

No. _____

In the Supreme Court of the United States

Jennifer Marie Detillier,
Applicant

v.

Amber Rachel Smith,
Respondent

ON CORRECTED AMENDED APPLICATION FOR AN EXTENSION OF TIME

TO FILE A PETITION FOR A WRIT OF CERTIORARI

To the Honorable Samuel A. Alito, Jr.,

Associate Justice of the Supreme Court of the United States

And Circuit Justice for the Fifth Circuit

Respectfully submitted by,

Michelle May O'Neil
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Petitioner respectfully applies for an extension of time to file a petition for a writ of certiorari to review the judgment of the Supreme Court of Texas.

1. On September 5, 2025, the Supreme Court of Texas entered judgment in this case on multiple cause numbers. Timely motions for rehearing were filed on two of the three matters. On October 24, 2025, the Supreme Court of Texas denied rehearing on all causes. The case numbers at issue below in the Supreme Court of Texas were 25-0036 and 25-0037.
2. Petitioner intends to seek review in this Court pursuant to 28 U.S.C. § 1257.
3. Under Supreme Court Rule 13.1, the petition for a writ of certiorari is currently due on January 22, 2026.
4. Petitioner respectfully requests an extension of 60 days, up to and including March 23, 2026, within which to file the petition for a writ of certiorari.
5. Good cause exists for this extension. The decision below arises from multiple related proceedings in the Texas courts, each with its own procedural history and record. Preparing a petition for certiorari will require careful reconstruction and presentation of those procedural paths to accurately frame the jurisdictional basis and issues for this Court's review. In addition, the proceedings involve three separate trial court cause numbers and two appellate decisions, which must be synthesized into a single, accurate jurisdictional narrative. Additional time is therefore necessary to prepare a petition that properly and responsibly addresses the procedural complexity of the case.
6. In compliance with Rule 12.4, Petitioner identifies the following cause numbers of matters out of the Supreme Court of Texas that will be presented within the same, singular Petition for Writ of Certiorari: 1)25-0036, 2) 25-0037. To be specific, both of these matters involve

the same parties and same general fact situation, but alternative legal theories. Copies of the orders denying rehearing on both causes are included in this Application.

7. This is Petitioner's first request for an extension of time to file a petition for a writ of certiorari.
8. This application is submitted before the expiration of the time prescribed by Rule 13.

Respectfully submitted by,

/s/ Michelle May O'Neil _____

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CERTIFICATE OF SERVICE

I certify that on January 12, 2026, a copy of the original application was served on all counsel of record of Respondent by electronic mail and Supreme Court E-Filing. I further certify that a paper copy was served to that same party by USPS delivery, post marked on January 22, 2026. I further certify that a copy of this Amended Application was served on all counsel of record of Respondent by electronic mail and Supreme Court E-Filing on January 29, 2026. Finally, I certify that a copy of this Corrected Amended Application was served on all counsel of record of Respondent by electronic mail and Supreme Court E-Filing, as well as by registered mail, on February 25, 2026.

Counsel of Record for the opposing party is:

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/s/ Michelle May O'Neil
Michelle May O'Neil

RE: Case No. 25-0036
COA #: 09-22-00425-CV
STYLE: IN RE R.G.S., A CHILD

DATE: 9/5/2025
TC#: 22-12-16328-CV

Today the Supreme Court of Texas denied the petition for review in the above-referenced case.

MS. MICHELLE M. O'NEIL
O'NEIL WYSOCKI, P.C.
1845 WOODALL RODGERS FRWY
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DALLAS, TX 75201
* DELIVERED VIA E-MAIL *

RE: Case No. 25-0036

DATE: 10/24/2025

COA #: 09-22-00425-CV

TC#: 22-12-16328-CV

STYLE: IN RE R.G.S., A CHILD

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

MS. MICHELLE M. O'NEIL
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RE: Case No. 25-0037

DATE: 9/5/2025

COA #: 09-22-00384-CV

TC#: 20-10-12649-CV

STYLE: DETILLIER v. SMITH

Today the Supreme Court of Texas denied the petition for review in the above-referenced case.

MS. MICHELLE M. O'NEIL
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RE: Case No. 25-0037

DATE: 10/24/2025

COA #: 09-22-00384-CV

TC#: 20-10-12649-CV

STYLE: DETILLIER v. SMITH

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

MS. MICHELLE M. O'NEIL
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