

NO. \_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

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*EX PARTE WILLIAM A. RUNNELS*  
RELATOR

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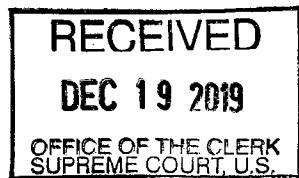
**APPLICATION FOR EXTENSION OF TIME TO FILE PETITION  
FOR WRIT OF CERTIORARI TO THE TEXAS SUPREME COURT**

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To the Honorable Samuel A. Alito, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Fifth Circuit:

Pursuant to Supreme Court Rule 13.5, 22, and 30, petitioner, William A. Runnels, respectfully requests a sixty (60) day extension of time in which to file his petition for certiorari in this Court, to and including February 14, 2019. The published decision of the Texas Supreme Court was entered on September 27, 2019. *See Ex Parte William A. Runnels*, 19-0740. Petitioner did not file a motion for rehearing in the Texas Supreme Court. Copies of the opinion and order denying petition for review/habeas corpus are attached to this application. Petitioner's time to petition this Court for a writ of certiorari currently expires on December 26, 2019. This application is being filed on the tenth (10) day that the time to submit an application for extension of time to file a writ of certiorari would normally expire, and therefore is timely filed. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. 1257(a).

1. This case involves three important doctrinally questions:



Whether the impact of the issue of voidness may be considered in isolation, or must be evaluated cumulatively, as is the case with respect to the petitioner's history of continuous and specific evidentiary complaints that the trial judge violated his constitutional due process rights; and based his order of injunction off of fraud and perjury. The lower courts refused to evaluate the petitioner's claim despite the supporting testimonies, exhibits, the November 3, 2018 audio recording and the Longview Police Department's Open Records response -which affirmatively contradicted the officer's testimony.

Whether the defense counsel's statement to the trial court that he was not knowledgeable of the case's history as he had only been on the case for a month; and his failure to provide competent and professional representation constitutes as ineffective assistance of counsel. *Strickland v. Washington*, 466 U.S. 668 (1984); *Buck v. Davis*, 580 U.S.\_\_\_\_(2017)

Whether the trial court could infringe on, and take away, a parent's constitutional right to reasonable discipline of their child absent strict scrutiny and without giving instruction as to what form of discipline was substitutable. The trial court's prior ruling that the parent's were to make sure their child respects boundaries confused the issue and made the order of injunction ambiguous.

2. Petitioner will further demonstrate in his petition for certiorari, that: The Texas Supreme Court's approach to the first issue and the allowing of the appellate court to issue an opinion without addressing every issue raised, *In the Interest of N.G., A Child*, No. 18-0508 (2019), deviates from this Court's ruling on void judgments. *Old Wayne*

*Mut. L. Assoc. v. McDonough*, 204 U. S. 8, 27 S. Ct. 236 (1907) It also deviates from the Texas Supreme Court's own rulings under *Commander v. Bryan*, 123 S.W.2d 1008 (Tex. App. 1938). With respect to the second issue, the trial court judge should have been recused or disqualified from presiding over the March 22, 2019 contempt hearing due to the ongoing embroiled controversy *Taylor v. Hayes*, 418 U.S. 488, 501 (1974), the constitutional disqualification under 28 U.S. Code §455, and the trial court's deep-seated favoritism and antagonism against petitioner. *Liteky v. United States*, 510 U.S. 540 (1994) Lastly, the Texas Supreme Court's denial of the petition for review/writ of habeas corpus deviates from that of this Court and the lower courts. *Troxel v. Granville*, 530 U.S. 57 (2000); *In the Interest of K.R.P.C., A Child*, No. 05-16-00405-CV (Tex.App. - Dallas, 2017)

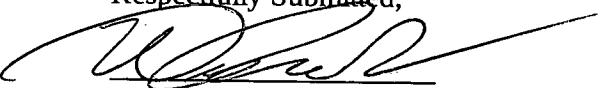
3. An extension of time is necessary because petitioner's current obligations allow insufficient time to research, draft and file a proper petition for writ of certiorari. Petitioner has represented himself and prepared motions, petitions, and other filings under the Texas Supreme Court case number 19-0740 (this motion for extension of time to file petition for writ of certiorari pertains to such) and 19-0806. Petitioner currently has a pending case in the Texas Supreme Court under 19-0331, and further has a current deadline to file a petition for writ of certiorari pertaining to case number 19-0806. This has taken substantial coordination, and has limited petitioner's ability to work on this matter. In addition, petitioner has been confined in the Gregg County Jail, under the judgement of this case in question, until he was released on October 14, 2019. The jail to which he was confined to did not have a law library to where petitioner could have properly prepared a

petition for writ of certiorari. He therefore lost sixteen (16) days from the allowed 90 day timeframe to file a petition for writ of certiorari to this Court.

Accordingly, the petitioner respectfully request that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, up to and including February 14, 2019.

Dated: December 16, 2019

Respectfully Submitted,



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