have in the past requested that Petitioner approach them when Petitioner's legal matters have ended. Petitioner doesn't draw Unemployment benefits, and is much constrained in means. Petitioner doesn't have any retirement account and has only around twenty thousand USD in funds remaining in Petitioner's bank account.

4) Petitioner suffered perforation of the right eardrum on October 17 when making efforts to repair Petitioner's vehicle. There is hearing loss in the affected ear. The ear began to be treated on October 18, and referral to a specialist was necessary, which happened on October 22. There was pre-operative intervention on October 22 and Petitioner was informed of an observation period of six weeks from then onwards.

The ear has to be kept under observation, and Petitioner was told that surgery could be necessary following observation.

5) Petitioner has incontinence and treatment was interrupted because Petitioner had to change care provider to be able to use his Medicare benefit and also because of 2) – the practice at the care provider then wasn't qualified to treat people who had been in accident cases. The incontinence hasn't responded to treatments yet, and Petitioner isn't able to travel much.

6) An individual attempted to sell a vehicle under a Maryland Historic (restricted use) tag to Complainant 14 September (at 124 Plaza, Woodfield Road in Gaithersburg, MD) saying it had permanent safety inspection waiver, without disclosing that the tag was restricted use, there were many owners, there were issues on the title, and the MVA had given a NAM title to previous owners because of odometer reading inconsistency following a theft. He refused to return Complainant's cash deposit of USD 500. There is also a large mileage discrepancy in the reports relating to the person who attempted to sell the vehicle. Progressive Insurance which is Complainant's provider asked that the matter be pursued through law enforcement. Though trial date and venue were set for October 29, the State Attorney's office said only on October 26 that they were having difficulty pursuing the matter. The trial date was prolonged to 13 December 2019. Petitioner was unable to complete gathering and providing related information to the State Attorney's office in Rockville, MD because of the perforated eardrum (3 above).

Petitioner was told Petitioner could have to obtain the services of an Attorney. Petitioner will probably have to now send a complaint to the office of the Attorney-General, which wasn't done because the State's Attorney office were involved.

- 7) Until October 18, 2019, Petitioner had to file an Appeal against a United States Department of Commerce Final Agency Decision which was communicated to Petitioner on 27 August 2019, which Petitioner somehow did by himself.
- 8) Filing for renewal of Petitioner's passport has to be done in person and was repeatedly delayed because of 2), 3), and 5) above. Notarizations had to be obtained which couldn't be obtained timely. Petitioner has to file at the earliest. Petitioner is able to drive only with difficulty, and in the company of drivers from the nearby area who are also commuting to the same destinations as Petitioner, or nearby.
- 9) Petitioner's present residential address has become searchable through the public internet, and is now publicly known. Such was never the case until February 2018. Petitioner has concerns about it because Petitioner is an identity and information theft victim as described below, and also because of happenings in 2018 and 2019, some of them within the locality itself where Petitioner has been staying. Petitioner has been thinking to move and has

been receiving contacts from email and internet room-sharing websites – though this could also cause identity and information theft there isn't an alternative – to seek accommodation.

Petitioner has concerns about Petitioner's present residential address being available through Internet search because Petitioner was informed in September 2015 that Petitioner is affected by breach in data protection at the Office of Personnel Management. Petitioner was subsequently informed by the data protection company for Petitioner's Internal Revenue Service eFile provider, in July and August 2016, that the password for Petitioner's Gmail account had been compromised. Petitioner already had webmail accounts which became unreachable, with the recently-set and/or hitherto correctly working passwords for each such account being unrecognized by the login webpage. Petitioner has suffered identity, authentication, and information theft since at least 2003. Petitioner requests some accommodation for this ongoing issue/obstacle Petitioner has been facing.

Accordingly, the Petitioner respectfully requests that an order be entered extending the time to file a petition for a Writ of Certiorari for thirty days, up to and including December 24, 2019.

Any extension in time will be valuable to Petitioner who is in ill-health and short of means. Petitioner sincerely regrets inconvenience.