

No. ---

In The

SUPREME COURT OF THE UNITED STATES

DR. JASMINE YOUNGE,

Petitioner,

v.

FULTON JUDICIAL CIRCUIT DISTRICT
ATTORNEY'S OFFICE, GEORGIA,

Respondent.

APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

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Counsel for Petitioner

To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

Petitioner Dr. Jasmine Younge prays for a 30-day extension of time to file her petition for certiorari in this Court, to and including September 22, 2025.¹ The decision of the United States Court of Appeals for the Eleventh Circuit was rendered on April 1, 2025. A timely petition for rehearing was denied on May 23, 2025. Petitioner's time to petition for certiorari in this Court currently expires on August 21, 2025. This application is being filed more than 10 days before that date.

A copy of the opinion below and of the denial of petitioner's petition for rehearing *en banc* are attached hereto. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

As shown by the opinion below, this case concerns the interpretation of the Federal Rules of Civil Procedure on an issue that has broad implications for numerous cases in federal district court. The question is whether a defendant who has filed an answer that does not plead an affirmative defense may thereafter raise the affirmative defense by a motion for summary judgment without amending its answer to plead that affirmative defense, particularly when the deadline for amending pleadings in the

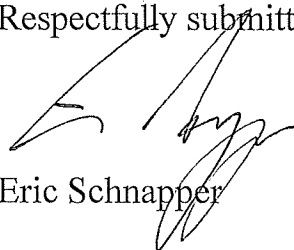
¹ Thirty days from the current deadline is Saturday, September 20, 2025. Pursuant to Rule 30.1 of this Court, Petitioner calculates the deadline as the next day which is not a Saturday, Sunday, or federal legal holiday: Monday, September 22, 2025.

District Court's Rule 16(b) Scheduling Order has long passed.

Petitioner was represented in the courts below by local counsel in Georgia. Because of the distinctive issues and procedures in this Court, petitioner has recently retained as additional counsel Eric Schnapper of Seattle, Washington. Mr. Schnapper requires additional time to familiarize himself with the record and to perform the necessary legal research, so that the petition may be properly framed and argued in this Court. In addition, Mr. Schnapper is currently working on a petition for certiorari in another matter that is due on August 28, 2025, and he requires additional time to complete that Petition before working on the petition in this case.

Wherefore petitioner respectfully requests that an order be entered extending her time to petition for certiorari to and including September 22, 2025.

Respectfully submitted,



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August 4, 2025