

No. \_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

\_\_\_\_\_ Term, \_\_\_\_\_

CARL WARD,

*Petitioner,*

v.

NPAS, INC

*Respondent.*

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

TO THE HONORABLE JUSTICE BRETT KAVANAUGH, ASSOCIATE JUSTICE OF THE SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE SIXTH CIRCUIT:

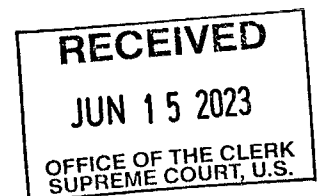
Petitioner, Carl Ward prays for a 60-day extension to file a Petition for Writ of Certiorari in this Court to and including September 20, 2023. R. 13.5.

The decision of the United States Court of Appeals for the Sixth Circuit was issued on March 24, 2023. Thus, Petitioner's time to file a Petition for Writ of Certiorari currently expires on June 22, 2023.

A copy of the opinion below is attached. (Exh. A).

Jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

This Motion is being transmitted by commercial carrier today, June 12, 2022, for delivery no later than June 15, 2022. It is thus being filed at least ten (10) days prior to the above-referenced Petition's deadline. R. 13.5; R. 29.2.



Petitioner requests an extension of the time to file his Petition for Writ of Certiorari because his undersigned counsel has never appeared on behalf of a litigant before this Honorable Court and requires additional time both to become more acquainted with this Honorable Court's Rules and to prepare Petitioner's petition for this Court's adjudication. If this Motion is denied, irreparable prejudice will result to Petitioner as well as to other residents of the Sixth Circuit.

Good cause also exists because this case presents an important question regarding the interpretation of the word "default" as it is used in the Fair Debt Collection Practices Act ("FDCPA")'s definition of "debt collector." In the opinion below, the Sixth Circuit disregarded default's plain meaning in favor of a judicially constructed and inherently circular definition whereby a debt cannot be "in default" unless it is "treated . . . as if it were in default."

The Sixth Circuit's departure from the statute's plain meaning exacerbates existing inconsistencies in federal courts' diverse interpretations of the word "default" without providing a clear positive standard for use within the Sixth Circuit. As a result, clarification by this Court is needed to provide both consumers and the debt collection industry with certainty as to the scope of the FDCPA.

WHEREFORE, Petitioner respectfully requests that an order be entered enlarging time to file a Petition for Writ of Certiorari by sixty (60) days.

By: s/ Geoffrey C. Parker

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*\*Application for admission to the bar  
of this Court pending*

**Certificate of Service**

I, Geoffrey Parker, do hereby certify that on this 12th day of June, 2023, I caused the foregoing document to be served on the below by both first-class and electronic mail:

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**Exhibit A – Opinion Below**  
*Ward v. NPAS, Inc.*, 63 F.4th 576 (6th Cir. 2023)

**UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT**

Deborah S. Hunt  
Clerk

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Filed: March 24, 2023

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Re: Case No. 21-6189, *Carl Ward v. NPAS, Inc.*  
Originating Case No. : 3:19-cv-00484

Dear Counsel,

The court today announced its decision in the above-styled case.

Enclosed is a copy of the court's published opinion together with the judgment which has been entered in conformity with Rule 36, Federal Rules of Appellate Procedure.

Yours very truly,

Deborah S. Hunt, Clerk

Cathryn Lovely  
Deputy Clerk

cc: Ms. Lynda M. Hill

Enclosures

Mandate to issue.