

A-_____

In The
SUPREME COURT OF THE UNITED STATES
October Term 2023

GEOFFREY HAMILTON WOODWARD,
Applicant/Petitioner,

v.

SARAH EDGE WOODWARD,
Respondent.

**Application for an Extension of Time Within Which
to File a Petition for a Writ of Certiorari to the
Third Circuit Court for Davidson County, Tennessee**

**APPLICATION TO THE HONORABLE
BRETT M. KAVANAUGH AS CIRCUIT JUSTICE**

CARTER G. PHILLIPS*
JACQUELINE G. COOPER
CODY M. AKINS
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000

August 22, 2023

Counsel for Applicant/Petitioner

* Counsel of Record

STATEMENT PURSUANT TO RULE 29.6

Applicant is Geoffrey Hamilton Woodward. Respondent is Sarah Edge Woodward. No party to this proceeding is a corporation.

APPLICATION FOR EXTENSION OF TIME

To the Honorable Brett M. Kavanaugh, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Sixth Circuit:

Pursuant to Rule 13.5 of the Rules of this Court and 28 U.S.C. § 2101(c), Applicant Geoffrey Hamilton Woodward hereby requests a 30-day extension of time within which to file a petition for a writ of certiorari, to and including October 4, 2023.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgments for which review is sought are: Order Implementing Recommendation of Agreed Upon Psychological Evaluator, *Woodward v. Woodward*, No. 21D-825 (Tenn. Circ. Ct. Mar. 7, 2023), a copy of which is attached as *Exhibit A*; and Order Denying Stay of March 7 Order, *Woodward v. Woodward*, No. 21D-825 (Tenn. Circ. Ct. Apr. 17, 2023), a copy of which is attached as *Exhibit B*.

JURISDICTION

The Tennessee Circuit Court issued the orders for which review is sought on March 7, 2023, and April 17, 2023. Those orders became final on June 5, 2023, when the Supreme Court of Tennessee denied discretionary review. See Order, *Woodward v. Woodward*, No. M2023-00444-COA-R10-CV (Tenn. Ct. App. Apr. 13, 2023) (attached as *Exhibit C*); Order, *Woodward v. Woodward*, No. M2023-00444-COA-R10-CV (Tenn. June 5, 2023) (attached as *Exhibit D*). This Court will have jurisdiction over any timely filed petition for certiorari in this case pursuant to 28 U.S.C. § 1257. Under Rules 13.1, 13.3, and 30.1 of this Court, a petition for a writ of certiorari is due to be filed on or before September 4, 2023.

In accordance with Rule 13.5, Applicant has filed this application more than 10 days in advance of that date.

REASONS JUSTIFYING AN EXTENSION OF TIME

An extension is warranted because of the importance of the issues presented and undersigned counsels' need for additional time to prepare a petition that will assist this Court in deciding whether to grant certiorari. Specifically, Mr. Woodward respectfully requests additional time to file his petition for certiorari for the following reasons:

1. Mr. Woodward initially sought emergency relief in this Court on August 15, 2023, by filing an application for a stay of the Tennessee trial court's order. Application for a Stay, No. 23A137 (U.S. Aug. 15, 2023). Mr. Woodward was awaiting preparation of his petition for writ of certiorari until the Court disposed of his stay application. Justice Kavanaugh denied that application on August 18, 2023. An extension of time is warranted to ensure counsel now has sufficient time to prepare a separate petition for writ of certiorari.

2. In addition, pre-existing commitments will limit counsel's ability to prepare a petition for certiorari on or before September 4, 2023. In particular, Mr. Phillips had a reply brief that was filed on August 18 in the New York Supreme Court, Appellate Division, in *IntegrateNYC, Inc. v. New York*, No. 2022-02719, and has a response brief due on August 24 in the U.S. District Court for the Western District of Wisconsin in *Epic Systems v. Tata Consultancy*, No. 3:14-cv-00748. Mr. Phillips also has a previously paid-for vacation in Poland September 1–10.

3. An extension of time is warranted because this case raises an exceptionally important question about when, consistent with the Due Process Clause, family courts may compel medical treatment as a condition of allowing a loving and fit parent to see his child. That question arises frequently, and family courts across the Nation take differing views on its answer. But the answer is clear under this Court's precedents: Without an overriding state interest and thorough consideration of reasonable alternatives, courts cannot force unwanted medical treatment on a parent, and certainly cannot do so as a condition of parental contact. The Tennessee trial court in this case flouted that rule, and courts across the country would benefit from this Court's guidance on this recurring and important issue.

CONCLUSION

For these reasons, Applicant respectfully requests that an order be entered extending the time to file his petition for a writ of certiorari to and including October 4, 2023.

Respectfully submitted,

/s/ Carter G. Phillips
CARTER G. PHILLIPS *
JACQUELINE G. COOPER
CODY M. AKINS
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000

Attorneys for Applicant/Petitioner

* Counsel of Record

August 22, 2023

CERTIFICATE OF SERVICE

I, Carter G. Phillips, do hereby certify that, on this 22nd day of August, 2023, I caused a copy and an electronic copy of the Application for Extension of Time in the foregoing case to be served by U.S. Mail, postage prepaid, and by email on the following party:

Helen S. Rogers
Laura S. Blum
The Wind in the Willows Mansion
2205 State Street
Nashville, TN 37203
(615) 320-0600
Helen@thewindinthewillowslaw.com
l.blum@thewindinthewillowslaw.com

/s/ Carter G. Phillips
CARTER G. PHILLIPS
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000
cphillips@sidley.com