

No. 26A-

IN THE
SUPREME COURT OF THE UNITED STATES

R.S., other V.H.; T.H,

Applicants,

v.

SUSAN HICKEY; REBECCA VON SAKEN, individually and in their
capacity as case workers for Lucas County Children Services

Respondents.

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

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

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March 13, 2026

**APPLICATION FOR EXTENSION OF TIME IN WHICH TO FILE A
PETITION FOR A WRIT OF CERTIORARI**

TO: The Honorable Brett M. Kavanaugh, Associate Justice of the Supreme Court of the United States and Circuit Justice for the United States Court of Appeals for the Sixth Circuit:

Pursuant to 28 U.S.C. § 2101(c) and Rule 13.5 of the Rules of this Court, Applicants R.S. and T.H. respectfully requests an extension of sixty (60) days in which to file a petition for a writ of certiorari in this case. The U.S. Court of Appeals for the Sixth Circuit issued its decision on November 18, 2025. *See R.S., et al. v. Lucas County Children Services, et al* 2025 U.S. App. LEXIS 30251; App. Exh. 1. The Sixth Circuit denied a petition for rehearing en banc on December 26, 2025. App. Exh. 2.

Absent extension, the deadline for filing a petition for writ of certiorari is March 26, 2026. With the requested extension, the petition would be due on May 25, 2026. This application is being filed at least ten days before the petition is due. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1). In support of this application, Applicant states:

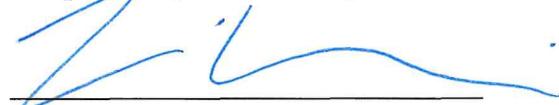
1. The petition for certiorari in this case will present a question that should be addressed to provide direction to the federal courts of appeals: whether the Sixth Circuit Court of Appeals has created an impossible standard for a civil plaintiff to meet for a claim under 42 U.S.C. § 1983 based on the deliberate indifference by a social worker who places children in an unsafe home where they were sexually abused.

2. This case presents an important question for federal courts. As a result, there is a reasonable prospect that this Court will grant the petition, such that it warrants additional time for these important questions to be fully addressed.

3. Applicant's counsel is working diligently to prepare the petition, but need additional time to research, complete, print, and file Applicant's petition. Of note, the undersigned had to prepare for a civil jury trial in April 2026.

4. In light of these obligations, Applicant's counsel would face significant challenges completing the petition by the current due date. For these reasons, Applicant requests that this Court grant an extension of sixty (60) days to and including May 25, 2026, within which to file a petition for a writ of certiorari in this case.

Respectfully submitted,



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