

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

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**IN THE  
SUPREME COURT OF THE UNITED STATES**

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KATHERINE NOVOTNY, ET AL.,  
*Applicant,*

v.

WESLEY MOORE, ET AL.,  
*Respondent,*

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SUSANNAH KIPKE, ET AL.,  
*Applicant,*

v.

WESLEY MOORE, ET AL.,  
*Respondent,*

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On Application for an Extension of Time Within Which  
To File a Petition for Writ of Certiorari to the  
United States Court of Appeals for the Fourth Circuit

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**APPLICATION TO THE HON. JOHN G. ROBERTS, JR. FOR  
AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION  
FOR WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE FOURTH CIRCUIT**

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**PARTIES TO THE PROCEEDING, CORPORATE DISCLOSURE STATEMENT,  
AND RELATED PROCEEDINGS**

Applicants are Katherine Novotny, Sue Burke, Esther Rossberg, Maryland Shall Issue, Inc., Second Amendment Foundation, and Firearms Policy Coalition, jointly with Applicants Susannah Warner Kipke and Maryland State Rifle and Pistol Association. Respondents are Wes Moore, Governor of Maryland, Roland L. Butler, Maryland State Policy Superintendent and Secretary, Joshua Kurtz, Secretary of Natural Resources, Alison M. Healey, States Attorney for Hartford County, Maryland, Scott D. Shellenberger, States Attorney for Baltimore County Maryland, Ivan J. Bates States Attorney for Baltimore City, Maryland, Col. Roland L. Butler, Jr., Superintendent of Maryland State Police, and Paul J. Wiedefeld, Secretary of Transportation.

Per Supreme Court Rule 29, Maryland Shall Issue, Inc., Second Amendment Foundation, Firearms Policy Coalition, and Maryland State Rifle and Pistol Association, have no parent corporation and no publicly held company owns 10% or more of its stock. There are no related proceedings.

*To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the Fourth Circuit:*

Petitioners Katherine Novotny, Sue Burke, Esther Rossberg, Maryland Shall Issue, Inc., Second Amendment Foundation, and Firearms Policy Coalition, jointly with Petitioners Susannah Warner Kipke and Maryland State Rifle and Pistol Association hereby respectfully move, pursuant to Rule 13(5) of the Rules of this Court, for a 30-day extension of time in which to file a petition for writ of certiorari to and including May 20, 2025. A panel of the United States Court of Appeals for the Fourth Circuit issued a decision in these consolidated cases dated January 20, 2026 (Appendix A). This Court has jurisdiction under 28 U.S.C. §1254(1).

1. The date on which a petition for a writ of certiorari would be due, if not extended, is April 20, 2026. This motion is timely as it is being filed at least 10 days in advance of that deadline.

2. This case presents substantial legal issues regarding the constitutionality of sweeping restrictions on the public locations where Maryland forbids the carrying of firearms for self-defense. Petitioners are two groups of Plaintiffs who filed separate, but overlapping, challenges to Maryland's locational restrictions.

3. Petitioners' counsel face a press of other deadlines and professional obligations, including briefing and discovery deadlines in *New York State Rifle & Pistol Association v. James*, No. 1:22-cv-907 (N.D.N.Y) (April 17, 2026), a briefing deadline in *Granata v. Campbell*, No. 25-1918 (1st Cir.) (April 15, 2026), and depositions in *Harris v. Carlson*, No. 4:24-cv-737 (E.D. Tex.) (April 13 and 17, 2026).

4. Moreover, Petitioners' counsel intend to file a single petition for a writ of certiorari for consideration by this Court, covering both of their cases. Doing so, Petitioners submit, will

streamline the consideration of these complex issues by the Court. However, to accommodate the distinct claims and overlapping issues presented by the separate cases, and to coordinate among multiple parties interested in the petition, Petitioners' counsel would benefit from additional time to prepare an appropriate petition.

5. The Fourth Circuit stayed the mandate in this case on March 2, 2026 (Appendix B), so the status quo in this case has been unchanged since the district court entered its preliminary injunction (which it later converted into a final injunction) on September 29, 2023. A 30-day extension will not disturb the status quo, as Petitioners will notify the Fourth Circuit clerk of the extension if granted. *See* FED. R. APP. P. 41(d)(2)(B)(i).

Dated: April 10, 2026

Respectfully submitted,



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