No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

ADAM DAVID CLAYMAN (SUSTAINED COURT ALIAS / FORMER NAME),

Petitioner,

v.

TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA;
KENSEY ERIN PEASE; DAVID WALZER, M.D.,

Respondents.

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

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 Supreme Court Rules 13.5, 22, 30.2, and 30.3, Petitioner Adam David Clayman (former name and sustained court alias) respectfully requests that the time to file a Petition for Writ of Certiorari in this matter be extended by sixty (60) days, from January 4, 2026, to March 5, 2026.

JURISDICTION

This Court would have jurisdiction over this matter under 28 U.S.C. § 1254(1). The United States Court of Appeals for the Sixth Circuit entered its judgment on October 6, 2025. Absent an extension, a petition for writ of certiorari would be due on January 4, 2026. This

application is being filed more than ten (10) days before that deadline, as required by Supreme Court Rule 30.2.

JUDGMENT SOUGHT TO BE REVIEWED

Petitioner seeks review of the judgment of the United States Court of Appeals for the Sixth Circuit, entered October 6, 2025, in Case No. 24-4047. In that decision, the Sixth Circuit affirmed the District Court's extremely cursory, barely-two-line-in-page-margin denial of Petitioner's extensively argued motion to seal judicial records. A copy of the unbelievable marginalia case sealing denial in the Ohio Northern District as well as the Sixth Circuit's opinion is attached hereto as Exhibit A and B.

After the Appeals Court ruled, the Petitioner filed a Petition for Panel Rehearing for further review in Appeals fourteen days late by mistake on November 3, 2025, believing mistakenly that the time allowed for a Panel Rehearing request would analogously match the 28-day time allowed for a Motion for Reconsideration in District Court instead of be shortened and quickened to 14-days. The Petitioner may never have received a response to his late Panel Rehearing Request – no response appears in the public docket or in his forwarded mail and oddly the Petition for Panel Rehearing that Petitioner sent the 6th Circuit has not ever appeared in the public docket to my knowledge either. The mailing of the Panel Rehearing Petition was postmarked on 02025-11月03 (November 3rd) and delivered one week later on 02025-11月10 (November 10th). Immediately below you will see my certified mail receipt for the Rehearing Request and attached at the end of this document you will see the USPS delivery[5] confirmation. It was delivered. Without calling into question mysterious Court processes I must assume now that the Petition for Panel Rehearing has been denied or would have been denied, or would have been denied for purposes of allowing this to

accelerate toward your final review, and that I must proceed on a timely or time-adjusted basis with this SCOTUS writ of certiorari stage.

REASONS JUSTIFYING EXTENSION

Good cause exists for the requested extension for the following reasons:

1. Petitioner's Civic and Religious Emergency Response Work. Petitioner is the founder and CEO of Lifesaver Labs Public Benefit Corporation, which is actively developing *Naybor SOS*™ (also known as Neighbor 911™), a mobile and server application designed to train, alert, and dispatch neighbors either *sua sponte* or through a Public Safety Answering Point (PSAP) dispatcher to act as emergency[5] Good Samaritan first-first-responders for community members experiencing emergency or critical conditions for which great speed of response, with a dose of wisdom and endemic or trained common sense, is often more immediately pivotal than great skill that's pro-level but minutes more slowly arriving. This technology aims to address critical gaps in emergency response times by enabling immediate

neighbor-to-neighbor assistance while professional first responders are en route. The Petitioner hopes that this technology can be provided to all, not just locally in Palm Beach County, or statewide in Florida, or nationally in the United States, but globally eventually, so that no matter where a person was born or resides, no matter their local, state, or national citizenship(s), and no matter where they travel to, they can rely on a Naybor Emergency Aid Response (NEAR) system accessible through the same app they use at home during their years abroad, sojourns, or travels. For full disclosure, the Petitioner also hopes to extend this technology into interactional domains that professional governmentally-affiliated responders do not traditionally go, for Plaintiff argues reckless lack of exercise of proper government mandate, such as, as one example, dissuading cigarette lightings and encouraging sustained quit grit for corpsing harmful nicotine addictions, or gathering at school boards or youth tackle football games to dissuade officers of the state or those receiving any public funds from allowing government funds dedicated fundamentally to healthy tissue and brain development being used to destroy subconcussively brain tissue in collision youth sports, inasmuch as the alterable rules such as youth heading in soccer or, in the case of tackle football, the fundamental collision physics of these sports are deeply and fundamentally inimical to the *fundamental* purposes of education, as we've known in conscience science for at least a decade. The Plaintiff is a "Fundamentalist" on harm prevention, harmless, and harm less strategies and hopes to see Naybor SOS help calmunities (communities) self-organize on harm prevention in their own nayborhoods, supporting civic activism on emergency or critical harm prevention topics that have the blessing of Hippocratic thought.

The development of the Naybor SOS Family is at an extremely time-sensitive juncture. The application addresses urgent public safety needs, and lives may depend on its timely completion. Petitioner is proceeding pro se and must balance this critical civic and religious duty—which he considers an overriding priority under both civic responsibility and

religious obligation—with the preparation of a thorough and well-researched petition for certiorari.

2. Importance and Complexity of the Constitutional Questions. This case presents significant questions regarding the intersection of the Religious Freedom Restoration Act (RFRA) and judicial record-keeping practices in the digital age—what Petitioner has termed the "Right to Forgive and Be Forgotten." The petition will raise important issues concerning:

(a) Whether the permanent, searchable online publication of judicial records containing sensitive personal information substantially burdens sincere religious exercise under RFRA, particularly where religious beliefs prohibit the spread of damaging information about others;

(b) Whether courts must apply RFRA's strict scrutiny framework when evaluating motions to seal that raise religious burden claims, rather than the general presumption-of-openness standard;

(c) Whether the digital transformation of court records—making information permanently and instantaneously accessible worldwide—constitutes a qualitatively different burden on religious exercise than the historical norm of paper records that faded into practical obscurity at the time of the Founders all the way up to our media and archival systems of the late 01900s.

(d) Whether human beings under civic religion (civigion), let alone Judeochrislamhais under branch divine religion, carry a universal Right and Rite to Forgive, with the attendant necessarily-connected Right and Rite to Offer Apology and Apologize, and an always protected channel of at least minimal communication to relay the same, even in the face of blanket No

Contact Orders applied by authorities acting on behalf of groups, educational institutions, private or public associations or corporations, or governments. The development and prosecution of the underlying student disciplinary case that spun out of control originated in the Petitioner's Religious Duty to Apologize in putative violation of a No Contact Order (a message whose content was simply, to the best of my recollection, simply "May I someday ask for your forgiveness?"), a no contact order violation that was punished with relentless prosecution both before and continuing after a Hearing Panel found the Petitioner not responsible for the conduct with which he was charged.

(e) Whether Courts May Make Factual Determinations Without Live, Interactive Hearings

The question is whether any court may issue factual findings, summaries, or assessments about a disputed matter without either (1) relying on a fundamentally fair Hæring in the underlying proceeding where all parties were present and able to interact orally, or (2) conducting such a Hæring itself.

In Blesséd Dialekt, also known as "BLED Dialekt" or "Wounded Dialekt", a Hæring is provisionally defined by the Plaintiff as such:

"HÆRING: *An event in which you and all counterparts and any witnesses are heard, by uninvolved neutral parties, and have a chance to hear from them as well. Your voice and understanding interacts with your counterparts in lock-and-key fashion, supportively decrypting with one another your fractional best-effort recollections of the events. You are all required to be present, and you are all required to speak, hear, and dynamically interact with questioning and honest and complete responses, subject to any recognized*

right not to self-incriminate. Your fundamentally partly unreliable narrative memory is tested separately and in koupled states, to understand what the past looked like to the best of our ability[5] when there is a separation between you and when you fase each other and truly[5] "hær" each other, in couples "ashes to ashes (æ - aesc)" "Adam with Eve, Eve with Adam" form. "Hearings" in which only one person or a subset of persons who must be there appear or where some parties are unquestionable, noninteractive, never reasonably memory-coupled for interactive mutual memory examination and mutual realtime privacy unlock (for instance, in romantic harassment or sexual harassment cases, mutual fair realtime prespousal, spousal, or postspousal privacy right layer decryption), or unchallengeable do not qualify as Hærings. The author has been through such a fraudulent "Hearing" where the Innocenter was never heard, let alone compassionately questioned or challenged interactively, that wasn't a Hæring — failing to assemble a fair Hæring where everyone directly involved must appear and interact whenever feasible and possible when one is necessary can be dramatically worse than having no Hearing or process at all and be a wrecking ball to peoples' lives, leading to extended "undecidable lack of purpose or clarity" suicidal reasoning for lack of closure, and the absence of a Hæring can or should in itself be an obvious legal cause of action for tremendous punitive damages when pivotal decisions are made in institutions where and when Hærings are required under the law."

This matters because human knowledge is fundamentally oral and dynamically interactive. Critical evidence often exists in a distributed form across multiple minds—accessible only when parties and witnesses can

question one another directly before a fair tribunal. Truth emerges through this necessary gathering process, not from static documentary review alone.

Applied to this case: This Court can find that a Title IX disciplinary panel was fundamentally unfair when it failed to provide meaningful accommodation for:

- The Innocenter (the party conventionally labeled Complainant/Victim/etc.) to question the Innocentest (the party conventionally labeled Respondent/Suspect/Perpetrator), and
- The Innocentest to question the Innocenter.

Without such direct interaction, the process forecloses the possibility of genuine understanding, mutual accountability, and closure—whether understood in civic-religious or spiritual terms. What results instead, as occurred here, is prolonged recrimination, institutional bad faith, endless damaging gossip in gross violation of civigious (civic religious) or divigious (divine religious) religious principle without conclusive adjudication on the presumption of innocence, a very severe almost deadly interruption of the life purpose and career of one or both of the parties, and the impossibility of authentic reconciliation between the parties both between themselves and with respect to the institutional community overseeing, which tends toward arbitrary and capricious authoraritarianism without a fair hæring.

It is not entirely clear if I suffer from a variety of estoppel on (d) for not raising that question in a generalized "Right to Forgive and/or Be Forgotten" earlier in this case. (That two-part formulation of the most essential and fundamental core issues of this case only crystallized in that expressive form in the last week – marked and datestamped by the

immediate registration by Lifesaver Labs of the web domain "forgiveandorforget.org" on 02025-12月11 — December 11, 2025). Recognition of such a guaranteed double-pronged right and rite could have helped prevent at least one United States suicide attempt; regrettably the Petitioner's own in 02011, when the Petitioner succumbed to an impulse to lay down his life fatalistically and altruistically for a *National Student Bill of Rights*, altruistically ironically to protect other drivers on the road, and altruistically, in his view at the time, for the sake of his counterpart's uninterrupted journey toward a medical career, whose educational opportunities the Petitioner only wished to advance or *constructively* interfere (read: support), not ever *destructively* interfere, even as his own medical career was threatened and ultimately extinguished by the fact patterns in this underlying case.

These novel constitutional questions require careful research and articulation. An extension will allow Petitioner to present these issues in the most thorough and helpful manner for this Court's consideration.

The Plaintiff would further like to find representation for this case but has been unable to date to arrange such representation. The Plaintiff must confess that that is partly for lack of a clear legal market for this kind of representation for the Plaintiff to navigate, as it falls between many more difficult-to-find focus areas of law (at the intersection of Religious Freedom Law, Privacy Law, Constitutional Law (Plaintiff aims to argue an originalist privacy case), and Appellate and Supreme Court Practice). Your Honor surely knows thousands of lawyers who can be appointed to represent the Plaintiff on this case, but the Plaintiff lacks such legal social capital and finds it hard to find a lawyer with availability to attack these questions. The Plaintiff would be honored if the Honorable Justice or Justice's Staff should in any responsive order offer a shortlist of persons you might recommend or appoint to triage or represent the Plaintiff on this possibly very significant precedential case.

If the Plaintiff lacks representation and continues having trouble navigating toward or attracting Supreme Court representation from Ohio or Florida, and under pressure to produce Naybor SOS can't find the time to work through this case regularly, there is a risk that these claims will never reach filing, not for assumed lack of merit but just for lack of adequate staffing and the overwhelming pressure of responding to the tremendous press of sociobiophysical emergencies Plaintiff is aware and the Courts, which ultimately help handle so much of the aftermath, should be aware Naybor SOS or any similar platform that reaches service capacity[5] could in practice greatly help mitigate and support.

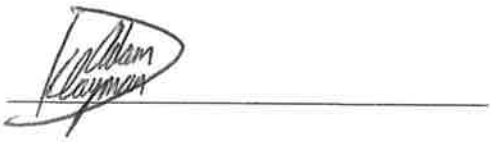
3. Pro Se Status. Petitioner is proceeding pro se and does not have the resources of a law firm or legal team to assist in preparing the petition. Additional time is necessary to ensure that the petition meets this Court's exacting standards and presents the legal issues in a manner that will be most useful to the Court.

4. No Prejudice to Respondents. Respondents will suffer no prejudice from the requested extension. The underlying case involves a motion to seal judicial records; the records at issue will remain in their current status during the extension period, and no party's substantive rights will be affected by the additional time.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court grant an extension of sixty (60) days, to and including March 5, 2026, to file a petition for writ of certiorari. Please see the following

Respectfully submitted,



/s Adam David Clayman/
ADAM DAVID CLAYMAN (Court alias - former name until Right to Be Forgotten is attained)
Petitioner, Pro Se
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Dated: 02025-12月20 (December 20, 2025)

OBSERVATIONS REGARDING FORMATTING AND SUBMISSION REQUIREMENTS

Petitioner respectfully submits the following observations regarding the Court's document formatting and submission requirements, and requests that the Court consider whether modifications to these requirements might better serve the interests of access to justice.

A. The Current Requirements Impose Substantial Costs

The Court's current rules require submission of forty copies of any petition for writ of certiorari in booklet format, printed on paper measuring 6⅛" × 9¼", with text blocks of 4⅛" × 7⅛", bound with colored covers of specified weight. *See* Sup. Ct. R. 33.1. Petitioner has received quotes ranging from $2,000 to $3,000 for printing services to achieve compliance with these specifications.

These costs are not incidental. The existence of an entire commercial sector dedicated to "Supreme Court printing compliance"—including specialized services such as supremecourtpress.com and similar enterprises—suggests that compliance with the Court's formatting requirements lies beyond the reasonable capacity of ordinary citizens without professional assistance. Petitioner respectfully submits that the emergence of such a cottage industry reflects a design failure in the rules themselves, rather than an indication of appropriate institutional standards.

B. The Burden Is Disproportionate to Any Identifiable Benefit

Petitioner acknowledges the Court's legitimate interest in orderly document management. However, the marginal benefit of the current specialized booklet format over standard letter-size (8½" × 11") or A4 paper submissions is unclear, while the burden is substantial and quantifiable.

Applying a functional standard: compliance with the Court's submission requirements should be achievable by any petitioner of ordinary education and basic document preparation skills within approximately thirty minutes of good-faith effort, with minimal risk of rejection for formatting deficiencies. Documents should be printable on standard home equipment or, if professional printing is required, easily produced at common retail establishments such as FedEx Office or similar services using a simple one-page specification sheet.

The current system fails this functional test.

C. The Aggregate Cost to Petitioners Seeking Review Is Substantial

The Court receives approximately 7,000 to 8,000 petitions for certiorari annually and grants review in roughly 1–2% of cases. At current compliance costs of approximately $2,000 per petition, petitioners collectively expend roughly $100,000 in formatting compliance costs for each case the Court agrees to hear.

A streamlined system—whether through acceptance of standard paper dimensions or through a Court-facilitated printing arrangement with a contracted vendor—could reduce per-petition compliance costs to approximately $500 or less, representing a 75% reduction in the financial barrier to seeking review.

D. Historical Practice Supports Simplification

From an originalist perspective, the Court's earliest practice imposed no such specialized formatting requirements. Documentary evidence indicates that submissions to the Court in the 1790s were prepared on standard "foolscap folio" paper—the most common paper size of the era—without specialized binding or dimensional requirements. Written briefs were not even the primary mode of advocacy; the early Court relied predominantly on oral argument, and the Justices themselves delivered opinions orally until 1834. The elaborate formatting regime reflected in Rule 33.1 is a modern accretion without apparent foundation in the Court's original practice or constitutional necessity.

III. THE PRINTING COMPLIANCE COSTS IMPOSE A SUBSTANTIAL BURDEN ON RELIGIOUS EXERCISE UNDER RFRA

A. Petitioner's Religious Exercise and Financial Circumstances

Petitioner is the founder and CEO of Lifesaver Labs Public Benefit Corporation, which develops safety-critical applications including Safeword™ (a consent monitoring and bedroom safety system) and Naybor SOS™ (a community emergency response platform). For Petitioner, the development of these life-preserving and dignity-protecting technologies constitutes sincere religious exercise—an embodiment of the commandment to love one's neighbor, to protect the vulnerable, and to steward resources toward the preservation of human life and welfare.

Petitioner's liquid assets, though nominally substantial (approximately $700,000), are dedicated to religious purposes and fundamental life obligations including:

NOT RECOMMENDED FOR PUBLICATION

No. 24-4047

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

ADAM DAVID CLAYMAN, Plaintiff-Appellant, v. TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA; KENSEY ERIN PEASE; DAVID WALZER, M.D., Defendants-Appellees.	)	ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

ORDER

Before: GIBBONS, BUSH, and LARSEN, Circuit Judges.

Adam David Clayman, proceeding pro se, appeals the district court's denial of his motion to seal the district court record. He also moves to seal the appellate record, to retitle and redact the case under pseudonyms in both this court and the district court, and to file his new legal name under seal. This case has been referred to a panel of the court that, upon examination, unanimously agrees that oral argument is not needed. *See* Fed. R. App. P. 34(a). We deny the motion to seal and affirm.

In 2015, Clayman sued the Trustees of the University of Pennsylvania and two individual defendants. The district court found Clayman's amended complaint "almost entirely incomprehensible," with the only discernable claim being a breach-of-contract claim against the Trustees, and it sua sponte dismissed the action for improper venue and lack of subject-matter jurisdiction. Clayman's appeal was dismissed for want of prosecution.

Nearly one decade later, Clayman moved to seal the entire case record, to file all further evidence ex parte, and for permission to file electronically. The district court denied the motion in a marginal entry order. Clayman now appeals.

We review the district court's denial of a motion to seal for an abuse of discretion. *See Rudd Equip. Co. v. John Deere Constr. & Forestry Co.*, 834 F.3d 589, 593 (6th Cir. 2016).

"The public has a strong interest in obtaining the information contained in the court record, which includes an interest in ascertaining what evidence and records the District Court and this Court have relied upon in reaching our decisions." *Lipman v. Budish*, 974 F.3d 726, 753 (6th Cir. 2020) (cleaned up). Accordingly, "the party seeking to seal a record carries the burden of overcoming" the "strong presumption in favor of openness," and "only the most compelling reasons can justify non-disclosure of judicial records." *Id.* (cleaned up). Clayman's motion to seal articulated no reason to justify sealing. The district court therefore did not abuse its discretion in denying it.

In his appellate brief, Clayman argues that the district court failed to consider his arguments for sealing that he raised in a memorandum in support of his motion to seal; he asserts that the district court declined to enter the memorandum into the record. He has "resubmitted" that memorandum to this court. But neither that memorandum nor Clayman's appellate brief contains any compelling reason to justify sealing, even if we could consider the arguments raised in them for the first time on appeal. *Cf. Cash-Darling v. Recycling Equip., Inc.*, 62 F.4th 969, 975 (6th Cir. 2023). Clayman argues that sealing is necessary "to protect sensitive information," including medical information concerning his manic-depressive symptoms, to prevent "significant personal and reputational damage," and to avoid a "substantial[] burden[] [on his] religious beliefs." He claims that the failure to seal the record containing "sensitive, needlessly embarrassing topics" caused a prospective romantic partner to reject him and has jeopardized his employment prospects. According to Clayman, he "was not of right mind at the time that he filed his initial 2015 case and, as a result of oversight and mistake, failed to protect his confidential information as zealously as

he would have if he had been more aware of how this case would become a major search engine result."

None of these arguments are compelling enough to overcome the presumption of openness. *See Lipman*, 974 F.3d at 753. Harm to reputation is insufficient to overcome the strong presumption in favor of public access, especially where, as here, the party who filed the suit is the one alleging harm from the public availability of the record. *See Rudd Equip. Co.*, 834 F.3d at 594; *see also Procter & Gamble Co. v. Bankers Tr. Co.*, 78 F.3d 219, 225 (6th Cir. 1996) ("[A] private litigant['s] interest in protecting [his] vanity or [his] commercial self-interest simply does not qualify as grounds . . . for keeping the information under seal . . . ."). And although Clayman's amended complaint in 2015 made passing references to manic depression, it did not discuss any psychiatric conditions from which he might personally suffer, nor were any medical records attached. Clayman simply has not shown that any of the allegations raised in this action justify sealing. *See Lipman*, 974 F.3d at 753.

Accordingly, we **DENY** the motions to seal, to retitle and redact the case using pseudonyms, and to file a new legal name under seal, and, finding no abuse of discretion, **AFFIRM** the district court's order.

ENTERED BY ORDER OF THE COURT

Kelly L. Stephens

Kelly L. Stephens, Clerk