William Muhr
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October 30, 2025

Scott S. Harris, Clerk
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543

Re: **Application for Extension of Time to File Petition for Writ of Certiorari**

In re the Parental Responsibilities Concerning M.M., a Child, and Concerning Kristin Lee a/k/a Kristin Ellias, Appellee, and William Muhr, Appellant; El Paso County Case No. 2016DR30155; Colorado Court of Appeals Case No. 23CA1367; Colorado Supreme Court, Case No. 25SC168 (cert denied Aug. 4, 2025)

Dear Mr. Harris:

Enclosed for filing is an Application for Extension of Time addressed to the Honorable Neil M. Gorsuch, Associate Justice, requesting additional time to file my petition for a writ of certiorari. I respectfully ask that it be docketed and promptly forwarded to Justice Gorsuch for consideration.

Thank you for your attention to this submission. Please contact me if any further information or documentation is required.

Respectfully submitted,

/S/ William Muhr
Pro Se Applicant

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The Honorable Neil M. Gorsuch
Associate Justice
Supreme Court of the United States
One First Street, N.E.
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Re: **Application for Extension of Time to File Petition for Writ of Certiorari**

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Dear Justice Gorsuch:

Pursuant to Supreme Court Rule 13.5, I respectfully request a 60-day extension, until January 2, 2026, to file my petition for a writ of certiorari. Good cause, excusable neglect, and the fundamental national significance of the issues in this case necessitate this request.

On October 27, 2025, I received for the first time the enclosed letter from the Colorado Supreme Court (dated October 20, 2025, attached as **Exhibit A**). This official confirmation exposes that the trial judge presiding over my case never had lawful appointment—an extraordinary jurisdictional defect that fundamentally transforms the posture of my petition. Until now, this fact was actively concealed despite recurring, diligent inquiries by me and formal requests to multiple state actors at every available level.

The constitutional question this presents is one of national and federal consequence: Whether a disqualified, conflicted state judge may personally select and appoint their own successor, in secret and without any public record or independent oversight, in violation of the Fourteenth Amendment's Due Process Clause. This is not simply a local matter. If permitted, such unchecked assignment power enables secret manipulation of judicial proceedings nationwide, undermines the integrity of the courts, and permits retaliatory or biased appointments that erode public trust.

This new evidence directly supports critical arguments that now form the very heart of the federal constitutional challenge to Colorado's process. It enables me, for the first time, to present a clear, well-supported petition showing how this precedent threatens due process protections for

litigants across America—especially in state cases that implicate federal constitutional rights, and which may arise from courts of last resort in other states. This issue warrants the United States Supreme Court's attention to resolve existing splits in lower courts and to safeguard transparent, impartial procedures nationally.

The harm inflicted here is ongoing and irreparable. On September 9, 2025, I filed a motion in the trial court seeking immediate and expanded parenting time with my daughter—a request of urgent importance to her emotional well-being and my rights as a parent. This crucial motion is currently pending before a judge whose lack of lawful appointment has now been officially confirmed by the Colorado Supreme Court's letter of October 20, 2025 (attached as Exhibit A). Critically, despite my repeated challenges, neither the Colorado Court of Appeals nor the Colorado Supreme Court addressed or corrected this foundational jurisdictional defect when denying relief, including upon denying certiorari review on August 4, 2025. I did not seek review in the U.S. Supreme Court at that time because the evidence of this jurisdictional defect was actively concealed and only brought to light by the state's highest court after their own discretionary review had concluded. The appearance of this letter not only substantiates my claim of ongoing constitutional harm, but provides a viable concrete federal question—whether the Due Process Clause is violated when a recused judge selects his own successor and the new judge acts without official appointment or public record—making this a case of urgent national importance for this Court's attention. "See attached, September 1, 2023, order (**Exhibit B**), and October 20, 2025, letter (**Exhibit A**).

Despite severe personal and legal obstacles, I have acted with the utmost diligence. Upon learning of this defect, I immediately filed an original proceeding with the Colorado Supreme Court on October 30, 2025, and am preparing my petition for certiorari to this Court. As a *pro se* litigant, it will take additional time to marshal the relevant state and federal questions, present a fully developed record, and ensure that the petition fulfills all procedural and substantive requirements for review by this Court.

No previous applications have been made. Granting this modest extension will allow the Supreme Court to receive a petition that, for the first time, squarely presents a federal question of grave, urgent, and recurring national importance—one that the highest court must address to preserve fundamental justice in America.

Thank you very much for your careful and just consideration of this extraordinary request.

Respectfully submitted,

/S/ William Muhr
Pro Se Applicant

Enclosure: **Exhibit A**—Colorado Supreme Court Letter mailed October 20, 2025; **Exhibit B** September 1, 2023, Order.

COLORADO SUPREME COURT CASE ANNOUNCEMENTS
MONDAY, AUGUST 4, 2025

"Slip opinions" are the opinions delivered by the Supreme Court Justices and are subject to modification, rehearing, withdrawal, or clerical corrections. Modifications to previously posted opinions will be linked to the case number in the petition for rehearing section the day the changes are announced. Click on the public domain citation to view the opinion in pdf format.

PETITIONS FOR REHEARING

2025 CO 40

Supreme Court Case No. 23SC272
Certiorari to the Colorado Court of Appeals
Court of Appeals Case No. 21CA1856

Petitioners:

Terra Management Group, LLC and Littleton Main Street LLC d/b/a Main Street Apartments,

v.

Respondents:

Kathleen Keaten and Delaney Keaten.

Petition for Rehearing DENIED. EN BANC.

No. 25SC168, Court of Appeals Case No. 23CA1367
In Re: the Parental Responsibilities Concerning
Child:
M.M.
Petitioner:
William Muhr,
v.
Respondent:
Kristin Lee a/k/a Kristin Ellias.

Petition for Writ of Certiorari DENIED. EN BANC.

No. 25SC190, Court of Appeals Case No. 22CA960
Petitioner:
Devien Patrick Brown,
v.
Respondent:
The People of the State of Colorado.

Petition for Writ of Certiorari DENIED. EN BANC.

No. 25SC193, Court of Appeals Case No. 21CA1934
Petitioner:
Lessie Steve Britton,
v.
Respondent:
The People of the State of Colorado.

Petition for Writ of Certiorari DENIED. EN BANC.

No. 25SC204, Court of Appeals Case No. 23CA484
Petitioner:
Karl Jeran Friday Williams,
v.
Respondent:
The People of the State of Colorado.

Petition for Writ of Certiorari DENIED. EN BANC.

Certificate of Service

I hereby certify that on October 30, 2025, I caused the original and two copies of the attached Application for Extension of Time to File Petition for Writ of Certiorari to be sent by first-class mail, postage prepaid, to:

Clerk of the Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543

and that a copy was served electronically, via JBITS e-filing system (consented electronic service), on the following counsel of record in the underlying trial court proceedings:

John Cyboron, Esq. #28227
Attorney for Kristin Lee/Ellias
14 N. Madre Street, Suite A
Colorado Springs, CO 80903
(Served via Colorado Courts JBITS e-filing system)

Jake Yu, Esq.
El Paso County Child Support Services
1675 Garden of the Gods Road, Suite 1107
Colorado Springs, CO 80907
(Served via Colorado Courts JBITS e-filing system)

No service is being made on the Colorado Court of Appeals or the Colorado Supreme Court via this application.

By: /s/ William Muhr

Additional material from this filing is available in the Clerk's Office.