

APPLICATION No. _____

In the
Supreme Court of the United States

ALI AL MAQABLH,


Petitioner,

v.

CRYSTAL L. HEINZ, *et al.*

Respondents.

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


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May __, 2025

To the Honorable Brett M. Kavanaugh, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Sixth Circuit:

Pursuant to Rule 13.5 of the Rules of this Court, Applicant, Ali Al Maqablh, respectfully submits this application for an extension of time to file his petition for a writ of certiorari, requesting that the deadline be extended from May 14, 2025, to July 13, 2025, a period of sixty (60) days.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought arises from *Al Maqablh v. Heinz*, No. 23-5935 (6th Cir. Dec. 23, 2024) (attached as Exhibit B). A timely petition for rehearing *en banc* was filed and subsequently denied on February 13, 2025 (attached as Exhibit A).

JURISDICTION

This Court has jurisdiction over a timely filed petition for certiorari pursuant to 28 U.S.C. § 1257. Under Rules 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari must be filed on or before May 15, 2025. In compliance with Rule 13.5, this application is submitted more than ten days before the deadline for filing the petition.

REASONS SUPPORTING THE APPLICATION

Applicant respectfully submits the following grounds in support of this request for an extension of time:


1. This case was previously before this Court on a petition for a writ of certiorari, which was granted on October 3, 2022 (*see* Petition No. 21-1399).
2. On remand, the proceedings deviated from this Court's directive, as the Sixth Circuit remanded the case to the District Court rather than addressing it directly.
3. The District Court proceedings were further disrupted by the replacement of the presiding judge without explanation.
4. Complicating matters further, lead counsel for Applicant in the prior appeal, the Honorable Marisa Maleck and the Honorable Michael Slaughter, passed away on April 17, 2023, and June 29, 2023, respectively.
5. On remand, the defendants reasserted, *nearly verbatim*, arguments previously rejected by this Court, this time under the guise of motions for summary judgment.
6. On September 29, 2023, the District Court issued judgment in favor of the defendants (Exhibit C), adopting legal reasoning inconsistent with this Court's prior decision, effectively rendering that decision inoperative.
7. The Sixth Circuit affirmed this judgment on December 23, 2024 (Exhibit B), relying on an erroneous interpretation of this Court's precedent in *Thompson v. Clark*, 596 U.S. 36 (2022), and disregarding established principles such as the mandate rule and the law of the case doctrine.
8. Applicant is presently unrepresented and is diligently seeking qualified appellate counsel to prepare the petition.

9. This case raises significant and unsettled questions of federal law, including the proper application of *Thompson v. Clark*, the mandate rule, and the law of the case doctrine.
10. These issues are complex and merit thorough and expert presentation before this Court, which necessitates additional time to engage experienced appellate counsel.
11. This request for an extension is made in good faith and not for purposes of delay. Applicant seeks only the time necessary to ensure these important issues are effectively presented to the Court.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that the Court grant an extension of sixty (60) days, until July 13, 2025, for the filing of his petition for a writ of certiorari.

Respectfully submitted,
This First Day of May, 2025.



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