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**In The  
Supreme Court of the United States**

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ROBERT F. ANDERSON, as Chapter 7 Trustee for Infinity Business Group, Inc.,

*Petitioner,*

v.

MORGAN KEEGAN & COMPANY, INC. and KEITH E. MEYERS,

*Respondents.*

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

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

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*Counsel for Petitioner*

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**TO THE HONORABLE JOHN G. ROBERTS, JR., CHIEF JUSTICE OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE FOURTH CIRCUIT:**

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner respectfully requests a 40-day extension of time, up to and including October 11, 2022, to file a petition for writ of certiorari to the United States Court of Appeals for the Fourth Circuit to review that Court's decision in *Anderson v. Morgan Keegan & Co. (In re Infinity Bus. Grp., Inc.)*, 31 F.4th 294 (4th Cir. 2022) (attached as Exhibit A.) The Fourth Circuit issued its judgment on April 19, 2022. (Attached as Exhibit B). It thereafter denied Petitioner's petition for rehearing and rehearing en banc on June 2, 2022. (Attached as Exhibit C).

Petitioner intends to file a petition seeking review of this judgment under Supreme Court Rule 12. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will expire without an extension on August 31, 2022. This application for an extension of time to file a petition for writ of certiorari is being filed more than 10 days prior to the current due date.

1. This case presents a substantial and important question of federal law: whether a bankruptcy trustee seeking to recover funds for the benefit of the debtor's creditors under 11 U.S.C. § 544(a) is charged with the debtor's knowledge. Below, the Fourth Circuit held that trustees are bound by the debtor's knowledge and, as a result, held that Petitioner's claims were barred by the doctrine of *in pari delicto*. In doing so, the Fourth Circuit deepened a split between the circuit courts on this question.

2. Petitioner's counsel has responsibility for many other matters which have pending deadlines before this petition is due, including several back-to-back depositions in a putative class action during the week of August 8, 2022, mediation in a matter pending before the F.A.A. scheduled for August 16, 2022, and mediation in another matter scheduled for August 30, 2022, in addition to other briefing and discovery obligations. Furthermore, Petitioner's counsel will conduct an evidentiary hearing currently scheduled for the entire week of September 26, 2022.

3. A 40-day extension of time is reasonable to allow Petitioner's counsel to fully research, coordinate, and present a petition for certiorari in a professional manner.

For the foregoing reasons, Petitioner requests an extension of time to and including October 11, 2022, which is the first business day following the 40-day extension, be granted within which Petitioner may file a petition for a writ of certiorari.

[Signature page follows]

Respectfully submitted,

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August 4, 2022