

IN THE

Supreme Court of the United States

JASVINDER SINGH, *et al.*,

Applicants,

v.

THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF WASHOE, *et al.*,

Respondents.

**Application for Extension of Time Within
Which to File a Petition for a Writ of Certiorari to
the Supreme Court of Nevada**

**APPLICATION TO THE HONORABLE
JUSTICE ELENA KAGAN, AS CIRCUIT JUSTICE**

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May 20, 2026

APPLICATION FOR EXTENSION OF TIME

Under this Court's Rule 13.5, Applicants Jasvinder Singh, Kuldeep Singh Ghuman, Nachhater Singh, Divinder Chawla, Gurmail Singh, Jaswinder Singh Dhani, Parmjit Singh, and Sarvpreet Singh Bains, respectfully request a 30-day extension of time within which to file a petition for a writ of certiorari, to and including July 31, 2026.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Singh v. Second Judicial District Circuit in & for County of Washoe*, 586 P.3d 858 (Nev. 2026) (attached as Exhibit 1).

JURISDICTION

This Court will have jurisdiction over any timely petition under 28 U.S.C. § 1257 and *Cox Broadcasting Corp. v. Cohn*, 420 U.S. 469 (1975). The Supreme Court of Nevada issued its judgment on April 2, 2026. In accordance with Rule 13.5, this application is being filed more than 10 days before the current due date of July 1, 2026.

REASONS JUSTIFYING AN EXTENSION OF TIME

1. This case presents an important constitutional question that has split the lower courts. The church-autonomy doctrine, rooted in the Free Exercise and Establishment Clauses, bars courts from intervening in internal church disputes involving matters of faith, doctrine, church governance, and polity. See *Kedroff v. St. Nicholas Cathedral*, 344 U.S. 94, 116–17 (1952). This Court has recognized an exception to that doctrine for real-property disputes that can be resolved entirely through secular, neutral legal principles. See *Presbyterian Church in U.S. v. Mary Elizabeth Blue Hull Mem'l Presbyterian Church*, 393 U.S. 440, 441–43 (1969). But

lower courts have split on a key follow-on question: Whether the “neutral principles” exception applies not just to property cases, but to *all* disputes involving religious organizations.

This case concerns a challenge by some members of the Northern Nevada Sikh Society to a decision by elected Society leaders (Applicants here) to transfer the Society’s Temple into a trust for the congregation’s benefit. Ex. 1 at 2. The challengers sued under state law, asserting violations of the Society’s bylaws. In response, Applicants moved to dismiss the claims based on the church-autonomy doctrine (sometimes called the ecclesiastical abstention doctrine). See *id.*

The Nevada courts, however, rejected their arguments. The trial court refused to dismiss the case and the Supreme Court of Nevada affirmed. The state high court held that—“absent Supreme Court authority holding otherwise”—“the neutral-principles exception applies beyond the context of church property ownership disputes, so long as the court applying neutral principles can do so ‘without resolving underlying controversies over religious doctrine.’” *Id.* at 12 (citation omitted). The Nevada court acknowledged that other courts “are split as to whether the neutral-principles exception” extends beyond property disputes. *Id.* at 10.

Indeed, many other appellate courts disagree with the Supreme Court of Nevada’s conclusion. See *McRaney v. N. Am. Mission Bd.*, 157 F.4th 627, 648 (5th Cir. 2025) (noting that the neutral-principles exception is “very clearly limited ... to property-dispute cases” and is “not some freestanding exception”); *Hutchison v. Thomas*, 789 F.2d 392, 396 (6th Cir. 1986) (exception “applies only to cases involv-

ing disputes over church property”); *Crowder v. S. Baptist Convention*, 828 F.2d 718, 722, 725–26 (11th Cir. 1987) (A state’s interest in adjudicating ecclesiastical disputes “is substantially diminished where the controversy does not concern formal title to property.”); *In re Diocese of Lubbock*, 624 S.W.3d 506, 515–16 (Tex. 2021) (refusing to apply exception to defamation dispute); *El-Farra v. Sayyed*, 226 S.W.3d 792, 795–96 (Ark. 2006) (recognizing the “narrow exception” applies “only with regard to real-property disputes”); *Bruss v. Przybylo*, 895 N.E.2d 1102, 1125 (Ill. App. Ct. 2008) (“Because there are no clear signs ... that a neutral principles analysis is applicable beyond property cases, we believe it best to err on the side of expanding rather than restricting first amendment protection.”); *Turner v. Tri-Cnty. Baptist Church of Cincinnati*, 122 N.E.3d 603, 606 (Ohio App. 2018) (“[T]he ‘neutral principles’ exception to the ecclesiastical abstention doctrine applies only to cases involving church property.”) (citation and internal marks omitted).

2. An extension is warranted to allow counsel time to coordinate and prepare a petition that will aid the Court’s review of these issues. Applicants have asked the Carter G. Phillips/Sidley Austin LLP Supreme Court Clinic at Northwestern Pritzker School of Law to help prepare the petition. During the initial weeks following the decision below, the Clinic students were preparing for and taking final exams. Now that the school year is over, the Clinic has no students. An extension will thus provide necessary time for Sidley Austin attorneys and summer associates to develop a cogent and well-researched petition.

An extension is also warranted because of the press of counsel's other client business. The Clinic is also responsible for forthcoming cert-stage reply briefs in *Busby v. Mississippi*, No. 25-6885, and *Pheasant v. United States*, No. 25-6911, and forthcoming petitions for certiorari in *Watkins v. United States*, No. 23-6210 (10th Cir.), and *McHenry v. United States*, No. 24-7048 (10th Cir.). In addition, undersigned counsel is presenting oral argument on June 9 in *Union Pacific Railroad v. Surface Transportation Board*, No. 25-2919 (8th Cir.), and is responsible for opening appellate briefs in *Commuter Rail Division of the Regional Transportation Authority v. Union Pacific Railroad*, No. 1-26-0612 (Ill. App.), and *Brightline Trains Florida LLC v. National Mediation Board*, No. 26-11487 (11th Cir.), both currently due in early July.

CONCLUSION

For these reasons, Applicants respectfully request a 30-day extension of time within which to file a petition for a writ of certiorari, to and including July 31, 2026.

Respectfully submitted,

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