

No.

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

**MADELYN MARINA QUIROZ; MARINA  
NAOMI HERNANDEZ QUIROZ, *Petitioners,***

**V.**

**EDUARDO HERNANDEZ; CITY OF DAYTON;  
THEO MELANCON, CITY OF DAYTON, CITY  
MANAGER; DICKENSON CITY MANAGER;  
ROBERT VINE, DAYTON CITY POLICE  
CHIEF; JOHN D. COLEMAN, DAYTON CITY  
POLICE CAPTAIN; TERRI HUGHES,  
CRIMINAL INVESTIGATION DIVISION  
LIEUTENANT, DAYTON CITY; CAROLINE  
WADZECK; KRISTEN SEIBERT; CITY OF  
DAYTON FIRE DEPARTMENT; MURPHY  
GREEN; JENNIFER BERGMAN HARKNESS,  
LIBERTY COUNTY DISTRICT ATTORNEY;  
MATTHEW POSTON, LIBERTY COUNTY  
ATTORNEY; MATTHEW SALDANA; CITY OF  
LIBERTY, TEXAS; KATELYN GRIMES;  
ALLEGIANCE MOBILE HEALTH MEDICAL  
SERVICE; STEVE SMITH; RAMJI LAW  
GROUP; JAMEY WAYNE BICE, ALSO KNOWN  
AS JAIME BICE, ALSO KNOWN AS JAMES  
BICE, ALSO KNOWN AS JAMEY BICE;  
STEPHANIE LEE BLUM BICE; MORGAN  
SKYE WHITE; UNION PACIFIC RAILROAD  
COMPANY; ADAM RAMJI, *Respondents.***

**MOTION FOR EXTENSION OF TIME  
TO FILE PETITION FOR A WRIT OF  
CERTIORARI**

**U.A. LEWIS**

**COUNSEL OF RECORD**

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**COUNSEL FOR PETITIONERS**

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**APPLICATION FOR EXTENSION OF TIME**  
**TO FILE PETITION FOR A WRIT OF**  
**CERTIORARI**

To the Honorable Chief Justice and the Associate Justices of the Supreme Court of the United States:

Pursuant to Rule 13.5 of the Rules of this Court, Petitioners Madelyn Marina Quiroz and Marina Naomi Hernandez Quiroz, respectfully requests a 60-day extension of time, or the time this Honorable Court will allow, to and including August 15, 2026, within which to file a petition for a writ of certiorari in this matter. The petition is currently due on June 15, 2026. This is Petitioners' first request for an extension of time.

The requested extension is necessary to allow Petitioners sufficient time to secure specialized Supreme Court counsel and to finalize the petition for a writ of certiorari. Additional time is required to complete the preparation of the extensive appendix, manage the technical requirements of printing booklets in compliance with Court rules, and thoroughly address the complex legal issues arising from the underlying litigation. These issues

include intricate civil rights claims and questions regarding the application of statutes of limitations to the various parties involved. Given the breadth of the respondent list, which includes numerous municipal entities, law enforcement officials, and private corporations, additional time is essential to ensure all arguments are properly developed and presented.

The Undersigned, Trial and Appellate, counsel conferred by email with counsel for Respondents, on May 15, 2026, on behalf, Petitioners Marina Hernandez Quiroz which all have indicated they opposed the extension. Petitioners Marina Hernandez Quiroz files a version of the petition in the alternative in the event the motion is denied.

WHEREFORE, Petitioners respectfully request that the time to file a petition for a writ of certiorari in this matter be extended by 60 days, to and including August 15, 2026.

U.A. Lewis  
*Counsel of Record for Petitioners*