

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

---

---

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

\_\_\_\_\_  
AMIGO SHUTTLE INC., MICHAEL H. CONNERY, JR.,

*Applicants,*

v.

PORT AUTHORITY OF NEW YORK AND NEW JERSEY, SUSAN WARNER DOOLEY, AMY  
FISHER, SHERIEN KHELLA,

*Respondents.*

\_\_\_\_\_  
To the Honorable Sonia Sotomayor  
Associate Justice of the United States Supreme Court  
And Circuit Justice for the Second Circuit  
\_\_\_\_\_

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

\_\_\_\_\_  
CAMERON L. ATKINSON  
*COUNSEL OF RECORD*  
ATKINSON LAW, LLC  
P.O. Box 340  
Harwinton, CT 06791  
(203) 677-0782  
catkinson@atkinsonlawfirm.com

*Counsel for Applicants*

---

---

## **RULE 29.6 DISCLOSURE STATEMENT**

Amigo Shuttle Inc. does not have any parent entities, and no parent entity or publicly held company owns 10% or more of its stock.

## **APPLICATION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI**

To the Honorable Sonia Sotomayor, Associate Justice of the Supreme Court of the United States:

Pursuant to Rule 13.5 of this Court, the Applicants respectfully request an additional sixty (60) days in which to file a petition for writ of certiorari. The Applicants seeking an extension of time are Amigo Shuttle Authority Inc. (“Amigo”) and Michael H. Connery, Jr. (“Connery”). They are the Plaintiffs in the United States District Court for the Southern District of New York and the Plaintiff-Appellants in the United States Court of Appeals for the Second Circuit.

The petition is currently due on December 10, 2025. The Applicants seek until February 9, 2026 to file a petition for writ of certiorari.

Good cause exists for granting their application.

## **BASIS FOR JURISDICTION**

This Court has jurisdiction over this application under 28 U.S.C. § 1254(1) and 28 U.S.C. § 1651.

## **JUDGMENT SOUGHT TO BE REVIEWED**

The Applicants anticipate filing a petition for writ of certiorari to review the Summary Order of the United States Court of Appeals for the Second Circuit in

*Amigo Shuttle v. Port Authority*, No. 25-83, Dkt. 36.1, dated September 11, 2025. A copy of the opinion is included as **Exhibit A**. In it, the Second Circuit affirmed orders of the United States District Court for the Southern District of New York (Castel, J.) entered March 26, 2024, granting in part and denying in part Respondents’ motion to dismiss, and December 13, 2024, dismissing the Applicants’ complaint in its entirety and denying leave to amend.

### **REASONS FOR EXTENSION**

“For good cause, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding 60 days.” Sup. Ct. R. 13.5. Good cause exists to extend the time to file the Applicants’ petition for writ of certiorari.

The Applicants alleged that the Port Authority entered an unlawful agreement with two defendants below to create a monopoly on shuttle transportation of airline employees between JFK airport and destinations in New York and New Jersey. The Second Circuit held (among other things) that the Applicants failed to plausibly allege an antitrust violation by the Respondents. *See* Exhibit A.

The case involves complex legal issues that require careful consideration. Some issues appear meritorious, but certain doctrinal nuances require further investigation, especially because undersigned counsel did not represent the Applicants in the district court or before the Second Circuit.

The current deadline to file a petition for writ of certiorari is 90 days from September 11, 2025, which is December 10, 2025. Sup. Ct. R. 13.1. Unfortunately, counsel’s schedule is not conducive to finishing the necessary review, analysis, and

drafting needed to prepare a petition for writ of certiorari before December 10. Counsel's conflicting obligations include a full work schedule, other briefing, multiple filing deadlines, family holiday commitments, and business travel. An extension of 60 days would facilitate the best presentation of the case and issues on petition for writ of certiorari. Respondents will not be prejudiced by the requested extension.

The undersigned contacted counsel for the Respondents for their position on this application and have not received a response.

Accordingly, the Applicants respectfully request up to and including Monday, February 9, 2026, to file a petition for writ of certiorari.

Dated: December 1, 2025

Respectfully submitted,

Cameron L. Atkinson  
Atkinson Law, LLC  
*Counsel of Record*

P.O.Box 340  
Harwinton, CT 06791  
Phone: (203) 677-0782  
[catkinson@atkinsonlawfirm.com](mailto:catkinson@atkinsonlawfirm.com)