

No. _____

**IN THE
SUPREME COURT OF THE UNITED STATES**

BRETT CHRISTIAN, ET AL.,

Applicant,

v.

STEVEN G. JAMES, ET AL.,

Respondent,

On Application for an Extension of Time Within Which
To File a Petition for Writ of Certiorari to the
United States Court of Appeals for the Second Circuit

**APPLICATION TO THE HON. JOHN G. ROBERTS, JR. FOR
AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION
FOR WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE SECOND CIRCUIT**

**PARTIES TO THE PROCEEDING, CORPORATE DISCLOSURE STATEMENT,
AND RELATED PROCEEDINGS**

Applicants are Brett Christian, Firearms Policy Coalition, Inc., and Second Amendment Foundation. Per Supreme Court Rule 29, Brett Christian, Firearms Policy Coalition, Inc., and Second Amendment Foundation, each have no parent corporation and no publicly held company owns 10% or more of any entity's stock. There are no related proceedings known to Applicants at this time.

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the Second Circuit:

Applicants Brett Christian, Firearms Policy Coalition, Inc., and Second Amendment Foundation hereby respectfully move, pursuant to Rule 13(5) of the Rules of this Court, for a 30-day extension of time in which to file a petition for writ of certiorari to and including September 16, 2026. A panel of the United States Court of Appeals for the Second Circuit issued a decision in this case dated May 18, 2026 (Appendix A). This Court has jurisdiction under 28 U.S.C. §1254(1).

1. The date on which a petition for a writ of certiorari would be due, if not extended, is August 17, 2026. This motion is timely as it is filed at least 10 days in advance of that deadline.

2. This case presents an important Second Amendment challenge to public carry bans in New York in so-called “sensitive locations.” In particular, the question presented is whether New York’s ban on carrying firearms in public parks is unconstitutional under the Second Amendment, either facially or as applied. In *New York State Rifle & Pistol Association v. Bruen*, this Court was clear: New York could not, consistent with the Second Amendment, “declare the island of Manhattan a ‘sensitive place’” where firearms may be restricted, “simply because it is crowded and protected generally by the New York City Police Department.” 597 U.S. 1, 31 (2022). Despite this clear instruction, New York proceeded to pass an omnibus firearms law that effectively declared Manhattan (and much of the rest of the state) a “sensitive place” piece-by-piece, rather than wholesale. Applicants challenged this effort as unconstitutional and inconsistent with this Court’s Second Amendment precedents.

3. A 30-day extension is needed because Applicants’ counsel face a press of other deadlines and professional obligations, including briefing, discovery, and trial deadlines in

numerous matters. These include a civil trial this week, multiple oppositions to motions to exclude expert testimony and an opposition to motion for summary judgment due in *State of Texas v. TikTok, Inc.*, No. D-1-GN-25-003118 (Travis Cnty. Dist. Ct.) (July 28, 29, 31, & August 4); an expert report and multiple rebuttal reports due in *Louisiana v. TikTok, Inc.*, No. 184754 Div. A (21st Jud. Dist. Ct.) (August 3 & 7); multiple expert reports due in *Kansas v. TikTok, Inc.*, No. SN-2024-CV-000165 (Shawnee Cnty. Dist. Ct.) (July 31); multiple expert reports due in *Arkansas v. TikTok, Inc.*, No. 12CV-23-65 (Cleburne Cnty. Cir. Ct.) (August 7); proposed findings of facts and conclusions of law in *In re Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (N.D. Cal.) (July 29, 2026); a combined opposition to defendants motion for summary judgment and reply in support of motion for summary judgment due in *Poway Weapons & Gear, Inc. v. California Department of Tax and Fee Administration*, No. 25CV018964 (Cal. Super. Ct.) (August 5); a motion for summary judgment due in *Padua v. Davenport*, No. 1:25-cv-13527 (D.N.J.) (August 7); and an initial merits brief due in *Viramontes v. Cook County, Ill.*, No. 25-238 (U.S.) (August 14).

4. A 30-day extension will not cause undue prejudice to Respondents.

5. For these reasons, Applicants respectfully request a 30-day extension of time in which to file a petition for certiorari, up to and including September 16, 2026.

Dated: July 28, 2026

Respectfully submitted,



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