

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

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

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CLEMENTE PROPERTIES, INC.; 21 IN RIGHT, INC.; ROBERTO CLEMENTE,  
JR.; LUIS ROBERTO CLEMENTE; ROBERTO ENRIQUE CLEMENTE,

*Petitioners,*

v.

HON. PEDRO R. PIERLUISI-URRUTIA, Governor of Puerto Rico, in his official and individual capacity and as representative of the Commonwealth of Puerto Rico; THE COMMONWEALTH OF PUERTO RICO; EILEEN M. VÉLEZ-VEGA, Secretary of the Department of Transportation and Public Works, in her official and individual capacity; FRANCISCO PARÉS ALICEA, Secretary of the Department of the Treasury, in his official and individual capacity; RAY J. QUINOÑES-VÁZQUEZ, Secretary of the Department of Sports and Recreation, in his official and individual capacity; PUERTO RICO CONVENTION CENTER DISTRICT AUTHORITY,

*Respondents.*

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

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**Application to the Honorable Ketanji Brown Jackson for an Extension of  
Time to File Petition For A Writ of Certiorari**

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## **CORPORATE DISCLOSURE STATEMENT**

Pursuant to Supreme Court Rule 29.6, Petitioners certify that they have no parent corporations and no publicly held company owns 10% or more stock in Petitioners.

To the Honorable Ketanji Brown Jackson, Associate Justice of the Supreme Court of the United States and Circuit Justice for the First Circuit:

Pursuant to Supreme Court Rule 13.5, Petitioners Clemente Properties, Inc., 21 In Right, Inc., Roberto Clemente, Jr., Luis Roberto Clemente, and Roberto Enrique Clemente respectfully request a 30-day extension of time, up to and including June 25, 2026, within which to file a petition for a writ of certiorari to review the judgment of the United States Court of Appeals for the First Circuit.

### **JUDGMENT FOR WHICH REVIEW IS SOUGHT**

The judgment for which review is sought is *Clemente Props., Inc. v. Pierluisi-Urrutia*, 165 F.4th 1 (1st Cir. 2026) (attached as Exhibit 1). On February 25, 2026, the First Circuit issued an order denying a petition for panel rehearing and for rehearing en banc filed by Respondents Pedro R. Pierluisi-Urrutia, Eileen M. Vélez-Vega, Francisco Parés Alicea, and Ray J. Quiñones-Vázquez in their individual capacities (attached as Exhibit 2). Absent an extension, the petition for a writ of certiorari would be due on May 26, 2026. This application is being filed more than ten days before the current due date. *See* Sup. Ct. R. 13.5.

### **JURISDICTION**

This Court has jurisdiction under 28 U.S.C. § 1254(1), as the petition seeks review of a judgment rendered by the United States Court of Appeals for the First Circuit.

## REASONS FOR GRANTING EXTENSION

Good cause exists for the requested extension. This case involves a multitude of important and complex issues including (1) whether Puerto Rico is entitled to sovereign immunity, (2) whether the Lanham Act abrogates any immunity that Puerto Rico might have, and (3) whether the government's appropriation of intangible property constitutes a per se taking under the Fifth Amendment to the United States Constitution.

In addition, Petitioners' counsel of record has been on parental leave during much of the briefing period and, during that time, has (in addition to this case) devoted time to several other cases, including a petition for certiorari in this Court in *Bethlehem Manor Village, LLC v. Donchez*, 25-1200 (filed Apr. 13, 2026) and the complaint in *ExoticRidge Crypto Company, LLC v. Hawkins County*, 26-cv-64 (E.D. Tenn., filed Mar. 31, 2026). This is Petitioners' first request for an extension. The extension would not result in any prejudice to any of the parties in this case and would allow counsel to prepare a thorough petition for this Court's review.

## CONCLUSION

For the foregoing reasons, Petitioners respectfully request that this Court grant a 30-day extension of time, up to and including June 25, 2026, within which to file a petition for a writ of certiorari.

DATED: May 7, 2026

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Respectfully submitted,

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## CERTIFICATE OF SERVICE

A copy of this application was served via email and U.S. mail to counsel listed below in accordance with Supreme Court Rules 22.2 and 29.3:

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DATED: May 7, 2026.

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