

No. \_\_\_\_\_

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In The  
**Supreme Court of the United States**

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RICHMOND ROAD PARTNERS, LLC; STEP FORWARD,

*Petitioners,*

**v.**

CITY OF WARRENSVILLE HEIGHTS; CITY OF WARRENSVILLE  
HEIGHTS PLANNING COMMISSION; CITY OF WARRENSVILLE  
HEIGHTS BUILDING COMMISSIONER,

*Respondents.*

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On Petition for Writ of Certiorari  
to the United States Court of Appeals  
for the Sixth Circuit

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**APPLICATION TO THE HONORABLE BRETT M. KAVANAUGH FOR  
AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION  
FOR A WRIT OF CERTIORARI**

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*Counsel for Petitioners*

To the Honorable Brett M. Kavanaugh, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Sixth Circuit:

Pursuant to Supreme Court Rule 13.5, Petitioners Richmond Road Partners, LLC, and Step Forward respectfully request a 45-day extension of time, to and including July 21, 2025, within which to file a petition for a writ of certiorari to review the judgment of the United States Court of Appeals for the Sixth Circuit. Petitioners attempted to confer on May 8 and have not yet received Respondents' position.

### **JUDGMENT FOR WHICH REVIEW IS SOUGHT**

The judgment for which review is sought is *Richmond Road Partners, LLC v. City of Warrensville Heights*, No. 24-3502, 2025 WL 737342 (6th Cir. Mar. 7, 2025) (attached as Exhibit 1). Absent an extension, the petition for a writ of certiorari would be due on June 5, 2025. This application is being filed more than ten days before the current due date. *See* Sup. Ct. R. 13.5.

### **JURISDICTION**

This Court has jurisdiction under 28 U.S.C. § 1254(1), as the petition seeks review of a judgment rendered by the United States Court of Appeals for the Sixth Circuit.

### **REASONS FOR GRANTING EXTENSION**

Good cause exists for the requested extension. Petitioners' Counsel of Record, Wencong Fa, was not involved in the litigation below and has only been recently retained to prepare a petition for certiorari. The requested extension will allow Mr. Fa more time to review the record in this case. In addition, Mr. Fa has had or will

devote significant time to other litigation matters, including preparing for the oral argument in the United States Court of Appeals for the First Circuit on May 6 in *Clemente Properties, Inc., et al. v. Hon. Pedro R. Pierluisi-Urrutia, et al.*, 23-1922 (1st Cir.) and finalizing a joint motion for preliminary approval of settlement, certification of Rule 23 settlement class, and notice to proposed settlement to class members in a 1.4-million-dollar class action settlement in *Pratt v. Metropolitan Government of Nashville and Davidson County, Tennessee*, 3:24-cv-01508 (M.D. Tenn.). This is Petitioners' first request for an extension. No prejudice will result from granting the requested extension, and the additional time will allow counsel to prepare a thorough and effective petition for the Court's review.

### CONCLUSION

For the foregoing reasons, Petitioners respectfully request that this Court grant a 45-day extension of time, up to and including July 21, 2025, within which to file a petition for a writ of certiorari.

DATED: May 16, 2025

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Respectfully submitted,

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## CERTIFICATE OF SERVICE

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

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DATED: May 16, 2025

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