

1  
2 **IN THE SUPREME COURT OF THE UNITED STATES**

3 **MOBARZA KHAN ON**

**Court of Appeal No. F083096**

4 **BEHALF OF ITSELF AND SIMILARLY**

5 **SITUATED PERSONS, CLASS MEMBERS**

**Superior Court No. BCV-20-102645**

6  
7 **Plaintiffs and Appellant and**

8 **Petitioner,**

**CA Supreme Court No. S287266**

9 **vs.**

10 **STATE OF CALIFORNIA**

**US Supreme Court No. [to be assigned]**

11  
12 **Defendant(s) and Respondents**

13 **MOTION FOR EXTENSION**

14  
15  
16  
17 **MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF**  
18 **CERTIORARI**

19  
20 **MOBARZA KHAN**

21 **PO BOX 334, PALM DESERT, CA 92261**

22 **TELEPHOONE NO: 760-567-7506**

23 **PETITIONER**

24 **SELF REPRESENTED**

**RECEIVED**

**MAR 14 2025**

**OFFICE OF THE CLERK  
SUPREME COURT, U.S.**

1 Petitioner, **Mobarza Khan**, respectfully requests an extension of time to file the **Petition for**  
2 **Writ of Certiorari** in the above-referenced case. The Petition is currently due on [**March 10,**  
3 **2025**], and I am requesting an extension of **days 60 days**. The California Supreme Court issued  
4 its judgment on December 11, 2024, making the petition for certiorari currently due on March  
5 10, 2025. This application is filed less than ten days before the existing deadline; however,  
6 exceptional circumstances justify this request, as outlined below. This motion is based on the  
7 following reasons:

#### 6 **1-Health and Homelessness Issues:**

7 Since February 16, 2025, I have been experiencing homelessness, compelling me to live out of  
8 my car. This situation has severely impacted my health, including ongoing back pain, and has  
9 limited my access to basic amenities such as restrooms and shower facilities. The necessity to  
10 rely on gym facilities for hygiene needs presents significant challenges and exacerbates my  
11 physical discomfort. I have been experiencing ongoing **back pain** and **harassment and**  
12 **homelessness**, which have affected my ability to consistently work on my case. I am going  
13 through extremely difficult period. I am fasting during Ramadan. I am sleeping in the Car. I  
14 don't have proper access to bathroom during night time. I don't have access to **basic necessities**  
15 **of human life**. This period, I am not able to manage the stress and **back pain** properly.

13 **Background:** I was looking for housing after continues harassment and eviction threat from  
14 landlord since December 2024. I was busy to find a proper place. When I was finally found  
15 different places and I did talk to the agents and I was ready to submit the rental application.  
16 There was a "collection placed on my **perfect score dated February 1, 2025**. That was  
17 deliberate timing. I did not have enough time to clean/**negotiate collection** and secure housing.  
18 **So I end up homeless dated Feb 16<sup>th</sup>**. I was busy in packing and moving stuff. My movers  
19 denied at last minute dated Feb 14-15<sup>th</sup>; so I have to move lot of boxes myself; finally I found a  
20 mover. But it put lot of strain on my back to move so many boxes alone **due to last minute**  
21 **cancelation**. This was deliberate effort to create chaos and back pain. I recently get homeless  
22 and I am trying to figure out the life where to sleep and shower and other necessity. It's very  
23 difficult.

#### 20 **2-Ramadan and fasting**

21 The holy month of **Ramadan, observed from March 1 to end March 29<sup>th</sup>**, requires fasting from  
22 sunrise to sunset. Due to my current living conditions, I face difficulties in managing pre-dawn  
23 meals and prayers, often resulting in extended fasting periods of up to 24 hours. This has led to  
24 increased fatigue and has further hindered my ability to work on my legal petition **and tax work**.  
25 This is month of Ramadan. And I always fast. God is my strength during all the difficult days.  
26 Unfortunately, this is first Ramadan where I can't **eat in the morning** and pray fajr due to lack  
27 of bathroom and business opening early morning. So usually, my last meal was at sunset. So  
28 basically, I am doing 24 hours of fast due to my situation. It's extremely tiring. Now time  
changed **due to day light saving, so it** might possible that I will **able to find something to eat**  
**or pray**. Still it's not easy; and I don't know how things will go. All I know that it's very  
difficult to observe fast due to exceptional circumstances.

1  
2 **3. Professional Obligations and Suspicious Timing:**

3  
4 As a tax preparer, I am currently in the peak season of my profession, with critical deadlines on  
5 March 15 and April 15, 2025. The convergence of these professional responsibilities with my  
6 personal hardships has made it exceedingly challenging to allocate adequate time and resources  
7 to prepare a comprehensive petition. In addition to my health challenges and homelessness, I  
8 have **professional obligations** as a tax preparer, which require my full attention. These  
9 obligations have demanded much of my time and focus, making it challenging to dedicate  
10 sufficient attention to my legal case. In addition to my professional obligations, I am dealing  
11 with severe **harassment**, which has made even simple tasks like grocery shopping a source of  
12 stress and fear. I am frequently subjected to **death threats**, homelessness and **harassment** that  
13 directly impact my ability to live and work normally. I done nothing for this tax time so far due  
14 to exceptional circumstances. I have few clients left; and I have no idea how I will work and pay  
15 bills; I still have bills and I need to pay groceries as I don't have any help from state.

11 **4-Harassment and Safety Concerns:**

12 Following the denial of review by the California Supreme Court, I have been subjected to  
13 continuous harassment, including death threats and homelessness. These actions appear to be  
14 retaliatory, stemming from my refusal to give up the pursue of Justice. The stress and fear  
15 resulting from these threats have significantly affected my emotional well-being and capacity to  
16 focus on legal matters.

17 The timing of the Court of Appeal's decision, issued on **December 11th, 2024**, seems strange.  
18 Despite my best efforts during review. The court's swift decision, issued shortly before the  
19 **presidential inauguration of President Trump**, appears to have been influenced by the  
20 external events. This raises concerns about **corruption** and further adds to the challenges I am  
21 facing in pursuing this legal matter. The court's decision was rendered swiftly, just before critical  
22 tax period and other emotionally challenging events. This overlap created an overwhelming  
23 situation for me. While I respect the court's schedule, the timing of its decision has compounded  
24 my personal and professional difficulties, further limiting my ability to manage both my legal  
25 responsibilities and my work. I did my best to manage everything; but I found myself  
26 overwhelmed, caught between crucial deadlines and homelessness. This created significant  
27 stress, causing me to falter in meeting certain obligations. I strongly believe that this confluence  
28 of events placed me in an unmanageable position. It literally froze me for a while.

24 Despite the extraordinary challenges, I prepared a Petition for write of certiorari and motion for  
25 leave to proceed in forma pauperes. I have done my best to comply with the court's  
26 requirements under exception circumstances.

26 **5. Safety Concerns and Emotional Well-being Amid Retaliation, harassment and**  
27 **homelessness**

1 My legal troubles are not solely personal. I filed a civil lawsuit to address broader issues. I  
2 became entangled with individuals involved in misconduct because I refused to participate in  
3 illegal activities, including fund embezzlement and other crimes directed by Jan Harnik. This  
4 situation initially arose from my disputes with Jan Harnik, which eventually led me to approach  
5 Kamala Harris in 2016. However, following my request for Harris to investigate corruption in  
6 local city halls and the involvement of the sheriff's office, my life has been in a constant state of  
7 turmoil. This ongoing battle for justice has placed me in a vulnerable position, but I remain  
8 steadfast in my pursuit of a fair and just resolution.

#### 6. Lack of Legal Knowledge:

7  
8 As a **self-represented litigant**, I lack formal legal training and expertise, which makes  
9 navigating the legal process more difficult. The legal issues involved in this case, particularly the  
10 **continuous violation doctrine** and **equitable tolling** due to government misconduct, are  
11 complex and require more time for me to adequately research and prepare my arguments. The  
12 additional time will allow me to ensure that my Petition for Writ of Certiorari is well-researched  
13 and fully addresses these important legal doctrines.

#### 7. Impact on Justice and Fairness:

13 Denying the extension could result in a miscarriage of justice, as it would prevent the Court from  
14 considering substantial legal issues that have broader implications beyond this civil case.

#### 8. Public Interest Considerations:

15  
16 This case addresses systemic issues within the legal system that are of significant public interest.  
17 Granting the extension will allow for a comprehensive presentation of these concerns, facilitating  
18 the Court's role in upholding justice and public confidence in legal institutions.

#### 9. Comparative Jurisprudence:

19  
20 There are conflicting decisions across various jurisdictions on the legal issues presented in this  
21 case. An extension will enable a detailed analysis of these discrepancies, underscoring the  
22 necessity for the Supreme Court's guidance to ensure uniformity in the law.

#### 10. Potential for Irreparable Harm:

23  
24 Without the extension, there is a risk of irreparable harm affecting fundamental rights. The  
25 additional time is crucial to develop arguments that fully convey the potential consequences of  
26 this case, ensuring the Court can make an informed decision.

#### 11. Clarification of Legal Principles:

1 This case presents an opportunity for the Court to clarify existing legal principles, contributing to  
2 the development of the law and providing guidance for future cases. The extension will facilitate  
3 a more thorough exploration of these issues.

4 **12. Compliance with Procedural Requirements:**

5 There is a strong intention to comply meticulously with all procedural requirements moving  
6 forward. The additional time will ensure that all filings meet the Court's standards, reflecting  
7 respect for the judicial process.

8 **13. Commitment to Timely Filing:**

9 There is a firm commitment to filing the Petition for Writ of Certiorari promptly within the  
10 extended period. The extension will facilitate the preparation of a comprehensive petition, aiding  
11 the Court in its deliberations.

12 **14. Submitting a Preliminary Petition for Writ of Certiorari:**

13 To ensure compliance with the current deadline, I have attached a preliminary Petition for Writ  
14 of Certiorari and an Affidavit of Declaration in Support of Motion for Leave to Proceed In  
15 Forma Pauperis. If this extension is not granted, I respectfully request that the attached petition  
16 be accepted and considered by the Court. However, the additional time sought would allow me  
17 to refine and strengthen the petition to address all pertinent legal issues comprehensively. To  
18 avoid missing the deadline, I have attached a **Petition** as a precautionary measure. If the Court  
19 does not grant this extension, I request that the attached Petition for Writ be accepted and  
20 considered. However, I would prefer to have more time to refine the Petition to ensure that it  
21 fully addresses all the relevant legal issues and concerns.

22 **Conclusion:**

23 **For the reasons stated above, I respectfully request that the Court grant an extension of [60**  
24 **days] to file the Petition for Writ of Certiorari. I hope this additional time will allow me to**  
25 **manage my health issues, living situation, fasting, fulfill my professional obligations, and**  
26 **properly prepare a well-supported Petition for Writ of Certiorari. I understand that**  
27 **extension need to request 10 days prior to the deadline; but I was shocked by homeless and**  
28 **sudden “collection charges”. I did not prepare for this. I was looking for housing in**  
**January according to my budget. I was excited for a better future and new president**  
**Trump. Despite all the harassment, I was positive for the future and looking for the place**  
**to live and office to work. However, I end up very critical situation due to forced**  
**homelessness. It was not easy to maneuver the life during exceptional circumstances.**

1 In light of the exceptional circumstances detailed above, I respectfully request that the Court  
2 grant an extension of 60 days, up to and including May 9, 2025, to file the Petition for Writ of  
3 Certiorari. This additional time will enable me to manage my health challenges, fulfill  
4 professional obligations, and prepare a well-supported petition.

5 Thank you for your consideration.

6  
7 **Attachments:**

- 8 1. Petition for writ of Certiorari  
9 2. AFFIDAVIT OF DECLARATION IN SUPPORT OF MOTION FOR LEAVE TO  
10 PROCEED IN FORMA PAUPERIS.

11  
12 VARIFICATION

13 I HAVE READ THE FORGOING RESPONSE.

14 I AM A PARTY TO THIS ACTION. THE MATTERS STATED IN THE FOREGOING DOCUMENT ARE TRUE  
15 OF MY OWN KNOWLEDGE EXCEPT AS TO THOSE MATTERS, WHICH ARE STATAED ON  
16 INFORMATION AND BELIEF, AND AS TO THOSE MATTERS I BELIEVE THEM TO BE TRUE.

17 EXECUTED ON March 10, 2025, at CALIFORNIA.  
18 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT  
19 THE FOREGOING IS TRUE AND CORRECT.

20 *M. Khan*

21 \_\_\_\_\_  
22 MOBRAZA KHAN,

23 PLAINTIFF/Appellant/petitioner  
24  
25  
26  
27