

APP No. 23A85

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IN THE SUPREME COURT OF THE UNITED STATES

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NICOLAS A. SALOMON,  
PETITIONER,

V.

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

RESPONDENTS.

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

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**PETITIONER'S SECOND 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](mailto:janderson@fr.com)

*Attorneys for Petitioner*

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

On July 28, 2023, Petitioner Nicolas A. Salomon's motion for extension of time to file a petition for certiorari was granted. Pursuant to 9 U. S. C. §1 *et seq.*, and Rules 13.5, 22, and 30.2 of this Court, Petitioner respectfully requests an additional 30-day extension of time in which to file a petition for a writ of certiorari, up to and including Friday, September 22, 2023. Absent an extension of time, the petition for a writ of certiorari would be due on August 24, 2023.

Rule 13.5 states that "a Justice may extend the time to file a petition for writ of certiorari for a period not exceeding 60 days." A second extension of thirty days will not exceed the 60-day maximum extension provided for in Rule 13.5. Petitioner has good cause for more 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. Petitioner informed undersigned counsel, who represented him below in the California Supreme Court, that he is working to engage different attorneys to represent him in filing the petition for writ of certiorari.

In sum, Petitioner respectfully requests that this Court grant this Application for an Extension and extend Petitioner's time to file his petition for writ of certiorari for another 30 days, up to and including September 22, 2023, so that he can engage separate counsel and that his appellate rights will not be prejudiced.

Dated: August 11, 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](mailto:janderson@fr.com)

*Attorneys for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of PETITIONER'S SECOND APPLICATION TO EXTEND TIME TO FILE PETITION FOR WRIT OF CERTIORARI was served by e-mail and first-class mail upon:

Kevin D. Evans  
Evans Law PLLC  
5613 DTC Parkway, Suite 850  
Greenwood Village, CO 80111  
Email: [KDEvans@evanspllc.law](mailto:KDEvans@evanspllc.law)

/s/ Jeremy D. Anderson  
Jeremy D. Anderson