

No.

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**In The**  
**Supreme Court of the United States**

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SAMUEL CALHOUN ARRINGTON,

*Applicant,*

vs.

CITY OF LOS ANGELES, ET AL.,

*Respondent.*

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**MOTION FOR AN EXTENTION OF TIME TO FILE A PETITION FOR A WRIT**  
**OF CERTIORARI TO THE SUPREME COURT OF THE UNITED STATES**

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

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant Samuel Calhoun Arrington (“Arrington”) respectfully requests a 60-day extension of time, up to and including June 10, 2022, to file a petition for a writ of certiorari to the Supreme Court of the United States, seeking review of the Ninth Circuit’s rulings in *Samuel Arrington v. City of Los Angeles, et al*, No. 16-56755 (9th Cir. 2021). The Ninth Circuit Court issued its rulings on September 14, 2021, and on December 17, 2021. Copies of both orders are attached as Appendix A. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will otherwise expire on March 17, 2022. This Application for Extension of Time is timely filed on March 4, 2022, more than ten days prior to the date on which the time for filing the petition is to expire.

2. This is applicant’s first request for an extension of time to file a response. Good cause exists for the requested extension of the March 17, 2022, deadline, and a substantial amount of work remains to be done in order to submit an adequate petition for writ of certiorari.

a. Counsel for applicant is currently involved in a high volume of ongoing litigation and mediations with impending deadlines, due in part to the impact of the COVID-19 pandemic, all of which require substantial attention, including a trucking crash wrongful death case in Wyoming. Because of the number of issues and the complexity of the appeal, Haysbert | Moultrie, LLP is also seeking to retain appellate counsel to assist with this case.

b. An extension of time would better enable preparation of a response that would be most helpful to the Court.

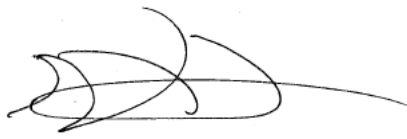
c. This request is made in good faith and for the reasons set forth above, and not for the purposes of delay.

3. Respondents do not object to this extension of time request. On March 3, 2022, counsel for applicant emailed counsel for respondent, Shaun Dabby Jacobs, to inform her of the request for an extension of time and requested that she advise whether respondent would oppose this motion. Counsel for applicant received an email back from Ms. Jacobs stating that respondent will oppose not oppose applicant's request.

WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, to and including June 10, 2022.

Dated: March 4, 2022

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nazareth M. Haysbert', written over a horizontal line.

Nazareth M. Haysbert  
California SBN 294431  
*Counsel of Record*  
HAYSBERT | MOULTRIE LLP  
4640 Admiralty Way  
Marina Del Rey, California 90292  
Telephone: (310) 496-5796  
Email: [nazareth@hmlaw.la](mailto:nazareth@hmlaw.la)

*Counsel of Record for Applicant*  
*Samuel Calhoun Arrington*

## CERTIFICATE OF SERVICE

I hereby certify that on this 4<sup>th</sup> of March 2022, I electronically filed the foregoing with the Clerk of the Court for the United States Supreme Court. I further certify that on this day, I sent to this Court one original and two copies (pursuant to Guidance Concerning Clerk's Office Operations) of the foregoing via First Class Mail. I further certify that, as required by Sup. Ct. R. 29(3), I served one copy of the foregoing via U.S. Mail and electronic mail upon:

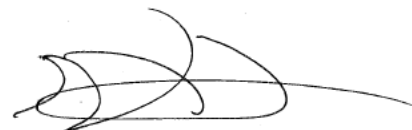
Shaun Liza Dabby Jacobs

City Attorney, Los Angeles City Hall, 200 N. Spring St., 14th Floor, Los Angeles,  
CA 90012

Phone: 213-978-2704

Email: shaun.jacobs@lacity.org

*Counsel for Respondent*



NAZARETH M. HAYSBERT

California SBN 294431

*Counsel of Record*

HAYSBERT | MOULTRIE LLP

4640 Admiralty Way

Marina Del Rey, California 90292

Telephone: (310) 496-5796

Email: nazareth@hmlaw.la