

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

KOLA HASANAJ,
Petitioner,

v.

DETROIT PUBLIC SCHOOLS COMMUNITY DISTRICT, ET AL.,
Respondents.

**Application for Extension of Time to File Petition for a Writ of Certiorari to
the United States Court of Appeals for the Sixth Circuit**

Shanta Driver (Supreme Court Bar No. 288138)
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Attorneys for Petitioner

**PETITIONER’S APPLICATION FOR EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI**

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

Petitioner, Kola Hasanaj, respectfully applies to this Court for an order extending the time in which to file his petition for writ of certiorari by sixty (60) days, from October 6, 2022 to December 5, 2022.

JURISDICTION

This Court has jurisdiction to review this case in the Sixth Circuit under 28 U.S.C. §1254(1).

A three-judge panel of the Sixth Circuit Appeals Court entered the attached order on May 19, 2022. Petitioner’s petition for *en banc* rehearing was denied in the attached order on July 8, 2022. Therefore, the current last date to file a petition for writ of certiorari is October 6, 2022.

REASONS FOR APPLICATION

Good cause and extraordinary circumstances for this application exist. I am 68 years old and have had a number of debilitating health issues this year. In the past four months I have had two hip replacements: the first occurred in early June and the second in August. I have been in Home Care (see attached Exhibit A) and have

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been undergoing physical therapy. Two months ago, I contracted COVID and had pneumonia. I have not fully recovered from the COVID pneumonia, and I have had symptoms of Long COVID. I contracted COVID a second time earlier this month. Starting a few days ago, I have been unable to stop coughing due to my COVID pneumonia. My physician has ordered CT scan, and I have another doctor's appointment today.

I need this sixty-day extension in light of other cases I am working on, to be able to give the proper due diligence to this case.

CONCLUSION

Accordingly, the Petitioner respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, from October 6, 2022 to December 5, 2022.

Respectfully submitted,
UNITED FOR EQUALITY AND
AFFIRMATIVE ACTION LEGAL
DEFENSE FUND (UEAALDF)

BY: /s/ Shanta Driver

DATE: September 29, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2022, the document “Application for Extension of Time to File Petition for a Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit” was served on the following party by placing a true and correct copy in the United States mail, via first-class mail, postage prepaid, to their address of record. All parties required to be served have been served:

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/s/ Shanta Driver
September 29, 2022