

No. \_\_\_\_\_

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In the  
Supreme Court of the United States

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CANADA HOCKEY, L.L.C., DOING BUSINESS AS EPIC SPORTS;  
MICHAEL J. BYNUM,

*Petitioners,*

v.

TEXAS A&M UNIVERSITY ATHLETIC DEPARTMENT; ALAN CANNON;  
LANE STEPHENSON, IN HIS INDIVIDUAL CAPACITY,

*Respondents.*

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**APPLICATION FOR EXTENSION OF TIME WITHIN WHICH TO FILE A  
PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES  
CIRCUIT COURT OF APPEALS FOR THE FIFTH CIRCUIT**

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To the Honorable Samuel A. Alito, Jr., Associate Justice of the United States Supreme Court and Circuit Justice for the Fifth Circuit:

Pursuant to Supreme Court Rule 13(5), Canada Hockey, L.L.C., d/b/a Epic Sports and Michael J. Bynum (“Bynum”), hereby move for an extension of time of 30 days, to and including June 15, 2022, for filing of a petition for a writ of certiorari. Unless an extension is granted, the deadline for filing the petition for certiorari will be May 16, 2022.

The United States Court of Appeals for the Fifth Circuit rendered its decision on September 8, 2021, Ex. A, and issued its opinion on petition for rehearing on February 14, 2022. Ex. B. This Court has jurisdiction under 28 U.S.C. § 1254(1).

The petition for writ of certiorari intends to address an important issue of federal law: whether the Takings Clause of the United States Constitution protects copyrighted works from infringement by state actors.

Petitioners seek an extension of time to file their petition for writ of certiorari because Petitioners have just recently secured new lead counsel—Professors Ernest Young and Ralph Oman—to handle the petition and briefing before this Court. Petitioners seek the extension so that their new counsel has sufficient time to conclude their significant end-of-semester academic responsibilities, fully evaluate the merits of the matter, and file their petition for a writ of certiorari.

Respectfully submitted,

**BECK REDDEN LLP**



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