

**REBECCA C. LAFFERTY**  
Also Admitted to PA Bar  
EMAIL: [rlafferty@cooperlevenson.com](mailto:rlafferty@cooperlevenson.com)

Direct Phone (609) 572-7550  
Direct Fax (609) 572-7551

FILE NO. 54078.6

November 27, 2019

VIA FIRST CLASS MAIL, UPS OVERNIGHT DELIVERY, AND ELECTRONIC FILING

United States Supreme Court  
Clerk's Office  
1 First Street, N.E.  
Washington, D.C. 20543

Re: Sara Ann Edmondson v. Lilliston Ford, Inc.; Jane and John Does 1 - 10 and XYZ  
Corporation 1 – 10  
No. 19-582

Dear Clerk:

This firm represents Respondent, Lilliston Ford, Inc., in the referenced matter. Petitioner, Sara Ann Edmondson, has filed a Petition for a Writ of Certiorari. This firm intends to file a Brief in Opposition.

This case arises out of a consumer transaction wherein the Petitioner purchased an automobile from the Respondent. This litigation was initiated in 2012 in the Superior Court of New Jersey, Law Division. The matter was dismissed without prejudice in 2013 and the parties participated in American Arbitration Association proceedings. Dissatisfied with the decision in the Arbitration, Petitioner, in 2013, filed a Complaint in U.S. District Court for the District of New Jersey. In April of 2017, the District Court entered a Judgment against the Petitioner and in favor of the Respondent. Thereafter, in June of 2017, Petitioner filed an Appeal with the U.S. Court of Appeals, Third Circuit. The Third Circuit Court of Appeals affirmed the District Court's decision. Petitioner filed an Application seeking En Banc consideration of the matter. That Application was denied. Petitioner now asks this Honorable Court to grant a Writ of Certiorari. In support of that Application, this pro se Petitioner has submitted an extensive 21 page Brief together with a 59 page Appendix.

The Petitioner first filed a Petition on or about October 8, 2019. It was rejected by the Clerk's Office as a result of various deficiencies. The Petitioner submitted a revised Petition for Writ of Certiorari which was received on or about November 4, 2019. Thereafter, your office was contacted

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several times by Kevin J. Thornton, Esquire, a Partner in this firm. Mr. Thornton called your office several times to find out if the Petitioner's second submission had been accepted for filing. He was told that it was not yet filed and that he should follow up. He called as recently as November 18, 2019 and left a detailed voice mail message asking to be advised whether the Petitioner's Petition had been accepted for filing and a case number assigned. Mr. Thornton never received any notice from the Respondent as to whether her Petition was accepted for filing. He called again today, and was surprised to learn that the Petition was, in fact, docketed as of November 4, 2019 and was assigned No. 19582. Given the filing date, Respondent's Brief in Opposition is due on December 4, 2019.

Mr. Thornton was the only attorney that handled the below matters after 2017 and only he is fully familiar with the tortured history of the matter. It is extremely fact specific and frankly often difficult to follow given the participation of the pro se litigant. Accordingly, Mr. Thornton personally needs to prepare the Opposition Brief and the matter cannot be fairly or efficiently assigned to any other attorney in this firm. Furthermore, he has prior commitments to clients and courts and cannot meet the December 4, 2019 deadline.

Based upon the foregoing, it is respectfully requested that a 21 day extension be granted such that the Respondent's Brief in Opposition to the Petition would be due on December 25, 2019.

Thank you for your kind attention to the above.

Very truly yours,



Rebecca C. Lafferty

RCL/pjb

cc: Kevin J. Thornton, Esquire  
Ms. Sara Ann Edmondson