

In the
Supreme Court of the United States

Real Estate Exchange, Inc.,
a Delaware corporation,
Applicant,
v.

Zillow Group, Inc., a Washington corporation;
National Association of Realtors.

**Unopposed Application for a Further Extension of Time
to File a Petition for a Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit**

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

Charles R. Flores
Counsel of Record
Flores Law PLLC
917 Franklin Street, Suite 600
Houston, Texas 77002
(713) 364-6640
cf@chadflores.law

To the Honorable Elena Kagan, Circuit Justice for the United States Court of Appeals for the Ninth Circuit:

**Unopposed Application for a Further Extension of Time to File a
Petition for a Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit**

Pursuant to Supreme Court Rules 13.5 and 30, counsel for applicant Real Estate Exchange, Inc. respectfully requests a further 30-day extension of time to petition for a writ of certiorari in this matter, to and including September 15, 2025. The judgment to be reviewed is of the United States Court of Appeals for the Ninth Circuit, which entered its decision on March 3, 2025, and denied a timely petition for rehearing on April 16, 2025. Unless extended, the time to file a petition for a writ of certiorari will expire on August 15, 2025. 28 U.S.C. § 1254(1) gives the Court jurisdiction. This Application is filed less than 10 days before the current deadline due to counsel’s unforeseen obligations regarding urgent family health matters.

Reasons for Granting an Extension

A 30-day extension of time is necessary and appropriate for the Applicants to prepare and file any petition for writ of certiorari. The request is unopposed.

1. This case presents important, recurring, and divisive questions about antitrust law. At issue are questions of whether a dominant national trade association may avoid liability under Section 1 of the Sherman Act by promulgating a facially anticompetitive rule—here, a no-commingling rule that suppresses competition from innovative market entrants—but delegating enforcement to local surrogates and relying on private platforms to implement it.

2. Applicants retained undersigned counsel for the purposes of filing a petition for certiorari. An extension will permit counsel to prepare a petition that best presents this case's important questions for this Court's consideration. Counsel is also engaged in other important representations¹ and will need to continue balancing commitments until the petition is filed. The other parties consent to the extension.

Conclusion

The Applicants' request for a 30-day extension of time to petition for a writ of certiorari in this matter should be granted to and including September 15, 2025.

August 12, 2025

Respectfully submitted,



Charles R. Flores

Counsel of Record

Flores Law PLLC

917 Franklin Street, Suite 600

Houston, Texas 77002

(713) 364-6640

cf@chadflores.law

¹ The other representations include (1) in *Krell et al. v. American Bureau of Shipping et al.*, No. 24-20438 (5th Cir.), appellate briefing and preparation for oral argument, (2) in *Megalomedia Inc. et al., v. Philadelphia Indemnity Insurance Co.*, No. 23-20570 (5th Cir.), remanded district court proceedings for jurisdictional findings and preparation for oral argument, (3) in *United States v. Jones et al.*, No. 2:24-cr-20070-DDC-TJJ (D. Kan.), briefing of discovery motions regarding abrogation of attorney-client privileges, (4) in *VanDerStok v. Bondi*, No. 4:22-cv-00691-O (N.D. Tex.), proceedings on a motion for a preliminary injunction, (5) in *Larosiére v. Wilson*, No. 6:24-cv-1629 (M.D. Fla.), proceedings on a motion to dismiss and discovery motions, (6) in *Webber v. Home Depot U.S.A., Inc.*, No. 7:25-cv-00095 (S.D. Tex.), proceedings on a motion to remand, (7) in *Defense Distributed v. YouTube, LLC*, No. 25-BC03B-000 (Tex. Bus. Ct. [3rd Div.]), proceedings for injunctive relief, and (8) in *Nevada Department of Business and Industry v. Mansour*, No. 85521 (Nev.), preparation of a petition for a writ of certiorari in this Court.