

No. A _____

IN THE
Supreme Court of the United States

PTI UNION, LLC,

Applicant,

v.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA, ET AL.

**Application for Extension of Time to File a Petition for a Writ of Certiorari
to the Superior Court of California, County of Alameda**

To the Honorable Elena Kagan, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Ninth Circuit:

Under Rules 13.5 and 30.2 of this Court, PTI Union, LLC applies for a 30-day extension of time, to and including October 14, 2026, within which to file a petition for writ of certiorari to review the judgment of the Superior Court of the State of California, Alameda County, in this case. The Superior Court issued its order on November 19, 2025; the California Court of Appeal, First Appellate District, denied a timely petition for writ of prohibition on April 2, 2026, and the California Supreme Court denied a timely petition for review on June 17, 2026. Unless extended, Union's deadline to file a petition for writ of certiorari will expire on September 15, 2026. The jurisdiction of this Court would be invoked under 28 U.S.C. 1257(a).

Union is a contract manufacturer headquartered in Missouri and formerly organized under Delaware (now North Carolina) law. For a time, it blended and bottled talc-containing body powder products, which it transferred to the product's

brand owners. The brand owners marketed, distributed, and sold those products. Union, however, had no role in that distribution, marketing or sale. Yet the Superior Court determined Union was subject to *specific* personal jurisdiction under a “stream-of-commerce” theory without regard for whether Union itself had any “minimum contacts” with California or “purposefully availed” itself of the California market. This case presents the opportunity to define and refine what it means for a domestic contract manufacturer to “purposefully avail” itself of a forum and the “minimum contacts” sufficient to satisfy the Fourteenth Amendment’s Due Process Clause.

Good cause supports this modest request. This case presents complex and important issues concerning proper interpretation of the Due Process Clause, the impact of more recent precedent on a deep split in authority, and the application of the purposeful-availment requirement for specific personal jurisdiction. There are also petitions for review pending—against Union arising from the same Superior Court, presenting the same issues—in the California Supreme Court; additional time is warranted in order to allow that court to act before the petition is filed here. *See PTI Union, LLC v. Superior Court of Alameda County*, Case No. S297403 (Cal.); *PTI Union, LLC v. Superior Court of Alameda County*, Case No. S297382 (Cal.); *PTI Union, LLC v. Superior Court of Alameda County*, Case No. S297324 (Cal.). In addition, counsel has several cases with due dates proximate to the deadline for filing the petition in this case. *See Jones v. CVS Health Corp.*, No. 2026-CAB-005906 (Sup. Ct. of the Dist. of Columbia) (anticipated motion to dismiss); *Walton v. CVS Pharm., Inc.*, No. 8:26-cv-01808 (C.D. Cal.) (responsive pleading); *Baker v. Johnson &*

Johnson, et al., Case No. 26CV185752 (Alameda Cnty., Cal.) (oral argument on a motion to quash for lack of personal jurisdiction).

Respectfully submitted,

/s/ MICHAEL J. RUTTINGER

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August 31, 2026