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**In The**  
**SUPREME COURT OF THE UNITED STATES**

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**KRISTANALEA DYROFF,**  
Individually and On Behalf of  
The Estate of Wesley Greer,

*Petitioner,*

**v.**

**THE ULTIMATE SOFTWARE GROUP,**

*Respondent*

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

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To the Honorable Elena Kagan, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Ninth Circuit:

Petitioner Kristanalea Dyroff prays for a 45 day extension of time to file her petition for certiorari in this Court to and including January 2, 2020. The final judgment of the Ninth Circuit was entered on August 20, 2019. Petitioner's time to petition for certiorari in this Court expires on November 18, 2109. This application is being filed more than 10 days before that date.

A copy of the opinion below is attached hereto. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

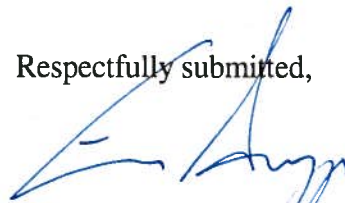
As shown by the opinion below, this case concerns section 230 of the Communications Decency Act. 47 U.S.C. § 230(c)(1). The defendant in this proceeding, Ultimate Software, operated a website known as the Experience Project, which hosted groups on which users could post experiences, pose and answer questions, and interact with other users. The Experience Project itself analyzed the comments of individual users, and affirmatively recommended to them that they join other groups, and sent out emails when new content was posted on a group. One group so hosted and publicized by the Experience Project was "where can i [sic] score heroin in Jacksonville, fl." When a Florida drug-dealer posted in the group, indicating a willingness to sell heroin, the Experience Project emailed Wesley Greer, petitioner's son. Based on information posted by the drug dealer, Greer contacted the drug dealer and purchased what he believed to be heroin. Greer died the next day from fenantyl toxicity. The Ninth Circuit held that section 230 immunized Ultimate Software from any liability for its conduct in recommending, and emailing about, the website group concerning where to buy heroin in Florida.

Petitioner was represented in the courts below by counsel in Arkansas and California, none

of whom have experience in this Court. Because of the distinctive issues and procedures in this Court, petitioners have recently retained as additional counsel Eric Schnapper of Seattle, Washington. Mr. Schnapper requires additional time to familiarize himself with the record in the instant case and to perform the legal research necessary to ensure that the issues are properly framed and argued to this Court. Mr. Schnapper is required to devote substantial time to his teaching responsibilities until December 4, when the autumn term ends at the University of Washington School of Law.

Wherefore petitioner respectfully requests that an order be entered extending her time to petition for certiorari to and including January 2, 2020.

Respectfully submitted,



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November 6, 2019