

IN THE SUPREME COURT OF THE UNITED STATES

No. A-_____

Samsung SDI Co., Ltd.,
Applicant

v.

Shawn Peters

APPLICATION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI
TO THE COURT OF APPEALS OF MINNESOTA

To the Honorable Brett M. Kavanaugh, Circuit Justice:

Pursuant to 28 U.S.C. § 2101(c) and Rules 13.5, 22, and 30 of this Court, Applicant Samsung SDI Co., Ltd.,¹ respectfully requests a 30-day extension of time, to and including April 30, 2026, in which to file a petition for a writ of certiorari. This application is timely because it is made at least ten days before the petition would be due. No prior application has been made in this case. In support of this request, Applicant states:

1. The Minnesota Court of Appeals issued its decision on October 13, 2025 (App., infra, 1a-21a), and its final judgment on December 31, 2025 (App., infra, 22a-23a). The Minnesota Supreme

¹ Applicant Samsung SDI Co., Ltd. (KRX: 006400, 006405) has no parent corporation. One company, Samsung Electronics Co., Ltd. (KRX: 005930, 005935), owns approximately 19% of its stock.

Court denied Applicant's petition for review on December 31, 2025. App., infra, 24a. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1257(a).

2. There is a recognized split among lower courts about how to apply the "relatedness" test described in Ford Motor Company v. Montana Eighth Judicial District Court, 592 U.S. 351 (2021), to identical fact patterns. The cases comprising the split all involve foreign manufacturers that sell sealed packs of 18650 lithium-ion battery cells to preapproved corporate clients in the United States. The plaintiff in each case is an individual consumer who has sustained injuries after purchasing a battery cell from an unauthorized third-party vape retailer.

3. The decision below is part of that split. The court below held that it had specific personal jurisdiction over Applicant. It asserted that Applicant's contacts with three sophisticated corporate manufacturers in Minnesota were sufficiently "related" to the plaintiff-consumer's injury stemming from a standalone battery acquired through distribution channels that Applicant had neither authorized nor participated in. The court below expressly disagreed with decisions of two federal courts of appeals. See App., infra, 18a n.11.

4. On March 16, 2026, a petition for a writ of certiorari was filed seeking review of the Fifth Circuit's decision in Ethridge v. Samsung SDI Co., Ltd., 163 F.4th 136 (5th Cir. 2025).

See Petition for a Writ of Certiorari, Ethridge v. Samsung SDI Co., Ltd., No. 26-__ (filed Mar. 16, 2026). Counsel for the undersigned represents Samsung SDI Co., Ltd., in that proceeding. The petition in Ethridge asks this Court to resolve a split that could also be asserted as a ground for certiorari in this case. The petition (at 16) cites and endorses the decision of the Minnesota Court of Appeals in this case.

5. There is good cause for the requested extension. Counsel for the undersigned, and their client, require additional time to decide whether to petition in this case and to coordinate the response to the petition for a writ of certiorari in Ethridge with a possible petition for a writ of certiorari in the case below. Counsel for the undersigned also have a brief due in Marshall v. The Procter & Gamble Co., No. 25-6162 (9th Cir.), on March 25, 2026; and will participate in court-ordered joint evidence inspections conducted by the U.S. Department of Justice on April 2-3, 2026, and on April 13-20, 2026.

For the foregoing reasons, Applicant requests that the time for filing a petition for a writ of certiorari in this case be extended by 30 days, to and including April 30, 2026.

Respectfully submitted.

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