

No. 22A_____

IN THE
SUPREME COURT OF THE UNITED STATES

ZHANG JINGRONG, ZHOU YANHUA, ZHANG PENG, ZHANG CUIPING, WEI MIN, LO
KITSUEN, CAO LIJUN, HU YANG, GUO XIAOFANG, GAO JINYING, CUI LINA, XU
TING, BIAN HEXIANG,

Applicants,

v.

CHINESE ANTI-CULT WORLD ALLIANCE INC., MICHAEL CHU,
LI HAUHONG, WAN HONGJUAN, ZHU ZIROU,

Respondents.

On Petition for a 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**

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

To the Honorable Sonia Sotomayor, Associate Justice of the Supreme Court of the United States and Circuit Justice for the United States Court of Appeals for the Second Circuit:

Pursuant to Rules 13.5, 22, and 30 of this Court and 28 U.S.C. § 2101(c), Applicants Zhang Jingrong et al. respectfully request a sixty (60) day extension of time—up to and including May 6, 2022—to file a petition for writ of certiorari. The petition will challenge the Second Circuit’s decision in *Zhang Jingrong v. Chinese Anti-Cult World Alliance, Inc.*, 16 F.4th 47 (2d Cir. 2021), a copy of which is attached. App. 1-28.

In support of this application, Applicants state as follows:

1. The Second Circuit entered final judgment against Applicants on October 14, 2021, and denied their timely petition for rehearing on December 7, 2021. App. 40.

2. Without the requested extension, the petition for writ of certiorari would be due on March 7, 2022.

3. This application is filed more than ten days before the deadline for filing the petition for writ of certiorari absent the requested extension.

4. This Court’s jurisdiction will be based on 28 U.S.C. § 1254(1).

5. This case is a serious candidate for review. In addition to forbidding acts of violence or intimidation against those seeking to obtain services at a reproductive health facility, the Freedom of Access to Clinic Entrances Act

(FACEA), 18 U.S.C. § 248(a)(2), forbids violence and intimidation against those seeking to exercise their First Amendment right to religious freedom at a “place of religious worship.”

6. The anticipated question to be presented to this Court is whether a “place of religious worship” worthy of FACEA’s protections should be interpreted to include only places whose “primary purpose” is religious worship—as the Second Circuit panel held—or whether “place of religious worship” should be understood more broadly—as the late District Court Judge Jack Weinstein determined.

7. The definition of “place of religious worship” under FACEA is a matter of exceptional importance, and not just to Applicants but to adherents of any religion who are vulnerable to violence and intimidation—particularly members of marginalized faiths, those with the resources to secure only a mixed-purpose place of religious worship, or those whose beliefs do not as easily mesh with the concept of a primary place of religious worship.

8. This application for a 60-day extension seeks to accommodate Applicants’ legitimate needs. Most notably, the extension is needed for counsel at the Stanford Law School Religious Liberty Clinic to master the record below, to research implications of the Second Circuit panel’s unbriefed adoption of the “primary” modifier to the FACEA statutory term of “place of religious worship,” and to draft and complete the petition. As importantly, more time is needed for the Clinic to work effectively with translators required to communicate with

several of the Applicants who speak little to no English—only furthering the gap with a panel decision that they believe failed to grasp their religious beliefs and practices when it comes to defining and applying the FACEA term of “place of religious worship.”

9. Furthermore, the Stanford Clinic has numerous present or looming commitments that also demand counsel’s attention in the coming weeks. These include work on an appellant’s reply brief in *Bolden-Hardge v. Office of the California State Controller’s Office*, U.S. Court of Appeals for the Ninth Circuit, No. 21-15660; a court mediation and appellant’s opening brief in *Chernetsky v. Nevada*, U.S. Court of Appeals for the Ninth Circuit, No. 21-16540; a court mediation and appellant’s opening brief in *Guardado v. Nevada*, U.S. Court of Appeals for the Ninth Circuit, No. 21-16068; an amicus brief in support of rehearing in *Slockish v. U.S. Dep’t of Transportation*, U.S. Court of Appeals for the Ninth Circuit No. 21-35220; and post-trial motions in *Brown v. California Department of Corrections and Rehabilitation*, Sacramento County Superior Court, No. 34-2015-00176321. Without the requested 60-day extension, the Stanford Clinic may not be able to adequately handle these tasks.

10. Applicants understand that they are asking for the maximum extension permitted under the Rules. But given the foregoing commitments of the Clinic and the unique nature of Stanford’s quarter system—for example, its winter term ends March 18, 2022 and its spring term begins with entirely

new students on March 28, making a shorter extension less helpful than usual—Applicants respectfully submit they need the additional 60 days.

For these reasons, Applicants request that the due date for their petition for writ of certiorari be extended to May 6, 2022.

Respectfully submitted,

By:

A handwritten signature in blue ink, appearing to read 'James A. Sonne', with a stylized flourish at the end.

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