



COMMONWEALTH OF PENNSYLVANIA
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The Honorable Scott S. Harris
Clerk of the Supreme Court of the United States
1 First Street NE
Washington, D.C. 20543

RE: *Title Max of Virginia, Inc. v. Spicher*
No. 25-1359

TMX Finance Corporate Services v. Spicher
No. 26-23

Title Max of South Carolina v. Spicher
No. 26-271

Dear Mr. Harris:

I write on behalf of Respondent Wendy S. Spicher, Secretary, Pennsylvania Department of Banking and Securities, in the above-referenced cases.

Although these are technically three distinct petitions arising from three different courts of appeals, in truth, all three petitions are interrelated, arise from the same action taken by the Pennsylvania Department of Banking and Securities, and raise the exact same question presented. The Court previously granted my request for an extension to respond to the petitions filed in No. 25-1359 and No. 26-23. Those responses are currently due on the same date, September 28. Thereafter, Petitioner filed a third petition in No. 26-271, with Secretary Spicher's response due October 1. I have not previously sought an extension in No. 26-271.

Because of this third petition, I require additional time to respond to all three petitions. As these petitions arise from three different Circuit Courts of Appeal, I must break down the analysis of each Court. Further, I believe that the Court's simultaneous consideration of these three cases would promote judicial efficiency.

I also have several competing responsibilities during the relevant time period with pressing deadlines. Those matters are as follows:

- A reply brief in *Amerisource Bergen v. Commonwealth*, No. 10, 11, and 12 MAP 2026, filed in the Pennsylvania Supreme Court on September 2, 2026;
- A reply brief in *General Motors Company v. Commonwealth*, No. 7, 8, 9 MAP 2026, due in the Pennsylvania Supreme Court on September 8, 2026;
- A petition for *en banc* review in *Pennsylvania Game Commission v. Thomas E. Proctor Heirs Trust*, No. 22-1587, due in the U.S. Court of Appeals for the Third Circuit on September 14, 2026;
- Oral argument in *G.F. v. D.H.S.*, 33 MAP 2025, in the Pennsylvania Supreme Court on September 16, 2026;
- An opening brief and appendix in *Murray v. McCoy*, No. 26-2112, due in the U.S. Court of Appeals for the Third Circuit on September 24, 2026;
- An opening brief and reproduced record in *Allegheny Reproductive Health Center v. DHS*, No. 34 MAP 2026, in which undersigned counsel is assisting other attorneys, due in the Pennsylvania Supreme Court on September 30, 2026; and,
- A responsive brief in *School District of Pittsburgh v. State Tax Equalization Board*, 70 C.D. 2026, due in the Commonwealth Court of Pennsylvania on October 8, 2026.

A thirty-day extension from the current due date of October 1, for Secretary Spicher's response to the third petition (No. 26-271), would make that response due November 2 (October 31, 2026). Accordingly, I request that Secretary Spicher's response in all three cases be extended to November 2, 2026.

Prior to filing this motion, I contacted opposing counsel who has graciously indicated that he consents to my request.

Respectfully,

s/ Michael J. Scarinci

MICHAEL J. SCARINCI
Senior Deputy Attorney General

CC: all parties