

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

---

---

IN THE  
**Supreme Court of the United States**

\_\_\_\_\_  
AMOS N. JONES,

*Petitioner,*

v.

CATHOLIC UNIVERSITY OF AMERICA,

*Respondent.*

\_\_\_\_\_  
**APPLICATION FOR AN EXTENSION OF TIME TO FILE A PETITION FOR  
WRIT OF CERTIORARI  
TO THE DISTRICT OF COLUMBIA COURT OF APPEALS**

---

AMOS N. JONES

*pro se*

AMOS JONES LAW FIRM

1150 K STREET NW, SUITE 902

WASHINGTON, DC 20005-6809

(202) 351-6187

jones@amosjoneslawfirm.com

*Petitioner*

June 23, 2023

---

---

## APPLICATION

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the District of Columbia Circuit:

Pursuant to Rules 13.5, 22, 30.2 and 30.3 of the Rules of this Court and 28 U.S.C. § 2101(c), applicant Amos N. Jones respectfully requests a 60-day extension of time, to and including September 5, 2023, within which to file a petition for a writ of certiorari to review the decision of the District of Columbia Court of Appeals in this case, *Amos N. Jones v. Catholic University of America*, No. 2017-CA-008331-B (D.C. Ct. App. Feb. 23, 2023; *reh'g denied*, April 7, 2023) (Appendix A).

### **Background**

1. This case is listed as the one “related case” in the now-pending Petition for a Writ of Certiorari in *Amos N. Jones v. Campbell University, et al*, No. 22-1128 (hereafter “*Campbell University et al*”). These two interrelated cases were severed by a June 2018 order of the U.S. District Court for the District of Columbia, which ordered ten counts against four other defendants to be transferred into the Eastern District of North Carolina while the one count (i.e., tortious interference with contractual relations, against Respondent Catholic University of America) was remanded as its own standalone case to the D.C. Superior Court, where all counts against all defendants had originated in a nearly 100-page initial Complaint filed in December 2017 by predecessor Lead Counsel Arinderjit Dhali.

2. Petitioner timely appealed the District Court’s severance to the U.S. Court of Appeals for the District of Columbia Circuit in Fall 2018, arguing that the two cases belonged re-joined, as they had been originally filed in the D.C. Superior Court in December 2017. However, the D.C. Superior Court – to which the one-count claim against Respondent had been remanded – twice denied Petitioner’s motions to stay this case, in spite of the pendency of its severance actively on appeal before the D.C. Circuit, and immediately dismissed this case for failure to state a claim for tortious interference with contractual relations. Petitioner appealed the trial court’s dismissal to the D.C. Court of Appeals, which rendered its decision approximately four years later, on Feb. 23, 2023. *See Appendix*. The D.C. Court of Appeals denied Petitioner’s Petition for Rehearing En Banc on April 7, 2023. *See id*.

3. Meanwhile, over the same years, *Campbell University et al* proceeded as transferred to the Eastern District of North Carolina and, amid the developments set out in the Appendix to the petition for a writ of certiorari in that case, Petitioner voluntarily dismissed that case without prejudice in July 2021.

4. In the two actions, Petitioner has employed twelve (12) counsel of record, intermittently working collaboratively, all but four of whom continue in various capacities prepared to re-appear for Petitioner on Remand. (Two of the four attorneys no longer involved changed law firms.)

5. The vexatious protracting of litigation from defendants and the inferior courts has drained years and resources – especially time – across law firms and courts, including Petitioner’s own practice based in downtown Washington, D.C.

6. Petitioner is a member of the District of Columbia Bar and had been a unanimously promoted Associate Professor of Law teaching contracts and ethics at Baptist-related Campbell University Norman Adrian Wiggins School of Law in Raleigh, N.C. until Spring 2017.

7. Petitioner received his B.A. *cum laude* in political science from Emory University, where he was a National Merit Scholar, a Harry S. Truman Scholar, a Robert W. Woodruff Scholar, and a 2000 recipient of Emory's Burt and Betty Shear Family Prize "for the student most likely to make a uniquely positive impact on her or his universe." He later earned a Master of Science in Journalism from Columbia University in 2003 and a Juris Doctor from Harvard Law School in 2006. After law school, Jones, who had published three law review articles across the country while a Harvard Law student and Executive Editor of two journals, spent a year as a Fulbright Postgraduate Scholar in Australia in the Centre for Comparative Constitutional Studies at the University of Melbourne.

8. Petitioner then spent three years excelling as an associate in international trade and commercial litigation in Bryan Cave Leighton Paisner LLP's Washington, D.C., office before joining the legal academy in Fall 2010, when he accepted recruitment to serve as a Visiting Assistant Professor of Constitutional Law at North Carolina Central University School of Law for one year, during which he contacted Campbell University Law School's Recruitment Committee to express his interest in a tenure track position at that school. Campbell hired him as an Assistant Professor of Law by a unanimous faculty vote.

9. Petitioner spent six years teaching at Campbell, where his courses routinely faced overloaded enrollment. His History of the Black American Lawyer course became the most popular elective at a school with only a 3% African American student body—70 of his 78 students were White. In addition to his teaching, Jones amassed an impressive record of publications and lectures. After his first four years, Campbell promoted Jones to Associate Professor of Law based on another unanimous vote, this time of the tenured faculty, and confirmation by the university's Board of Trustees in Fall 2015. When legal disputes arose among Petitioner, Campbell University, and Respondent Catholic University of America in Spring 2017, Petitioner hired highly rated counsel who brought his claims and represented him until the defeats at the United States Court of Appeals for the Fourth Circuit (in *Campbell University et al*) and the D.C. Court of Appeals (in the instant case).

10. Because of the procedurally predictable pathways in advanced cases and an urgent need for economy and efficiency, Petitioner, from the point of the filings of his petitions for rehearing in both cases in both jurisdictions into the present, has appeared *pro se*, having been admitted to the Bar of the Supreme Court of the United States in 2012.

11. Without seeking any extension, Petitioner timely filed a petition for a writ of certiorari in *Campbell University et al* on May 15, 2023, *pro se*; the petition was timely opposed by Respondents on June 20, 2023, three days ago.

## Reasons for Granting an Extension of Time

12. In the instant case, *Amos N. Jones v. Catholic University of America*, the D.C. Court of Appeals issued its decision on April 7, 2023. Unless extended, the time to file a petition for certiorari will expire on July 6, 2023. *See* SUP. CT. R. 13.1. This application is being filed more than ten days before the petition is currently due. *See* SUP. CT. R. 13.5. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1257(b).

13. This case presents questions on at least two important constitutional issues, including questions relating to: (A) the applications of the procedural and substantive due process clauses of the United States in assuring privileges and equal protection, U.S CONST. amend. V and U.S CONST. amend. XIV, and (B) the interpretation and application of the full faith and credit clause of the Constitution, U.S CONST. art. IV, including as abrogated by the impositions of unpublished opinions. There are additional issues that Petitioner might include in the petition for a writ of certiorari, subject to further legal analyses as to whether their significance merits being brought before the Supreme Court of the United States.

14. Petitioner's mother, Kay Grimes Jones, died at the age of 83 two days after Easter Sunday, four days after the D.C. Court of Appeals denied the Petition for Rehearing En Banc, 17 days before her 60<sup>th</sup> wedding anniversary with Petitioner's father, who will turn 84 on July 4, 2023, and requires significant attention amid this loss.

15. Petitioner’s mother, having died on Tuesday April 11, 2023, was funeralized on Tuesday April 18, 2023, in Petitioner’s native hometown of Lexington, Ky., and her monument was dedicated on Sunday May 28, 2023, with Petitioner officiating in Lexington Cemetery. Petitioner has been heavily involved in both his late mother’s end-of-life care (she was pronounced terminally ill on January 4, 2023), in her funeral services and burial, and in the adaptations of his father – a retired schoolteacher and Baptist pastor – to life as a widower.

16. Meanwhile, Petitioner met the deadline for filing – without request for extension – the petition for a writ of certiorari in the related case, *Campbell University et al*, No. 22-1128, on May 15, 2023.

17. Nevertheless, significant practice priorities in various courts – including three petitions for writs of certiorari to this Court – combine with the personal setback and professional disruption caused by the death of Petitioner’s mother to necessitate the filing of this Application for an Extension of Time in which to file.

18. Such practice priorities include, but are not limited to:

a. The August 24, 2023, deadline for undersigned Petitioner’s timely filing of a petition for a writ of certiorari in the matter where he is sole counsel of record captioned *Karen M. Suber, Applicant, v. VVP Services, LLC, et al*, (Application No. 22A1061), in light of this Court’s recent time-extension grant by Justice Sotomayor.

b. The briefing undersigned Petitioner prepared and filed as Local Counsel for “73 AMICI CURIAE FEMALE ATHLETES, COACHES, SPORTS OFFICIALS, AND WOMEN ATHLETES’ FAMILY MEMBERS, MANY OF WHOM HAVE BEEN

FORCED TO COMPETE AGAINST BIOLOGICAL MALES AND ALL OF WHOM HAVE SUFFERED THE PSYCHOLOGICAL DAMAGE FROM WITNESSING FORCED AND UNEQUAL MALE DOMINANCE OVER WOMEN IN SPORTS” in the pending case of *Selina Soule v. Connecticut Association of Schools, Inc. et al*, No. 21-1365 (2d. Cir.), amid the en banc-rehearing oral arguments on Tuesday June 6, 2023, in New York City, attended by undersigned Petitioner as the case is expected to come before this Court in the near future.

c. Various hearings and motions in the four mass-casualty cases pending before U.S. District Judge Benjamin Beaton in the U.S. District Court for the Western District of Kentucky, in which undersigned Petitioner serves as co-lead counsel with Milberg LLP to the putative class of 110 employees or estates of employees who were casualties in the December 2021 EF4 tornado that ravaged Western Kentucky, especially the Mayfield Candle Factory:

i. *Johnson et al v. Mayfield Consumer Products, LLC*, Case 5:22-cv-00044-BJB-LLK;

ii. *Aliff et al v. Mayfield Consumer Products, LLC*, Case 5:23-cv-00005-BJB-LLK;

iii. *Daniel et al v. Mayfield Consumer Products, LLC et al*, Case 5:23-cv-00018-BJB-LLK; and

iv. *Sanchez v. Brooks et al*, Case 5:22-cv-00177-BJB.

19. On May 26, 2023, Judge Beaton announced a June 9, 2023, hearing on all of the many pending motions in all of the above cases, and the hearing required significant



preparation; this week, undersigned Petitioner, as counsel to the Plaintiffs, has begun servicing as to unexpected post-hearing briefing at this critical point in these four urgent cases.

### **Conclusion**

All of the consequences of the loss of *pro se* Petitioner's mother over Easter, including his responsibilities for certain time-sensitive professional affairs relating to the loss and end-of-life commitments, have created extenuating circumstances as to time in this unique moment.

For the foregoing reasons, Plaintiff-Petitioner respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari in this matter by 60 days, up to and including September 5, 2023.

Respectfully submitted,

/s/ Amos N. Jones /s/

AMOS N. JONES

AMOS JONES LAW FIRM

1150 K STREET NW, SUITE 902

WASHINGTON, DC 20005-6809

(202) 351-6187

jones@amosjoneslawfirm.com

*Petitioner-Applicant*  
(pro se)

June 23, 2023