

NO. _____

IN THE
SUPREME COURT OF THE UNITED STATES

STANLEY KAPPELL WATSON,

Petitioner,

v.

SHENEKKA BRADSHER,
ZARINAH ALI,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Eleventh Circuit

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

Elizabeth A. Falconer
Gregory M. Taube
Nelson Mullins Riley & Scarborough LLP
201 17th Street N.W., Suite 1700
Atlanta, Georgia 30363
T: (404) 322-6000
F: (404) 322-6050

Pro Bono Counsel of Record for Petitioner

To the Honorable Clarence Thomas, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Eleventh Circuit:

Petitioner STANLEY KAPPELL WATSON prays for a 60-day extension of time, to and including Friday, January 2, 2026, in which to file a petition for a writ of certiorari. In support of this request, Mr. Watson states as follows:

1. On August 4, 2025, the United States Court of Appeals for the Eleventh Circuit affirmed the judgments of the district court in favor of Ali and Bradsher. (Attachment A.)

2. Mr. Watson has ninety days from August 4, 2025 to file a petition for a writ of certiorari. *See* Sup. Ct. R. 13.3. The petition is, therefore, due on November 2, 2025. This application is filed at least ten days before that date.

3. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

4. The undersigned pro bono counsel believes an extension of time is needed to adequately prepare Mr. Watson's petition for writ of certiorari. Counsel Elizabeth Falconer was the primary author of the Petitioner's appellate briefs and made the argument before the Eleventh Circuit Court of Appeals. Ms. Falconer is getting married on October 25, 2025 and will be traveling for her honeymoon in the days leading up to the deadline to file the Petition. Further, she has been preparing for trial in another case that was on the October 6, 2025 trial calendar. This trial has been continued but may be rescheduled at any time on short notice. Accordingly, Ms. Falconer continues to prepare for that trial. Mr. Watson's other counsel of record similarly has been required to file summary judgment and post-trial briefs in four

other matters in the past six weeks. Consequently, Mr. Watson's counsel requires an extension of time so that counsel may adequately prepare Mr. Watson's petition for a writ of certiorari.

* * *

WHEREFORE, Petitioner STANLEY KAPPELL WATSON respectfully requests that an order be entered extending the time in which to petition for certiorari by sixty days, to and including January 2, 2026.

Respectfully submitted,

/s/ Gregory M. Taube

Elizabeth A. Falconer

Gregory M. Taube

Nelson Mullins Riley & Scarborough LLP

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Atlanta, Georgia 30363

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Pro Bono Counsel of Record for Petitioner