APPLICATION TO HON. ELENA KAGAN, ASSOCIATE JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE NINTH CIRCUIT, FOR A 60-DAY EXTENSION OF TIME TO FILE A PETITION FOR A WRIT OF CERTIORARI

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 Emmanuel Adewale Adeyinka, proceeding *pro se*, respectfully requests a **60-day extension of time** within which to file his Petition for a Writ of Certiorari, extending the current deadline of November 10, 2026, up to and including **January 9, 2027**.

In support of this Application, Applicant states as follows:

1. Opinions and Orders Below

- The Memorandum Disposition of the United States Court of Appeals for the Ninth Circuit in *Emmanuel Adeyinka v. Ayden Hendrie, et al.*, Case No. 26-154, was entered on **April 30, 2026**.
- Applicant filed a timely Petition for Panel Rehearing (Docket Entry Nos. 82, 91), which the Ninth Circuit denied by order on **August 12, 2026**.
- The Ninth Circuit issued its Mandate on **August 20, 2026**.
- The underlying decision of the United States District Court for the District of Oregon in Case No. 3:25-cv-01594-SB was entered following Findings and Recommendations issued on **November 18, 2025**.

2. Jurisdiction and Timeliness

Under Supreme Court Rule 13.1, a petition for a writ of certiorari is due within 90 days after entry of the order denying a timely petition for rehearing. Because panel rehearing was denied on August 12, 2026, the 90-day deadline currently expires on **November 10, 2026**. This Application is submitted on **October 31, 2026**, fully satisfying Supreme Court Rules 13.5 and 30.2. Jurisdiction is invoked under 28 U.S.C. § 1254(1).

3. Grounds for Requesting an Extension of Time

Good cause exists under Supreme Court Rule 13.5 for granting the requested extension:

- **Documented External Mail Obstruction & Service Impediments:** Applicant experienced documented postal interference with court notices, registered via USPS Inquiry Service Request #84691071 and USPIS Ref #38295818, obstructing record compilation.
- **Complexity of Civil Rights and Record Fraud Claims:** The petition requires intricate legal analysis of Fourth/Fourteenth Amendment doctrine, *Monell* municipal liability, and civil RICO theories arising from alleged municipal record fabrications (18 U.S.C. § 1001) without counsel.
- **Assembly of Physical Records:** Additional time is required to transcribe and format critical digital audio exhibits and police dispatch logs (Gresham PD GO 41 2025-21359) into standard letter-sized Appendix format per Rule 14.

4. Relief Requested

Applicant respectfully requests that the Circuit Justice enter an order extending the time to file a Petition for a Writ of Certiorari in Case No. 26-154 by 60 days, up to and including **January 9, 2027**.

Dated: October 31, 2026

Respectfully submitted,

Emmanuel Adewale Adeyinka, *Applicant, Pro Se*
P.O. Box 2261, Portland, Oregon 97208

CERTIFICATE OF SERVICE

I hereby certify that on **October 31, 2026**, I served a true and correct copy of the foregoing *Application for a 60-Day Extension of Time to File a Petition for a Writ of Certiorari* upon counsel for Respondents by placing the same in a sealed, prepaid envelope deposited in the U.S. Mail in Portland, Oregon, addressed as follows:

Counsel for City of Portland & Officer Hendrie:
Office of the City Attorney
1221 SW 4th Avenue, Suite 430
Portland, OR 97204

Counsel for City of Gresham:
Office of the City Attorney, City of Gresham
1333 NW Eastman Parkway
Gresham, OR 97030

Emmanuel Adewale Adeyinka, *Applicant, Pro Se*

FILED

AUG 20 2026

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

EMMANUEL ADEWALE ADEYINKA,

Plaintiff - Appellant,

v.

AYDEN HENDRIE, #65356, Police Officer, Portland Police Bureau; CITY OF PORTLAND, Municipal Corporation; DESIREE SHEPHERD,

Defendants - Appellees.

No. 26-154

D.C. No. 3:25-cv-01594-SB

District of Oregon, Portland

MANDATE

The judgment of this Court, entered April 30, 2026, takes effect this date.

This constitutes the formal mandate of this Court issued pursuant to Rule 41(a) of the Federal Rules of Appellate Procedure.

FOR THE COURT:

MOLLY C. DWYER
CLERK OF COURT

FILED

AUG 12 2026

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

EMMANUEL ADEYINKA, Plaintiff - Appellant, v. AYDEN HENDRIE, #65356, Police Officer, Portland Police Bureau; et al., Defendants - Appellees.	No. 26-154 D.C. No. 3:25-cv-01594-SB District of Oregon, Portland ORDER

Before: LEE, DESAI, and JOHNSTONE, Circuit Judges.

The petition (Docket Entry Nos. 82, 91) for panel rehearing is denied.

The motion (Docket Entry Nos. 86, 88) to stay the mandate is denied. *See* Fed. R. App. P. 41(b).

The mandate will issue in due course.

This court will not entertain further filings in this closed case.

Extension of Time:Emmanuel Adewale Adeyinka v. Ayden Hendrie, et al., Case No. 26-154.

1 message

Emmanuel . Adeyinka1980 <emmanuel.adeyinka1980@gmail.com>
To: cityattorneysoffice@portlandoregon.gov, Mary.Hajdu@greshamoregon.gov

Sat, Oct 31, 2026 at 12:56 PM

Dear Office of the City Attorney (City of Portland and City of Gresham),

Please find attached the Application for a 60-Day Extension of Time to File a Petition for a Writ of Certiorari directed to the Honorable Elena Kagan, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Ninth Circuit, in the matter of Emmanuel Adewale Adeyinka v. Ayden Hendrie, et al., Case No. 26-154.

Respectfully submitted,
Emmanuel Adewale Adeyinka
Applicant, Pro Se

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356 KB