

No. 20-219

IN THE
SUPREME COURT OF THE UNITED STATES

JANE CUMMINGS,

Petitioner,

v.

PREMIER REHAB KELLER, P.L.L.C.,

Respondent.

On Writ of Certiorari to the
United States Court of Appeals
for the Fifth Circuit

**APPLICATION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF ON THE MERITS**

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**APPLICATION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF ON THE MERITS**

To: Justice Samuel A. Alito, Jr., Circuit Justice for the United States Court of Appeals for the Fifth Circuit:

Pursuant to Rule 30.3 of the Rules of this Court, Petitioner Jane Cummings requests an extension of four (4) days, to and including November 2, 2021, in which to file her reply brief on the merits. In support of this application, petitioner states:

1. On July 2, 2021, this Court granted certiorari in this case. Shortly thereafter, the parties jointly filed a motion to extend the due dates for their briefs on the merits. On July 12, 2021, this Court granted the motion, extending the time in which to file the opening brief to August 23, 2021, and the time in which to file respondent's brief to September 29, 2021.

2. The reply brief is currently due on October 29, 2021, and the Court has scheduled argument for November 30, 2021. With the four-day requested extension, the reply brief would be due on November 2, 2021—four weeks before oral argument and well before the completion of the previous sitting of arguments.

3. This is petitioner's first request for an extension of time on the reply brief, and it would not require the Court to alter the date on which the case is set for oral argument.

4. This short extension is warranted because of the heavy press of other matters undersigned counsel is handling. Counsel of record is part of the seven-

lawyer Eisenberg & Baum Center for Deaf and Hard of Hearing, which has numerous active cases across the country on short deadlines. Co-counsel at the Stanford Supreme Court Litigation Clinic is currently short-staffed and involved in several matters pending in this Court, including *Hemphill v. New York*, No. 20-637 (argued October 5, 2021), and *Houston Community College System v. Wilson*, No. 20-804 (to be argued on November 2, 2021).

5. Counsel for respondent has consented to this extension.

Respectfully submitted,

By:



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