

No. _____

In The
Supreme Court of the United States

BETHLEHEM MANOR VILLAGE, LLC,

Petitioner,

v.

CITY OF BETHLEHEM; CITY COUNSEL OF THE CITY OF BETHLEHEM;
ROBERT J. DONCHEZ, FORMER MAYOR OF THE CITY OF BETHLEHEM,

Respondents.

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

**APPLICATION TO THE HONORABLE SAMUEL A. ALITO, JR. FOR
AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION
FOR A WRIT OF CERTIORARI**

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To the Honorable Samuel A. Alito, Jr., Associate Justice of the Supreme Court of the United States and Circuit Justice for the Third Circuit:

Pursuant to Supreme Court Rule 13.5, Petitioner Bethlehem Manor Village, LLC respectfully request a 50-day extension of time, to and including May 1, 2026, within which to file a petition for a writ of certiorari to review the judgment of the United States Court of Appeals for the Third Circuit.

CORPORATE DISCLOSURE STATEMENT

Pursuant to Supreme Court Rule 29.6, Petitioner Bethlehem Manor Village, LLC, certifies that it has no parent corporations and no publicly held company owns 10% or more of its stock.

JUDGMENT FOR WHICH REVIEW IS SOUGHT

The judgment for which review is sought is *Bethlehem Manor Vill., LLC v. City of Bethlehem*, No. 24-2925, 2025 WL 3562730 (3d Cir. Dec. 12, 2025) (attached as Exhibit 1). Absent an extension, the petition for a writ of certiorari would be due on March 12, 2026. This application is being filed more than ten days before the current due date. *See* Sup. Ct. R. 13.5.

JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 1254(1), as the petition seeks review of a judgment rendered by the United States Court of Appeals for the Third Circuit.

REASONS FOR GRANTING EXTENSION

Good cause exists for the requested extension. Petitioner is in the process of obtaining counsel, who were not involved in the lower court proceedings, to prepare the petition for certiorari in this case. The requested extension is needed to give counsel time to familiarize themselves with the record and prepare the petition in this case. This is Petitioner's first request for an extension. No prejudice will result from granting the requested extension, and the additional time will allow counsel to prepare a thorough and effective petition for this Court's review.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court grant a 50-day extension of time, up to and including May 1, 2026, within which to file a petition for a writ of certiorari.

DATED: February 13, 2026

Respectfully submitted,

/s/ Pamela M. Tobin

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