

No. 19- _____

In The
Supreme Court of the United States

**Dimond Rigging Company, L.L.C.,
d/b/a Absolute Rigging & Millwrights**

Petitioner,

On Petition For Writ
Of Certiorari To The
United States Sixth
Circuit Court Appeals
6th Cir. Case. 18-3615

v.

**BDP International, Inc., and
Logitrans International, Inc.**

Respondents.

_____/

***Petitioner's Application For Brief Extension
Of Time Within Which To File Application For Writ of Certiorari***

Petitioner, Dimond Rigging Company, LLC, through Law Offices of Duncan H. Brown, P.C. submits the following as its Application for Brief Extension of Time Within Which To File Application For Writ of Certiorari:

1. On January 25, 2019, the Sixth Circuit Court of Appeals issued its Opinion involving this matter in Case No. 18-3615 (See Exh. "1").

2. The undersigned was Petitioner's attorney of record throughout the lower court (trial) proceedings; and, throughout the appeal to the Sixth Circuit Court of Appeals, (See Exh. "1").

3. Pursuant to Rule 13, Rules of the Supreme Court of the United States, Petitioner's Application For Writ of Certiorari is due to this Court on or before April 25, 2019.

4. The undersigned is aware that Petitioner, on a *pro se* basis, filed a Motion For Extension of Time Within Which To File Application For Writ of Certiorari (the Motion For Extension) on or about April 12, 2019, which was returned by the Clerk of the Supreme Court because the movant (Ron Lech, *Pro Se*, on behalf of Petitioner) filed the Motion and is not an attorney or admitted to practice before this Court.

5. The prior Motion for Extension was based on the following:

A. Following the Sixth Circuit's issuance of its January 25, 2019 Opinion, Petitioner assumed that the Law Offices of Duncan H. Brown would also be representing Petitioner in connection with any Application for Writ of Certiorari filed with this Court that Petitioner decided to file.

B. Last month, Petitioner was informed by the undersigned that I was terminating my solo practice and joining another law firm to practice law; that the law firm I was joining did not practice appellate law in connection with United States Supreme Court appeals; that my new law firm would not expand its practice to permit me to continue representing Petitioner in connection with its desire to submit an Application for Writ of Certiorari; and, that I would not be continuing representation of Petitioner in any capacity and that Petitioner should seek replacement counsel.

C. Since that time, upon information and belief, Petitioner has diligently sought replacement counsel to file the Application for Writ of Certiorari to this Court. As yet, Petitioner informs me that it has been unable to presently locate an attorney admitted to practice before this Court; or, who has the time to take on this matter (including review of all court files in the Sixth Circuit appellate matter; and the trial court matter from which the Sixth Circuit appeal arose).

7. I am admitted to practice in this honorable court, and file the instant Motion (only) as a member of the bar of the United States Supreme Court for the purpose of seeking an extension of time on

Petitioner's behalf within which to file its Application for Writ of Certiorari by another attorney admitted to practice before this Honorable Court.

8. Upon information and belief, Petitioner has represented that it should be able to retain legal counsel who are and/or will be permitted to practice before this Honorable Court within the next 30 days (at most) and, upon information and belief, that attorney will need 15 days to complete and file an Application for Writ of Certiorari.

9. As such, Petitioner submits that good cause exists under Rule 13(5) of the Rules of the United States Supreme Court, for this Court to grant Petitioner a relatively brief extension of time of an additional 45 days within which to file its Application For Writ of Certiorari (until June 9, 2019 [April 25, 2019 + 45 days]).

WHEREFORE, Petitioner respectfully requests that the Motion For Extension of Time be granted, or such other relief as is fair and proper under the circumstances.

/s/ Duncan H. Brown (electronic signature)
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Certificate of Service

This is to certify that on April 19, 2019 a copy of the foregoing, with attached exhibit, was served upon the counsel of record for each of the Respondents by first class mail with postage prepaid thereon to: Troy B. Morris, Counsel for BDP International, 8000 Ravine's Edge Ct., Ste. 300, Columbus, Ohio 43235; and Eric W. Beery, Counsel for Logitrans International, 5025 Arlington Centre Boulevard, Suite 550 Columbus, Ohio 43220.

/s/Duncan H. Brown
Duncan H. Brown (P38598)

EXHIBIT “1”