

No. 24A-____

IN THE
Supreme Court of the United States

RED RIVER TALC LLC,

Applicant,

v.

AD HOC COMMITTEE OF SUPPORTING COUNSEL, ET AL.,

Respondents.

**APPLICATION FOR AN EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI TO THE UNITED
STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

To the Honorable Samuel A. Alito, Associate Justice of the Supreme Court and
Circuit Justice for the Third Circuit:

1. In accordance with Supreme Court Rules 13.5, 22, and 30, Applicant Red River Talc, LLC, respectfully requests a 60-day extension of time, up to and including December 23, 2024, to file a petition for a writ of certiorari to the United States Court of Appeals for the Third Circuit, seeking review of that court's decision in *In re LTL Management LLC*, Nos. 23-2971, 23-2972 (3d Cir. July 25, 2024). A copy of that decision is attached as Appendix A.

2. 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 otherwise expire on October 23, 2024. This Application is timely because it was filed on October 11, 2024, more than ten days before the date on which the time for filing the petition is to expire.

Applicant is the corporate successor to LTL Management LLC as relevant to this bankruptcy proceeding. *See* Supreme Court Rule 35 (permitting substitution of parties).

3. Applicant has good cause for an extension of time. Undersigned counsel, as well as other counsel involved in the petition, has had and will have briefing and argument obligations in several other matters including *Truck Insurance Exchange v. Kaiser Gypsum Co.*, No. 21-1858 (4th Cir.), on remand from this Court; *Official Committee of Asbestos Claimants of Bestwall LLC v. Bestwall LLC*, No. 24-1493 (4th Cir.); and *ITG Brands, LLC v. Reynolds American Inc.*, No. 2017-0129 (Del. Ch.). Furthermore, Applicant is engaged in its own bankruptcy proceeding, and counsel are extensively occupied with that proceeding.

WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, to and including December 23, 2024.

Dated: October 11, 2024

Respectfully submitted,

/s/ C. Kevin Marshall

C. KEVIN MARSHALL
Counsel of Record

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