

**In the Supreme Court of the United States**

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**ZOE SPENCER,  
PETITIONER,**

**v.**

**VIRGINIA STATE UNIVERSITY, ET AL.  
RESPONDENTS.**

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**ON PETITION FOR WRIT OF CERTIORARI  
TO THE UNITED STATES SUPREME COURT**

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**APPLICATION FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE BRIEF IN  
OPPOSITION TO PETITIONER'S WRIT OF CERTIORARI**

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*(\* Application for Admission to this Court Pending)*

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## **APPLICATION FOR AN EXTENSION OF TIME**

Pursuant to Rule 30.4 of the Rules of this Court, Respondents Virginia State University ("VSU") and Dr. Keith T. Miller hereby request a 30-day extension of time within which to file a brief in opposition to the petition for a writ of certiorari up to and including Tuesday, September 3, 2019.<sup>1</sup>

### **REASON JUSTIFYING AN EXTENSTION OF TIME**

Respondents respectfully request a 30-day extension of time within which to file a brief in opposition to the petition for a writ of certiorari seeking review of the Fourth Circuit Court of Appeals in this case, up to and including Tuesday, September 3, 2019, for the following reason:

1. The extension of time is necessary because of the nature of VSU as an institution of higher education. VSU is a public, historically black college dedicated to the preparation of a diverse population of men and women through the advancement of academic programs and services that integrate instruction, research, extension, and outreach.
2. Due to the summer recess, key decision makers at VSU are currently not available for review and consultation on this matter.
4. The short 30-day extension will provide Respondents sufficient time to review and draft a brief in opposition to Petitioner's writ of certiorari.

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<sup>1</sup> In accordance with Rule 30.1 of the Rules of this Court, the last day of a 30-day period is Sunday, September 1, 2019, and Monday, September 2, 2019, is a federal legal holiday, therefore the period extends to Tuesday, September 3, 2019.

## CONCLUSION

For the foregoing reason, Respondents respectfully request that this Court grant an extension of 30 days, up to and including Tuesday, September 3, 2019, within which to file a brief in opposition to the petition for a writ of certiorari in this case.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2019, in accordance with Rule 29 of the Rules of this Court the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, and one hard copy was mailed to the following addresses:

Supreme Court of the United States  
1 First Street, NE  
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Petitioner *Pro Se*

/s/ Elizabeth M. Ebanks  
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