

No. - \_\_\_\_\_

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IN THE  
SUPREME COURT OF THE UNITED STATES

\_\_\_\_\_  
JOHN-HENRY AYANBADEJO,

PETITIONER,

VS.

CHANEL GOOSBY,

ALLSTATE FIRE & CASUALTY INSURANCE COMPANY,

RESPONDENT.

On Application for an Extension of Time to File Petition for a Writ of Certiorari  
to the Supreme Court of Texas

\_\_\_\_\_  
PETITIONER'S APPLICATION TO EXTEND TIME TO FILE PETITION FOR  
WRIT OF CERTIORARI  
\_\_\_\_\_

JOHN-HENRY AYANBADEJO

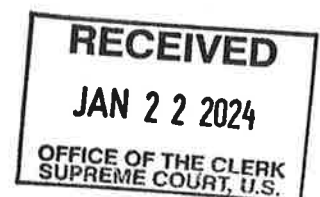
*Pro Se*

PETITIONER

2918 WEST GRAND PARKWAY NORTH, # 150-218

KATY, TEXAS 77449

TEL NO.: (832) 616-0772



## **PARTIES TO THE PROCEEDING AND RULE 29.6 STATEMENT**

All parties appear in the caption of the case on the cover page. A list of all parties to the proceeding in the Court whose judgment is the subject of this petition is as follows:

1. John-Henry Ayanbadejo, Plaintiff-Petitioner.
2. Chanel Goosby
3. Allstate Fire & Casualty Insurance Company, Defendant-Respondent.

The Petitioner, John-Henry Ayanbadejo is not a Corporation; therefore, a corporate disclosure statement is not required under Supreme Court Rule 29.6.

**TO THE HONORABLE JUSTICE SAMUEL ALITO OF THE UNITED STATES  
SUPREME COURT:**

Pursuant to this Court's Rules 13.5, 22, 30.2, and 30.3, Petitioner John-Henry Ayanbadejo respectfully requests that the time to file his Petition for Writ of Certiorari in this matter be extended for 60 days up to and including March 25, 2024. In support of this Application, Petitioner shows the following:

1. The Supreme Court of Texas in [Austin, Texas] rendered its judgment denying the Petitioner's, John-Henry Ayanbadejo's, Petition for Review in [John-Henry Ayanbadejo, Appellant v. Chanel Goosby and Allstate Fire & Casualty Insurance Company], No. [23-0343], on [August 4, 2023] and denied Motion for Rehearing of the said Petition for Review on [October 20, 2023]. *See*, App. 1, 2, and App. 3. The Petition for Writ of Certiorari is due no later than [January 22, 2024].

2. Petitioner requests an extension of time of sixty (60) working days, to [March 25, 2024]. This is Petitioner's first request for an extension of time in regards to this Application at this Court in this case.

3. Petitioner relies on the following facts as a reasonable explanation for the requested extension of time. John-Henry Ayanbadejo is *Pro se* Petitioner, in this case, as a proximate result of the criminal interference of his Civil, Statutory, and Constitutional Rights to hire an attorney of his choice in a civil hearing. Ayanbadejo, in addition to preparing a Petition for Writ of Certiorari in this case, must also devote time to the following additional matters: [Petitioner's health]. Petitioner, John-Henry Ayanbadejo, travelled overseas to take care of his

elderly parents and to continue with treatment that Petitioner sought overseas as a proximate result of Respondent's refusal to pay for injuries sustained in an accident on Petitioner's way to Dallas, Texas for work. On returning on November 6, 2023, Petitioner developed a chest infection that affected him for approximately 2 months compounded by the side effects of the medication prescribed by his overseas doctors. During such time, Petitioner could not work on his said Petition for Writ of Certiorari to this Court from a decision of the Supreme Court of Texas as well as work on his regular job to pay his basic necessities.

*Pro se* Petitioner's said Petition for a Writ of Certiorari to this Court raises the following very important issues that requires *Pro se* Petitioner to conduct more research and analysis to prepare for a Petition for Writ of Certiorari before this Court:

1. United States Constitutional due process and equal protection issues under the First, Fourth, Fifth, Seventh, and Fourteenth Amendment.
2. The said Petition raises Federal Questions regarding the case citing Supreme Court Judicial precedent.
3. The said Petition raises important consumer related issues and the rights of consumers to file suit against insurance companies that are in fiduciary relationships with consumers in the State of Texas.
4. It is important to note that as opposed to Respondents who have multiple attorneys representing them, Petitioner was forced to continue this case *pro se* as a proximate result of the egregious actions of his former attorney, his employees, and other possible parties that deprived *pro se* Petitioner

from hiring other Texas Licensed Attorneys from continuing the case on behalf of Petitioner as this Court will plainly see from the Petition for Writ of Certiorari.

5. During the pendency of this case a reasonable effort was made to resolve the dispute at the 14<sup>th</sup> Court of Appeals of Texas without the necessity of Court intervention, and the effort failed due mainly to Respondents' and the said former attorney's failures. Therefore, Petitioner prays that this Court grant this motion for extension of time for an additional 60 days or till March 25, 2024. *See*, App. 1.

Respectfully submitted,

By: 

JOHN-HENRY AYANBADEJO

*Pro Se* PETITIONER

2918 WEST GRAND PARKWAY NORTH, # 150-218

KATY, TEXAS 77449

TEL NO.: (832) 616-0772

**CERTIFICATE OF  
SERVICE**


A Copy of this Application was served by email and United States mail to the counsel listed below in accordance with Supreme Court Rule 22.2 and 29.3. My email address is johnhenryesq@gmail.com.

John M. Causey,  
Hope & Causey, P.C.  
P. O. Box 3188, Conroe,  
Texas 77305-3188.

Email: hcdocket@hope-causey.com

Attorney for Appellees:

1. Allstate Fire & Casualty Insurance Co.
2. Chanel Goosby.

By:   
John Henry Ayanbadejo

Petitioner *Pro Se*

**APPENDIX**

**TAB**

1. Petitioner's, John-Henry Ayanbadejo's, Affidavit in Support of his Application to Extend Time to File Petition for Writ of Certiorari, dated January 13, 2024
2. Judgment of the court / or order of the Supreme Court of Texas, denying Petitioner's, John-Henry Ayanbadejo's Motion for Rehearing of the said Petition for Review, dated October 20, 2023.
3. Judgment of the court / or order of the Supreme Court of Texas, dated August 4, 2023.

APP. 1



IN THE  
SUPREME COURT OF THE UNITED STATES

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JOHN-HENRY AYANBADEJO,

PETITIONER,

VS.

CHANEL GOOSBY,

ALLSTATE FIRE & CASUALTY INSURANCE COMPANY,

RESPONDENT.

**On Application for an Extension of Time to File Petition for a Writ of Certiorari  
to the Texas State Supreme Court**

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**PETITIONER'S AFFIDAVIT IN SUPPORT OF HIS APPLICATION TO  
EXTEND TIME TO FILE PETITION FOR WRIT OF CERTIORARI**

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STATE OF TEXAS

HARRIS COUNTY


§  
§  
§

1. Before me, the undersigned notary, on this day personally appeared

John-Henry Ayanbadejo, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

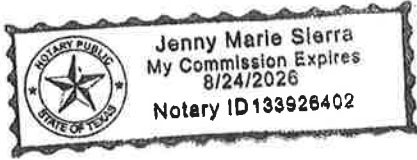
2. "My name is John-Henry Ayanbadejo, Petitioner, and consumer, at all material times to this suit, to Respondents' Gold Insurance Policy. I am over 18 years of age and capable of making this affidavit. As a consumer at all material times prior to this case of the said Respondents' Gold Insurance Policy, I am familiar with the facts of this case. I submit this affidavit in support of my, Application for an Extension of Time to File Petition for a Writ of Certiorari to the Texas State Supreme Court.
3. I have read the aforesaid Application for an Extension of Time to File Petition for a Writ of Certiorari to the Texas State Supreme Court, with attached documents, the facts stated in it, barring any inadvertent omissions, errors or speculation, are within my personal knowledge and are true, correct, and made in good faith."

I signed this affidavit on the 13th day of January 2024 at Harris County, Texas.

  
\_\_\_\_\_  
John-Henry Ayanbadejo, Affiant

SWORN TO and SUBSCRIBED before me by John-Henry Ayanbadejo, on

January 13, 2024.



*Jenny Sierra*  
\_\_\_\_\_  
Notary Public in and for  
the State of Texas

APP. 2

FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 10/20/2023  
TC#: 2019-18186

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

JOHN-HENRY AYANBADEJO  
\* DELIVERED VIA E-MAIL & POSTAL \*

FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 10/20/2023  
TC#: 2019-18186

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

MR. WESLEY RALPH WARD  
HOPE & CAUSEY, P.C.  
P.O. BOX 3188  
CONROE, TX 77305  
\* DELIVERED VIA E-MAIL \*

FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 10/20/2023  
TC#: 2019-18186

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

ALEXANDER TAYLOR  
HOPE & CAUSEY, P.C.  
P.O. BOX 3188  
CONROE, TX 77305  
\* DELIVERED VIA E-MAIL \*

FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 10/20/2023  
TC#: 2019-18186

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

DISTRICT CLERK HARRIS COUNTY  
HARRIS COUNTY CIVIL COURTHOUSE  
P.O. BOX 4651  
HOUSTON, TX 77210  
\* DELIVERED VIA E-MAIL \*



FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 10/20/2023  
TC#: 2019-18186

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MR. JOHN M. CAUSEY  
HOPE & CAUSEY, P.C.  
P.O. BOX 3188  
CONROE, TX 77305-3188  
\* DELIVERED VIA E-MAIL \*

FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 10/20/2023  
TC#: 2019-18186

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

MS. DEBORAH M. YOUNG (14TH COA)  
CLERK, FOURTEENTH COURT OF APPEALS  
301 FANNIN STREET, RM 245  
HOUSTON, TX 77002  
\* DELIVERED VIA E-MAIL \*

**APP. 3**

FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 8/4/2023  
TC#: 2019-18186

Today the Supreme Court of Texas denied the petition  
for review in the above-referenced case.

JOHN-HENRY AYANBADEJO  
\* DELIVERED VIA E-MAIL \*





FILE COPY

RE: Case No. 23-0343                      DATE: 8/4/2023  
COA #: 14-20-00264-CV                    TC#: 2019-18186  
STYLE: AYANBADEJO v. GOOSBY

Today the Supreme Court of Texas denied the petition  
for review in the above-referenced case.

DISTRICT CLERK    HARRIS COUNTY  
HARRIS COUNTY CIVIL COURTHOUSE  
P.O. BOX 4651  
HOUSTON, TX 77210  
\* DELIVERED VIA E-MAIL \*





FILE COPY

RE: Case No. 23-0343  
COA #: 14-20-00264-CV  
STYLE: AYANBADEJO v. GOOSBY

DATE: 8/4/2023  
TC#: 2019-18186

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CLERK, FOURTEENTH COURT OF APPEALS  
301 FANNIN STREET, RM 245  
HOUSTON, TX 77002  
\* DELIVERED VIA E-MAIL \*