

APP. NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

TERRI LEMASTER AND PERFORMACE MEDIA, LLC

PETITIONER

v.

OUTFRONT MEDIA, LLC

RESPONDENT

On Application for an Extension of Time
to File Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

**PETITIONER APPLICATION TO THE HONORABLE JUSTICE
BRETT V. KAVANUAGH AS CIRCUIT JUSTICE**

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APPLICATION FOR AN EXTENSION OF TIME

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Terri LeMaster hereby request a 60-day extension of time within which to file a petition for a writ of certiorari up to and including March 27th, 2022.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgement for which review is sought *is Outfront Media, LLC v. Terri LeMaster and Performance Media, LLC*, No. 20-5562/5563 (September 22, 2021) (attached as Exhibit 1). The Sixth Circuit Court of Appeals has denied Applicant's motion for rehearing October 28th, 2021. (attached as Exhibit 2).

JURISDICTION

This Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. § 1254(1). Under Rules 13.5, 22, 30.2, and 30.3 of the Rules of this Court, a petition for a writ of certiorari was due to be filed on or before January 26th, 2022. In accordance with Rule 13.5, this application is being filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS FOR JUSTIFYING AN EXTENTION OF TIME

Applicant respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari seeking review of the decision of the Sixth Circuit Court of Appeals in this case, up to and including March 27th, 2022.

1. This case is of importance in maintaining the integrity and confidence in the judicial system. Petitioner has recently submitted a request to vacate the decision of the Sixth Circuit Court of Appeals based upon respondent's failure to submit an accurate financial disclosure statement. Petitioner has since learned that several potential financial conflicts of interest exist on the Sixth Circuit Court of Appeals and thus Petitioner needs time to determine if the Sixth Circuit will grant her submission-Rendering the current Court of Appeal decision moot.

2. Petitioners' Counsel of Record, Shane Sidebottom, was not involved in the litigation below and has only recently been retained to prepare a petition for certiorari. The underlying litigation involved the Highway Beautification Act and who controls "illegal" billboards. The issue may have nationwide implications. It will take considerable time for Mr. Sidebottom to familiarize himself with the substantial record and prepare a concise and well-researched petition to the Court. In addition, Mr. Sidebottom has numerous litigation deadlines in the weeks leading up to and immediately following the current deadline.

3. Counsel would not usually ask for a 60-day extension request but does so in order to allow him the necessary amount of time to effectively contribute to all open matters including Applicant's position as well as his other client's business. Additionally, a 60-day extension would allow him sufficient time for research and drafting efforts per Applicant's request.

CONCLUSION

For the foregoing reasons, Applicant respectfully request that the time to file the petition for a Writ of Certiorari in this matter be extended 60 days, up to and including, March 27, 2022.

Respectfully submitted

ZIEGLER & SCHNEIDER, P.S.C.

/s/ Shane C. Sidebottom

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CERTIFICATE OF SERVICE

A copy of this application was served by U.S. mail this 13th day of January, 2022, to the counsel listed below in accordance with Supreme Court Rule 22.2 and 29.3:

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