

No. _____

In The
Supreme Court of the United States

SPARTAN SECURITIES GROUP, LTD; ISLAND CAPITAL MANAGEMENT LLC;
CARL E. DILLEY; AND MICAH J. ELDRED,
Applicants,

v.

U.S. SECURITIES AND EXCHANGE COMMISSION,
Respondent.

**APPLICATION DIRECTED TO THE HONORABLE CLARENCE THOMAS
FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE A
PETITION FOR A WRIT OF *CERTIORARI* TO THE
UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**

TO THE HONORABLE CLARENCE THOMAS, ASSOCIATE JUSTICE OF THE SUPREME COURT
OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE ELEVENTH CIRCUIT:

Pursuant to 28 U.S.C. § 2101(c) and Rules 13.5, 22, and 30.2 of the Rules of this Court, Applicants Spartan Securities Group, LTD; Island Capital Management LLC; Carl E. Dilley and Micah J. Eldred respectfully request a 60-day extension of time, to and including September 27, 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 Eleventh Circuit in this case. Without an extension, the time for filing a petition for a writ of *certiorari* will expire on July 29, 2026. This Court has jurisdiction to review the judgment of the Eleventh Circuit in this case under 28 U.S.C. § 1254(1).

In support of this request, Applicants state as follows:

1. The United States Court of Appeals for the Eleventh Circuit rendered its decision on January 16, 2026 (Exhibit 1), and denied a timely petition for rehearing on April 30, 2026 (Exhibit 2). This Court has jurisdiction to review the judgment of the Eleventh Circuit in this case under 28 U.S.C. § 1254(1).
2. This case concerns the securities laws of the United States and the issues concerning liability after a jury trial and issues of penalties and disgorgement under 15 U.S.C. § 78u(d)(5), (7). In this case, 13 of 14 counts were decided in the Applicants' favor with a finding of no liability and no scheme to deceive. The validity of the remaining count and the issue of penalty and sanctions are important to the wider enforcement of securities laws. There are important issues, *inter alia*, regarding the Government's burden in disgorgement, but also regarding whether penalties can be imposed for a "scheme to defraud" when the jury found explicitly no such scheme existed. The opinion of the Eleventh Circuit in this case drew a lengthy dissent from Judge Tjoflat. On June 4, 2026, this Court issued its decision in *Sripetch v. SEC*, 146 S. Ct. 1403 (2026), which has a bearing on the questions to be presented in this petition for *certiorari*.
3. Within days of the issuance of *Sripetch*, Applicants' counsel of record in the Eleventh Circuit—and intended counsel of record in this Court—Kara Rollins went into early labor and gave birth to a baby girl on June 7, 2026. She is currently on maternity leave and not expected to return for at least

60 days. Undersigned counsel will need to consult with Ms. Rollins in the preparation of this petition for *certiorari*, and that cannot be reasonably done without an extension of time. Applicants' counsel accordingly requires additional time in order to prepare with the attorney most conversant with the case and file a petition that will best present the issues for this Court's review.

4. Applicants' counsel thus requests an extension of 60 days.

WHEREFORE, for the foregoing reasons, Applicants request that an extension of time to and including September 27, 2026 be granted within which Applicants may file a petition for a writ of *certiorari*.

Respectfully submitted,

/s/ John J. Vecchione

JOHN J. VECCHIONE

Counsel of Record

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June 30, 2026.