

COPY

DOCKET NUMBER: Not yet assigned

IN THE SUPREME COURT OF THE UNITED STATES
Addressed to the Honorable
Ruth Bader Ginsberg,
as Circuit Justice for the
Second Circuit Court of Appeals

The Alliance to End Chickens as Kaporos,
RINA DEYCH, individually, and RINA DEYCH,
as member of The Alliance to End Chickens as Kaporos,
LISA RENZ, individually and LISA RENZ,
as member of The Alliance to End Chickens as Kaporos,
MICHAL ARIEH, JOY ASKEW, ALEKSANDRA SASHA
BROMBERG, STEVEN DAWSON, VANESSA DAWSON,
RACHEL DENT, JULIAN DEYCH, DINA DICENSO,
FRANCES EMERIC, KRYSTLE KAPLAN, CYNTHIA KING,
MORDECHAI LERER, CHRISTOPHER MARK MOSS,
DAVID ROSENFELD, KEITH SANDERS,
LUCY SARNI, LOUISE SILNIK, DANIEL TUDOR,

Petitioners-Plaintiffs-Appellants,

-against-

THE NEW YORK CITY POLICE DEPARTMENT,
COMMISSIONER WILLIAM BRATTON, in his official
Capacity as Commissioner of the New York City Police
Department, THE CITY OF NEW YORK,
NEW YORK CITY DEPARTMENT OF HEALTH
AND MENTAL HYGIENE,

Respondents-Defendants-Respondents,

CENTRAL YESHIVA TOMCHEI
TMIMIM LUBAVITZ, INC., SHLOMIE ZARCHI,
ABRAHAM ROSENFELD, NATIONAL COMMITTEE FOR
THE FURTHERANCE OF JEWISH EDUCATION AND AFFILIATES,
RABBI SHEA HECHT, RABBI SHALOM BER HECHT, RABBI SHLOMA L.
ABROMOVITZ, YESHIVA OF MACHZIKAI HADAS, INC.,
MARTIN GOLD, CONGREGATION BEIS KOSOV MIRIAM LANDYNSKI,
LMM GROUP, LLC., ISAAC DEUTCH, LEV TOV
CHALLENGE, INC., ANTHONY BERKOWITZ,
[caption continued on next page]

YESHIVA SHEARETH HAPLETAH SANZ BNEI
BEREK INSTITUTE, MOR MARKOWITZ, NELLIE MARKOWITZ, and BOBOVER
YESHIVA BNEI ZION, INC. d/b/a KEDUSHAT ZION, RABBI HESHE
DEMBITZER,

Defendants (no appeal on any level took place regarding
the issues involving these parties).

**PETITIONERS' MOTION FOR SIXTY DAY EXTENSION OF TIME IN WHICH
TO FILE PETITION FOR WRIT OF CERTIORARI**


Nora Constance Marino (USSC bar admission pending)
Attorney for Petitioners-Plaintiffs-Appellants
175 East Shore Road, Suite 230
Great Neck, NY 11023
Ph: 516-829-8399
Fax: 516-829-4699
Email: nora@marinojustice.com

IN THE SUPREME COURT OF THE UNITED STATES

**PETITIONERS' MOTION FOR SIXTY DAY EXTENSION OF TIME IN WHICH TO
FILE PETITION FOR WRIT OF CERTIORARI**

The Alliance to End Chickens as Kaporos,
RINA DEYCH, individually, and RINA DEYCH,
as member of The Alliance to End Chickens as Kaporos,
LISA RENZ, individually and LISA RENZ,
as member of The Alliance to End Chickens as Kaporos,
MICHAL ARIEH, JOY ASKEW, ALEKSANDRA SASHA
BROMBERG, STEVEN DAWSON, VANESSA DAWSON,
RACHEL DENT, JULIAN DEYCH, DINA DICENSO,
FRANCES EMERIC, KRYSTLE KAPLAN, CYNTHIA KING,
MORDECHAI LERER, CHRISTOPHER MARK MOSS,
DAVID ROSENFELD, KEITH SANDERS,
LUCY SARNI, LOUISE SILNIK, DANIEL TUDOR,

Petitioners-Plaintiffs-Appellants,

-against-

THE NEW YORK CITY POLICE DEPARTMENT,
COMMISSIONER WILLIAM BRATTON, in his official
Capacity as Commissioner of the New York City Police
Department, THE CITY OF NEW YORK,
NEW YORK CITY DEPARTMENT OF HEALTH
AND MENTAL HYGIENE,

Respondents-Defendants-Respondents,

NOW COMES petitioners, by and through their attorney and undersigned
counsel, affiant herein, pursuant to Supreme Court Rule 13.5, who hereby
respectfully moves this Honorable Court for a sixty-day extension of time in
which to file their petition for Writ of Certiorari, for the following reasons. Your
affiant has applied for admission to this Honorable Court; said application
was returned for administrative errors, and has been resubmitted. It is

currently pending, and your affiant anticipates admission at the next first available opportunity.

Moreover, your affiant's lead plaintiff is a not for profit 501-c-3 organization, that has been attempting to accrue the necessary funds for costs to pursue this writ (and then for the subsequent appeal, should we be successful on the writ). The not for profit organization has limited funds; the remaining plaintiffs do not have the funds and upon information and belief, would not qualify for governmental aid. The extension of time would allow an opportunity to obtain the necessary resources required to pursue this writ and possible subsequent appeal.

The underlying decision of which we pray for review was issued on November 14, 2018 by New York State's highest court, the Court of Appeals. Ninety days from that date would be February 12, 2019. Even if the necessary funds were gathered now, your affiant cannot properly and competently submit an appropriate petition in this limited time period. As such, Alliance to End Chickens as Kapreros and the other plaintiffs and potential petitioners respectfully move this honorable Court for a sixty day extension of time in which to file said petition, making the new due date on or before April 13, 2019, which is a Saturday; thus, the next business day is Monday, April 15, 2019, which would be the new due date.

This motion is filed at least ten days before the current deadline of February 12, 2019; thus, it is in compliance with Supreme Court rule 13.5. The decision from New York State's Court of Appeals (New York State's court of

last resort), for which we pray for review is annexed hereto. Also annexed is the New York State Appellate Division decision, which contained a dissenting opinion from two dissenters, which gave petitioners herein access to New York State's Court of Appeals as a matter of right.

Your affirmand believes that this matter is proper for consideration in this Honorable Court in that it involves an important issue regarding constitutional separation of powers, and also, it disregards past Supreme Court decisions.

The basis for jurisdiction is 28 USC 1257.

WHEREFORE, all for all the foregoing reasons, petitioners-plaintiffs respectfully move this Honorable Court for a sixty day extension of time in which to file this Petition, thus making the new due date on or before April 15, 2019 (due to the sixtieth day falling on a Saturday).

Affirmed and Respectfully submitted,



Nora Constance Marino
NYS Bar # 2759611
Attorney for Petitioners/Plaintiffs
175 East Shore Road, Ste. 230
Great Neck, NY 11023
Ph: 516-829-8399
Fax: 516-829-4699
Email: nora@marinojustice.com