

FILED

Shaheryar Khan
2219 Olive street
Burbank Ca 91506
Plaintiff In proper

2024 JAN 30 PM 2:03

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: 

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHAHERYAR KHAN

CASE NUMBER 2:22-CV-02333 ~~MEMF-ASX~~

PLAINTIFF,

PLAINTIFFS **exparte** application for
an extension of time to file first amended
complaint

DECLARATION OF PLAINTIFF

ADAM KRAEMER ET AL

DEFENDANTS,

JUDGE: Maame Ewusi Mensah Frimpong

DATE: February 12th 2024

Time 10 AM

CRTRM: 8 AM 8TH FLOOR

ACTION FILED: APRIL 7 TH 2022

Please take notice that onn 2/12/24 an exparte hearing will take place at the above captioned time and location. PLAINTIFF SEEKS an extension of time to file first amedned complaint

Plaintiff respectfully seeks and order to grant Plaintiff extension of time . I am awaiting councils reply on my approval of my retainer.

I am meeting with seperate council on the hacking incident that just occured in late December 23 . This device is related google. Information for my complaint and other cases was illegally accessed or taken from this device and was erased . I am trying to retrive this information.

Plaintiff will need time to RE draft this information and gather information and evidence which was taken. Plaintiff has some information but will need to redraft complaint structure and retrive information for final complaint that was taken and on the deveice prior to the incident.

I will need time to RE draft this information and gather information and evidence which was taken.

I will supply the court with evidence of this tampering and reports .

I am medically cleared through 2/28/24 currently(Exhibit)

I will update the court with update with council on 2/8/24 and the retrieval of information for First Ameded complaint

Plaintiff is very upset and distrought with stress about this tampering which is not legal.

Plaintiff Medical stautus

I was contracted Covid 19 and RSV this month and am recivering from this curretnly. I had an adverse reaction to the illness and had to have treatmwnt on 1/29/24 and seek the courts permission to file my exparte on 1/30/24 due my inability to travel and seek treatment on 1/29/24 and get medication.

Plaintiff Commincation with opposing council

I contacted opposing council about the extension to file first amended complaint and the tampering with my device for complaint on or about 1/19/24 via fax and telephonically on

1/22/24. (exhibit)

On or about 1/23/24, I spoke telephonically to both attorneys for everly well and google

Neither attorney for google did comment on the issue with my device

Neither attormney agreed to an extension

The attorney wished me to get well

I told the attorneys I would contact them before I file (exhibit)

I updated the opposing council on my status of aquiring attorney aswell .I will update the court on this on or about 2/8/24

I was ill and sick with ailment and illness at that time and spoke to the attorneys for google and Everlywell. I have been vewry ill againand might be diagnosed with covid again (exhibit) and needed to seek medical treatment on 1/29/24 (exhibit) . I contacted opposing council on 1/29/24 and let them know i will be filing the exparte but on tuesday 1/30/24 so that I could recover from treatmewnt on 1/29/24 (exhibit) I will be in the hospital 1/30/24 for more treatment.

UPDATE with COUNCIL

I am meeting with additional council due to tampering with my device and the information that was lost for my complaint.

I will update the court if I am able to retrieve the information ,Otherwise I will need to try to access or reproduce the complaint . In this instance i will need time to do so.

I am meeting with council and awaiting retainers due to c

I will be seeking a seperate attorneys council as well to see what can be done about this recent "hacking and spoilation of evidence. who may be co-council.

**Plaintiff seeks a short extesnion for the court to amend and correct the clerks
filing of sealed documents to comply with 11/2/23 order**

Plaintiff will update the court on retrieving informatioin from device . If Plaintiff cannot

retriev this information Plaintiff will need to redraft complaint with information is left.

Plaintiff will update the court on 2/8/24 regading council.

Plaintiff will update the court of council in this filing of medical status cleared though 2/28/24
(exhibit)

Plaintiff will contact the court with update with authorities on the device information lost

Plaintiff seeks an extention of time for these reasons

Plaintiff will need to add defendants related to google into updated complaint due to hacking
on plaintiffs device information.

Plaintiff respectfully submits this application I declare under the penalty of perjury the
foregoing is true and correct.

1/28/24

Sam Lu
x _____

Plaintiff Shaheryar Khan in Pro Per

DATE: 1/29/2024

Attention Every Well And Google Defendants: Regarding

Susman Godfrey : K. Pachman Fax 310 789-3150

Perkins Coie Alisha Burgin Fax 310-788-3399

Case Number 2:22 CV 02333 Shaheryar Khan vs Adam Kramer; Google; Apple ;Everly Well Et Al

Plaintiff is filing the exparte as discussed in this case. I am filing the exparte on Tuesday 1/30/24 due to illness and medical treatment requirement of Infection that is dangerous and needs to be to treated immediately. I will request the court to allow me to file my exparte one day after 1/29/24 and on 1/30/24 for this reason , I will not be done with treatment on 1/29/24 and I cannot efile due to" hacking fears" I will file the exparte as soon as possible when the coiurt opens up on 1/30/24 due to travel restrictions on 1/29/24 for my illness.

Judge Frimpong issued an order requesting that any communication should be conducted by 1/22/24. I am send this fax to be recieved by you to set a call for Monday 1/22/24. Any extension will need to be filed by 1/29/24. Event occurred on or about 12/28/23 prior to the order dated 12/27/23 and after Plaintiff filed his exparte application which was granted. I will need to discuss with you and also address meetings with council.

I will disclose to the court that council for everlywell and google both did oppose the exparte extension I am filing on the telephonic call we had scheduled and had last week.

I have physicians medical extension through February 2/28/24, and I will supply the court the medical letter from illness I am having now that is being treated for emergency purposes.

Plaintiff would like to discuss exparte filing and stipulating and allowing Plaintiff an extention of time to file documents pertaining to council coming on board and councils correspondence and the First Amended Complaint. Plaintiff also would like to discuss and seek a stipulation Please Email me at syst.82817@outlook.com to set a time to meet and confer to discsuss this issue and feel free to email any agreements that defendnats council may be agreeable to ton the information in the above request.

Respectfully

Shaheryar Khan

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