

IN THE SUPREME COURT OF THE UNITED STATES

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

ANGELOS KOLOBOTOS,

Applicant/Petitioner,

v.

CITY OF DALLAS, A MUNICIPAL CORPORATION IN THE STATE OF  
TEXAS;

ALBERT TRE BLACK, III, RECEIVER FOR PROPERTY LOCATED AT 1918  
DULUTH STREET, DALLAS, TEXAS;

CHESTNUT HILL HOLDINGS LLC;

CITY OF DALLAS WATER DEPARTMENT;

DENNIS ROOSSEIN;

DENNIS L. ROOSSEIN JR.;

2700 ALW LLC;

CITY OF DALLAS CODE ENFORCEMENT;

AND OTHER DEFENDANTS LISTED IN THE COURT OF APPEALS  
PROCEEDINGS,

Respondents.

APPLICATION FOR 60-DAY 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:

Applicant Angelos Kolobotos, proceeding pro se, respectfully applies under Supreme Court Rule 13.5 and 28 U.S.C. § 2101(c) for a 60-day extension of time to file a petition for writ of certiorari seeking review of the unpublished order of the United States Court of Appeals for the Fifth Circuit entered April 27, 2026, in Case No. 25-10512, Kolobotos v. City of Dallas, et al.

The current deadline to file the petition for writ of certiorari is Monday, July 27, 2026. Applicant respectfully requests an extension of 60 days, up to and including Friday, September 25, 2026.

I. ORDER SOUGHT TO BE REVIEWED

Applicant seeks review of the unpublished order entered by the United States Court of Appeals for the Fifth Circuit on April 27, 2026, in Case No. 25-10512.

The Fifth Circuit order denied Applicant's motion to recall the mandate and denied Applicant's motion for leave to file a petition for panel rehearing and rehearing en banc out of time.

A copy of the Fifth Circuit's April 27, 2026 order is attached as Exhibit A.

## II. JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 1254(1), which permits review by writ of certiorari of cases in the United States courts of appeals.

Supreme Court Rule 13 provides that a petition for writ of certiorari is timely when filed within 90 days after entry of the judgment or order sought to be reviewed.

The Fifth Circuit order sought to be reviewed was entered on April 27, 2026.

Ninety days from April 27, 2026 falls on Sunday, July 26, 2026. Because that date falls on a Sunday, the current deadline is Monday, July 27, 2026.

This application is being filed more than 10 days before the current deadline.

## III. PROCEDURAL BACKGROUND RELEVANT TO THIS APPLICATION

Applicant filed a federal civil action in the United States District Court for the Northern District of Texas, Case No. 3:24-CV-3070, arising from serious allegations involving deprivation of property rights, receivership abuse, denial of due process, denial of meaningful access to court, and alleged conduct involving the City of Dallas and receivers connected to Applicant's property interests.

No summons or citation issued in the district court before dismissal, and no discovery occurred. The only respondent known to Applicant to have appeared in the federal proceedings below was Dennis Roossein / Dennis L. Roossein Jr., who filed a motion to dismiss even though Applicant had not been permitted to serve summons or citation. Applicant does not know how Roossein learned of the case, but his appearance is part of the procedural history Applicant intends to address in the petition for writ of certiorari.

The district court dismissed the case with prejudice before Applicant could obtain service, discovery, or merits development of the claims. Applicant appealed to the United States Court of Appeals for the Fifth Circuit. Applicant respectfully submits that the merits of the constitutional and property-rights issues have not been meaningfully reached by the district court, by the court of appeals, or in the rehearing process.

On April 27, 2026, the Fifth Circuit entered the unpublished order sought to be reviewed. The order denied Applicant's motion to recall the mandate and denied leave to file a petition for panel rehearing and rehearing en banc out of time.

#### IV. REASONS WHY AN EXTENSION IS JUSTIFIED

Good cause exists for a 60-day extension.

1. Applicant is proceeding pro se.

Applicant is not represented by counsel. Applicant must prepare the petition for writ of certiorari, questions presented, jurisdictional statement, statement of the case, reasons for granting the writ, appendix, motion for leave to proceed in forma pauperis, affidavit or declaration, and certificate of service without assistance of counsel.

2. The case has a complicated procedural history.

This matter involves proceedings in the United States District Court for the Northern District of Texas, the United States Court of Appeals for the Fifth Circuit, mandate issues, out-of-time rehearing issues, delayed-mail issues, and the unusual circumstance that the case was dismissed with prejudice before summons or citation issued and before discovery occurred.

Additional time is necessary so Applicant can accurately present the procedural history and prepare a proper appendix.

3. The merits have not been meaningfully reached.

Applicant respectfully submits that the serious constitutional and property-rights issues have not been meaningfully addressed on the merits by the district court, the court of appeals, or through rehearing review.

Applicant seeks additional time to prepare a petition that clearly explains why the case presents substantial federal questions involving due process, access to court, deprivation of property, receivership-related misconduct, and the practical effect of procedural barriers on a pro se litigant whose property rights were allegedly destroyed without meaningful merits review.

4. Applicant has documented delayed and damaged court mail.

Applicant has repeatedly received court correspondence late.

The Fifth Circuit order entered April 27, 2026 was mailed on or about April 29, 2026 and received by Applicant on or about May 8, 2026.

Applicant also previously received Fifth Circuit correspondence after substantial delay in a United States Postal Service envelope marked "FOUND LOOSE IN MAIL." That prior correspondence was dated March 2, 2026, postmarked March 3, 2026, and not received by Applicant until March 20, 2026.

These facts are significant because Applicant is pro se, relies on United States Mail, and does not consent to electronic service. The repeated delayed and damaged mail has materially impaired Applicant's ability to protect strict appellate deadlines.

5. Applicant acted promptly and in good faith.

After receiving delayed correspondence, Applicant mailed a Motion for Reconsideration to the Fifth Circuit on May 27, 2026. The USPS receipt shows mailing to New Orleans, Louisiana 70130.

Applicant is not seeking delay. Applicant is attempting to protect his right to Supreme Court review while also preparing a petition that fairly and clearly presents the federal questions.

6. A 60-day extension is necessary to prepare a complete petition and appendix.

Applicant needs additional time to gather and organize the Fifth Circuit order, district court dismissal order, appellate docket materials, mandate materials, delayed-mail evidence, "FOUND LOOSE IN MAIL" evidence, evidence of the absence of summons or citation and discovery, and other essential appendix materials.

A rushed petition would risk failing to present the federal questions clearly. The requested extension is necessary so Applicant can prepare a complete and orderly petition for writ of certiorari.

7. Respondents will not be prejudiced.

The requested extension is limited to 60 days and concerns only the time for filing a petition for writ of certiorari. Respondents will have the opportunity to respond under the Rules of this Court if the petition is filed and docketed.

#### V. RELIEF REQUESTED

For the foregoing reasons, Applicant Angelos Kolobotos respectfully requests that the time to file a petition for writ of certiorari be extended for 60 days, from Monday, July 27, 2026, up to and including Friday, September 25, 2026.

Respectfully submitted,



Angelos Kolobotos

Pro Se Applicant/Petitioner

4848 Lemmon Avenue, Suite 405

Dallas, Texas 75219

(214) 701-4751

Date: June 29, 2026

## DECLARATION OF ANGELOS KOLOBOTOS

I, Angelos Kolobotos, declare under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Applicant/Petitioner in this matter.
2. I am proceeding pro se.
3. The United States Court of Appeals for the Fifth Circuit entered the order sought to be reviewed on April 27, 2026, in Case No. 25-10512.
4. The April 27, 2026 order denied my motion to recall the mandate and denied my motion for leave to file a petition for panel rehearing and rehearing en banc out of time.
5. The April 27, 2026 order was mailed on or about April 29, 2026 and was received by me on or about May 8, 2026.
6. I have repeatedly experienced delayed receipt of court correspondence by United States Mail.
7. In connection with this same appellate matter, I previously received Fifth Circuit correspondence in a United States Postal Service envelope marked "FOUND LOOSE IN MAIL."
8. The prior Fifth Circuit correspondence was dated March 2, 2026, postmarked March 3, 2026, and not received by me until March 20, 2026.

9. No summons or citation issued in the district court before dismissal.
- 10.No discovery occurred in the district court before dismissal.
- 11.The only respondent known to me to have appeared in the federal proceedings below was Dennis Roossein / Dennis L. Roossein Jr., who filed a motion to dismiss even though I had not been permitted to serve summons or citation.
- 12.I do not know how Dennis Roossein / Dennis L. Roossein Jr. learned of the federal case before summons or citation issued.
- 13.The district court dismissed the case with prejudice before service, discovery, or merits development.
- 14.After receiving delayed correspondence, I acted in good faith and mailed a Motion for Reconsideration to the Fifth Circuit on May 27, 2026.
- 15.I am requesting a 60-day extension in good faith and not for delay.
- 16.Additional time is necessary for me to prepare a proper petition for writ of certiorari and appendix in a case involving serious constitutional, due-process, access-to-court, receivership, and property-deprivation issues.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2026.



Angelos Kolobotos