

**In the Supreme Court of the United States**

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FAIZ SIDDIQUI, APPLICANT

v.

ERUM MAJID RANDHAWA, RESPONDENT

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*OPPOSITION TO APPLICATION FOR EXTENSION OF TIME WITHIN WHICH TO FILE A  
PETITION FOR A WRIT OF CERTIORARI TO THE CONNECTICUT APPELLATE COURT*

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**RESPONDENT'S OPPOSITION TO APPLICANT'S APPLICATION FOR EXTENSION  
OF TIME WITHIN WHICH TO FILE A PETITION FOR WRIT OF CERTIORARI**

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April 29, 2026

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## **OPPOSITION TO APPLICATION FOR EXTENSION OF TIME**

The defendant/respondent Erum Majid Randhawa (“Defendant”) opposes the Application for Extension of Time filed by the plaintiff/applicant Faiz Siddiqui (“Plaintiff”) dated April 25, 2026. In his application, Plaintiff mischaracterizes the factual background of this action and fails to identify a valid basis upon which to grant an extension of time to file a petition for a writ of certiorari. Plaintiff has managed to draw out this action for an inordinately long time through the filing of numerous unsuccessful post-judgment motions. There is no justification for further delay.

### **BACKGROUND COUNTER STATEMENT**

Plaintiff’s claims in this action arise out of a complaint made by Defendant to the police that Plaintiff was harassing her. Plaintiff, a resident of the United Kingdom, and Defendant met in the summer of 2006 when Plaintiff was visiting family in Connecticut. After Plaintiff returned to his home, he pursued a romantic relationship with Defendant, despite Defendant making clear that she was not interested. Plaintiff developed an unhealthy fixation on Defendant that lasted for many years and included sending an appalling and offensive lengthy email about Defendant to Defendant’s friends and family on the eve of Defendant’s wedding in 2012. Uncontroverted evidence at trial established that even Plaintiff’s own family members begged him to end his obsession with Defendant.

In 2015, after receiving suspicious phone calls on her personal and work phones that Defendant reasonably believed were made by, or caused to be made by, Plaintiff, Defendant made a complaint to the West Hartford, Connecticut police. After an investigation, an arrest warrant was issued for Plaintiff, which warrant remains outstanding as Plaintiff remains a fugitive, refusing to come the United States so that the warrant may be served.

Based on Defendant's complaint to the police, Plaintiff commenced this action in December 2016, asserting claims for defamation, intentional infliction of emotional distress, and negative infliction of emotional distress against Defendant. After years of delay (much of which was caused by Plaintiff), trial was finally held in March 2023. After Plaintiff caused further delays, the Trial Court rendered judgment in Defendant's favor on November 2, 2023 on the grounds that Defendant was entitled to qualified immunity and, even if she were not, Plaintiff had failed to meet his burden of proof.

Although Plaintiff had originally filed a claim for a jury, after a conference with the Trial Court on March 13, 2023, Plaintiff filed a withdrawal of his jury claim and thereafter participated in a court trial *without objection or reservation*. Only after judgment had been entered in Defendant's favor did Plaintiff for the first time, in a motion for reconsideration, claim he had been deprived of the right to a jury.

Plaintiff appealed and on June 3, 2025, only *thirteen days* after oral argument was held, the Connecticut Appellate Court issued a Memorandum Decision affirming *per curiam* the Trial Court's judgment in favor of Defendant. Plaintiff thereafter filed a Petition for Certification with the Connecticut Supreme Court, which was denied. In response to Plaintiff's motion for reconsideration *en banc* of the denial of his Petition for Certification, the Connecticut Supreme Court issued an order stating that reconsideration was granted but the relief requested was denied.

Plaintiff in his motion characterizes Defendant's statements to the police as being "false and malicious lies". (Pl App at 3). This is contrary to the findings of the Trial Court, as upheld on appeal, that Defendant had a reasonable and good faith basis for her complaint to the police such that she was entitled to qualified immunity. Plaintiff similarly states that Defendant engaged in a "campaign of scurrilous defamation" against Plaintiff. (*Id.*) Again, this is contrary to the findings

of the Trial Court, as upheld on appeal, that Defendant had a good faith basis for the statements at issue and that Plaintiff had failed to meet his burden of proof to establish defamation. Plaintiff's statement that he had "little or no contact with the Respondent for nearly a decade" is similarly disingenuous in that it ignores, for example, that Plaintiff sent Defendant's friends and family a multi-page email on the eve of Defendant's wedding in which Plaintiff made numerous scandalous and offensive statements about Defendant's character. (*See, id.*)

Plaintiff now seeks an extension of time in which to file a petition for writ of certiorari. This matter has gone on far longer than it ever should have based on the claims asserted by Plaintiff. Defendant has suffered great anguish and has been forced to incur substantial legal expenses to defend Plaintiff's meritless claims—even though the genesis of this matter was *Plaintiff's* disturbing obsession with Defendant.

#### **THE REQUESTED EXTENSION IS NOT JUSTIFIED**

Plaintiff states four reasons for the requested extension, none of which justifies further delaying this matter.

First, Plaintiff's counsel states that he has a very full schedule. However, a busy schedule is not a valid basis for an extension of time in which file a petition for a writ of certiorari. *See, Knickerbocker Printing Corp. v. United States*, 75 S. Ct. 212, 213, 99 L. Ed. 1292 (1954). Moreover, the deadline for a petition for a writ of certiorari in this action was not unknown or unexpected. Simply being busy does not justify further delay.

Second, Plaintiff claims that additional time is needed because the issues in this appeal are purportedly "novel and complex". However, this is not the case as the holdings in this action have been entirely consistent with Connecticut precedent regarding jury waivers. Connecticut caselaw regarding waiver of the right to a jury trial uniformly holds that when there is no operative jury

claim at the time of trial and the party participates in a court trial without objection or reservation of his rights, not only has the plaintiff waived his right to a jury trial, but he also has not preserved the issue for appellate review. *See, e.g., Delahunty v. Targonski*, 158 Conn. App. 741, 749 (2015); *Keating v. Glass Container Corp.*, 197 Conn. 428, 431-35 (1985). This is exactly what happened here. Although Plaintiff had initially filed a claim for a jury, the claim was withdrawn before trial and Plaintiff thereafter participated in the court trial *without objection or a reservation of his rights*. Plaintiff, who has been represented by counsel throughout this matter, only claimed that he had been deprived of his right to a jury trial after judgment was entered in favor of Defendant. Moreover, at this point in this matter, Plaintiff and his counsel should be intimately familiar with all of the issues in this action. Due to the length of time that this action has been pending and the inordinate number of post-judgment motions filed by Plaintiff in the state trial and appellate courts, the issues in this action have been briefed *ad nauseum*. Plaintiff and his counsel have already had ample time to brief and research any issues to be raised in a petition for a writ of certiorari. No additional time is necessary.


Third, Plaintiff claims that additional time is necessary because he wishes to obtain new counsel. This is no surprise as Plaintiff has engaged in lawyer-shopping throughout this matter and has changed counsel frequently. Plaintiff has had ample time to seek additional counsel such that no extension is warranted on this basis. Moreover, in a December 29, 2025 motion seeking an extension of time to file a motion for reconsideration of the Connecticut Supreme Court's denial of his petition for certification, Plaintiff similarly cited a desire for new counsel as a basis for an extension of time. Thus, Plaintiff apparently has been seeking new counsel for, at a minimum, four months. No further time is warranted on this basis.

Finally, Plaintiff cites the ADA as a basis for his requested extension and represents that the Connecticut Appellate Court has previously assessed Plaintiff to be a qualified individual under the ADA. (Pl App at 7). The undersigned is unaware of any such determination by any court. The undersigned has raised this issue each time Plaintiff has claimed in numerous motions for extension of time to have been assessed by a court to be a “qualified individual” under the ADA. However, Plaintiff has never once proffered any evidence to support his claim or provided any information whatsoever regarding the scope or type of accommodation to which he claims to be entitled. The opinion letter attached to Plaintiff’s application does not change this analysis as it is unclear on what basis a foreign doctor could possibly opine as to the applicability of United States law (the ADA). Nor is it appropriate for a foreign doctor to opine as to whether Plaintiff is entitled, under Supreme Court rules of practice, to an extension of time.

#### CONCLUSION

Plaintiff’s application should be seen for what it is: the latest step in a pattern of delay that has persisted throughout this entire matter. Defendant is entitled to have this matter finally come to an end after having had to defend herself against Plaintiff’s frivolous claims since Plaintiff commenced this action over nine years ago. Simply because Plaintiff is upset that he has lost is not a reason to further prolong this meritless matter.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

No. 25 \_\_\_\_\_

FAIZ SIDDIQUI, APPLICANT

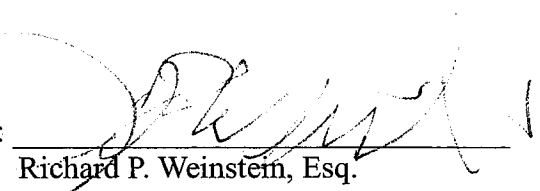
v.

ERUM MAJID RANDHAWA, RESPONDENT

I, Richard P. Weinstein, certify that on this 29<sup>th</sup> day of April 2026, I caused one copy and an electronic copy of the Respondent's Opposition to Applicant's Application for Extension of Time Within Which to File a Petition for Writ of Certiorari to be served by United States Mail, first class postage prepaid, and by electronic mail on the following:

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