

In the Supreme Court of the United States

KATY KABHA,

Petitioner,

v.

THE STATE OF TEXAS,

Respondent.

From Cause No. 071657 in the 59th District Court of Grayson County, Texas; Case No. 05-24-00000-CR in the Fifth Court of Appeals; and PDR No. 0309-25 in the Texas Court of Criminal Appeals

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

To the Honorable Samuel A. Alito, Jr., Associate Justice of the Supreme Court of the United States and Circuit Justice for the Fifth Circuit:

COMES NOW, Katy Kabha, Petitioner pro se, and respectfully moves for an extension of time within which to file a Petition for a Writ of Certiorari seeking review of the judgment of the Court of Criminal Appeals of Texas, which denied Petitioner's Petition for Discretionary Review on September 3, 2025.

1. Current Deadline and Requested Extension

Under Rule 13.1 of the Rules of the Supreme Court of the United States, Petitioner's petition for a writ of certiorari is currently due December 3, 2025 (90 days after the denial of discretionary review).

Pursuant to Rule 13.5, Petitioner respectfully requests a 60-day extension, making the new filing deadline February 1, 2026.

2. Good Cause for Extension

Good cause exists for this request.

Petitioner has multiple post-judgment motions pending before the 59th District Court of Grayson County, Texas, including a Motion to Vacate Judgment was filed on November 12, 2025. That motion seeks to vacate the judgment based on newly discovered evidence, certified Denison Municipal Court dismissals that invalidate the probable cause relied upon in Petitioner's felony conviction and addresses documented misconduct, including the suppression of exculpatory evidence, improper handling of recorded evidence, and falsified documentation.

The outcome of these pending motions directly affects the completeness and accuracy of the record that will be presented to this Court.

Petitioner proceeds pro se and in forma pauperis, without legal counsel or access to electronic filing resources, and requires additional time to compile certified record excerpts, trial transcripts, and exhibits for inclusion in the petition.

This brief extension will enable Petitioner to incorporate the results of the pending state-court filings and ensure a comprehensive, accurate submission. Granting this motion will not prejudice Respondent and will promote judicial efficiency and fairness.

3. Relief Requested

For these reasons, Petitioner respectfully prays that Justice Alito grant a 60-day extension of time, up to and including February 1, 2026, to file her Petition for Writ of Certiorari.

Respectfully submitted,


Katy Kabha, Pro Se Petitioner

11/12/2025

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Certificate of Service

I, Katy Kabha, certify that on this 12th day of November, 2025, I mailed the original and two copies of the foregoing Motion for Extension of Time to File Petition for Writ of Certiorari to the Clerk, Supreme Court of the United States, 1 First Street N.E., Washington, D.C. 20543, and served one copy on the Office of the Criminal District Attorney of Grayson County, 200 S. Crockett St., Suite 116A, Sherman, Texas 75090, by first-class mail, and certified mail.


Katy Kabha, Pro Se Petitioner

11/12/2025