## In The

## SUPREME COURT OF THE UNITED STATES

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## **BRONWYN RANDEL,**

Petitioner,

V

## RABUN COUNTY SCHOOL DISTRICT,

Respondent.

APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

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To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

Petitioner Bronwyn Randel prays for a 60-day extension of time to file her petition for certiorari in this Court, to and including November 20, 2022. The decision of the United States Court of Appeals for the Eleventh Circuit was rendered on April 22, 2022. A timely petition for rehearing was denied on June 23, 2022. Petitioner's time to petition for certiorari in this Court expires on September 21, 2022. This application is being filed more than 10 days before that date.

A copy of the opinion below and of the denial of petitioner's petition for rehearing en banc are attached hereto. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

As shown by the opinion below, this case concerns the interpretation of the Due Process clause of the Fourteenth Amendment. The question is whether a due process violation occurs when a state or local agency deprives an individual of property without due process of law, or only when *both* (a) a state or local agency deprives an individual of property without due process of law *and* (b) the state fails to provide a judicial or other remedy for that deprivation.

Petitioner was represented in the courts below by local counsel in Georgia.

Because of the distinctive issues and procedures in this Court, petitioner has recently retained as additional counsel Eric Schnapper of Seattle, Washington. Mr. Schnapper requires additional time to familiarize himself with the record and the Georgia administrative procedures and standards at issue, and to perform the necessary legal research, so that the petition may be properly framed and argued in this Court.

Wherefore petitioner respectfully requests that an order be entered extending her time to petition for certiorari to and including November 20, 2022.

Respectfully submitted, September 8, 2022

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