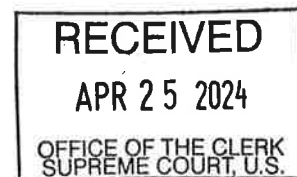


**THE SUPREME COURT
OF THE UNITED STATES OF AMERICA (SCOTUS)**

In re:)
)
Predrag Tosic, a man) REQUEST BY PRO-PER
Appellant Pro Per / Sui Juris) APPELLANT FOR TIME-
) EXTENSION TO FILE
) WRIT OF CERTIORARI;
v.) DUE TO DISABILITY
) AND RECURRING ILLNESS
HEATHER BLAKEMORE-TOMASON)	
(and the state of Washington),)	Re: Washington Supreme Ct.
Respondent to Appeal)	cause #102306-5
) (denied petition for appellate
) review on <u>merits</u>)
_____)	

A) Identity of Petitioner: Predrag Tosic, a living man, Appellant Sui Juris/Pro Per before all state of Washington appellate courts, including state Supreme Court; and Petitioner Pro-Per in the upcoming *Writ of Certiorari* to the Supreme Court of these United States of America (SCOTUS) re: state Supreme Ct.'s denied petition for review (cause #102306-5) on blatantly denied both appellate due process and ADA/federal statutes protecting pro-se/pro-per litigants with disability/history of disability; and who had timely sought ADA accommodations from lower courts (specifically, from state of Washington Ct. of Appeals – Division I), yet whose ADA-related requests were ignored then snubbed and declared moot (even though said requests were originally filed timely). I am a living man, not a corporation. I declare under the penalty of perjury that I have disability/history of disability; as well as that I was repeatedly ill in the second half of February and much of March 2024; resulting in delays with and necessity of time-extensions for various filings, all as Pro-Se/Pro-Per, with three different state courts including the state Supreme Court; as well as necessity for additional time to file aforementioned Writ with SCOTUS.



B) Relief Sought: I am specifically asking this Supreme Court to grant me a time extension of 60 days for filing Writ of Certiorari, as Pro-Per/Pro-Se, on aforementioned denied petition for review by the state Supreme Ct; which ignored blatant violations of Due Process, and various federally/constitutionally protected rights, from the right to be reasonable heard by lower courts, 1st and 14th amendment rights, to the ADA-related federally protected rights for persons/men/women with disabilities; at both the original trial court (King Co. Superior Ct.) and subsequently lower state appellate court, Ct. of Appeals – Division I. While I do not intend to wait for 59 days prior to filing my Writ of Certiorari, given my deteriorated health and disability/history of disability, that I have been forced to contemporaneously deal with 3-4 different courts as Pro-Per litigant with limited financial resources and no legal or political ‘clout’; and being aware that SCOTUS will grant time extension requests (at most) once, I am taking the liberty to request maximal time extension under the SCOTUS rules and statutes.

C) Justification for why time-extension should be granted: there are four main grounds for seeking this sorely needed time extension, with respect to the standard hard deadline on April 3. Those grounds/reasons are as follows:

C1: I am, and have been practically all along, Pro-Per/Pro-Se, contemporaneously dealing with multiple state courts (and, now, also the US Supreme Court) as a litigant/appellant Pro-Per; while trying to put my life and my career back together after years of documented abuse (which has been invariably ignored by various state courts to date, up to & including Wash. Supreme Court). This is rather over-whelming, resulting in high levels of anxiety, stress, trauma, sleep deprivation etc.; and necessitating time extensions.

C2: I have a disability / history of disability; of which I have been notifying various state courts consistently since Spring 2023 (some of those courts, such as Ct. of Appeals – Div. I, have entirely ignored my disability pleadings and requests for accommodations; which is one of the key reasons for this upcoming Writ with SCOTUS). My application for federal disability benefits has entered its final stages as of March 2024; the state Disability Determination Services agent/case-worker has notified me, the adjudication by his office (on behalf of federal Social Security Administration) will take another 30-45 days from the time

all the documentation from myself and my current and past therapists has been received. Alas, I have hard deadlines at various courts, including SCOTUS, which do not allow me to wait for my disability benefits to (hopefully!) get approved. That said, I cannot accelerate the disability adjudication process – but am stating under the penalty of perjury (and will provide evidence as Appendices to my upcoming Writ) that all statements/claims pertaining to my disability are true and accurate, to the best of my knowledge, at the time of this petition/motion for time extension.

C3: On top of long-term disability and trauma, throughout late February and the month of March I had recurring short-term health issues (multiple infections necessitating multiple rounds of antibiotics; that resulted in drowsiness, fatigue, at times significant physical discomfort, worsened sleeping disorder and other factors resulting in lowered ability to perform various tasks, be it related to my college teaching be it re: filing briefs and pleadings with various courts). This too has been documented and has, together with long-term disability, affected my ability to file pleadings with various courts timely, necessitating time extensions including specifically with respect to the upcoming Writ with this SCOTUS.

C4: I have been repeatedly denied due process, reasonable access to courts, and having my legal causes evaluated on their merits and not various procedural loopholes (in spite of being Pro-Per; having notified said courts of disability; and having repeatedly reminded state courts on SCOTUS's instructions/ample caselaw on how to treat Pro-Se/Pro-Per litigants in general) by various state of Washington courts to date; including but not limited to the state's Supreme Court. While time extensions might be disfavored in general, I pray that it will be granted in this case, given the factors C1 – C3 above (my pro-per status, disability, recent illnesses, and having to deal with multiple courts concurrently), as well as, per C4, in the interest of substantive justice I've been repeatedly denied, and ensuring that, at long last, my many grievances about how I have been treated by state courts, will be heard by this esteemed highest court of the land. Key denials of my petitions/appeals at Wash. Ct. of Appeals Division I and also the state Supreme Court, have all been on various procedural grounds, while avoiding reviewing and adjudicating on actual merits like a plague – which, given the widespread corruption among the state judiciary, as well as that merits of my case are rather

damning to at least two lower state courts (King County Superior Ct. and Ct. of Appeals – Division I) and a number of judicial and other officers/agents of the state at those two courts and beyond, are sadly no longer surprising.

My 90-day deadline falls on April 3, 2024. Being Pro-Per, it appears I cannot file electronically, like I have been accustomed to with other courts, including federal district courts, I've dealt with to date. (I have repeatedly reached out via phone to SCOTUS Clerk's Office, and left voice-mails seeking assistance and clarifications; while the recording pledges the clerk would call back the parties seeking information and procedural assistance, I have not been called-back in a timely manner, necessitating that I file this Motion/Petition for Time Extension and send it via US postal services, making sure the postmarked date is no later than on the 90th day deadline – which is the best I can do, from across the country, under the totality of my circumstances, as summarized herewith.)

D) Motion / Petition Summary: As a Pro-Per, partially disabled party with documented disability and several additional recent (February-March 2024) illnesses/health issues, I am respectfully requesting a time-extension of additional 60 days to file Writ of Certiorari with SCOTUS; until June 2, 2024. I pray, given my Pro-Per/Pro-Se status, disability and overall totality of circumstances, and in order to give substantive justice a chance (something the state courts, incl. state Supreme Ct., have repeatedly denied me), my request will be granted. I swear/affirm, under the penalty of perjury and laws of these United States of America, that all factual information as stated herewith is true and accurate, to the very best of my knowledge. I also affirm this Petition is less than 1,500 words long.



Predrag Tosic, PhD; a living man; in Spokane, Washington, USA

CERTIFICATE OF SERVICE

I certify that on April 2, 2024, I served a copy of this pleading / request for time extension to file Writ of Certiorari with SCOTUS electronically to the opposing counsel of record.



Predrag Tosic, a man
Pro Per Appellant / child's father; domiciled in Spokane, Washington

THE SUPREME COURT OF WASHINGTON

HEATHER TOSIC,)	No. 102306-5
)	
Respondent,)	ORDER
)	
v.)	Court of Appeals
)	No. 83518-1-I
PREDRAG TOSIC,)	
)	
Petitioner.)	
)	
)	
)	

Department I of the Court, composed of Chief Justice González and Justices Johnson, Owens, Gordon McCloud, and Montoya-Lewis, considered at its January 2, 2024, Motion Calendar whether review should be granted pursuant to RAP 13.4(b) and unanimously agreed that the following order be entered.

IT IS ORDERED:

That the petition for review is denied.

DATED at Olympia, Washington, this 3rd day of January, 2024.

For the Court


CHIEF JUSTICE