

IN THE
Supreme Court of the United States

MICHAEL SALAZAR,

Petitioner,

v.

PARAMOUNT GLOBAL, DBA 247SPORTS,

Respondent.

**ON PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

**MOTION FOR LEAVE TO DISPENSE WITH PREPARATION
OF A JOINT APPENDIX**

JOSHUA I. HAMMACK
Counsel of Record
BAILEY & GLASSER, LLP
1055 Thomas Jefferson Street N.W., Suite 540
Washington, DC 20007
(202) 463-2101

Counsel for Petitioner

Pursuant to Supreme Court Rule 26.8, Petitioner Michael Salazar respectfully requests leave to dispense with the requirement of filing a joint appendix in this case. Petitioner has conferred with Respondent Paramount Global, and Respondent agrees a joint appendix is not necessary here.

This case presents a purely legal question: Whether the phrase “goods or services from a video tape service provider,” as used in the VPPA’s definition of “consumer,” refers to all of a video tape service provider’s goods or services or only to its audiovisual goods or services. The lower courts resolved that question on Respondent’s motion to dismiss. Both opinions below, as well as the operative complaint, were included in the appendix to the petition for a writ of certiorari. Both parties agree no other portion of the record merits special attention such as would warrant the preparation and expense of a joint appendix. And a joint appendix would not materially assist the Court in its consideration of this case.

Accordingly, Petitioner asks this Court to grant leave to dispense with the requirement of filing a joint appendix.

Dated: February 18, 2026

Respectfully submitted,

/s/ Joshua I. Hammack
Joshua I. Hammack
Counsel of Record
Bailey & Glasser, LLP
1055 Thomas Jefferson Street N.W., Suite 540
Washington DC 20007
(202) 463-2101