

# THOMPSON BURTON PLLC

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February 17, 2025

## VIA FEDERAL EXPRESS

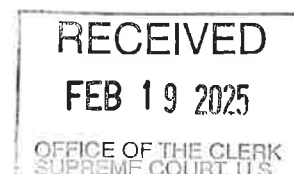
Hon. Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

**RE:   Request for Extension of Time to File Response to Petition  
         *Coney Island Auto Parts Unlimited, Inc. v. Jeanne Ann Burton, Chapter 7*  
         *Trustee for Vista-Pro Automotive, LLC*  
         S. Ct. No. 24-808**

Dear Mr. Harris:

This firm represents Chapter 7 Trustee Jeanne Ann Burton, the respondent in the above-referenced matter. Petitioner filed its petition for a writ of certiorari on November 25, 2024, and it was placed on the docket on January 30, 2025. Pursuant to Rule 15.3 of the Rules of the Supreme Court of the United States, a response is currently due on March 3, 2025. Pursuant to Rule 30.4, the Respondent respectfully requests that the time for filing a response be extended by 30 days, to and including April 2, 2025.

This is the Respondent's first request for an extension of time to file a response. Good cause exists for the requested extension. Undersigned counsel is not currently admitted before this Court, but is in the process of being admitted. The Respondent is also considering whether to retain national co-counsel to represent the estate in this appeal. An extension of time would allow the Respondent time to have a response filed by admitted counsel.



Accordingly, the Respondent respectfully requests that the time for filing a response to the petition for writ of certiorari in this matter be extended by 30 days, to and including April 2, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip G. Young, Jr.", written in a cursive style.

Phillip G. Young, Jr.  
Counsel for Jeanne Ann Burton, Trustee

cc: Daniel Ginzburg, Counsel for Petitioner  
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