

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

MICHAEL DEUSCHEL — PETITIONER

VS.

CITY OF LONG BEACH — RESPONDENT(S)

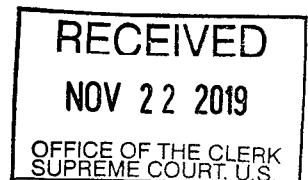
ON PETITION FOR A WRIT OF CERTIORARI TO
THE CALIFORNIA COURT OF APPEAL, SECOND DISTRICT

APPLICATION FOR 60 DAY EXTENSION TO FILE
THE PETITION FOR WRIT OF CERTIORARI
DUE TO EXACERBATED DISABILITIES, SURGERIES and RECOVERY

Michael Deuschel, Propria Persona

PO Box 1694

El Segundo, CA 90245,
323-620-1231
mdeuschel@yahoo.com



Request for a Sixty-Day Extension to File a Petition for Certiorari

Petitioner Michael Deuschel, *propria persona*, is a person with multiple disabilities. In accordance with Supreme Court Rule 13.5, he respectfully requests ADA accommodation of his exacerbated disabilities, medical incapacitation, surgeries and prescribed recovery by extending by sixty days the due date of his Petition for Certiorari for *Michael Deuschel v. The City of Long Beach*, Appellate number B269341 and State Supreme Court Number S257161.

June 19, 2019, the Court of Appeal affirmed the Superior Court ruling.

(Attachment #1)

July 8, 2019, the Court of Appeal denied Petitioner's request for Rehearing.

(Attachment #2)

September 18, 2019, the California State Supreme Court denied Petitioner's Petition for Review of the Appellate Decision. (Attachment #3).

Jurisdiction for the United States Supreme Court to review on a writ of certiorari the judgment in question is invoked pursuant 28 U.S.C. § 1257(a).

Petitioner's Petition for Writ of Certiorari is due December 17, 2019. He will move the Court at the time of his Petition to proceed in *forma pauperis*.

Exacerbated Disabilities, Medical Incapacitation, Surgeries and Recovery

November 18, 2019, Petitioner will receive revision brain surgery to address his exacerbated neurological disabilities. Neurosurgeon Dr. Ali Mesiwala prescribed excuse from all aspects of litigation starting September 18, 2019 until full recovery from surgery six weeks later to December 30, 2019. (Attachments #4)

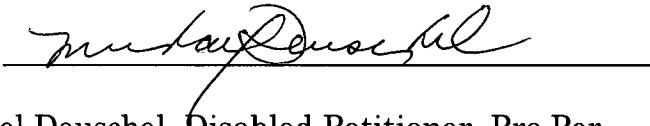
December 10, 2019, Petitioner will receive revision herniorrhaphy and neurosurgery to address his exacerbated neurological disabilities. Surgeon Dr. David Chen prescribed excuse from all legal work and six weeks of recovery to Tuesday, January 21, 2020. (Attachments #5)

Petitioner's exacerbated disabilities, debilitating presurgical conditions and diminished physical and cognitive capacities prevent him from performing the legal research and writing inherent in petitioning the U.S. Supreme Court. Therefore, he will suffer disability-based discrimination and legal disadvantage if this Court does not grant him the requested extension.

Therefore, Petitioner respectfully requests a sixty-day extension to file his Petition to Saturday February 15, 2020. Consistent with Supreme Court Rule 30.1, the due date extends to the next open court date, Monday, February 17, 2020.

Dated: November 18, 2019

By:


Michael Deuschel, Disabled Petitioner, Pro Per

Affidavit

I, Michael Deuschel, declare,

I am *propria persona* and a person with multiple disabilities. At the time of my Petition, I will move the Court to proceed *in forma pauperis*.

I currently suffer exacerbated disabilities, debilitating presurgical conditions and diminished physical and cognitive capacities which prevent me from performing the legal research and writing inherent in petitioning the U.S. Supreme Court.

November 18, 2019, I am scheduled to receive revision brain surgery to address my exacerbated neurological disabilities. Neurosurgeon Dr. Ali Mesiwala prescribed excuse from all aspects of litigation starting September 18, 2019 until full recovery from surgery six weeks later to December 30, 2019.

December 10, 2019, I am scheduled to receive revision herniorrhaphy and neurosurgery to address my exacerbated neurological disabilities. Surgeon Dr. David Chen prescribed excuse from all legal work and six weeks of recovery to Tuesday, January 21, 2020.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct

Dated: November 18, 2019

By:



Michael Deuschel, Disabled Petitioner, Pro Per

PROOF OF SERVICE

Michael Deuschel v. City of Long Beach
#B269341 & S257161

I hereby declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to this action. My business address is 646 Bungalow Drive, El Segundo, CA 90245.

On November 18, 2019, I served the following document(s):

**APPLICATION FOR 60 DAY EXTENSION TO FILE
THE PETITION FOR WRIT OF CERTIORARI
DUE TO EXACERBATED DISABILITIES, SURGERIES and
RECOVERY**

on the parties stated below, by following means of service:

SEE ATTACHED SERVICE LIST

Unless otherwise noted on the attached Service List, BY MAIL: I placed a true copy in a sealed envelope or package addressed as indicated above, on the above-mentioned date, and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this company's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited with the U.S. Postal Service in the ordinary course of business in a sealed envelope with postage fully prepaid. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing set forth in this declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of November, 2019, at El Segundo, CA

David Clark
Name


Signature

SERVICE LIST

California Appeal #B269341 & Supreme Court #S257161

<u>Party</u>	<u>Method of Service</u>
Howard Russel Office of the City Attorney 333 West Ocean Blvd. Long Beach, CA 90802	USPS, First Class Mail
Dept. of Justice Office of the Attorney General 300 Spring St., # 1700 Los Angeles, CA 90013	USPS, First Class Mail