

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

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UPSOLVE, INC., and  
REV. JOHN UDO-OKON,

*Applicants,*

v.

LETITIA JAMES, in her official capacity as Attorney General of New York,

*Respondent,*

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On Application for Extension of Time

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**APPLICATION FOR FURTHER EXTENSION OF TIME TO FILE A  
PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE SECOND CIRCUIT**

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December 10, 2025

To the Honorable Sonia Sotomayor, as Circuit Justice for the United States Court of Appeals for the Second Circuit:

Applicants respectfully request pursuant to Supreme Court Rule 13.5 that the time to file a Petition for Certiorari in this matter be extended by an additional 30 days, up to and including February 6, 2026. That extension will be within the 60-day limit imposed by Rule 13.5.

On September 9, 2025, the United States Court of Appeals entered an opinion and judgment vacating the district court's preliminary injunction in this case. On September 29, 2025, Applicants filed a first application for a 30-day extension of time within which to file a petition for a writ of certiorari. Justice Sotomayor granted that application on October 5, 2025.

Absent an extension, the petition in this matter would currently be due on January 7, 2026. This application is being filed more than 10 days in advance of that date.

As explained in the prior application, this case concerns a challenge to New York's prohibition on non-lawyers giving any spoken, one-on-one advice about an individual's legal rights. The Second Circuit held that this restriction on speech was not content-based because earlier circuit precedent holds that speech restrictions based on the speech's "particular purpose, focus, and circumstance" are categorically content-neutral and therefore subject only to intermediate scrutiny. Slip op. 20–21. In addition to splitting from other circuits to have considered the question, this

holding implicates the free-speech questions at issue in *Chiles v. Salazar*, No. 23-539, currently pending on this Court's merits docket.



Since the original application, undersigned pro bono counsel have encountered unexpected demands in other matters and other courts that have interfered with the timely preparation of the petition. Those include briefing in the Southern District of New York, a trial setting in New Jersey for January 2026, and an amicus brief to be filed in this Court also in January 2026. As a result, Applicants respectfully request that an order be entered extending the time to file a petition for a writ of certiorari, to and including February 6, 2026.

### Conclusion

Applicants request that the time to file a petition for a writ of certiorari in this case be further extended by 30 days, to and including February 6, 2026.

Dated this 10th day of December, 2025.

Respectfully submitted,



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