

No. 19 A543

ORIGINAL

In the
Supreme Court of the United States

Supreme Court of the United States
FILED

NOV 21 2019

OFFICE OF THE CLERK

BAHAR MIKHAK,

Petitioner,

v.

UNIVERSITY OF PHOENIX (UOP),

Respondent.

Application for An Extension of Time Within Which
to File Petition for Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit

PETITION FOR WRIT OF CERTIORARI

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OFFICE OF THE CLERK
SUPREME COURT, U.S.

Dear Honorable Justice Kagan,

I am writing to request a **60-day** time extension, until January 25, 2020, to file my **Petition for a Writ of Certiorari**. My request is in compliance with the Supreme Court Rule 13.5 because it is justified and does not exceed 60 days.

The original due date for my Petition for a Writ of Certiorari is November 26, 2019 because the Ninth Circuit issued its decision on my Petition for Panel Rehearing and Rehearing *en banc* on August 28, 2019 (dkt. 65) and issued its initial decision on my appeal on April 24, 2019 (dkt. 53-1). The length of the requested extension is **60 days** from the due date of November 26, 2019.

Supporting evidence for the reason why an extension is necessary

- **Reason #1:** I am currently a *pro se* petitioner so it will take me much longer to write a persuasive legal petition than those who are formally trained and experienced.
- **Reason #2:** I spent the first 30 days out of the 90 days allowed to try to make sense of my setback, submit to GOD's will, and get back on track in my pursuit of justice. I contacted as many attorneys as possible and reached out to lawyer referral services, Bar Associations, and litigation clinics. Sadly, I was unable to hire an affordable attorney that specializes in the US Supreme Court to fully represent me (email evidence and phone call logs are available upon request).
- **Reason #3:** Because of my concern for my senior parents, I may need to travel to Massachusetts to stay with and care for them. Sadly, my 86-year old father, Dr. Ahmad Mikhak, had a heart attack on 10/15/19. Please see enclosed proof that he was admitted to Lahey Health Hospital in Burlington, MA to receive cardiac catheterization, coronary angiography, and coronary intervention. For security purposes, I have redacted his month and day of birth for filing purposes.
- **Reason #4:** I need to prioritize my health per the advice of my doctor (Dr. Alejandro Diaz). The stress of being a *pro se* appellant has taken a toll on my health. Please see enclosed my doctor's note stating that, I am at risk of developing stress related health problems. The additional 60 days will help me prepare my petition without compromising my health.
- **Reason #5:** I also need to prioritize my faculty job search to help pay for my living expenses and legal fees to a limited-scope attorney consultant (if I can find one).

Finally, I have served this motion to the Office Managing Shareholder (Mr. Eric Bellafronto) at Littler Mendelson law firm. I recently learned that the opposing counsel (Ms. Neda Dal Cielo) and her co-counsel (Mr. Cooper Spinelli) for the University of Phoenix both have left the law firm and it's still not clear who will be handling my case. Please see enclosed the Certificate of Service. Thank you in advance.

With kind regards,
Bahar Mikhak

