

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Veronika Marcoski,¹

Petitioner,

v.

Jan Rath,

Respondent.

**APPLICATION FOR EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI**

John G. Crabtree
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Counsel for Petitioner Veronika Marcoski

¹ Petitioner is a natural person and, thus, has no parent company and no publicly traded company owns 10% or more of the company's stock.

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

Petitioner Veronika Marcoski respectfully requests a 60-day extension of time, to and including July 28, 2018, within which to file a petition for a writ of certiorari to the U.S. Court of Appeals for the Eleventh Circuit. The Eleventh Circuit issued its decision on December 27, 2017. *Veronika Marcoski v. Jan Rath*, 718 Fed.Appx. 910 (11th Cir. 2017), and Marcoski filed a motion for rehearing, which the Eleventh Circuit denied on February 28, 2018. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1254(1). Unless extended, the time within which to file a petition for a writ of certiorari will expire on May 29, 2018.

The Eleventh Circuit's decision is attached as Exhibit A. The order denying the motion for rehearing is attached as Exhibit B.

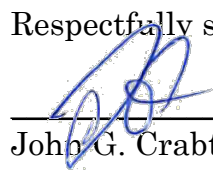
This case centers on (1) whether the harmless error doctrine can be properly applied to factual findings deemed to be clearly erroneous, after the trial judge has found those same findings "highly persuasive" to the dispositive issue in the case; and (2) when, if ever, mere cohabitation by parents of a newborn child establishes the legally necessary "last-shared-intention" to raise that child permanently in a particular country, and, thus, establish the newborn child's "habitual residence" under the Hague Convention?

Additionally, Marcoski's undersigned counsel of record, John G. Crabtree, has been fully preoccupied with other matters including the following commitments:

1) acting as lead counsel in an ongoing, certified national class action in *Congdon v. Uber Technologies, Inc.*, 4:16-cv-02499-YGR (N.D. Cali.); acting as co-lead counsel in a certified class action pending in Florida state court in *Solaris v. Brickell Bay Condominium Association v. LM Funding, LLC*, Case No. 2014-20043-CA-40 (Fla. 11th Jud. Cir.); acting as lead appellate counsel and providing trial support in the ongoing *Engle* progeny tobacco litigation *Kenneth Gloger v. R.J. Reynolds Tobacco Company, et al.*, 11-23377 CA 21 (Fla. 11th Jud. Cir.); acting as co-lead appellate counsel in *Sabal Insurance Group, Inc., and Ian M. Norris v. Philadelphia Indemnity Insurance Company*, Case No. 17-14844-H (11th Cir.); and acting as co-lead appellate counsel in *Veronika Marcoski v. Jan Rath*, Case No. 18-10403-DD (11th Cir.). This list does not include multiple other appellate cases counsel is handling that are currently pending within Florida's appellate courts.

For these reasons, Marcoski requests the time to file a petition for certiorari be extended by 60 days, up to and including Saturday, July 28, 2018.

Respectfully submitted,



John G. Crabtree

Date: May 7, 2018

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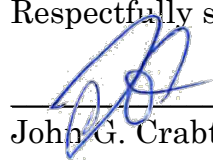
CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.5, I, John G. Crabtree, a member of the Supreme Court Bar, hereby certify that one copy of the attached Application was served on May 7, 2018 through electronic mail to:

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Respectfully submitted,



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Dated: May 7, 2018

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