

No. 26-A-_____

IN THE SUPREME COURT OF THE UNITED STATES

KARINA SIGALOVSKAYA,

Petitioner-Plaintiff,

v.

SPECIAL AGENT ABIGAIL BRADEN, SPECIAL AGENT LUANN WALTER,
SPECIAL AGENT MEGAN BUCKLEY and SPECIAL AGENT ROBERT
MANCENE, Individually and in their Official Capacity as Special Agents,

Respondents-Defendants.

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

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TO THE HONORABLE SONIA SOTOMAYOR, ASSOCIATE JUSTICE AND CIRCUIT JUSTICE FOR THE SECOND CIRCUIT:

Pursuant to 28 U.S.C. § 2101(c) and Rule 13.5 of the Rules of this Court, Applicant Karina Sigalovskaya respectfully requests a 60-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 Second Circuit in this case. The Second Circuit denied a timely request for rehearing on December 2, 2025. Unless extended, the time to file a petition for a writ of certiorari will expire on March 2, 2026. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1). The order denying rehearing and the panel opinion are attached hereto as Exhibits A and B, respectively.

In support of this petition, Applicant states as follows:

1. The case presents a serious candidate for review. A panel of the Second Circuit split three ways on the availability of a *Bivens* remedy for an individual who was subject to false arrest in circumstances that were virtually identical to those presented in *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971), itself. Two judges agreed that a *Bivens* remedy was unavailable, albeit for different reasons. One judge concluded that the case presented a “new context” because the officer offered a false explanation for the arrest; a second judge disagreed that the case presented a “new context,” but concluded that no *Bivens* claim was available because the plaintiff could have availed herself of a grievance procedure. The third judge dissented, observing that the reasoning contained in the two concurrences would eviscerate *Bivens* entirely. This case thus tees up the

question of whether *Bivens* remedies continue to exist in the narrow contexts in which they have already been recognized, as this Court held in *Ziglar v. Abbasi*, 582 U.S. 120, 121, 139 (2017), or whether *Bivens* is now a dead letter.

2. Applicant recently retained undersigned counsel to represent her in filing a petition for certiorari. In addition to an unusually high case load—including two amicus briefs in support of certiorari petitions, due in mid-March and mid-April—undersigned counsel has two extenuating personal circumstances necessitating additional time: He welcomed his first child on November 9, 2025 and he will be tending to a relative in hospice for at least the next two weeks.

For these reasons, Applicant requests that the due date for her petition for a writ of certiorari be extended to May 1, 2026.

Dated: February 17, 2026

Respectfully submitted,

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