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**IN THE SUPREME COURT OF THE  
UNITED STATES OF AMERICA**

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**R&R GROUND MAINTENANCE, INC.**

**Petitioner**

**v.**

**ALABAMA POWER COMPANY,  
ROBERT GARRISON**

**Respondents.**

**MOTION FOR EXTENSION OF TIME TO SUBMIT PETITION FOR A  
WRIT OF CERTIORARI**

Comes now, R&R Ground Maintenance, Inc. and requests an additional 30 days to file a petition for a writ of certiorari up to and including February 27, 2018.

As grounds for this motion, counsel states as follows:

1. Any petition for a writ of certiorari is due January 28, 2018.
2. The case concerns allegations of race discrimination in violation of 42 U.S.C. § 1981, in awarding of an employment services contract for landscaping and maintenance.

2. In the Northern District of Alabama, the case was dismissed at summary judgment.
3. The dismissal was affirmed on appeal. (copy attached).
4. Due to health issues of the company owner and disabled veteran Earnest Rayford and counsel who had other summary judgment response briefs due in the last 40 days additional time to file is sought.
5. While the chances of any petition being granted are well documented, why summary judgment is more frequently granted in employment discrimination cases is an important issue. Chin, Denny. "Summary Judgment in Employment Discrimination: A Judges Perspective", 57 N.Y.L. Rev. 671 (2012-2013).
6. The motion is not filed for purposes of delay and no party will be prejudiced by granting the motion.

**Wherefore premises considered**, R&R requests until to and including February 27, 2018 file any petition for certiorari.

/s/Lee Winston  
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*Attorney for R&R Ground  
Maintenance*

January 26, 2018

**CERTIFICATE OF SERVICE**

I Lee Winston certify that I copy of the foregoing will be sent via e-mail upon the following:

M. Jefferson Starling, Esq.  
Chase T. Espy, Esq.  
B. Chelsea Phillips, Esq.  
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January 26, 2018

s/Lee Winston