

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Whispering Oaks Residential Care Facility LLC, Whispering Oaks
RCF Management Co Inc., and Naren Chaganti,

Applicants,

v.

Travelers Property Casualty Company of America, and Joseph
Tancredy,

Respondents

On Application for an Extension of Time to File Petition for a Writ of Certiorari to
the Court of Appeal for the State of California, Sixth Appellate District

**PETITIONERS' APPLICATION TO EXTEND TIME TO FILE PETITION
FOR A WRIT OF CERTIORARI**

Naren Chaganti
713 The Hamptons Ln
Town & Country, MO 63017
Naren@Chaganti.com
650-248-7011

Counsel for Applicants

Rule 29.6 Disclosure Statement

Applicants Whispering Oaks Residential Care Facility LLC and Whispering Oaks RCF Management Co Inc are privately held corporations with no parent corporation and no publicly held company owns 10% or more of either entity's corporate stock.

APPLICATION FOR AN EXTENSION OF TIME

To the Honorable Elena Kagan, Associate Justice of the United States Supreme Court and Circuit Justice for the Ninth Circuit:

Pursuant to this Court's Rules 13.5, 22, 30.2, and 30.3, Applicants Whispering Oaks Residential Care Facility LLC, Whispering Oaks RCF Management Co Inc., and Naren Chaganti, respectfully request that the time to file their Petition for Writ of Certiorari in this matter be extended for 60 days up to and including August 22, 2026.

The California Court of Appeal issued its decision on December 12, 2025. (Ex. A) The California Supreme Court denied a timely petition for review on March 25, 2026. (Ex. B). This Court's jurisdiction is invoked under 28 U.S.C. § 1257(a).

Absent an extension of time, a Petition for Writ of Certiorari to the California Court of Appeal would be due on June 23, 2026. This Application is filed more than ten days before the date the Petition would be due. See S. Ct. R. 13.5.

Applicants sought and obtained a statement of non-opposition to the Application from the respondents' counsel.

Background of the Case

This is an insurance coverage dispute. Applicants are additional insureds with respect to a liability insurance policy that insured risk in Missouri, where the underlying liability occurred and the additional insureds' claim against the insurer arose. The insurer failed to give a copy of the policy to the Applicants and hence they were unaware that they were covered by the policy as additional insureds. The insurer failed to defend the Applicants when they faced third party claims. Years later, upon discovery of the policy, Applicants filed suit in California alleging that the insurer breached its duty to defend.

The California trial court, ignoring that Missouri substantive law applied to the dispute, granted summary judgment to the insurer, which argued that certain obsolete provisions of California law absolved it of liability from the duty to defend.

On appeal, the California court of appeal failed to determine which state's law—the law of the forum state or the law of the state where the claim arose—applied to the key issues in this dispute. Instead, it applied, on the same issue, a selection of statements from each state's law. This charted a novel and unprecedented approach. It adopted an eclectic approach that cherry-picks provisions from multiple conflicting jurisdictions on the same issue, which is not only utterly confusing, but also against the U.S. Constitution's Due Process and Full Faith and Credit clauses.

The practice adopted by the California court of appeal fosters forum shopping and manipulation, resulting in confusion and delivering injustice by permitting selective application of various legal regimes. In the interest of consistency, and predictability, Applicants will argue that this Court should reaffirm that due process requires adoption of a definitive framework for resolving choice-of-law questions in contract disputes where the contracts do not provide governing law clauses.

The California Supreme Court denied a timely petition for review. (Ex. B)

Reasons for Granting an Extension of Time

The time to file a Petition for a Writ of Certiorari should be extended for 60 days because (1) the issue to be presented to the Court requires careful analysis and presentment of the due process issues raised by the decision below, which requires substantial additional research of contemporaneous developments in the law of due process; and (2) the undersigned is facing health issues which adversely impacted his ability to complete the petition in time. Applicants

therefore request an extension of time in order to research the relevant legal issues and prepare a petition that fully addresses the important and far-reaching issues raised by the decision below and frames those issues in a manner that will be most helpful to the Court.

Therefore, Applicants hereby request that an extension of time to and including August 22, 2026, be granted within which applicant may file a petition for writ of certiorari.

Respectfully submitted,

Dated: June 10, 2026

/s/ Naren Chaganti
Naren Chaganti, Counsel for Applicants

Certificate of Service

I certify under penalty of perjury of the laws of the United States that pursuant to Supreme Court Rules 22.2 and 29.3, on the date shown below, a copy of this Application was served upon counsel for respondents via e-mail to aagness@westonagnesslaw.com.

Respondents' Counsel's contact information is:

Aaron C. Agness
Weston & Agness LLP
1960 E. Grand Ave., Suite 811
El Segundo, CA 90245
aagness@westonagnesslaw.com
(213) 596-8029 Telephone
(213) 596-8039 Facsimile

Dated: June 10, 2026

/s/ Naren Chaganti
Naren Chaganti, Counsel for Applicants