

**IN THE
SUPREME COURT OF THE UNITED STATES**

NO. _____

CAMELLIA GRILL HOLDINGS, INC.,

Petitioner,

versus

GRILL HOLDINGS, LLC; CHARTRES
GRILL, LLC, d/b/a GRILL; UPTOWN
GRILL OF DESTIN, LLC; RANO, LLC;
HICKMAN KHODR; K & L
INVESTMENTS, LLC and ROBERT'S
GUMBO SHOP, LLC,

Respondents,

**PETITIONER CAMELLIA GRILL HOLDINGS, INC. APPLICATION FOR
EXTENSION OF TIME TO FILE A PETITION FOR
WRIT OF CERTIORARI**

Pam Warnock Blair #300304
Counsel of Record for Petitioner
McNABB, BRAGORGOS, BURGESS & SORIN PLLC
81 Monroe Avenue, 6th Floor
Memphis, Tennessee 38103

**DIRECTED TO THE HONORABLE JUSTICE SAMUEL A. ALITO JR.,
ASSOCIATE JUSTICE OF THE UNITED STATES SUPREME COURT
AND CIRCUIT JUSTICE FOR THE FIFTH CIRCUIT UNITED STATES
COURT OF APPEALS.**

Pursuant to Rule 13.5 of the Rules of this Court, Applicant Camellia Grill Holdings Inc, hereby requests a 60-day extension of time within which to file a

petition for a writ of certiorari for the above captioned case up to and including January 22, 2023.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is the above captioned case, having been assigned the Fifth Circuit Docket No. 21-30639. The Fifth Circuit Court of Appeals filed the opinion August 23, 2022 (attached as Exhibit 1) and entered a judgment August 23, 2022.

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 13.1, 13.3, and 30.1 of the Rules of this Court, a petition for a writ of certiorari is due to be filed on or before November 23, 2022. In accordance with Rule 13.5, this application is timely filed more than 10 days in advance of the filing date for the petition for a writ of certiorari.

REASONS JUSTIFYING AN EXTENSION OF TIME

Applicant respectfully requests a 60-day extension of time within which to file a petition for a writ of certiorari up to and including January 22, 2023.

Applicant's Fifth Circuit Appeal Counsel of record, Stephan Land McDavid, is retiring from the practice of law since his work as counsel of record for Applicant toward the Fifth Circuit opinion. Further, Mr. McDavid's key paralegal who assisted him in the Fifth Circuit litigation has moved to a new employer. Applicant has retained this new counsel for its quest for review of the Fifth Circuit judgment. Applicant's new counsel is starting from scratch to pursue this Appeal. A 60-day

extension for the Applicant would allow new counsel to effectively represent Applicant in the Writ of Certiorari process and provide the best advocacy for the Applicant.

CONCLUSION

For the foregoing reasons, Applicant respectfully requests this Court to grant an extension of 60 days, up to and including January 22, 2023, within which to file a Petition for Writ of Certiorari in this case.

Respectfully submitted,

**McNABB, BRAGORGOS,
BURGESS & SORIN, PLLC**

By: 

Pam Warnock Blair, #300304
81 Monroe Avenue, Sixth Floor
Memphis, Tennessee 38103
(901) 624-0640
pblair@mhbbslaw.com

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INVESTMENTS, LLC and ROBERT'S
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Respondents,

CERTIFICATE OF SERVICE

I declare and certify, I have served copies of this Application on October 17, 2022 on counsel of record for each party and on every other person required to be served, electronically and by depositing an envelope containing the above documents in the United States mail, properly addressed and with First Class postage pre-paid, or by delivery to a third-party commercial carrier for delivery within three (3) calendar days. The names and addresses of those served as follows:

Scott N. Hensgens
Danielle L. Borel
Breazeale, Sachse & Wilson, LLP
P.O. Box 3197
Baton Rouge, LA 70821
(225) 387-4000
danielle.borel@bswllp.com
snh@bswllp.com

Michael J. Marsiglia
Berrigan & Litchfield, LLC
201 St. Charles Avenue, Ste. 4204
New Orleans, LA 70170
mmarsiglia@berriganlaw.net



Pam Warnock Blair