

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

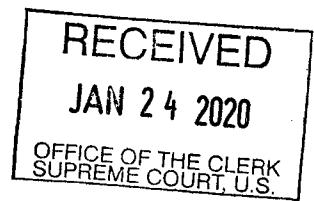
Robert Sarhan & Anabella Soury
Applicants/Petitioners

v.

H & H Investors, Inc
Respondent

**APPLICATION FOR AN EXTENTION OF TIME
TO FILE A WRIT OF CERTIORARI TO THE
HONORABLE JUSTICE CLARENCE THOMAS
AS CIRCUIT JUSTICE**

Robert Sarhan
Anabella Soury
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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Robert Sarhan & Anabella Soury hereby requests a 60-day extension of time within which to file a petition for a writ of certiorari.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is Robert Sarhan & Anabella Soury v. H & H Investors, Inc., Case No. 3D19-1322 (October 28, 2019) (attached as Exhibit A). The Third District Court of Appeals denied Applicant's Motion for Rehearing and Written Opinion on October 28, 2019. **Exhibit A**

JURISDICTION

This Court will have jurisdiction over any timely filed petition for writ of certiorari in this case pursuant to 28 U.S.C. § 1254(1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari was due to be filed on or before January 29, 2019. In accordance with Rule 13.5, this application is being filed more than 7 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Third District Court of Appeals in this case.

1. Applicants, Robert Sarhan and Anabella Soury and their minor child was forced out of their home by a Void Judgment of Foreclosure. The Judgment of Foreclosure is VOID, where Anabella Soury is an indispensable party (50% owner of the property) and her attorney Robert L. Moore were never served with the final judgment of foreclosure. Failure to give notice to an Indispensable Party Anabella Renders the judgment VOID, however, no judge will void the judgment of foreclosure and follow the law. The Third District Court of Appeals just “per curiam affirms” every Valid Motion that our Attorneys, Arthur J. Morburger and Robert L. Moore writes. The Judgment of Foreclosure is Void.

2. Our home of 26 years and \$800,000 was stolen and left us homeless. We have No money and our home was our nest egg, now stolen. Over the next three months we had to live in shelters and cheap motels and temporary living quarters.

3. Instead of focusing on this writ of certiorari, Robert Sarhan has been searching for work and taking odd jobs till he finds permanent employment to support his family.

4. There is clear and convincing evidence that attorney for the Respondents attorney, Raul Gastesi has engaged in bribery with Judge Rodriguez to deny us a Foreclosure Trial and went straight to Judgement. Then disqualified himself to wash his hands from this case. Judge Jose Rodriguez robing room reports show many

victims feel that Judge Rodriguez is unethical, immoral and does except bribes.

Please See Exhibit B

5. Attorney Evan Rosen **Fort Lauderdale, Florida (February 8, 2018)** – Statistics reveal what experienced Florida foreclosure attorneys already know, the Third District Court of Appeal has an issue properly adjudicating foreclosure cases. As detailed in one of the attached spreadsheets, of its sixteen written opinions addressing standing¹ in recent-era foreclosure cases, *the Third District has only ruled for a property owner twice. 66 Team, LLC v. JPMorgan Chase Bank Nat. Ass'n*, 187 So. 3d 929 (Fla. 3d DCA 2016) and *Riocabo v. Fed. Nat'l Mortgage Ass'n*, 230 So. 3d 579 (Fla. 3d DCA 2017). (Consider that in *66 Team*, the bank *did not admit any documents or evidence* at trial to prove its case. And in *Riocabo*, the bank confessed error - admitting that it must lose on appeal.) Yet, every other district in the state has ruled for property owners in the overwhelming majority of its cases and have issued far more written opinions. The attached chart tabulates and summarizes every Florida appellate written foreclosure opinion on standing over the course of the “foreclosure crisis.” **The neighboring Fourth District has issued 120 written foreclosure opinions on standing, 87 (73%) have been in favor of property owners. On this same issue, the Second District has issued 43 written opinions, 36 (84%) have been for property owners; the First District has ruled for owners 83% of the time; and the Fifth District has found for owners 72% of the time.**

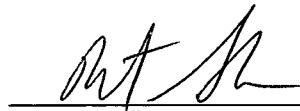
But, the Third District has ruled for a property owner only twice (13%). It's also noteworthy that the Third has only issued sixteen written foreclosure opinions on standing – the fewest of any appellate court in the state. There is apparently no justifiable way to explain this. **Exhibit C**

Law Offices of Evan M. Rosen, P.A. is a law firm that helps people defend against foreclosure and fight improper debt collection.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that this Court grant an extension for 60 days, in which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



SS/ Anabella Soury

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via of US Mail to the following: Raul Gastesi, Jr. 8105 NW 155 Street, Miami Lakes, Florida 33016 on this 22 day of January 2020.


Robert SARHAN