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In The
Supreme Court of the United States

BOSTON PARENT COALITION FOR
ACADEMIC EXCELLENCE CORP.,

Petitioner,

v.

THE SCHOOL COMMITTEE FOR THE CITY OF
BOSTON; ALEXANDRA OLIVER-DÁVILA;
MICHAEL O'NEILL; HARDIN COLEMAN; LORNA
RIVERA; JERI ROBINSON; QUOC TRAN;
ERNANI DEARAUJO; BRENDA CASSELLIUS,

Respondents.

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

**APPLICATION TO THE HONORABLE KETANJI BROWN JACKSON,
FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI**

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To the Honorable Ketanji Brown Jackson, Justice of the Supreme Court of the United States and Circuit Justice for the First Circuit:

Pursuant to Supreme Court Rule 13.5, Petitioner Boston Parent Coalition for Academic Excellence Corp. respectfully requests an extension of time of 30 days to file its Petition for a Writ of Certiorari in this Court up to and including April 17, 2024.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Boston Parent Coalition for Academic Excellence, Inc. v. School Committee for City of Boston*, 89 F.4th 46 (1st Cir. 2023) (attached as Exhibit 1). The judgment was issued on December 19, 2023, which means a Petition is presently due on March 18, 2024. This application for an extension for time is filed more than ten days in advance of that date.

JURISDICTION

This case arises under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983. The district court had original jurisdiction under 28 U.S.C. § 1331 and 42 U.S.C. § 1983. The Court of Appeals had appellate jurisdiction under 28 U.S.C. § 1291. This Court has jurisdiction under 28 U.S.C. § 1254(1).

REASONS FOR GRANTING EXTENSION OF TIME

Good cause exists for the requested extension. Counsel of record for Petitioner, Christopher M. Kieser, has a substantial workload that includes assisting in the preparation of a petition for a writ of certiorari in *835 Hinesburg Road, LLC v. City*

of *South Burlington*, No. 23A524, which is due March 20, 2024. Counsel also has several other obligations, including a reply brief due on March 22 in *Association for Education Fairness v. Montgomery County Board of Education*, No. 23-1068 (4th Cir.). In addition, this Court recently denied a Petition in *Coalition for TJ v. Fairfax County School Board*, No. 23-170, a case raising the same fundamental issue regarding race discrimination in K-12 schools. Justice Alito cited this case in his dissent from denial of certiorari in *Coalition for TJ* on February 20, 2024. An extension would help counsel prepare a more effective Petition in light of Justice Alito's dissent. This is Petitioner's first request for an extension.

CONCLUSION

For the foregoing reasons, Petitioner requests that this Court grant an extension of 30 days, up to and including April 17, 2024, within which to file a Petition for a Writ of Certiorari.

DATED: February 21, 2024.

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Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this application was served via email and U.S. mail to counsel listed below in accordance with Supreme Court Rules 22.2 and 29.3:

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DATED: February 21, 2024.


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