

App No. _____

In the Supreme Court of the United States

LISA GLOVER
Appellant,

v.

BUILDING and LAND TECHNOLOGIES,
HPC-EIGHT et al.,
Respondent.

**APPLICATION FOR EXTENSION OF TIME IN WHICH TO FILE
PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Sonia Sotomayor, Associate Justice of the Supreme Court of the United States for the Second Circuit:

Petitioner, Lisa Glover, respectfully requests pursuant to Supreme Court Rule 13.5 and Rule 22, that the time for a petition for writ of certiorari in this matter be extended for 60 days to and including March 12, 2023. The time to petition for writ of certiorari in this Court would therefore expire on March 13, 2023, absent an extension. **5 U. S. C. §6103.**

The last day of the period shall be included, unless it is a Saturday, Sunday, federal legal holiday listed in 5 U. S. C. §6103, or day on which the Court building is closed by order of the Court or the Chief Justice, in which event the period shall extend until the end of the next day that is not a Saturday, Sunday, federal legal holiday, or day on which the Court building is closed.

Plaintiff files this application at least ten days before that date. The jurisdiction of this Court is invoked under 28 U. S. C. § 1254. The United States Court of Appeals for the Second Circuit issued its MOTION ORDER, denying motion for panel reconsideration, or, in alternative, for

reconsideration en banc filed by Appellant, December 12, 2022 (see Appendix A)

Background

Applicant initially filed a housing discrimination claim against Respondents, Building and Land Technology, HPC-Eight et al., on January 18, 2020, based on Civil Rights Violations, including Race, discrimination, and detailing unequal treatment of a Black tenant, facilitating the harassment from more favorable white tenants who were described as being close “Friends” of leasing agent. The managers at NV Apts, demonstrated in no uncertain terms as being “staunch advocates” for the harassors, while showing belligerence towards an African American resident and creating a hostile environment. And due to the managers’ reluctance in enforcing their noise policy rules coupled with their firm stance in allowing, protecting, and facilitating the harassing conduct, it consequently resulted in a deluge of other noise disturbances, specifically escalating between 1:00am to 5:00am, (quiet hours) and then resuming shortly afterwards, for the sole purpose of creating uninhabitable and stressful conditions imposed upon the Plaintiff.

24 CFR § 100.400 - Prohibited interference, coercion, or intimidation.

(a) This subpart provides the Department's interpretation of the conduct that is unlawful under section 818 of the Fair Housing Act.

(b) It shall be unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of that person having exercised or enjoyed, or on account of that person having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by this part.

(c) Conduct made unlawful under this section includes, but is not limited to, the following:

(1) Coercing a person, either orally, in writing, or by other means, to deny or limit the benefits provided that person in connection with the sale or rental of a dwelling or in connection with a residential real estate-related transaction because of race, color, religion, sex, handicap, familial status, or national origin.

(2) Threatening, intimidating, or interfering with persons in their enjoyment of a dwelling because of the race, color, religion, sex, handicap, familial status, or national origin of such persons, or of visitors or associates of such persons.

(5) Retaliating against any person because that person has made a complaint, testified, assisted, or participated in any manner in a proceeding under the Fair Housing Act.

(6) Retaliating against any person because that person reported a discriminatory housing practice to a housing provider or other authority.

The CT. Commission was working under the former administration that severely hindered claims of housing discrimination and disparate intent and treatment of affordable housing applicants, which subsequently, eviscerated protections from victims of housing discrimination. For example, discriminatory claims being deemed frivolous while the victim(s) are left without protections from these acts.

To establish a prima facie case under the disparate treatment theory underlying this housing discrimination claim, complainant must demonstrate:

(1) That she belongs to a statutorily protected class. (2) that she applied for and was otherwise qualified to rent a unit, were told to choose the new rental unit, and then denied apt. by the owner/landlord; and (3) a rental unit remained available.

The Appellate Court and the District Court erred in their ruling. The claims of collusion, unfair treatment, rejecting an applicant after being qualified, and told to choose a unit were never addressed. In addition, discriminatory intent, interference of a real estate transaction, denying and refusing another rental to an applicant were overlooked and plaintiff displayed due diligence in obtaining an attorney, at the discretion of the Court, but nevertheless was denied the appointment of Counsel. (See Appendix A)

Therefore, I respectfully ask the Court to reconsider the facts.

Good cause supports granting an extension of time.

Appellant asks the Court for a 60-day extension to file a petition for writ of certiorari for the following reasons:

1) Due to plaintiff's Physical limitations (disabled) and the time limits presents a hinderance in submitting related cases and citing arguments in a timely fashion.

- 2) The Appellant is Pro-se, without any legal representation, or legal guidance to challenge Civil Rights decisions in a timely fashion. The limited time constraints are an impediment for efficient arguments required by the Plaintiff.
- 3) Due to the rules, complexity of the case, plaintiff needs to perform additional research, of the particular legal issues and the level of factual investigation that will be required.
- 4) In addition to the legal challenges and the various agencies involved, appellant must conduct additional research regarding the agencies investigating discriminatory claims, and the overt conduct geared favorable to the defendants, the violations and the laws governing them.
- 5) Additional time is requested to conduct research regarding violations of the CT. Housing Partners (housing agency), to whom the defendants sub-contracted with, who met with the defendants (managers) from NV Apts and then rescinding their offer to me for another sister property.

Conclusion

The extension will give applicant sufficient time to write the petition for a writ of certiorari in this case. Appellant therefore asks this Court to extend the time to file a petition for a writ of certiorari in this appeal by 60 days to and including March 13, 2023.

Respectfully submitted,



Lisa Glover
110 Commons Park N. #1156
Stamford, CT 06902

Dated February 18, 2023

Amended February 21, 2023

Submitted to:

U.S. Mail:

Supreme Court of the United States

1 First Street, NE

Washington, DC 20543

Attn: Clerk's office

Copy-Sent to:

Ashley Noel, Boyle Shaughnessy Law PC

280 Trumbull Ave. 23rd. FL.

Hartford Ct 06103

Via email: anoel@boyleshaughnessy.com