

No. 23-1103

**IN THE
Supreme Court of the United States**

Sawtooth Mountain Ranch, LLC, et al.,

Petitioners,

v.

United States Forest Service, et al.,

Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals
For the Ninth Circuit

**SUPPLEMENTAL BRIEF IN SUPPORT OF
PETITION FOR A WRIT OF CERTIORARI**

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Petitioners submit this brief pursuant to Rule 15.8, to bring to the Court's attention its own recent decision in *Harrow v. Department of Defense*, no. 23-21, decided May 16, 2024.

Harrow shows directly the need to grant certiorari here and reverse the decision of the Ninth Circuit Court of Appeals.

In *Harrow*, as here, the lower courts treated the statute of limitations as a hard deadline that could not be altered. In *Harrow*, this Court continued its recent line of cases holding that statutes of limitations are only rarely to be used as hard or jurisdictional deadlines. *Harrow* was unanimously reversed for taking such an absolute position.

Here, the statute of limitations on the Quiet Title Act (at issue here) was recently held by the Court to be non-jurisdictional. *Wilkins v. United States*, 598 U.S. 152, 160-61 (2023). Between *Wilkins* and *Harrow*, the proper road in this case seems clear. Certiorari needs to be granted.

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