

No. 24-\_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES

Maher Memarzadeh,

*Applicant,*

v.

Lottie Cohen, and Law Office of Lottie Cohen,

*Respondents.*

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On Petition for a Writ of Certiorari to the  
Supreme Court of California

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**APPLICATION FOR EXTENSION OF TIME TO FILE  
A PETITION FOR A WRIT OF CERTIORARI**

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**MAHER MEMARZADEH**

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**APPLICATION FOR EXTENSION OF TIME TO FILE  
A PETITION FOR A WRIT OF CERTIORARI**

TO: Hon. Elena Kagan, Circuit Justice for the Ninth Circuit:

Under this Court's rules 13.5 and 22, Applicant Maher Memarzadeh respectfully requests a 60-day extension to file his Petition for Writ of Certiorari. In support of this application, Applicant states:

1. Applicant intends to seek review of the decision of the California Supreme Court, denying review of a California Court of Appeal opinion, in *Memarzadeh v. Cohen, et al.*, S. Ct. Case No. S287722, Ct. App. Case Nos. B327967, B329476. (The Supreme Court's order and the Court of Appeal's decision are attached hereto as Exhibits A and B, respectively). The California Supreme Court's denial of review was entered on December 31, 2024. The time to file a petition for writ of certiorari therefore would run, without an extension, on March 31, 2025. Applicant seeks an extension of 60 days, until May 30, 2024, in which to file his petition for writ of certiorari.

2. The California Supreme Court's decision – as a petition for writ of certiorari will develop more fully – is a serious candidate for this Court's review because the decision let stand the dismissal of Applicant's lawsuit as a first sanction when he was unable, due to a medical disability, to appear for his scheduled deposition. The court's decision constituted a violation of Applicant's rights under the Americans with Disabilities Act and his right to due process under the Fifth and

Fourteenth Amendments of the United States Constitution. These issues raise important questions of federal law that have not been settled by this Court.

3. Applicant's counsel of record has over 30 years of experience, is an appellate specialist, and is the former Chief of Criminal Appeals at the U.S. Attorney's Office for the Central District of California. She now operates her own practice. Counsel will need substantial time to research and develop the arguments suitably for a petition for writ of certiorari. Her time has been limited substantially due to extensive travel for work and family reasons during February and March 2025. Among numerous other work commitments, counsel of record has been involved as the appellate specialist in connection with a significant white-collar criminal trial in the Southern District of New York and has been heavily involved in motion practice and the development of jury instructions during February and March 2025, and she also was the primary drafter of a petition for writ of certiorari and request for stay in this Court in the same case in January 2025. The extension requested would allow Applicant's counsel the necessary additional time to review and analyze Applicant's claims, and to develop the arguments for a petition for writ of certiorari in this matter.

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For these reasons, Applicant requests that the date for his filing a petition for a writ of certiorari be extended by 60 days, to and including May 30, 2025.

Dated: March 20, 2025

Respectfully submitted,

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/s/Becky S. James

Becky S. James

JAMES & ASSOCIATES

*Counsel for Applicant Maher Memarzadeh*

**CERTIFICATE OF SERVICE**  
*Maher Memarzadeh v. Lottie Cohen, et al.*

I hereby certify that on this 20<sup>th</sup> day of March 2025, I caused one copy of this Application for Extension of Time to File a Petition for Writ of Certiorari to be served on each of the following by first-class mail:

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*Attorneys for Defendants-Respondents Lottie Cohen and Law Office of  
Lottie Cohen*

I hereby certify that all parties required to be served have been served. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 20, 2025 at San Antonio, Texas.

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/s/Becky S. James  
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