SUPREME COURT OF THE UNITED STATES

APPLICATION TO JUSTICE SAMUEL A. ALITO, JR., AS CIRCUIT JUSTICE FOR THE THIRD CIRCUIT

In re: Reza Farzan, Petitioner

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Third Circuit, No. 25-2276

APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR A 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 Third Circuit:

Pursuant to Rules 13.5, 22, and 30 of this Court, applicant Reza Farzan, proceeding pro se, respectfully requests a 60-day extension of time to file a petition for a writ of certiorari seeking review of the judgment of the United States Court of Appeals for the Third Circuit in No. 25-2276. The current deadline is November 2, 2026. Applicant requests an extension through January 4, 2027, reflecting the 60-day extension and the operation of Rule 30.1 because January 1, 2027 is a federal holiday and January 2–3 fall on a weekend.

1. Judgment and jurisdiction.

The Third Circuit entered judgment affirming the District Court on July 8, 2026 (ECF No. 29), accompanied by a nonprecedential opinion (ECF No. 28). Applicant timely sought panel and en banc rehearing on July 22, 2026 (ECF No. 30). Rehearing was denied August 4, 2026 (ECF No. 32). The Court has jurisdiction to review the court of appeals judgment under 28 U.S.C. § 1254(1). Under Rule 13.3, the 90-day filing period runs from denial of rehearing.

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2. Good cause for extension.

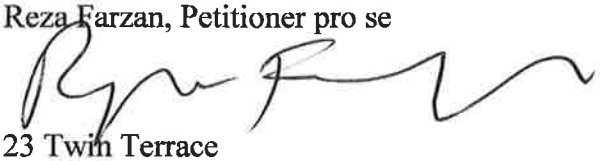
Applicant is a 76-year-old disabled senior citizen who has litigated this matter without counsel. He also has substantial ongoing responsibilities supporting and caring for his adult disabled child, who is currently hospitalized. These responsibilities include attending to the child's needs, communications concerning treatment and care, and hospital visits, all of which require significant time and attention. In combination with Applicant's disability and the demands of preparing a petition presenting federal legal questions from a bankruptcy proceeding, these circumstances have materially limited the time available to prepare a careful, rule-compliant petition. The additional time will permit Applicant to examine the lower-court decisions and record, identify the questions presented, and prepare the petition and supporting appendix.

3. Timeliness and relief requested.

This application is submitted before the ordinary certiorari deadline and is intended to be filed at least ten days before that deadline as required by Rule 13.5. Applicant respectfully requests an order extending the time to file the petition for a writ of certiorari through January 4, 2027. This request concerns time to file only and does not seek review of the merits at this stage.

Respectfully submitted,

Reza Farzan, Petitioner pro se



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Holmdel, NJ 07733
732-778-5047
raymondfarzan@gmail.com
Date: 10/20/2026

NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 25-2276

IN RE: REZA FARZAN,
Appellant

On Appeal from the United States District Court
for the District of New Jersey
(D.C. Civil Action No. 3:24-cv-09116)
District Judge: Honorable Robert Kirsch

Submitted Pursuant to Third Circuit LAR 34.1(a)
June 11, 2026
Before: BIBAS, CHUNG, and BOVE, *Circuit Judges*

(Opinion filed: July 8, 2026)

OPINION*

PER CURIAM

Reza Farzan appeals *pro se* from the District Court's order affirming the Bankruptcy Court's dismissal of his Chapter 13 petition and denying other relief. We will affirm.

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* This disposition is not an opinion of the full Court and pursuant to I.O.P. 5.7 does not constitute binding precedent.

This appeal is the latest in a series of proceedings relating to the foreclosure of Farzan's New Jersey home, which has been the subject of a final state-court judgment since September 2019. Farzan did not appeal that judgment. *See In re Farzan*, C.A. No. 21-1334, 2021 WL 4075750, at *1 (3d Cir. Sept. 8, 2021) (*per curiam*). Nor has he agreed to vacate the property. Instead, he filed more than a dozen federal lawsuits in the ensuing years to forestall his eviction. He also petitioned for bankruptcy on three separate occasions, most recently in September 2023. The Bankruptcy Court dismissed that petition in April 2024 upon finding that Farzan filed it in bad faith; the dismissal order barred him from filing another Chapter 13 petition for one year. Farzan unsuccessfully sought reconsideration and "multiple reliefs" and then appealed to the United States District Court for the District of New Jersey. The District Court denied several of Farzan's motions on the way to denying his appeal and affirming the Bankruptcy Court's orders. He appeals those rulings and moves to strike the appearance of Friedman Vartolo LLP's counsel on the grounds that the FDCPA or the Americans with Disabilities Act prohibits counsel from representing his own employer or its debt-collector client, Shellpoint Mortgage Servicing (Appellees both), in this matter.

We have jurisdiction under 28 U.S.C. §§ 158(d) and 1291. We review the District Court's decision *de novo* because it sat as an appellate court reviewing the Bankruptcy Court's order. *In re Continental Airlines*, 125 F.3d 120, 128 (3d Cir. 1997). Dismissals of bad-faith Chapter 13 petitions are subject to an abuse-of-discretion standard. *See In re LTL Mgmt., LLC*, 64 F.4th 84, 99 (3d Cir. 2023).

We see no error or abuse of discretion in the dismissal of Farzan's bankruptcy petition or the resolution of his appeal and ancillary motions. "[L]ack of good faith in filing [a Chapter 13 petition] is sufficient cause for dismissal under [11 U.S.C. §] 1307(c)." *In re Lilley*, 91 F.3d 491, 496 (3d Cir. 1996). "Bankruptcy Courts may reasonably find that bad faith exists where the purpose of the bankruptcy filing is to defeat state court litigation without a reorganization purpose." *In re Myers*, 491 F.3d 120, 125 (3d Cir. 2007) (citation and internal quotation marks omitted). Petitioning for bankruptcy to thwart foreclosure proceedings or judgments is an emblematic act of bad faith. *See In re Casse*, 198 F.3d 327, 332-33 (2d Cir. 1999). Farzan's quixotic litigation strategy over the past decade provides ample reason to believe that he initiated these bankruptcy proceedings simply to frustrate the execution of the final judgment of foreclosure entered by the Superior Court of New Jersey nearly seven years ago. And because dismissal was appropriate under the circumstances, his other challenges to the Bankruptcy or District Courts' adverse rulings on his miscellaneous motions are unavailing.

Accordingly, we will affirm the judgment of the District Court.[1]

[1] Farzan's motion to strike is denied because he has not demonstrated how counsel's representation presents a conflict of interest.

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 25-2276

IN RE: REZA FARZAN,
Appellant

On Appeal from the United States District Court
for the District of New Jersey
(D.C. Civil Action No. 3:24-cv-09116)
District Judge: Honorable Robert Kirsch

Submitted Pursuant to Third Circuit LAR 34.1(a)
June 11, 2026
Before: BIBAS, CHUNG, and BOVE, *Circuit Judges*

JUDGMENT

This cause came to be considered on the record from the United States District Court for the District of New Jersey and was submitted pursuant to Third Circuit LAR 34.1(a) on June 11, 2026. On consideration whereof, it is now hereby

ORDERED and ADJUDGED by this Court that the judgment of the District Court entered June 12, 2025, be and the same is hereby affirmed. Costs taxed against the appellant. All of the above in accordance with the opinion of this Court.

ATTEST:

s/ Patricia S. Dodszuweit
Clerk

Dated: July 8, 2026

OFFICE OF THE CLERK

PATRICIA S. DODSZUWEIT

CLERK

UNITED STATES COURT OF APPEALS
21400 UNITED STATES COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106-1790
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215-597-2995

July 8, 2026

Reza Farzan
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Jason B. Schwartz
Friedman Vartolo
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RE: In re: Reza Farzan
Case Number: 25-2276
District Court Case Number: 3:24-cv-09116

ENTRY OF JUDGMENT

Today, **July 08, 2026,** the Court entered its judgment in the above-captioned matter pursuant to Fed. R. App. P. 36.

If you wish to seek review of the Court's decision, you may file a petition for rehearing. The procedures for filing a petition for rehearing are set forth in Fed. R. App. P. 40, 3rd Cir. LAR 35 and 40, and summarized below.

Time for Filing:
14 days after entry of judgment.
45 days after entry of judgment in a civil case if the United States is a party.

Form Limits:
3900 words if produced by a computer, with a certificate of compliance pursuant to Fed. R. App. P. 32(g).
15 pages if hand or type written.

Attachments:
A copy of the panel's opinion and judgment only.
Certificate of service, unless the petition is filed and served through the Court's electronic-filing system.
Certificate of compliance if petition is produced by a computer.
No other attachments are permitted without first obtaining leave from the Court.

Unless the petition specifies that the petition seeks only panel rehearing, the petition will be construed as requesting both panel and en banc rehearing. A party seeking both forms of rehearing must file the petitions as a single document. Fed. R. App. P. 40(a).

A party who is entitled to costs pursuant to Fed.R.App.P. 39 must file an itemized and verified bill of costs within 14 days from the entry of judgment. The bill of costs must be submitted on the proper form which is available on the court's website.

A mandate will be issued at the appropriate time in accordance with the Fed. R. App. P. 41.

Please consult the Rules of the Supreme Court of the United States regarding the timing and requirements for filing a petition for writ of certiorari.

Very truly yours,
Patricia S. Dodszuweit, Clerk

By: s/Timothy, Case Manager
267-299-4953

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 25-2276

In re: REZA FARZAN,
Appellant

(District Court No. 3:24-cv-09116)

SUR PETITION FOR REHEARING

Present: CHAGARES, *Chief Judge*, SHWARTZ, KRAUSE, RESTREPO, BIBAS, PORTER, PHIPPS, FREEMAN, MONTGOMERY-REEVES, CHUNG, BOVE, and MASCOTT, *Circuit Judges*

The petition for rehearing filed by Appellant in the above-entitled case having been submitted to the judges who participated in the decision of this Court and to all the other available circuit judges of the circuit in regular active service, and no judge who concurred in the decision having asked for rehearing, and a majority of the judges of the circuit in regular service not having voted for rehearing, the petition for rehearing by the panel and the Court en banc, is denied.

BY THE COURT,

s/ Cindy K. Chung
Circuit Judge

Date: August 4, 2026
Tmm/cc: Reza Farzan
All Counsel of Record

CERTIFICATE OF SERVICE

I certify that on 10/20/2026, I served a true copy of the foregoing Application for Extension of Time to File a Petition for a Writ of Certiorari and its attachments on the parties or their authorized counsel listed in the attached service list, by depositing copies in the United States mail, first-class postage prepaid, addressed as shown.

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

Executed on: 10/20/2026

Signature: 

Reza Farzan, pro se

SERVICE LIST — VERIFY BEFORE MAILING

• Albert Russo, Esq., Chapter 13 Trustee — Suite 101, 1 AAA Drive, Robbinsville, NJ 08691

• Quenten E. Gilliam, Esq., Friedman Vartolo LLP — 85 Broad Street, Suite 501, New York, NY 10004 (Shellpoin)

• Jason B. Schwartz, Esq., Friedman Vartolo LLP — 1325 Franklin Avenue, Suite 160, Garden City, NY 11530 (Shellpoint)

• Ray A. Lebron, Esq., Fein Such Kahn & Shepard — 6 Campus Drive, Suite 304, Parsippany, NJ 07054 (FSKS, Bayview, and Nationstar)

• Julian Cotton, Esq. Padgett Law group (U.S. Bank National Trust and Padgett Law Group)
6267 Old Water Oak Road Ste 203 Tallahassee FL 32312