

No. _____

In the Supreme Court of the United States

CARL GORDON, Applicant

v.

UNITED STATES OF AMERICA, Respondent.

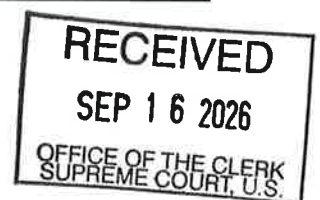
**APPLICATION ARISING FROM
GORDON v. GUTIERREZ,
UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT, NO. 25-1250**

**APPLICATION FOR AN EXTENSION OF TIME TO FILE A PETITION
FOR A WRIT OF CERTIORARI PURSUANT TO SUPREME COURT
RULE 13.5 FROM OCTOBER 8, 2026, THROUGH DECEMBER 7, 2026**

**TO THE HONORABLE ELENA KAGAN, ASSOCIATE JUSTICE OF THE
SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE
FOR THE NINTH CIRCUIT**

SEPT. 12, 2026

*Carl Gordon
Plaintiff, Applicant, Pro Se
8306 Wilshire Blvd., No. 792
Beverly Hills, CA 90211
(310) 926-3939
universityofthehood@gmail.com*



**TO THE HONORABLE ELENA KAGAN, ASSOCIATE JUSTICE OF THE
SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE
FOR THE UNITED STATES COURT OF APPEALS FOR THE NINTH
CIRCUIT:**

Applicant Carl Gordon, appearing pro se, respectfully applies pursuant to Supreme Court Rule 13.5 for a sixty-day extension of time, from October 8, 2026, through and including December 7, 2026, within which to file a petition for a writ of certiorari seeking review of the June 23, 2026, judgment of the United States Court of Appeals for the Ninth Circuit in No. 25-1250.

This Application seeks an extension solely on behalf of Carl Gordon and solely with respect to the judgment in Ninth Circuit No. 25-1250.

Good cause exists because Applicant, who is 80 years old and proceeding entirely pro se, is personally performing the legal, procedural, administrative, record-management, service, and production work that ordinarily would be divided among counsel, appellate specialists, legal staff, and professional litigation-support personnel.

Applicant is simultaneously managing several related Ninth Circuit judgments, the broader interconnected judicial record, Supreme Court Application No. 26A167 arising directly from No. 25-1250, Supreme Court Application No. 26A36 arising

from a related proceeding, continuing district-court proceedings, substantial printing and shipping expenses, and the specialized production requirements associated with Supreme Court practice.

Applicant therefore respectfully requests the full sixty-day extension permitted by Rule 13.5.

I. JUDGMENT FOR WHICH REVIEW WILL BE SOUGHT

On June 23, 2026, the United States Court of Appeals for the Ninth Circuit entered judgment in No. 25-1250, *Gordon v. Gutierrez*.

The Ninth Circuit granted the United States' motion for summary disposition, affirmed the district court's judgment, and denied all other pending motions as moot.

On July 7, 2026, Applicant filed a motion that the Ninth Circuit subsequently treated as a motion for reconsideration and reconsideration en banc.

On July 10, 2026, the Ninth Circuit entered an order denying Applicant's motion to stay the mandate. The court also treated Applicant's petitions for rehearing as a motion for reconsideration and reconsideration en banc and denied that motion.

The order stated that the mandate would issue in due course and that the court would not entertain further filings in the closed case.

The mandate was issued on July 20, 2026.

Under Supreme Court Rule 13.3, because the Ninth Circuit entertained and ruled upon Applicant's request for reconsideration and reconsideration en banc, the time for seeking certiorari runs from the July 10, 2026, order denying that relief, rather than from issuance of the mandate.

Accordingly, Applicant calculates the present deadline for filing a petition for a writ of certiorari as October 8, 2026.

Applicant requests the maximum sixty-day extension authorized by Rule 13.5, through and including December 7, 2026.

Attached to this Application are copies of the relevant Ninth Circuit materials:

Exhibit A — June 23, 2026, Order and Judgment in Ninth Circuit No. 25-1250;

Exhibit B — July 10, 2026, Order denying Applicant's motion to stay the mandate and denying reconsideration and reconsideration en banc; and

Exhibit C — July 20, 2026, Mandate.

II. JURISDICTION

This Court would have jurisdiction to review the judgment of the United States Court of Appeals for the Ninth Circuit pursuant to 28 U.S.C. § 1254(1).

Supreme Court Rules 13.1 and 13.3 govern the time within which Applicant may seek certiorari. Supreme Court Rule 13.5 authorizes a Justice, for good cause, to extend the time for filing a petition for a writ of certiorari for a period not exceeding sixty days.

Applicant submits this Application before expiration of the current certiorari deadline and more than ten days before that deadline, as contemplated by Rule 13.5.

III. THE JUDGMENT EXISTS WITHIN A GROUP OF CLOSELY RELATED NINTH CIRCUIT PROCEEDINGS

The judgment in No. 25-1250 does not stand in procedural isolation.

Applicant is presently evaluating Supreme Court review concerning five closely related Ninth Circuit judgments:

1. No. 25-1190 — Gordon v. Olguin, et al.;
2. No. 25-561 — Gordon v. Kounalakis, et al.;
3. No. 25-5722 — Gordon v. Newsom, et al.;
4. No. 25-1250 — Gordon v. Gutierrez; and
5. No. 26-1797 — Gordon v. Newsom, et al.

Applicant understands that each judgment remains subject to its own applicable jurisdictional deadline and that this Application seeks an extension only with respect to No. 25-1250.

The relationship among the proceedings nevertheless bears directly upon good cause.

The five matters contain overlapping procedural histories, records, parties, constitutional and jurisdictional questions, and issues concerning the treatment of Applicant's earlier litigation.

The five appellate matters were also disposed of during a compressed period by the same Ninth Circuit panel consisting of Judges William C. Canby, Mark J. Bennett, and Bridget S. Bade.

The Ninth Circuit entered dispositive judgments in Nos. 25-1250 and 26-1797 on June 23, 2026. It entered dispositive judgments in Nos. 25-1190, 25-561, and 25-5722 on June 24, 2026.

Applicant has been required to trace how judicial records, procedural rulings, arguments, counsel participation, and related issues traveled from one proceeding into another.

The relationship among the proceedings was not first reconstructed after judgment. Applicant expressly placed the asserted interrelationship before the Ninth Circuit

through consolidation requests, judicial-notice submissions, record-supplementation requests, and appellate briefing.

In No. 25-1190, Applicant requested consolidation with Nos. 25-1250 and 25-561.

The Ninth Circuit expressly identified those proceedings when it denied

Applicant's consolidation requests.

Applicant's July 28, 2025, opening brief in No. 25-1190 also identified Nos. 25-1250 and 25-561 as related pending appeals and presented issues crossing the boundaries of those proceedings.

Applicant does not suggest that all related proceedings are formally the subject of this Rule 13.5 Application. They are not.

The immediate legal effect of the requested extension would be limited to extending Applicant's time to seek certiorari from the judgment in No. 25-1250.

The related proceedings are identified because their overlapping records and procedural histories materially affect the time necessary for Applicant to identify the appropriate questions presented, assemble the required record, and determine whether any judgments may properly be presented together under Supreme Court Rule 12.4.

IV. APPLICANT MUST DETERMINE WHETHER RULE 12.4 PERMITS COORDINATED PRESENTATION

Supreme Court Rule 12.4 permits a single petition to seek review of multiple judgments entered by the same court when the judgments involve identical or closely related questions.

Applicant is examining the related Ninth Circuit judgments to determine whether, and to what extent, their questions are sufficiently identical or closely related to permit coordinated presentation under Rule 12.4.

That determination requires substantial work.

Applicant must compare the records and dispositions; distinguish common issues from case-specific issues; determine which judgments may properly be presented together; identify the appropriate questions presented; ensure that an independent jurisdictional basis exists for each judgment included; and assemble the necessary supporting record.

Applicant does not presume through this Application that Rule 12.4 necessarily permits all five judgments to be included in a single petition.

The requested extension will permit Applicant to make that determination carefully and responsibly rather than filing duplicative or prematurely fragmented petitions merely because separate jurisdictional deadlines are approaching.

Coordination is especially important because Applicant is proceeding without counsel and personally bears the costs and practical burdens associated with every separate filing.

V. APPLICANT HAS CONTINUOUSLY PURSUED SUPREME COURT RELIEF ARISING FROM NO. 25-1250

Applicant's conduct demonstrates continuous pursuit of Supreme Court relief rather than inactivity or delay.

Ninth Circuit No. 25-1250, the judgment for which this extension is sought, gave rise directly to Supreme Court Application No. 26A167.

The original application was submitted to Justice Kagan and denied on August 6, 2026.

Applicant thereafter renewed the application pursuant to Supreme Court Rule 22.4.

The Supreme Court's public docket reflects that on August 18, 2026, Application No. 26A167 was refiled and submitted to the Chief Justice.

Applicant subsequently delivered the supporting renewal materials to the Supreme Court Clerk's Office, including the original application, supporting appendices, and related Volumes II and III.

As of the date of this Application, Applicant is unaware of any subsequently docketed disposition of the renewed application.

Applicant does not ask the Court through this Rule 13.5 Application to determine the merits, filing status, or disposition of No. 26A167. Nor does Applicant seek through this Application to renew, reopen, modify, or obtain additional emergency relief in No. 26A167.

Application No. 26A167 is identified because it arises directly from the same Ninth Circuit judgment for which Applicant contemplates seeking certiorari and demonstrates the substantial amount of related Supreme Court work Applicant has personally undertaken while the certiorari period continued to run.

VI. APPLICANT HAS SIMULTANEOUSLY PURSUED RELATED SUPREME COURT RELIEF IN NO. 26A36

Applicant has simultaneously pursued Supreme Court relief arising from another of the related Ninth Circuit judgments.

Supreme Court Application No. 26A36 arises from Ninth Circuit No. 26-1797.

The original application was submitted to Justice Kagan on June 30, 2026.

Applicant thereafter submitted supplemental materials. Justice Kagan denied the application on July 9, 2026.

Applicant subsequently pursued renewal of that application. The Supreme Court's public docket reflects that on August 12, 2026, Application No. 26A36 was refiled and submitted to the Chief Justice.

Applicant does not seek additional relief concerning No. 26A36 through this Rule 13.5 Application.

The significance of Nos. 26A36 and 26A167 for purposes of this Application is procedural. Those proceedings demonstrate the substantial amount of related Supreme Court work Applicant has personally undertaken while the independently applicable certiorari deadlines continued to run.

VII. GOOD CAUSE EXISTS FOR THE REQUESTED SIXTY-DAY EXTENSION

Good cause exists because Applicant is handling this litigation without counsel and is personally performing work that, in represented Supreme Court litigation, ordinarily would be divided among attorneys, appellate specialists, legal staff, and professional litigation-support providers.

Applicant is not preparing one isolated filing concerning one isolated record.

Applicant is presently responsible for examining five related Ninth Circuit judgments for potential Supreme Court review within a broader interconnected litigation record.

Among other things, Applicant must personally:

Review and organize the underlying district-court and appellate dockets and records;

Identify the judgments and orders potentially subject to Supreme Court review;

Calculate and continuously monitor independently applicable jurisdictional deadlines;

Compare the related Ninth Circuit judgments and their underlying records;

Identify common and case-specific questions presented;

Determine whether and to what extent Rule 12.4 permits coordinated presentation;

Prepare the contemplated petition or petitions;

Assemble and verify the necessary appendices and supporting judicial records;

Prepare applications and related procedural documents;

Prepare and verify service materials;

Communicate with the Clerk's Office when necessary;

Maintain and preserve the underlying documentary record;

Coordinate professional Supreme Court formatting and printing;

Arrange reproduction and binding;

Arrange service upon the appropriate parties; and

Coordinate physical delivery and filing with the Court.

Applicant must perform these tasks himself while simultaneously maintaining the broader interconnected procedural record and addressing continuing related district-court proceedings.

Applicant's pro se status is not asserted as an abstract reason for additional time.

The practical circumstance is that one 80-year-old self-represented litigant is personally performing the work necessary to manage several potential Supreme Court matters embedded within an interconnected record while other related proceedings remain active.

VIII. APPLICANT HAS NOT BEEN INACTIVE AND DOES NOT SEEK ADDITIONAL TIME FOR DELAY

The procedural history demonstrates that Applicant has not been inactive and is not requesting additional time for purposes of delay.

To the contrary, Applicant, without counsel, has been simultaneously:

Preserving and organizing the underlying judicial record;

Pursuing Supreme Court Application No. 26A167;

Pursuing Supreme Court Application No. 26A36;

Assembling and maintaining Volumes I, II, and III;

Examining five Ninth Circuit judgments for potential Supreme Court review;

Maintaining the broader interconnected procedural record;

Addressing continuing related district-court proceedings;

Monitoring multiple independent appellate and Supreme Court deadlines; and

Preparing for the professional production, service, and filing of the contemplated certiorari materials.

The requested extension would provide Applicant a reasonable opportunity to complete this work accurately and in an orderly manner.

IX. THE FINANCIAL AND PRODUCTION BURDENS ARE SUBSTANTIAL

Applicant has already incurred more than \$1,800 in printing and shipping expenses associated with Supreme Court submissions.

Those costs are especially significant for a self-represented litigant personally financing and administering the litigation.

Preparing multiple separate petitions concerning substantially overlapping records would multiply the expense of formatting, printing, reproduction, binding, shipping, and service.

Applicant therefore seeks sufficient time to determine whether Rule 12.4 permits some or all of the related judgments and questions to be presented in a coordinated manner, thereby avoiding unnecessary duplication where the Court's Rules permit coordination.

Applicant must also provide sufficient time after the substantive legal work is completed for a professional Supreme Court printer to undertake the specialized formatting, printing, reproduction, binding, filing, service, and related production necessary for the contemplated certiorari submission.

The production process necessarily follows completion of the substantive petition and appendix.

Additional time therefore is necessary not only for legal analysis but also for preparation of a filing that complies with the Court's applicable requirements.

X. THE CUMULATIVE CIRCUMSTANCES ESTABLISH GOOD CAUSE

Applicant does not rely upon his pro se status alone.

Applicant does not rely upon his age alone.

Applicant does not rely upon financial hardship alone.

Applicant does not rely upon the related proceedings alone.

Applicant does not rely upon the related Supreme Court proceedings alone.

Rather, good cause arises from the cumulative effect of the circumstances confronting Applicant:

Five related Ninth Circuit judgments potentially requiring Supreme Court review;

A broader interconnected procedural record that Applicant must personally analyze and maintain;

Disposition of the five related appellate matters by the same Ninth Circuit panel during a compressed period;

Overlapping procedural histories, records, and potential questions presented;

Two related Supreme Court applications renewed and submitted to the Chief Justice;

Continuing related district-court proceedings;

Multiple independently applicable jurisdictional deadlines;

Applicant's age of 80 years;

Applicant's responsibility, as a pro se litigant, for personally performing work ordinarily distributed among counsel and professional staff;

More than \$1,800 already incurred in Supreme Court printing and shipping expenses;

The substantial additional financial hardship that would result from unnecessary duplication of substantially overlapping filings; and

The time reasonably required for a professional Supreme Court printer to complete formatting, reproduction, binding, service, and filing after the substantive materials have been finalized.

Taken together, these circumstances constitute good cause for the requested sixty-day extension under Supreme Court Rule 13.5.

XI. THE REQUESTED EXTENSION WILL FACILITATE ORDERLY AND ACCURATE SUPREME COURT REVIEW

The requested extension will not eliminate or alter the independently applicable jurisdictional requirements governing any other judgment.

Its immediate legal effect would be limited to extending Applicant Carl Gordon's time to seek certiorari from the June 23, 2026, judgment in Ninth Circuit No. 25-1250.

The extension would nevertheless provide an important practical opportunity for Applicant to evaluate that judgment alongside the related Ninth Circuit judgments and determine, within the limits of the Court's Rules and the independently applicable jurisdictional deadlines, whether coordinated presentation is appropriate.

The additional time would permit Applicant to avoid unnecessary duplication, identify the questions presented with greater precision, assemble the appropriate record, account accurately for developments in the related Supreme Court proceedings, and provide sufficient time for professional production of the final certiorari materials.

Applicant has pursued the underlying matters continuously and in good faith.

The requested extension is therefore sought not for purposes of delay, but to permit an orderly, accurate, financially manageable, and procedurally appropriate presentation to this Court.

XII. REQUEST FOR RELIEF

For the foregoing reasons, Applicant Carl Gordon respectfully requests that the Honorable Elena Kagan, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Ninth Circuit, enter an order pursuant to Supreme Court Rule 13.5 extending the time within which Applicant may file a petition for a writ of certiorari seeking review of the June 23, 2026 judgment of the United States Court of Appeals for the Ninth Circuit in No. 25-1250, for a period of sixty days, from October 8, 2026, through and including December 7, 2026.

The requested extension will permit Applicant to evaluate and coordinate the presentation of the related Ninth Circuit judgments identified herein, to the extent

permitted by Supreme Court Rule 12.4 and the independently applicable jurisdictional deadlines, while reducing unnecessary duplication, substantial financial hardship, and the logistical demands associated with preparation and professional Supreme Court printing and production.

Applicant respectfully requests that the Application be granted.

Dated: September 12, 2026

Respectfully submitted,



Carl Gordon

Applicant, Pro Se

University of the 'Hood®

8306 Wilshire Boulevard, No. 792

Beverly Hills, California 90211

Telephone: (310) 926-3939

Email: universityofthehood@gmail.com