

APP No. ____

IN THE SUPREME COURT OF THE UNITED STATES

NICOLAS A. SALOMON,
PETITIONER,

V.

KROENKE SPORTS & ENTERTAINMENT, LLC, OUTDOOR CHANNEL
HOLDINGS, INC., SKYCAM, LLC, AND CABLECAM, LLC

RESPONDENTS.

On Application for an Extension of Time
to File Petition for a Writ of Certiorari to the
California Supreme Court

**PETITIONER'S APPLICATION TO EXTEND TIME TO FILE
PETITION FOR WRIT OF CERTIORARI**

Jeremy D. Anderson
FISH & RICHARDSON P.C.
222 Delaware Avenue
Wilmington, DE 19801
Telephone: (302) 778-8452
E-mail: janderson@fr.com

Attorneys for Petitioner

To the Honorable Elena Kagan, Associate Justice of the United States and Circuit Justice for the Ninth Circuit:

Pursuant to 9 U. S. C. §1 *et seq.*, and Rules 13.5, 22, and 30.2 of this Court, Petitioner Nicolas A. Salomon respectfully requests a 30-day extension of time in which to file a petition for a writ of certiorari, up to and including Thursday, August 24, 2023. The California Supreme Court denied Petitioner's petition for review on April 26, 2023. A copy of the California Supreme Court's denial is attached as Exhibit 1. A copy of the decision of the California Court of Appeal, Second Appellate District, denying Petitioner's Appeal is attached as Exhibit 2. Absent an extension of time, the petition for a writ of certiorari would be due on July 25, 2023.

Petitioner has good cause for a 30-day extension of time in which to file a petition for a writ of certiorari because this case presents substantial questions under the Federal Arbitration Act, 9 U. S. C. §9. Rule 13.5. Namely, whether a court can confirm a partial arbitration award that is not immediately final because the arbitrator has not decided, and expressly reserved, issues for future consideration. Moreover, Petitioner informed undersigned counsel, who represented him below in the California Supreme Court, that he intends to engage different attorneys to represent him in filing the petition for writ of certiorari.

Petitioner acknowledges that this request is extraordinary under Rule 30.2, but respectfully requests that this Court grant this Application for an Extension and extend Petitioner's time to file his petition for writ of certiorari by 30 days, up to and including Thursday, August 24, 2023, so that he can engage separate counsel and that his appellate rights will not be prejudiced.

Dated: July 24, 2023

Respectfully submitted,

FISH & RICHARDSON P.C.

/s/ Jeremy D. Anderson _____

Jeremy D. Anderson
Fish & Richardson P.C.
222 Delaware Avenue
Wilmington, DE 19801
Telephone: (302) 778-8452
E-mail: janderson@fr.com

Attorneys for Petitioner