

No.

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

CHICHESTER SCHOOL DISTRICT

Appellant/ Petitioner

v.

S.M., through his parents, Michael C. and Danielle C.

Appellees/ Respondent

**APPLICATION TO THE HONORABLE THOMAS ALITO FOR AN
EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION**

GABRIELLE C. SERENI

Supreme Court ID # 328759

SERENI LAW GROUP, LLC

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Date: 9/2/2026

Pursuant to Supreme Court Rules 13(5), 21, 22, and 30, Applicant Chichester School District respectfully requests an extension of time of sixty (60) days, up to and including November 14, 2026, for the filing of a petition for writ of certiorari. Unless an extension is granted, the deadline for filing the petition for writ of certiorari falls on Sunday, September 13, 2026. Pursuant to Rule 30, due to the original deadline occurring on a Sunday, the deadline for filing the petition for writ of certiorari is Monday, September 14, 2026. Consistent with Rule 13(5), this application is filed more than 10 days before that date.

In support of this request, Applicant states as follows:

1. The Third Circuit Court of Appeals denied, though with a resounding dissent by a member of the original Panel, Applicant, Chichester School District's Petition for Rehearing En Banc on June 15, 2026. *See* Exhibit 1.
2. Accordingly, this court has jurisdiction pursuant to 28 U.S.C. §1254(1).
3. This case involves questions of exceptional importance regarding the district court's compliance with precedence of this Court and the Third Circuit Court of Appeals under the Individuals with Disabilities Act, 20 U.S.C. 1400, *et seq.*, which applicant asserts constituted an extraordinary departure from normal judicial procedure requiring this Court's supervisory intervention.
4. Applicant, Chichester School District is a publicly funded school located in Delaware County, Pennsylvania.

5. Due to the requirements set forth in Pennsylvania law, Chichester School District's Board of Directors is required to approve litigation including any appellate practices.

6. Due to summer recess, the Chichester School District Board of Directors did not approve an appeal to the Supreme Court of the United States or provide the undersigned authority to appeal to the Supreme Court of the United States until August 12, 2026, approximately one month prior to the deadline of the SCOTUS appeal.

7. The undersigned did not receive notice of admission to the United States Supreme Court Bar until August 18, 2026.

8. The undersigned requires additional time to condense and brief nearly six (6) years of litigation, inclusive of multiple appeals, and therefore requires additional time to prepare the Petition for Writ of Certiorari.

9. In light of the foregoing, Applicant's counsel respectfully requests an extension of time to address the complex issues raised by the forthcoming petition. Applicant's counsel does not anticipate any further extension requests.

WHEREFORE, for the foregoing reasons, Applicant respectfully requests that this Court grant a sixty-day extension of time, up to and including November 14, 2026, to file a petition for writ of certiorari.

Respectfully submitted,

Gabrielle C. Sereni

Gabrielle C. Sereni, Esq.

Supreme Court ID # 328759

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DATE: September 2, 2026