

No. 24A-____

IN THE
Supreme Court of the United States

COMMUNITY FINANCIAL SERVICES ASSOCIATION OF AMERICA LIMITED;
CONSUMER SERVICE ALLIANCE OF TEXAS,

Applicants,

v.

CONSUMER FINANCIAL PROTECTION BUREAU; ROHIT CHOPRA,

Respondents.

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

To the Honorable Samuel A. Alito, Jr., Associate Justice of the Supreme Court
and Circuit Justice for the Fifth Circuit:

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicants Community Financial Services Association of America, Limited, and Consumer Service Alliance of Texas (together, CFSA),¹ respectfully request a 60-day extension of time, up to and including April 11, 2025, to file a petition for a writ of certiorari to the United States Court of Appeals for the Fifth Circuit, seeking review of that court's June 19, 2024, decision in *CFSA v. CFPB*, 104 F.4th 930 (5th Cir. 2024) (mem.). The Fifth Circuit denied a timely petition for rehearing on November 12, 2024. The

¹ CFSA states that neither Applicant has a parent corporation, nor does any publicly held company own 10% or more of either's stock.

decision below and the order denying rehearing are attached as Appendices A and B, respectively. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254.

2. The time to file a petition for a writ of certiorari will otherwise expire on February 10, 2025—90 days from when the Fifth Circuit denied rehearing. This Application is timely because it has been filed on January 13, 2025, more than ten days prior to the date on which the time for filing is due to expire.

3. Applicant has good cause for an extension of time. This petition involves complicated and important issues relating to the scope of the remedy available under *Collins v. Yellen*, 594 U.S. 220 (2021). Given its experience and expertise in this area, Jones Day is well positioned to evaluate and prepare a petition that will assist this Court in reviewing the case and the issues presented. The quality of any petition would greatly benefit from an extension of time to allow Jones Day to further develop the arguments in this case and to complete the requisite research and writing.

4. That is especially so in light of counsel's other professional obligations, including assisting with preparations for oral argument before this Court in *FDA v. R.J. Reynolds Vapor Co.*, No. 23-1187, on January 21, 2025; preparing Plaintiffs' combined opposition to Defendants' motion for summary judgment and cross-motion for summary judgment in *R J Reynolds Tobacco Co. v. FDA*, No. 6:20-cv-176 (E.D. Tex.), due to be filed on January 27, 2025; and preparing Respondents' merits brief in *Hegar v. RJR Vapor Co.*, No. 24-0052 (Tex. Sup. Ct.), due to be filed on February 21, 2025.

WHEREFORE, Applicants respectfully request that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, to and including April 11, 2025.

January 13, 2025

Respectfully submitted,

/s/ Christian G. Vergonis

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