

IN THE
SUPREME COURT OF THE UNITED STATES

No. ____

EARL CROSBY, et al.,

Applicants,

v.

TWITTER, INC.; GOOGLE, LLC; FACEBOOK, INC.,

Respondents.

**APPLICATION TO THE HON. SONIA SOTOMAYOR FOR
AN EXTENSION OF TIME TO FILE A PETITION FOR A
WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

Pursuant to Supreme Court Rule 13(5), Earl Crosby, et al., hereby move for a 45-day extension of time, to and including August 29, 2019, to file a petition for a writ of certiorari. Unless an extension is granted, the deadline for filing the petition for certiorari is July 15, 2019.

In support of this request, Applicants state as follows:

1. The United States Court of Appeals for the Sixth Circuit rendered its decision on April 16, 2019 (Exhibit A). This Court has jurisdiction under 28 U.S.C. §1254(1).

2. This appeal involves whether Applicants failed to state plausible claims for relief under the Anti-Terrorism Act, 18 U.S.C. § 2331, *et seq.* Both the district court and the Sixth Circuit Court of Appeals determined that Applicants could not establish that Respondents (1) proximately caused their injuries, or (2) provided substantial assistance to a designated “foreign terrorist organization” – in this case, ISIS. 18 U.S.C. § 2333(d).

3. Between now and the petition’s current due date, Applicants’ counsel, Daniel W. Weininger, has substantial briefing obligations, including a motion for leave to appeal in *Royzenshteyn v. Pathak*, MON-C-45-18 (N.J. App. Div.) a response to the government’s motion to dismiss petitions to quash summonses in *Karcho-Polselli v. United States*, 19-cv-10956 (E.D. Mich.), and exceptions to a proposed judgment in *Crossman v. Dep’t of Treasury*, 17-005055 (Mich. Tax. Trib.).

4. Applicants request a modest extension for counsel to prepare a petition that fully addresses the complex issues raised by the decision below and frames those issues in a manner that will be most helpful to the Court.

For the foregoing reasons, Applicants request that an extension of time to and including August 29, 2019, be granted within which Applicants may file a petition for a writ of certiorari.

Respectfully submitted,



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