

IN THE
Supreme Court of the United States

MICHAEL SALAZAR,

Applicant,

v.

PARAMOUNT GLOBAL, DBA 247SPORTS,

Respondent.

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

**RESPONSE IN OPPOSITION TO APPLICATION
FOR EXTENSION OF TIME**

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Supreme Court Rule 29.6, Respondent Paramount Global discloses the following. There is no parent or publicly held company owning 10% or more of Respondent's stock.

To the Honorable Brett Kavanaugh, as Circuit Justice for the United States Court of Appeals for the Sixth Circuit:

1. Pursuant to 28 U.S.C. § 2101(c) and Supreme Court Rules 13.5, 21.4, and 33.2, Respondent Paramount Global (d/b/a 247Sports) respectfully requests that Petitioner Michael Salazar’s Application for an Extension of Time to File a Petition for a Writ of Certiorari be denied, or that the Court grant Mr. Salazar only a more limited extension of a few weeks. Respondent does not oppose an extension of a few weeks as a professional courtesy, but Mr. Salazar has not demonstrated the good cause required to justify a 60-day extension.

2. Mr. Salazar’s application for an extension does not disclose that he is on both sides of the debate about whether an apparent circuit split warrants this Court’s review. Mr. Salazar is the named plaintiff in both this case and in *National Basketball Association v. Salazar*, No. 24-994 (hereinafter, the “NBA” case). Both cases involve an identical question of statutory construction regarding the meaning of the term “consumer” as used in the Video Privacy Protection Act. *See* Petition for a Writ of Certiorari, No. 24-994 (Mar. 14, 2025). Mr. Salazar is represented by the same counsel in both matters. A certiorari petition in the NBA case has been fully briefed and distributed for the Court’s long conference on September 29, 2025. In the NBA case, Mr. Salazar, the respondent, *opposed* certiorari. *See* Brief in Opposition, No. 24-994 (June 30, 2025). In this case, Mr. Salazar, the petitioner, requests additional time to *seek* certiorari—for the same putative circuit split.

3. The 60-day extension Mr. Salazar requests here would make his certiorari petition in this case due October 10, 2025, after the long conference at which the Court will consider the petition in the *NBA* case raising the same issue. There is no good cause to put these parallel petitions on separate tracks. If Mr. Salazar believes the Second Circuit side of the split is not certworthy but the 6th Circuit side is certworthy, he should explain why in time for the Court to consider both petitions at the same conference.

4. Mr. Salazar's only basis for the 60-day extension he requests is "the press of other matters." Extension Application ¶ 3. That is not good cause to postpone the Court's consideration of this petition until after the long conference. The Sixth Circuit affirmed judgment against Mr. Salazar in this case on April 3, 2025, nearly four months ago. Petitioner's Application at 1a. Mr. Salazar's rehearing petition was denied on May 13, 2025, nearly three months ago.

5. An extension of a few weeks, until the end of August, is sufficient time for Mr. Salazar to file a petition in this case. Indeed, the "press of other matters" Mr. Salazar relies on for his extension request includes his time "draft[ing] and fil[ing] a brief in opposition to a petition for certiorari with this Court in *National Basketball Association v. Salazar*, No. 24-994." Extension Application ¶ 3. The brief in opposition Mr. Salazar filed in the *NBA* case concerns the same issue—and same apparent circuit split—as the certiorari petition Mr. Salazar proposes to file in this case. Granting Mr. Salazar an extension until the end of August would leave him ample time to explain why, in his view, the Court should deny certiorari in the *NBA*

case but grant certiorari here. And it would permit the Court to consider both related petitions at the same conference.

6. For the foregoing reasons, the Court should deny Mr. Salazar's request for an extension or, alternatively, grant a limited extension of a few weeks.

August 5, 2025

Respectfully submitted,

By: /s/ Gregory Silbert

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