## IN THE SUPREME COURT OF THE UNITED STATES

CRISTIAN M. LOGA-NEGRU,

Plaintiff/Appellant,

V.

Case no. 22-cv-909-LA Appeal no. 22-2789

MIRELA P. ZALEWSKI

Respondent/ Defendant

## MOTION FOR ENLARGING THE TIME TO FILE A BRIEF

Pursuant to S.Ct. Rule 21, the Plaintiff, Cristian M. Loga-Negru, respectfully moves for an extension of time to file his brief in the above matter, showing as follows:

- 1. The Respondent, an undisclosed rebuttal witness in the underlying criminal case 14-CF-1626, has not yet been served with process.
- 2. The ability to introduce evidence in the trial court regarding a jurisdictional issue related to the exigent circumstances claimed for the requisite of a legal arrest, depend on the state courts.
- 3. Due to the sensitive information held by the prosecutor and the respondent only knowledge of it, the case presently must be prolonged to ensure that the actions undertaken by the police could be traced to their true motivation. EMS responded to a call for medical help, not a crime.
- 4. The cellhalls in Waupun Correctional Institution are very loud, making legal attendance difficult in matters publicly known[...].
- 5. The Decision from the U.S. Court of Appeals for the 7th Circuit was issued on January 9, 2023, which makes the brief due by April 28, 2023. The Appellant applies for an extension of time to file his brief until may 26, 2023, for a period of 50 days.

Respectfully submitted, this 20 day of MARCH, 2023.

Cristian M. Loga-Negru, pro se. Waupun Correctional Institution 200 S. Madison St. Waupun, WI 53963

<sup>&</sup>lt;sup>1</sup> See <u>Loga-Negru v. Zalewski</u>, No. 22-2789, 2023 WL 128424, at 3 (7th Cir., 2023)