

No. 22A539

IN THE SUPREME COURT OF THE UNITED STATES

PAULA PARISI,

Petitioner-Plaintiff,

v.

U.S. TRUSTEE FOR REGION 16, Peter C. Anderson

Respondent-Defendant,

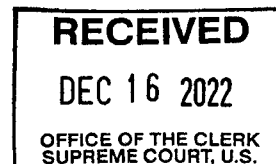
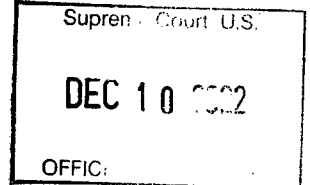
U.S. BANKRUPTCY COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA,
Judge Victoria S. Kaufman, presiding

Respondent-Defendant

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

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For Petitioner-Plaintiff



TO THE HONORABLE ELENA KAGAN, ASSOCIATE JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE NINTH CIRCUIT:

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner respectfully requests a 60-day extension of time, up to and including Monday, March 5, 2023 to file a petition for a writ of certiorari to the United States Court of Appeals for the Ninth Circuit to review that court's decision in the case docketed as *Paula Parisi v. U.S. Trustee for Region 16, Peter C. Anderson*, No. 20-56150, (Attached as Exhibit A). On August 8, 2022 Petitioner filed a Motion for Rehearing en Banc, which was denied on October 3, 2022. (Attached as Exhibit B.) 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 expire without an extension on Tuesday, January 3, 2023. This application, filed by the petitioner from the Ninth Circuit, is timely because it has been filed more than ten days prior to the date on which the time for filing the petition is to expire.

1. This case presents a substantial and important question of federal law: Whether a U.S. District Court sitting in its capacity under 28 U.S. Code § 158 (a) has discretion to designate a division of the U.S. Department of Justice — specifically, the Office of the U.S. Trustee — in a case originating under 11 U.S. Code, Chapter 11 — when that “entity” (11 U.S.C. § 101, at 15) was not joined a party in the court below, nor filed any action or motion to be joined thereafter. Said designation was prejudicial and no legal basis provided by the Ninth Circuit.

2. On a broader level, this case offers for examination whether a self-represented Petitioner is entitled to the same treatment under law as a party represented by counsel. Petitioner was subject to irregularities of which the above-referenced matter is but one example. This appeal stems from sua sponte dismissal of Petitioner's Chapter 11, which the bankruptcy court refused to administer normatively unless Petitioner would "agree" to have the court order counsel appointed, raising U.S. Constitutional issues. *Citizens United v. FEC*, 558 U.S. 310 (2010) made it legal for corporations to be heard as "people," but there appears to be reluctance to allow an individual citizen to enjoy rights enumerated to them under 11 U.S.C. Chapter 11 et seq, typically invoked by corporations. Since few pro se petitioners have the energy and resources to challenge injustice via certiorari, this case can potentially benefit society writ large.

3. Due to the complex nature of the issues raised, Movant is struggling to meet the existing deadline to petition writ of certiorari, which timing is compounded by the holiday season and the fact that Petitioner is in the midst of a geographical relocation, due to economic circumstances beyond her control.

4. Pro se Petitioner is also seeking to retain the assistance of professional counsel that may be able to assist in her goal of having certiorari granted and delivery of the strongest oral argument possible. Reaching potential representatives has been difficult during the holiday season that began in November and immediately precedes the current filing deadline.

5. The aforementioned combination of factors strains Movant's availability to continue legal research and complete work writing the petition for writ of certiorari between today and January 3, 2023.

Accordingly, Petitioner respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, up to and including Monday, March 6, 2023.

Dated: December 10, 2022

Respectfully Submitted,

A handwritten signature in cursive script that reads "Paula Parisi". The signature is written in black ink and is positioned above a horizontal line.

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