

No. A-_____

In The Supreme Court of the United States

XANADU CORP. and DAVID GOULD,
Applicant,

vs.

MEOR ADLIN; et al.,
ALL NIPPON AIRWAYS, et al,
Respondents.

**APPLICATION FOR AN EXTENSION OF TIME TO FILE A PETITION
FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF THE
UNITED STATES**

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

CORPORATE DISCLOSURE STATEMENT

Pursuant to Supreme Court Rule 29.6, Applicant Xanadu Corp. discloses
the following: There is no parent or publicly held company owning 10% or more
of Applicant's stock.

APPLICATION

1. Pursuant to 28 U.S.C. 2101(c) and Supreme Court Rules 13.5, 22, and
30, Applicants Xanadu Corp. and David Gould respectfully requests a 60-day
extension of time, up to and including July 26, 2024, to file a petition for a writ of
certiorari to the Supreme Court of the United States, seeking review of the Ninth
Circuit's rulings in Meor Adlin et al v. Xanadu Corp. et al, No 23-15118. The
Ninth Circuit Court issued its ruling on February 27, 2024. A copy of the order

is attached as Appendix A. Respondents filed a motion for attorney fees, which the Ninth Circuit Court denied on April 26, 2024. A copy of the order is attached as Appendix B. It is not suggested that proceedings resulting in the April 26, 2024, Order tolls the time for certiorari.

2. The jurisdiction of this Court will be invoked under 28 U.S.C. § 1254(1), and the time to file a petition for a writ of certiorari will otherwise expire on May 27, 2024. This Application for Extension of Time is timely filed by mailing on May 10, 2024, more than ten days prior to the date on which the time for filing the petition is to expire.

3. Good cause exists for the requested extension of the May 27, 2024, deadline to request certiorari:

(a) Counsel for applicant is being treated for cancer and has significantly curtailed his law practice; (b) Counsel recently had an unexpected skin operation that caused a delay to his workload; and (c) A large amount of time allocated to preparing the certiorari was exhausted answering and researching a motion for \$155,000 in attorney fees that Respondents submitted to the appeals court which was not expected and which was denied by the Ninth Circuit Court; (d) This request is made in good faith and for the reasons set forth above, not for the purposes of delay.

4. This case involves, *inter alia*, crucial questions in the public interest where courts in the Ninth Circuit ignore unclaimed property (escheat) laws as to uncashed checks sent by Class Action Claims administrators. In contrast, the Fifth Circuit has recognized that escheat laws should be recognized and honored. *All Plaintiffs v. All Defendants*, 645 F.3d 329 (5th Cir. 2011).

5. Counsel for the Applicants contacted counsel for the Respondents by email on the morning of May 9, 2024, and inquired whether they objected to the extension. As of 3:00 p.m. Eastern Time on May 10, 2024, no response was received.

WHEREFORE, Applicant respectfully requests that an order be entered extending the time to file a petition for a writ of certiorari for 60 days, to and including July 26, 2024.

Dated: May 10, 2024.

Respectfully submitted,



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