

No. \_\_\_\_\_

IN THE  
**Supreme Court of the United States**

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LA UNION DEL PUEBLO ENTERO; SOUTHWEST VOTER REGISTRATION EDUCATION  
PROJECT; MEXICAN AMERICAN BAR ASSOCIATION OF TEXAS; TEXAS HISPANICS  
ORGANIZED FOR POLITICAL EDUCATION; JOLT ACTION; WILLIAM C. VELASQUEZ  
INSTITUTE; FIEL HOUSTON, INCORPORATED;

Applicants,

v.

WARREN K. PAXTON, *in his official capacity as Attorney General of Texas*; STATE OF  
TEXAS; JANE NELSON, *in her official capacity as Texas Secretary of State*; HARRIS  
COUNTY REPUBLICAN PARTY; DALLAS COUNTY REPUBLICAN PARTY; NATIONAL  
REPUBLICAN SENATORIAL COMMITTEE; NATIONAL REPUBLICAN CONGRESSIONAL  
COMMITTEE; SEAN TEARE, *Harris County District Attorney*; REPUBLICAN NATIONAL  
COMMITTEE,

Respondents.

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On Application for Extension of Time to File a Petition for Writ of Certiorari  
to the United States Court of Appeals for the Fifth Circuit

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**PETITIONERS' APPLICATION TO EXTEND TIME  
TO FILE PETITION FOR WRIT OF CERTIORARI**

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Education Project; Mexican American Bar Association of Texas; Texas  
Hispanics Organized for Political Action; JOLT Action; William C. Velasquez  
Institute; FIEL Houston, Incorporated*

## **CORPORATE DISCLOSURE STATEMENT**

Pursuant to Supreme Court Rule 29.6, Petitioners La Union del Pueblo Entero, Southwest Voter Registration Education Project, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, JOLT Action, William C. Velasquez Institute, and FIEL Houston, Incorporated state that they have no parent corporations or publicly held companies that own 10% or more of their stock.

**APPLICATION TO EXTEND TIME TO FILE PETITION  
FOR WRIT OF CERTIORARI**

TO: The Honorable Samuel A. Alito, Jr., Circuit Justice for the Fifth Circuit.

Pursuant to Supreme Court Rule 13.5, Petitioners La Unión del Pueblo Entero, Southwest Voter Registration Education Project, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, JOLT Action, William C. Velasquez Institute and FIEL Houston, Inc. respectfully request that the time to file their petition for a writ of certiorari in this matter be extended for sixty days up to and including Tuesday, January 27, 2026.

**JUDGMENT FOR WHICH REVIEW IS SOUGHT**

The United States Court of Appeals for the Fifth Circuit issued its opinion (**App. A**) on August 29, 2025, with Circuit Judge James E. Graves, Jr. dissenting. The parties did not seek rehearing en banc. The Fifth Circuit reversed the district court's judgment, vacated the district court's permanent injunction of portions of six provisions of a Texas law concerning voter assistance, and remanded the case for further proceedings consistent with the Fifth Circuit's opinion.

**JURISDICTION**

This Court has jurisdiction over the judgment under 28 U.S.C. § 1254(1). Under Supreme Court Rules 13.1, 13.3, and 30.1, a petition for a writ of certiorari is currently due to be filed on or before November 28, 2025.<sup>1</sup> Petitioners are filing this

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<sup>1</sup> Pursuant to Rule 13.1, ninety days from August 29, 2025 is Thursday, November 27, 2025, which is Thanksgiving Day, a holiday listed in 5 U.S.C. § 6103. S. Ct. R. 13.1; 5 U.S.C. § 6103(a). Accordingly, the period to file a writ of certiorari shall extend until the end of the next day, Friday, November 28, 2025. S. Ct. R. 30.1.

Application more than ten days before that date. S. Ct. R. 13.5. This request is unopposed.

### **REASONS JUSTIFYING AN EXTENSION OF TIME**

A sixty-day extension is appropriate in this case for a number of reasons. Counsel of record is lead counsel in a number of litigation matters that are proceeding simultaneously, and would benefit from additional time to prepare the petition for a writ of certiorari in this matter. *See, e.g., LULAC v. Abbott*, No. 3:21-CV-00259-DCG-JES-JVB (W.D. Tex.). For the first two weeks of October, counsel of record was involved in a nine-day preliminary injunction hearing before a three-judge district court in *LULAC v. Abbott*, the Texas congressional redistricting litigation, and counsel anticipates expedited proceedings in that case before this Court in the near future.

In addition, Petitioners' counsel have upcoming deadlines in the following matters:

- A response brief on questions from the district court in *Texas v. United States*, No. 18-CV-00068 (S.D. Tex.) due by November 10, 2025;
- Scheduling recommendations for proceedings on remand in *City of El Cenizo v. Texas*, SA-17-CV-00404-OLG (W.D. Tex.) due by November 12, 2025;
- A reply brief in support of Petitioner's Amended Petition for Writ of Habeas Corpus in *Mboup v. Field Office Director of New Jersey Immigration and Customs Enforcement, et al.*, No. 2:25-CV-16882 (D.N.J.) due by November 14, 2025;
- A response brief on an Order to Show Cause in *Autumn River, LLC et al. v. 795 Fifth Avenue Corp.*, Index No. 659569/2025 in the New York Supreme Court due by November 17, 2025;

- Plaintiffs-Appellee's brief in *La Unión del Pueblo Entero v. Abbott*, No. 25-50246 (5th Cir.) due by November 21, 2025;
- A reply brief on questions from the district court in *Texas v. United States*, No. 18-CV-00068 (S.D. Tex.) due by November 24, 2025;
- Preparation of co-counsel for oral argument calendared in *La Unión del Pueblo Entero v. Abbott*, No. 24-50783 (5th Cir.) for December 2, 2025; and
- Plaintiffs-Appellees' response brief in *Las Americas v. Martin*, No. 25-50595 (5th Cir.) due by January 8, 2025.

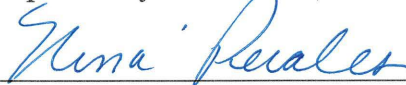
Finally, Petitioners' counsel have a number of upcoming travel obligations, including for the Thanksgiving holiday, and would benefit from additional time to file the petition for writ of certiorari.

### CONCLUSION

For the foregoing reasons, Petitioners respectfully request that this Court grant a sixty-day extension, up to and including Tuesday, January 27, 2026, within which to petition for a writ of certiorari.

November 10, 2025

Respectfully submitted,




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