

No. _____

In The
Supreme Court of the United States

Heewon Lee – Pro Se,

Petitioner,

v.

BAC Home Loans Servicing, LP, Bank of America, NA, and Others,

Respondent.

**APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR A
WRIT OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF
APPEALS FOR THE FIRST CIRCUIT**

To the Honorable Justice Ketanji Brown Jackson, Associate Justice of the United States Supreme Court and Circuit Justice for the First Circuit:

Pursuant to Rule 13.5 of the Rules of this Court, Petitioner Heewon Lee requests an extension of time to file his Petition for a Writ of Certiorari. Petitioner requests a 60 day extension of time from December 2, 2022 to February 2, 2023. Jurisdiction of this Court to review the order and judgment of the First Circuit is being invoked pursuant to 28 U.S.C. § 1254(1).

The order of the First Circuit for Rehearing and En Banc was entered September 1, 2022 (Appendix 1). Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari is due to be filed on or before December 2, 2022. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

The Petition for a Writ of Certiorari intends to address conflicting issues

between Res Judicata and Due Process. The District Court and First Circuit held that RICO claim could not be asserted because of Res Judicata¹. Appellant believes that the due process rights limit preclusive effects of both state and federal judgments based upon constitutional and non-constitutional premises. To date the Supreme Court has not clearly distinguished the due process requirements for a valid judgment and the perhaps more demanding constitutional and non-constitutional requirements for issue preclusion.

Petitioner seeks an extension of time to file his Writ of Certiorari because financial difficulties have precluded him from securing counsel; and, as Pro Se, needs more time to learn about rules of the Supreme Court procedures. In addition, Petitioner's mother was diagnosed with Alzheimer in need of 24 hour care (Appendix 2); and Petitioner has been working on the urgent care and solution. For the reasons of financial and personal situations, Petitioner seeks the extension so that Petitioner has sufficient time to fully evaluate the merits of legal matters in issue and to file Petition for a Writ of Certiorari properly according to the Supreme Court rules and procedures.

¹ The Appeals court decision stated that some of appendixes were stricken since they were not part of record of appeal. But all documents in appendixes were submitted in the lower court; and should have been part of official appeal record. There was a possibility those documents might have been neglected and excluded in the lower court decision. Also one of Petitioner's RICO claims was neglect and exclusion of important evidential documents by the state court in question for Res Judicata.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Heewon Lee', written in a cursive style.

/s/ Heewon Lee
Pro Se - Petitioner

Heewon Lee
60 Rantoul Street
Beverly, MA 01915
E-Mail: hwlhome@yahoo.com
October 28, 2022