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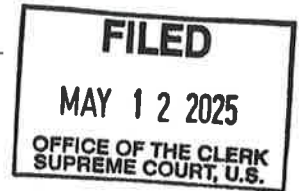
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IN THE SUPREME COURT OF THE UNITED STATES

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BRAD GREENSPAN,  
Petitioner  
v.  
Google, LLC,  
Respondent.

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Application for Extension of Time Within Which to File for a Writ of  
Certiorari to the Court of Appeals for the D.C. Circuit

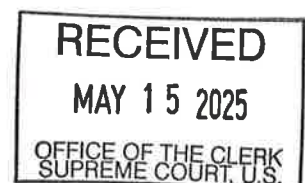
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APPLICATION FOR EXTENSION OF TIME TO  
FILE A PETITION FOR A WRIT OF CERTIORARI

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TO THE HONORABLE SONIA SOTOMAYOR, ASSOCIATE JUSTICE OF THE  
SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE  
FOR THE SECOND CIRCUIT:

Pursuant to Supreme Court Rules 13.5, 22, and 30, Petitioner respectfully request a 60-day extension of time, up to and including July 20, 2025, to file a petition for a writ of certiorari to the United States Court of Appeals for the D.C. Circuit to review that court's February 21, 2025 decision in *USA v. Google, LLC* #24-5006 (D.C. Circuit) (attached as Exhibit A).

The petition will seek review of this judgment under Supreme Court Rule 12.4.

The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will expire without an extension on May 22, 2025. This application, is timely because it has been filed at least ten days prior to the date on which the time for filing the petition is to expire.

1. This case presents substantial and important questions of federal law:

i. Whether the D.C. Circuit erred in dismissing Petitioner's Crime Victims' Rights Act petition as "moot" rather than addressing it on the merits as required by 18 U.S.C. § 3771(d)(3), which mandates that courts "shall take up and decide" such applications within 72 hours.

ii. Whether the D.C. Circuit's misclassification of Petitioner's CVRA petition as an ordinary mandamus petition violated Petitioner's statutory rights under 18 U.S.C. § 3771?

iii. Whether Plaintiff's Due Process has been violated as a result of not being reviewed by a Panel with a ruling on the merits.

2. Plaintiff is in the process of finalizing Supreme Court barred counsel and does not have an adequate amount of time to prepare an effective petition for writ of certiorari. A one-time extension of 60 days will allow Plaintiff to secure counsel and to prepare an effective petition.

Accordingly, the petitioner respectfully requests an order be entered extending the time to file a petition for a writ of certiorari for 60 days, up to and including July 20, 2025.

Dated: May 12, 2025

Respectfully submitted,  
/s/ Brad Greenspan  
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### **Rule 29.6 Statement**

1. The parent company for Google, LLC is Alphabet, Inc., a publicly traded corporation. No other publicly traded corporation owns more than 10 percent of Alphabet, Inc.

**EXHIBIT A**

**United States Court of Appeals**  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

**No. 24-5006**

**September Term, 2024**

**1:20-cv-03010-APM**

**Filed On: February 21, 2025**

United States of America, et al.,

Appellees

v.

Google LLC,

Appellee

Brad Greenspan,

Appellant

**BEFORE:** Pillard, Rao, and Childs, Circuit Judges

**ORDER**

Upon consideration of the motion for reconsideration, which the court construes to include a motion to recall the mandate; the motion for judicial notice; and the petition for writ of mandamus, it is

**ORDERED** that the motion for judicial notice be denied. Appellant's motion is unnecessary to the extent that he asks the court to take judicial notice of official court records. See Veg-Mix, Inc. v. U.S. Dep't of Agric., 832 F.2d 601, 607 (D.C. Cir. 1987). And his other proffered documents are irrelevant to the disposition of this appeal. See Larson v. Dep't of State, 565 F.3d 857, 870 (D.C. Cir. 2009). It is

**FURTHER ORDERED** that the motions for reconsideration and to recall the mandate be denied. The court's inherent power to recall its mandate "can be exercised only in extraordinary circumstances." Calderon v. Thompson, 523 U.S. 538, 549–50 (1998). And appellant has shown no such circumstances here. It is

**FURTHER ORDERED** that the petition for writ of mandamus be dismissed as moot.

**United States Court of Appeals**  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

**No. 24-5006**

**September Term, 2024**

The Clerk is directed to accept no further submissions from appellant in this closed case.

**Per Curiam**

**FOR THE COURT:**  
Clifton B. Cislak, Clerk

BY: /s/  
Daniel J. Reidy  
Deputy Clerk

## PROOF OF SERVICE

I, Brad Greenspan , do swear or declare that on this date, May 12, 2025 , as required by Supreme Court Rule 29 I have served the enclosed Application For Extension of Time on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of May in Stamford, CT.

/s/ Brad Greenspan

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