

No. 25A_____

IN THE
Supreme Court of the United States

SINNISSIPPI ROD & GUN CLUB, INC. and
SIMON EICHELBERGER,
Applicants

v.

KWAME RAOUL, in His Official Capacity as
Attorney General; and BRENDAN F.
KELLY, in His Official Capacity as Director
of the Illinois State Police,
Respondents

**APPLICATION FOR AN EXTENSION OF TIME TO FILE
A PETITION FOR A WRIT OF CERTIORARI TO
THE COURT OF APPEALS FOR THE STATE OF ILLINOIS**

Statement of Compliance With Supreme Court Rule 29.6

Pursuant to Supreme Court Rule 29.6, SINNISSIPPI ROD & GUN CLUB, INC. discloses the following. There is no parent or publicly held company owning 10% or more of Applicant's stock.

To the Honorable Amy Coney Barrett, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Seventh Circuit and the Supreme Court of Illinois:

1. Pursuant to Supreme Court Rules 13.5, 22, and 30, Applicants Sinnissippi Rod & Gun Club, Inc. and Simon Eichelberger respectfully request a 60-day extension of time, up to and including February 23, 2026, to file a petition for a writ of certiorari to the Court of Appeals for the State of Illinois, seeking review of that court's decision in *Sinnissippi Rod & Gun Club, Inc. v. Raoul*, 253 N.E.3d 346 (Ill.App. 2024). The Court of Appeals issued its decision on March 1, 2024. The Illinois Supreme Court denied a timely petition for leave to appeal on September 24, 2025. The decision of the Court of Appeals is submitted to this Court as Appendix A. The denial of the petition for leave to appeal to the Illinois Supreme Court is submitted to this Court as Appendix B. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will otherwise expire on December 23, 2025. This application is timely because it is filed more than ten days prior to the date on which the time for filing the petition is to expire.

2. Applicants have good cause for an extension of time. Applicants' Counsel of Record is a sole practitioner, who runs a one-person office. He represents the applicants herein pro bono. He has extensive professional obligations between now and the current due date of the petition. Counsel of Record has forty-five cases in which he must appear in court between now and December 23rd, in addition to depositions, interrogatories, and preparing and

filing three to four dispositive motions. In light of these commitments, the quality of the petition would greatly benefit from an extension of time.

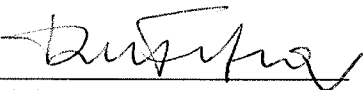
3. This case is closely related to *Jason Welford, et al., Petitioners v. Anne E. Lopez, Attorney General of Hawaii*, No. 24-1046, to which this Court granted the petition for a writ of certiorari on October 3, 2025. Both cases involve a determination of where licensed firearms can be carried in public, and in what manner.

4. This is applicants' first request for an extension of time. It is not made for purposes of delay, but solely to ensure that their interests are adequately protected. Applicants respectfully request that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, to and including February 23, 2026.

Dated: November 7, 2025

Respectfully submitted,

**SINNISSIPPI ROD & GUN CLUB, INC. and
SIMON EICHELBERGER**

By: 
Counsel for Applicants Sinnissippi
Rod & Gun Club, Inc. and Simon Eichelberger

Dmitry N. Feofanov
CHICAGOLEMONLAW.COM, P.C.
404 Fourth Avenue West
Lyndon, IL 61261
(815) 986-7303
Feofanov@ChicagoLemonLaw.com