

No. _____

IN THE
Supreme Court of the United States

ERIN DALY

Petitioner,

— v. —

CITIGROUP INC., CITIGROUP GLOBAL MARKETS, INC., and CITIBANK, N.A.

Respondents.

On Petition for Writ of Certiorari to the United States
Court of Appeals for the Second Circuit

**APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI**

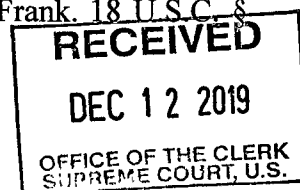
December 10, 2019

**To the Honorable Ruth Bader Ginsburg, Associate Justice of the United
States Supreme Court and Circuit Justice for the Second Circuit:**

Petitioner, Erin Daly requests a 60-day extension of time to file her Petition for Writ of Certiorari. The United States Court of Appeals for the Second Circuit entered a final judgment on September 19, 2019. Therefore, the Petition is currently due December 18, 2019. This application is being filed on December 10, 2019, less than 90 days from the date of the final Order.

The Petitioner is attaching a copy of the Second Circuit's opinion. This Court has jurisdiction over the Petition under 28 U.S.C. § 1254(1).

The Petition raises extremely important questions as to the arbitrability of post-employment retaliation claims under Sarbanes-Oxley as amended by Dodd-Frank, 18 U.S.C. §



1514A. The first question is whether Sarbanes-Oxley protects a whistleblower from post-employment retaliation in the form of interference with future employment of that whistleblower. The second question is whether a whistleblower can be forced to arbitrate some or all of those claims against a Defendant under 18 U.S.C. § 1514A.

The extension of time is necessary because the undersigned counsel was not admitted to the Supreme Court of the United States at the time the Second Circuit issued its Order. The Application and Motion for Admission to the Supreme Court was filed on December 2, 2019 but it is unknown whether the undersigned will be admitted in time to file the Petition for Writ of Certiorari by its December 18, 2019 deadline. The Application for Admission is attached herewith. The Petition and Appendix have already been completed and the booklets are presently being printed. The Petitioner greatly appreciate the Court's consideration of this application, and respectfully request a 60-day extension of time until February 13, 2019 to file her Petition.

Respectfully submitted,

Erin Daly,

By her attorney,

/s/Michelle N. Daly

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