



March 31, 2025

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

Re: Centerville Clinics, Inc., Petitioner v. Jane Do, No. 24-727

Dear Mr. Harris:

This case was originally filed in May 2023, almost two years ago, in the Washington County, Pennsylvania, Court of Common Pleas. As a direct result of Centerville's baseless removal, this case has not moved beyond the filing of the Complaint. Now, having lost at every turn, including this Court's denial of certiorari, Centerville asks for yet another delay: a thirty-day extension to seek rehearing. But it offers no reason—none—for doing so. At this point, enough is enough. The deadline for rehearing should remain April 18, 2025.

The basis for Centerville's request makes no sense. While we recognize that the deadline to seek certiorari is April 18, 2025, in a different case, *Blumberger v. Tilley*, that deadline has no impact here. Centerville can raise all the arguments it wants on why the two cases should be considered together in its petition for rehearing that is due on April 18, 2025, as it already did in its petition seeking certiorari. It does not need to, and indeed is not entitled to, wait for the Solicitor General to seek certiorari to do so. In fact, the petitioner in *Blumberger* already indicated that he intends to seek certiorari.

Still, it makes no difference what the Solicitor General does in that case because, unlike in *Blumberger*, the Solicitor General is not a party here (which is also probably why it won't respond to Centerville's requests for its position on this

case), and this case presents a different removal circumstance. For these reasons too, we disagree that a grant, vacate, and remand, based on *Blumberger* would ever be appropriate.

An extension of time would, at this point, prejudice Plaintiff. This case has been pending for almost two years without a single exchange of documents. The can has been kicked far enough. It's time for this case to move forward. The Court should deny the request.

Respectfully,


James Gerard Stranch, III

Counsel of Record for Respondent Jane Doe