

In the Supreme Court of the United States

Aila Curtis, *et al.*,
Applicants,

v.

Governor Jay Inslee; *et al.*,
Respondents.

To the Honorable Elena Kagan,
Associate Justice of the United States and
Circuit Justice for the Ninth Circuit

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

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APPENDIX

<i>Curtis v. Inslee</i> , 24-1869 (9th Cir. October 6, 2025)	1a
(ruling of the court of appeals)	
<i>Curtis v. Inslee</i> , 3:23-cv-5741 (USDC/WDWA, Feb 27, 2024)	12a
(opinion of the district court)	

RULE 29.6 STATEMENT

Applicants are natural persons.

APPLICATION TO EXTEND TIME
TO FILE PETITION FOR WRIT OF CERTIORARI

To the Honorable Associate Justice Elena Kagan, as Circuit Justice for the United States Court of Appeals for the Ninth Circuit:

Pursuant to Supreme Court Rule 13(5), Aila Curtis, *et al.*, (“Applicants”) respectfully apply for an extension of 90 days from January 5, 2026 — to and including April 6, 2026 — to file a Petition for Writ of *certiorari*. The current deadline for filing the Petition is January 5, 2026. This application is more than ten days before the deadline.

In support of this request, Applicants state:

1. On October 6, 2025 (App:1a), the Ninth Circuit affirmed a 12(b)(6) dismissal of Petitioners’ claims. The Ninth Circuit established a new legal precedent holding that a governor may require Respondents to receive an investigational drug as a condition of employment within a state’s healthcare industry.

2. Undersigned counsel’s obligations constrain his ability to complete the Petition timely, including filing two opening briefs to the Ninth Circuit (EFR on January 9, 2026) and (City of LA on January 9, 2026), in addition to daily case work.

3. Due to the national impact of the *Curtis* decision (four federal cases have cited Curtis as jurisprudence support for Rule 12(b)(6) dismissal), and because the undersigned counsel is a solo-practitioner, additional counsel is being sought to assist in the writing of the petition and argument before this Court, which will ensure that Petitioners are properly represented.

3. The 90-day extension would not prejudice the respondents.

CONCLUSION

Applicants request a 90-day extension—to and including April 6, 2026—to file a Petition for Writ of *Certiorari*.

Dated: December 12, 2025

Respectfully submitted,

s/ David J. Schexnaydre

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CERTIFICATE AS TO FORM

Pursuant to Sup. Ct. Rules 22 and 33, I certify that the foregoing application is proportionately spaced, has a typeface of Century Schoolbook, 12 point, and contains 2 pages (and 258 words) respectively, excluding this Certificate as to Form, the Table of Contents, and the Certificate of Service.

CERTIFICATE OF SERVICE

The undersigned certifies that, on the 12th day of December, 2025, in addition to filing the foregoing document—together with its appendix—via the Court’s electronic filing system, one true and correct copy of the foregoing document and appendix was served by Regular Mail, with a PDF courtesy copy served via electronic mail on the following counsel:

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The undersigned further certifies that, on this 12th day of December, 2025, an original and two true and correct copies of the foregoing document and its appendix were sent electronically with paper copies following by Priority Mail delivery to the Court.

Executed December 12, 2025

s/ David J. Schexnaydre

David J. Schexnaydre