

[Application] No. 24A612

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IN THE  
Supreme Court of the United States

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CAMERON THIERRY,

*Petitioner,*

v.

THE HONEY POT COMPANY (DE), LLC

*Respondent.*

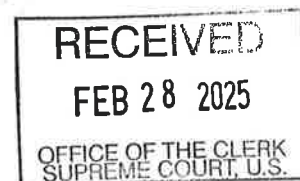
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**SECOND APPLICATION FOR AN EXTENSION  
OF TIME TO FILE PETITION FOR WRIT OF  
CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE ELEVENTH  
CIRCUIT**

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Cameron M. Thierry  
2635 4 Mile Rd #44025  
Racine, WI 53404  
404-822-0336  
cameron.thierry@gmail.com

*Pro Se Litigant for Petitioner  
Cameron Thierry*



**SECOND APPLICATION FOR AN EXTENSION OF TIME TO FILE  
PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE ELEVENTH CIRCUIT**

TO THE HONORABLE CLARENCE THOMAS, Associate Justice of the Supreme Court of the United States, and Circuit Justice for the United States Court of Appeals for the Eleventh Circuit:

The Petitioner, CAMERON THIERRY, proceeding *pro se* and pursuant to 28 U.S.C. § 2101 and S. Ct. Rule 13.5, respectfully requests a second extension of time of thirty (30) days to file his Petition for Writ of Certiorari in this Court. Mr. Thierry will seek review of the decision of the United States Court of Appeals for the Eleventh Circuit entered on August 29, 2024. The same court denied his petition(s) for rehearing and/or petition(s) for en banc on November 5, 2024. The same court subsequently issued its mandate in the case on November 14, 2024. Mr. Thierry invokes the jurisdiction of this Court pursuant to 28 U.S.C. § 1254. His time to file a Petition for Writ of Certiorari presently expires on March 5, 2025. Mr. Thierry makes this application at least ten (10) days before the present due date. *See* S. Ct. Rule 13-5. This is his second request for an extension of time, after being granted an initial thirty (30) day extension by the Court - please take notice that Mr. Thierry had originally sought the full sixty (60) day extension of time allottable under S. Ct. Rule 13-5 in his initial application for an extension of time (*See* [Application] No. 24A612 Docket's *Proceedings and Orders*, filed on

December 19, 2024 (“*Order [see Docket Text]*”) and December 13, 2024 (“*Main Document*”), respectively).

Mr. Thierry asks the Court to extend the deadline because the issues in this case are complex and involve important precedent from this Court, so the time required to do them justice is greater than usual. Moreover, Mr. Thierry has been contemporaneously embattled in several cases as an indigent *pro se* litigant from the outset of this case, with several intrusive deadlines in the other cases dating back to at least August 2024 and extending through current day, which has and is destined to continue to interfere with his preparation of his certiorari petition in this Court.

Accordingly, Mr. Thierry seeks an order extending the time to file a petition for writ of certiorari for a period of thirty (30) days, up until or on April 4, 2025. In support, the Petitioner further states the following in support thereof:

1. Petitioner's Petition for Writ of Certiorari was originally due to be filed on or received around the 3rd day of February, 2025.
2. On December 19, 2024, the Court granted Petitioner a thirty (30) day extension of time, upon his initial December 13, 2024 application seeking a sixty (60) day extension of time, to file his Petition for Writ of Certiorari, presently due to be filed on or received around the 5th day of March, 2025.

3. The allotted time is insufficient to insure an adequate presentation of Petitioner's dispute because Petitioner is a *pro se* litigant proceeding alone contemporaneously in multiple Federal District and/or Bankruptcy Court cases contemporaneously without the training of a professional attorney or such resources amid rampant gamesmanship from teams of lawyers serving as counsel to the opposing parties. More time is needed to research the case's extensive record made in the lower courts for adequate presentations to the U.S. Supreme Court.
4. Counsel for the opposing party will be served a copy of Petitioner's Second Motion for Extension of Time as is indicated on the Certificate of Service.
5. This request is in accordance with *U.S. v. Ballentine*, 245 F.2d 223 (and Cir. 1957) where an extension of time was granted.
6. The Eleventh Circuit Court's decision is dated August 29, 2024, and the denied petition(s) for rehearing and/or petition(s) for en banc is dated November 5, 2024 (*See* [Application] No. 24A612 Docket's *Proceedings and Orders*, filed on December 13, 2024 (“*Main Document, Exhibit A [panel opinion] and Exhibit B [petition for rehearing and/or en Banc consideration denial]*”), and came down

amid Petitioner's unpredictably mounting, and ongoing, Texas Southern Bankruptcy Court and the United States Court of Appeals for the Fifth Circuit complex action(s) deadlines and a thereto related lawsuit styled as *Cameron M. Thierry v. UMB Bank, N.A. solely in its Capacity as Class 6B Trustee, Serta Simmons Class 6B Trust, Endurance Assurance Corporation, a subsidiary of Somp International Holdings Ltd., Serta Simmons Bedding, LLC, Dreamwell, Ltd., et al.*, Adversary Proceeding No. 24-03214 (CML), filed in the Texas Southern Bankruptcy Court on October 15, 2024 (which involves a[n asserted] settlement agreement reached amongst the parties thereto) (*see also Dreamwell, Ltd., et al.*, Case No. 23-90024 (CML), S. D. Tex. Bankr. (2023)); and the discrimination lawsuit styled *Cameron Thierry v. Serta Simmons Bedding, LLC*, Case No. 23-20410, U.S.C.A. 5th Cir. (2023)), and amid unpredictably mounting deadlines on two (2) additional ongoing separate legal matters which had developed around the same time, confidential in part - with the bulk of these legal matters, as far as the Petitioner can judge, remaining in pendency during his instantly requested extension of time to file his Petition, and all of which Petitioner is proceeding *Pro Se* in, and *in Forma Pauperis* in the United States Court of

Appeals for the Fifth and Eleventh Circuit court cases, as well as previously in the Texas Southern Bankruptcy Court's district case and adversary proceeding, consequently preventing him from being able to currently dedicate sufficient litigation efforts to the filing of his Petition in this action before the past deadline and instantly requested extension of time, and thereby presenting a compelling reason for extension to the Court.

7. Petitioner is the sole litigant (*Pro Se*) responsible for preparing this Petition, as the sole litigant (*Pro Se*), pursuant to ¶ 6 above, involved in several other unrelated matters requiring significant amounts of his time and attention.
8. This request is not sought for purposes of delay or other improper motive, but instead in good faith.
9. The opposing party will not be prejudiced by granting the requested extension of time.
10. The Petition was previously due on March 5, 2025. An extension of thirty (30) days would extend the due date to April 4, 2025.

### **CONCLUSION**

WHEREFORE, the Petitioner respectfully requests an extension of thirty (30) days, to and including April 4, 2025, to file his Petition under the

extraordinary circumstances given his caseload and the posture of his ongoing cases carried *pro se*. For the foregoing reasons, the Court should grant Petitioner's motion for a thirty (30) day extension of time to file his Petition.

Respectfully submitted this 19th day of February, 2025.



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CAMERON M. THIERRY  
2635 4 Mile Rd #44025  
Racine, WI 53404  
404-822-0336  
cameron.thierry@gmail.com  
PRO SE

*Pro Se Litigant for Petitioner  
Cameron Thierry*

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## Certificate Of Service


By signature below, I hereby certify that:

(1) Pursuant to The Supreme Court Rule 29, I have served the Respondent with a copy of the within and foregoing by filing with the Clerk of Court using the S. Ct. Electronic Filing System which will send notification of such filing to all attorneys of record, and Petitioner also further certifies that on February 19, 2025, a true and correct copy of the within and foregoing will also be sent to all attorneys of record via electronic mail, and via U.S. First Class mail, as follows:

MICHAEL D. JOHNSON  
Georgia Bar No. 399430  
mjohnson@taylorenghish.com  
TOBIAS C. TATUM  
Georgia Bar No. 307104  
ttatum@taylorenghish.com

Taylor English Duma LLP  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
Telephone: 770-434-6868  
Facsimile: 770-434-7376

This 19th day of February, 2025.

  
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CAMERON M. THIERRY  
2635 4 Mile Rd #44025  
Racine, WI 53404  
404-822-0336  
cameron.thierry@gmail.com  
PRO SE

*Pro Se Litigant for Petitioner  
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