

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

CHRISTOPHER MICHAEL BAUER,

Petitioner,

v.

JOB SERVICE NORTH DAKOTA and HARLOW'S SCHOOL BUS SERVICES,
Respondents.

On Petition for a Writ of Certiorari
to the Supreme Court of North Dakota

**MOTION FOR LEAVE TO FILE PETITION FOR WRIT OF CERTIORARI
OUT OF TIME**

1. Pursuant to this Court's supervisory authority and in accordance with Supreme Court Rule 30.3 and Rule 13.5, Petitioner Christopher Michael Bauer, appearing pro se, respectfully moves this Court for leave to file his Petition for a Writ of Certiorari out of time.

BACKGROUND

2. The Supreme Court of North Dakota issued its final judgment on April 10, 2025, and denied Petitioner's timely motion for rehearing on April 23, 2025. Pursuant to Rule 13.1, the deadline for filing a petition for writ of certiorari was July 22, 2025.

3. Due to circumstances beyond Petitioner's control, including personal hardship, ongoing pro se legal proceedings, and resource limitations, he was unable to finalize and file the petition within the prescribed time. This motion is submitted shortly after the deadline and is accompanied by a completed petition.

GROUNDS FOR LATE FILING

4. Petitioner respectfully requests that the Court accept this late filing on the following grounds:

- a. Pro Se Status: Petitioner is proceeding without counsel and has made good-faith efforts to timely complete the filing, but required additional time to compile appendices, meet formatting requirements, and resolve printing and submission logistics.
- b. Good Cause and Diligence: Petitioner diligently prepared his petition, supported by extensive legal documentation and citations, and finalized it as soon as practicable given technical and logistical constraints.

5. **Weighty Constitutional Questions:** The petition presents first-impression issues under the Fourth, Fifth, and Fourteenth Amendments—namely, whether a State may withhold unemployment benefits as a form of post-acquittal punishment, relying only on an arrest later alleged to be unconstitutional and on purely speculative reputational harm.

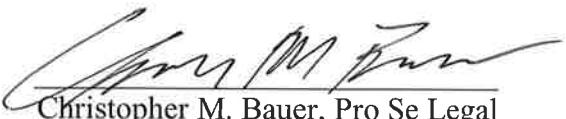
6. **No Prejudice to Respondents:** The relief requested will not prejudice the Respondents, who are governmental and corporate entities and are aware of ongoing litigation.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court grant leave to file his Petition for a Writ of Certiorari out of time, and that the Clerk be directed to accept the accompanying petition for docketing and review.

DATED this 28th Day of July, 2025.

Respectfully submitted,



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