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3/11/2025

Clerk of the Court

Supreme Court of the United States

1 First Street, NE

Washington, DC 20543

Re: Motion for Extension of Time to File Petition for Writ of Certiorari

Jonathan Loggins v. Ronny Albert, ET,AL, Docket No. 24-1545

Dear Clerk of the Court,

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 30.4 of the Rules of the Supreme Court of the United States, Petitioner respectfully moves for an extension of time to file a petition for writ of certiorari in the above-captioned case.

1. The decision of the lower court was entered on 12/11/2024. The current deadline for filing a petition for writ of certiorari is 3/11/2025

2. Petitioner, proceeding pro se, is employed full-time, enrolled as a full-time student, and actively litigating another civil case. These combined responsibilities have required significant time and attention, leaving limited opportunity to thoroughly prepare the petition within the original timeframe.

3. This case presents significant issues of legal and procedural importance that justify additional time for careful preparation. Specifically:

• Judicial Recusal: The district judge failed to disclose that the opposing party had represented him in seven prior civil cases. This lack of disclosure and refusal to recuse raises serious concerns about impartiality and the appearance of fairness. Binding precedent establishes that judges must disqualify themselves where their impartiality might reasonably be questioned. This critical issue, which the lower courts failed to address adequately, demands thorough legal analysis.

• Magistrate's Report and Recommendation: The magistrate's report found that the defendants' failure to object to a claim not explicitly raised in the complaint constituted implied consent. The district judge summarily dismissed this finding without explanation, contravening established procedural standards. Additionally, the report identified genuine issues of material fact that precluded summary judgment, yet these findings were disregarded by the lower courts.

• Departure from Binding Precedent: By ruling that the defendants multiple acts of excessive force which included punching, choking and utilizing prone position restraints on a nonviolent, nonresistant handcuffed pretrial detainee was objectively reasonable rejected well-established principles regarding judicial recusal, implied consent, and summary judgment standards, the lower courts have also deviated from binding precedent in a manner that has broader implications for the administration of justice.

4. Given these substantial legal issues and their implications, Petitioner respectfully requests an additional 60 days, extending the due date to 5/11/2024. This request is made in good faith and not for purposes of delay. The additional time will allow Petitioner to present a thorough and well-supported petition that clearly identifies the significant procedural and substantive errors that occurred in this case.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Court grant this motion for an extension of time to file the petition for writ of certiorari.

Respectfully submitted,

Jonathan David Loggins, Pro Se