

No. 21A-____

IN THE
Supreme Court of the United States

GLACIER NORTHWEST, INC., d/b/a CALPORTLAND,

Applicant,

v.

INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL UNION NO. 174,

Respondent.

**APPLICATION FOR AN EXTENSION OF TIME
TO FILE A PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF WASHINGTON**

To the Honorable Elena Kagan, Associate Justice of the Supreme Court and
Circuit Justice for the Ninth Circuit:

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicant Glacier Northwest, Inc., d/b/a CalPortland (“Glacier”),¹ respectfully requests a 58-day extension of time, up to and including May 13, 2022, to file a petition for a writ of certiorari to the Supreme Court of Washington, seeking review of that court’s decision in *Glacier Northwest, Inc. v. International Brotherhood of Teamsters Local Union No. 174*, 500 P.3d 119 (Wash. 2021). The Supreme Court of Washington issued its decision on December 16, 2021. A copy of that order is attached as

¹ The corporate parent of Glacier is CalPortland Company. The corporate parent of CalPortland Company is Taiheiyō Cement USA, Inc. The corporate parent of Taiheiyō Cement USA, Inc. is Taiheiyō Cement Corporation. Other than the listed entities, no publicly held corporation owns 10% or more of the stock of Glacier or any of its corporate parents.

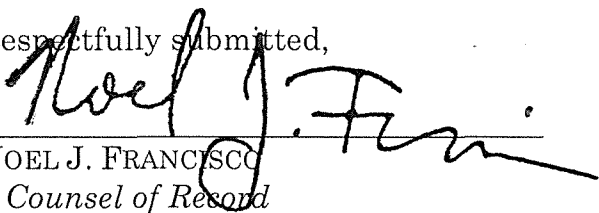
Appendix A. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1257, and the time to file a petition for a writ of certiorari will otherwise expire on March 16, 2022. This Application for Extension of Time is timely because it has been filed on February 8, 2022, more than ten days prior to the date on which the time for filing the petition is to expire.

2. Applicant has good cause for an extension of time. Because Glacier and its counsel below are not experts in this Court's certiorari practices, Glacier recently retained the law firm of Jones Day to prepare the petition for certiorari on its behalf. Given its experience and expertise in this area, Jones Day is better able to prepare a petition that will assist this Court in evaluating the case and the issues presented. The quality of the petition would greatly benefit from an extension of time to allow Jones Day to complete the requisite research and writing.

WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 58 days, to and including May 13, 2022.

Dated: February 8, 2022

Respectfully submitted,



NOEL J. FRANCISCO
Counsel of Record

JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
(202) 879-3939
njfrancisco@jonesday.com

*Counsel for Applicant Glacier
Northwest, Inc., d/b/a CalPortland*