No. _____

In The

Supreme Court of the United States

SHANIZ WEST,

Applicant,

v.

CITY OF CALDWELL; CITY OF CALDWELL POLICE DEPARTMENT; FORMER CHIEF CHRIS ALLGOOD, DOUG WINFIELD, Sergeant, in his official and individual capacity; ALAN SEEVERS; MATTHEW RICHARDSON,

Respondents.

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

To the Honorable Elena Kagan Associate Justice of the United States Supreme Court and Circuit Justice for the Ninth Circuit

> Shaniz West 10674 Gossamer St Nampa, ID 83687

Pro Se



To the Honorable Elena Kagan, Associate Justice for the United States Supreme Court and Circuit Justice for the Ninth Circuit:

cit.

Petitioner Shaniz West respectfully requests, under Supreme Court Rule 13.5, that the time to file a Petition for a Writ of Certiorari be extended for 60 days, up to and including February 3, 2020.

On July 25, 2019, the United States Court of Appeals for the Ninth Circuit entered an opinion and judgment reversing the district court's order denying qualified immunity to the police officers in the above-captioned case. *See* Attachment A. On September 4, 2019, the Ninth Circuit entered an order denying a timely filed petition for rehearing en banc. *See* Attachment B.

The United States Supreme Court now has jurisdiction to review a Petition for a Writ of Certiorari under 28 U.S.C. § 1254(1) and Supreme Court Rule 10. The Petition for a Writ of Certiorari is presently due on December 3, 2019. Petitioner files this Application at least ten days before that Date. *See* S. Ct. R. 13.5.

REASONS FOR GRANTING AN EXTENSION OF TIME

The time to file a Petition for a Writ of Certiorari should be extended for 60 days for the following reasons:

1. Petitioner Shaniz West was represented by counsel below, but those attorneys are not currently admitted to the bar of this Court and are therefore unable to file any papers on her behalf. Ms. West is currently in the process of retaining counsel for proceedings in this Court. She is therefore currently proceeding *pro se*.

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2. Petitioner has recently been in contact with attorneys from a national law firm with experience practicing before this Court who have expressed interest in representing her in filing a petition for certiorari. She therefore believes in good faith she will be able to retain experienced counsel to allow her to proceed with this case. It would be impossible, however, for her to retain new counsel and for her new counsel to familiarize themselves with the case and draft a petition before the current deadline of December 3, 2019.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the time to file a Petition for a Writ of Certiorari in this matter be extended 60 days, up to and including February 3, 2020.

Dated: November 4, 2019

Respectfully submitted