Bruce Koklich v-25135
P.O. Box 3100
Chino, CA. 91708

Petitioner in Pro Se

IN THE SUPREME COURT OF THE UNITED STATES

MOTION FOR ENLARGEMENT OF TIME

BRUCE KOKLICH Individually and as Class Representatives Petitioner - Appellant and HAROLD W. TAYLOR, DAVID M. ZIEMKI, JON GARY SCHNABEL, RONALD E. AUSTIN, CHRISTOPHER CAMP, GEORGE JACKSON -vs- DEAN BORDERS, Warden and Senior Administrative and policy Making Officer, individual and Offical Capacity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a California Public Entity Respondents - Appellees	USSC Case No. Ninth Cir. No. 24-3505 Dist. Ct. No. 5:18-cv-02488-TJH-AGR APPLICATION TO THE HONORABLE ELENA KAGAN JUDGE REQUESTING EXTENTION OF TIME TO FILE WRIT OF CERTIORARI

APPLICATION TO THE HONORABLE ELENA KAGAN, AS CIRCUIT JUSTICE, FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT.

To the Honorable Elena Kagan, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Ninth Circuit:

Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant respectfully requests a 60-day extension of time, up to and including

January 8, 2027, within which to file a Petition for a Writ of Certiorari in this matter. The current deadline for filing is November 10, 2026. This application is being filed at least 10 days prior to that date, in full compliance with Rule 30.2.

JUDGEMENT BELOW

The United States Court of Appeals for the Ninth Circuit entered its judgement on PETITION FOR PANEL REHEARING AND REHEARING EN BANC in case No.24-3505 on 08/12/2026. A copy of that order is attached to this application as (See Appendix #1).

JURISDICTION

The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1).

REASONS JUSTIFYING AN EXTENSION OF TIME

Good cause exists for the requested extension of time. Because Petitioner is an indigent prison inmate who continues to have access problems to the prison Law Library. Petitioner is also experiencing substantial difficulty in locating qualified counsel. The novel and complex legal questions of this case are causing delay in locating competent counsel, those legal issues are as follows:

A. Irreparable and Ongoing Harm and Injury

Intentional criminal fraud perpetrated by Defendants including falsifying lab tests to conceal ongoing excessive contamination (See: Declaration of Brian Thomas Boyd at Appendix #2). This evidence was not presented to a lower court and is authorized by the exceptional circumstances rule and applies here as these critical issues are highly relevant to the improper MSJ disposition. The exception to the rule that the issue must be raised in the Opening Brief is confirmed in (See: Kaass

v. Wells Fargo Bank N.A., 799 F.3d 1290, 1293 [2015 LEXIS 15127] (2015). "Plain error has occurred and injustice might otherwise result".

B. Unpunished and Cumulative Misconduct by Counsel

Multiple points of misconduct by counsel as properly raised in Appellants Opening Brief, including but not limited to intentional and contumacious misconduct, blatant and undisclosed Conflict of Interest (harming Plaintiff's) as well as failure to obay the Federal Rules of Civil Procedure (not serving or notifying the plaintiff's) when Plaintiffs counsel Motioned to withdraw as counsel (twice) warrants this courts sanctions against Plaintiff's counsel under 28 U.S.C. § 1927.

C. False Representations to the Court Cannot be a Basis for Dismissal

This Court should not rely on a false STATEMENT OF UNCONTROVERTED FACTS AND CONCLUSIONS OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGEMENT (MSJ) as the District court did. This continues to be a blatant miscarriage of justice, (See: 5:18;-cv-02488-TJH-AGR, Doc.185-6, Pg.6 of 7 at Para.'s 37, 40 & 41). These facts were, and are, all provably false on their face as admitted by Defendants Appeal Counsel in her Answering Brief (See: 9th Cir. ECF 24-3505, DktEntry 21.1, Pg.13 of 35 at Fn#4), wherein the AG minimized the falsity by claiming it was a mistake. Regardless of a mistake or fraud on the court the trial court was mislead into perpetrating a Miscarriage of Justice when multiple excessive contamination lab reports were presented, but defendants misrepresented to the court that there were none.

The above fully documented facts need to be advanced by experienced and non-conflicted counsel. Plaintiff's need the 60 day enlargement of time to have reasonable access to the Prison Law Library. Additionally, extension is warranted to locate and retain competent counsel that is

experienced in these legal claims which address multiple irreparable injury facts that defendants falsely represented to the District court that did not exist during MSJ proceedings. Because this case represents thousands of excessively contaminated citizen victim inmates, this Court should consider appointing or referring counsel to Petitioner so a filing of a cogent and accurate Writ of Certiorari can be provided to this court on an expedient basis. An Irreparable Harm investigation by this Court is also warranted.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests that the time for filing a Petition for a Writ of Certiorari in this case be extended by 60 days, up to and including January 11, 2027.

VERIFICATION - 28 U.S.C. § 1746

As Petitioner in the above entitled action, I declare under the penalty of perjury under the laws of the State of California and the Laws of the United States of America, that the foregoing is true and correct.

Dated: 10/21/26

Respectfully Submitted

Bruce Koklich
Petitioner in Pro Se