

**In the
Supreme Court of the United States**

— ♦ —
JOSHUA F. YOUNG,
Petitioner,

v.

COLORADO DEPARTMENT OF CORRECTIONS; MOSES “ANDRE” STANCIL;
JILL HUNSAKER RYAN,
Respondents.

— ♦ —
On Petition for Writ of Certiorari to the United States Court of Appeals
for the Tenth Circuit

— ♦ —
**UNOPPOSED APPLICATION FOR AN EXTENSION OF TIME IN WHICH TO FILE
A PETITION FOR A WRIT OF CERTIORARI**

To the Honorable Neil Gorsuch, Associate Justice and Circuit Justice for the
United States Court of Appeals for the Tenth Circuit:

Pursuant to 28 U.S.C. § 2101(c) and Rules 13.5, 22, and 30 of this Court,
Petitioner respectfully requests a 60-day extension of time, to and including Friday,
October 9, 2026, to file a petition for a writ of certiorari to review the judgment of the
United States Court of Appeals for the Tenth Circuit in this case. Petitioner has
conferred with Respondents regarding this application, and Respondents do not
oppose.

The Tenth Circuit issued its opinion on May 11, 2026. Petitioner did not seek rehearing, and a petition for a writ of certiorari is currently due on or before Monday, August 10, 2026. This application is being filed more than ten days before that date.

The opinion of the United States Court of Appeals for the Tenth Circuit, reported at *Young v. Colorado Department of Corrections*, 174 F.4th 1283 (10th Cir. 2026), is attached as Exhibit 1. The jurisdiction of this Court would be invoked under 28 U.S.C. § 1254(1).

BACKGROUND

Petitioner Joshua F. Young, a former corrections officer with the Colorado Department of Corrections, brought suit against the Department and two of its officials, alleging that a mandatory equity, diversity, and inclusion training program and its aftermath created a hostile work environment in violation of Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981, and that the resulting conditions forced his constructive discharge.

The United States District Court for the District of Colorado dismissed the complaint under Federal Rule of Civil Procedure 12(b)(6), and the Tenth Circuit affirmed, holding that Petitioner's allegations did not describe harassment sufficiently severe or pervasive to establish a racially hostile work environment.

REASONS JUSTIFYING AN EXTENSION OF TIME

Good cause exists for extending the time in which Petitioners can file their petition for a writ of certiorari.

First, the questions presented are substantial and warrant careful preparation. The case concerns the standard governing hostile-work-environment claims under Title VII and 42 U.S.C. § 1981 where the alleged harassment arises from mandatory, race-based workplace training, including as applied to majority-group employees—a subject addressed in recent decisions of this Court and the courts of appeals. *See Ames v. Ohio Dep’t of Youth Servs.*, 605 U.S. 303 (2025); *Chislett v. New York City Dep’t of Educ.*, 157 F.4th 172 (2d Cir. 2025). The significance of these questions is reflected in the substantial amicus participation before the court of appeals, which included the State of Montana and fifteen other States, the Arizona Legislature, and several national organizations.

Second, counsel for Petitioner is potentially in transition. Additional time is needed to consider and potentially complete that transition, and to prepare a petition that adequately presents the questions raised by the decision below.

Petitioner is not aware of any party that would be prejudiced by the requested extension.

PRAYER

For these reasons, Petitioner respectfully requests that the Court extend the time to file a petition for a writ of certiorari by 60 days, up to and including Friday, October 9, 2026.

Respectfully submitted,

/s/ William E. Trachman

William E. Trachman

Counsel of Record

Grady J. Block

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July 2, 2026 *Attorneys for Petitioner*