

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

JOHN DOE,

Petitioner,

v.

GRINDR INC.; GRINDR LLC,

Respondents.

On Application for an Extension of Time
to File Petition for a Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit

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

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To the Honorable Elena Kagan, Associate Justice of the Supreme Court and Circuit Justice for the Ninth Circuit:

Petitioner, John Doe, through counsel, respectfully requests that the time to file a Petition for Writ of Certiorari in this matter be extended for thirty days up to and including June 18, 2025. Petitioner seeks review of the judgment issued by the Ninth Circuit Court of Appeals in *Doe v. Grindr Inc.*, 128 F.4th 1148 (9th Cir. 2025). The Ninth Circuit entered its judgment on February 18, 2025. (Appendix (“App. A”)) Absent an extension of time, the petition would be due on or before May 19, 2025. This application is being filed at least ten days before that date. See Sup. Ct. R. 13.5, 30.2. This Court has jurisdiction to review the Circuit Court’s judgment pursuant to 28 U.S.C. 1254(1).

Background

Petitioner John Doe brought this action against Respondents Grindr Inc. and Grindr LLC (together, “Grindr”) in Los Angeles County, California alleging product defects and sex trafficking, asserting claims of strict product liability, negligence, negligent misrepresentation, and violation of the Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. §§ 1591, 1595. Defendants removed the case to the Central District of California where all claims were dismissed with prejudice because of Section 230 of the Communications Decency Act except for the TVPRA claim which was dismissed for failure to state a claim. The Ninth Circuit panel affirmed dismissal on February 18, 2025.

Reasons for Granting an Extension of Time

Petitioner respectfully requests a thirty-day extension within which to prepare a petition for writ of certiorari in this case for the following reasons:

First, Petitioner has good cause for an extension of time. This Petition presents complicated issues of importance relating to the scope of immunity granted to online platforms under section 230 of the Communications Decency Act. Given its experience and expertise in this area, C.A. Goldberg is well positioned to evaluate and prepare a petition that will assist this Court in reviewing the case and the issues presented. The quality of any petition would greatly benefit from an extension of time to allow for the further development of arguments in this case and to complete the requisite research and writing. Given the case's significance in interpreting the scope of immunity under section 230, a thirty-day extension is warranted to allow counsel to prepare a petition that addresses the critical questions presented in a manner that is both efficient and direct for the Court's consideration.

Second, undersigned counsel has been and continues to be engaged with numerous other significant professional obligations, including a matter, (where we are lead plaintiff's counsel for 28 wrongful deaths) accepted for review by Washington State Supreme Court which had an expedited briefing schedule that concluded on May 2, 2025. *Ruth Scott, et al., v. Amazon.com, Inc.* WASC No. 1037309. Additional time is not sought for the purpose of delay, but rather to allow counsel to prepare and file a timely, compelling petition.

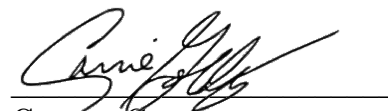
Third, this a matter of significance and the undersigned dares to imagine that there is a higher than average likelihood that this Court will grant certiorari. This petition presents the Court with the opportunity to do what it could not in Gonzalez and Taamneh. In 2022, Justice Thomas noted that, absent congressional clarity on the scope of immunity under Section 230, the Court would need to address the proper scope “in an appropriate case.” Doe v. Facebook, Inc., 142 S. Ct. 1087, 212 L. Ed. 2d 244 (2022) (Thomas, J., respecting the denial of certiorari). Justice Thomas issued the same sentiment several other times. Malwarebytes, Inc., v. Enigma Software Group USA, LLC, 592 U.S. (2020) (Statement of Thomas, J., respecting denial of certiorari), Doe v. Snap, 603 U.S. (2024) (Statement of Thomas, J., with Gorsuch, N., joining dissenting from the denial of certiorari).

Conclusion

For the foregoing reasons, Petitioner respectfully requests that the time to file the Petition for a Writ of Certiorari in this matter be extended thirty days, up to and including June 18, 2025.

Dated: May 14, 2025

Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this application was served by email and U.S. mail to the counsel listed below in accordance with Supreme Court Rule 22.2 and 29.3:

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