

No. \_\_\_\_\_

**In the  
Supreme Court of the United States**

STANDWITHUS CENTER FOR LEGAL JUSTICE, ET AL.,

*Applicants,*

v.

MASSACHUSETTS INSTITUTE OF TECHNOLOGY,

*Respondent.*

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UNOPPOSED APPLICATION DIRECTED TO THE HONORABLE KETANJI  
BROWN JACKSON FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE A  
PETITION FOR A WRIT OF CERTIORARI TO THE U.S. COURT OF APPEALS  
FOR THE FIRST CIRCUIT

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To: The Honorable Ketanji Brown Jackson, Associate Justice  
of the Supreme Court of the United States:

Pursuant to 28 U.S.C. § 2101(c) and Supreme Court Rules 13.5, 22, and 30.2, Applicants StandWithUs Center for Legal Justice, Katerina Boukin, and Marilyn Meyers (together, “Applicants”) respectfully request a 58-day extension of time, to and including Thursday, June 18, 2026, within which to file a petition for a writ of certiorari to review the judgment of the U.S. Court of Appeals for the First Circuit in the above-captioned case. This request for a 58-day extension of time is unopposed; all Parties have been contacted and have stated that they do not oppose this request.

The First Circuit entered its Opinion and Judgment on October 21, 2025. *See* App. A (Opinion); App. B (Judgment); *StandWithUs Ctr. for Legal Just. v. Mass. Inst. of Tech.*, 158 F.4th 1 (1st Cir. 2025). Applicants timely filed a petition for rehearing and/or rehearing en banc, which the First Circuit denied on January 21, 2026. *See* App. C. Without an extension, the time for filing a petition for a writ of certiorari will expire on Tuesday, April 21, 2026. *See* Sup. Ct. R. 13.3. This Application is being filed more than ten days before that date. *See* Sup. Ct. R. 13.5, 30.2. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1254(1).

### **Background**

This case arises out of Jewish students’ experiences at the Massachusetts Institute of Technology (“MIT”) in the wake of the October 7, 2023 Hamas terrorist attacks. Applicants Katerina Boukin and Marilyn Meyers—each a Jewish MIT student—and StandWithUs Center for Legal Justice—a tax-exempt membership organization that includes Jewish and Israeli MIT students and alumni—sued MIT

under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d (“Title VI”), alleging, in relevant part, that MIT was deliberately indifferent to the severe and pervasive hostile antisemitic environment they faced on campus. *See* App. A. Applicants also brought claims under 42 U.S.C. § 1986 and for common-law negligence and breach of contract. The U.S. District Court for the District of Massachusetts dismissed the federal claims for failure to state a claim and declined to exercise supplemental jurisdiction over the remaining state claims. *See StandWithUs Ctr. for Legal Just. v. Massachusetts Inst. of Tech.*, 742 F. Supp. 3d 133 (D. Mass. 2024).

Applicants appealed to the First Circuit, and on October 21, 2025, the court affirmed the district court’s dismissal. *See* App. A. Applicants timely filed a petition for rehearing and/or rehearing en banc, which the court denied on January 21, 2026. *See* App. C. Applicants intend to petition this Court for a writ of certiorari and have recently engaged new counsel to assist in doing so. Applicants now respectfully request a 58-day extension, to and including Thursday, June 18, 2026, of the time to file the petition for a writ of certiorari.

### **Reasons for Granting an Extension of Time**

Applicants’ request for a 58-day extension is warranted for three reasons:

*First*, an extension will allow Applicants’ new counsel to become fully acquainted with the robust legal and factual background of this case. This case involves complex issues that require a deep understanding of the factual record, constitutional law, and federal civil rights law, particularly due to the First Circuit’s wide-ranging holding regarding the interplay between the First Amendment and

Title VI. *See* App. A, at 18–41. Applicants’ new counsel have only recently been engaged, and require additional time to conduct the necessary research to ensure that all issues are appropriately raised in the petition for a writ of certiorari.

*Second*, an extension will not cause undue delay or prejudice any Party. The First Circuit denied Applicants’ petition for rehearing and/or rehearing en banc on January 21, 2026, *see* App. C, and this case has not been subject to any ongoing proceedings since January 29, 2026, when the First Circuit denied Applicants’ motion to stay issuance of the mandate. Moreover, this request is unopposed by all Parties.

*Third*, this Court may likely grant the petition for a writ of certiorari. Among other reasons, this case raises substantial issues regarding constitutional law and civil rights, and the First Circuit’s decision conflicts with decades of both First Amendment and civil rights jurisprudence, as well as with the growing body of other federal court decisions regarding similar issues. An extension will grant Applicants’ new counsel more time to fully articulate these issues for this Court’s eventual review.

### **Conclusion**

Applicants respectfully request that the time to file a petition for a writ of certiorari in the above-captioned matter be extended by 58 days, to and including June 18, 2026.

Dated this 27th day of March 2026.

Respectfully submitted,

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**CORPORATE DISCLOSURE STATEMENT**

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StandWithUs Center for Legal Justice certifies that it is a tax-exempt membership organization with no parent corporation and that no public company owns any interest in it. Katerina Boukin and Marilyn Meyers certify that they are natural persons.