

IN THE SUPREME COURT OF THE UNITED STATES

APPLICATION FOR EXTENSION OF TIME REQUEST FOR A PETITION FOR WRIT OF CERTIORARI

LUCY DUNNE, REPRESENTATIVE FOR HELENA DUPONT WRIGHT
JAMES MILLS; JOSEPH WRIGHT; T. KIMBERLY WILLIAMS, Petitioner

v.

ELTON CORPORATION; GREGORY FIELDS; FIRST REPUBLIC TRUST COMPANY OF DELAWARE LLC; M.C. DUPONT CLARK
EMPLOYEES PENSION TRUST

FIRST REPUBLIC TRUST COMPANY OF DELAWARE LLC; M.C. DUPONT CLARK EMPLOYEES PENSION TRUST

v.

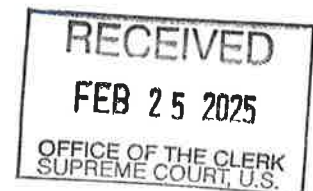
MARY MILLS ABEL SMITH; CHRISTOPHER T. DUPONT; MICHAEL DUPONT; JAMES B. WYETH, SOLELY AS EXECUTOR AND
PERSONAL REPRESENTATIVE OF THE ESTATE OF PHYLLIS M. WYETH; KATHERINE D. GAHAGAN

To The Honorable Scott S. Harris, Clerk of the United States Supreme Court

Petitioner, T. Kimberly Williams, pursuant to Rule 13(5), Rules of the Supreme Court, respectfully seeks a sixty (60) day extension of time within which to file my petition for writ of certiorari in this Court. This application is submitted more than ten (10) days prior to the scheduled filing for the Petition. The pertinent dates are:

- a. September 18, 2024: Issuance of written opinion of United States Court of Appeals for the Third Circuit, Lucy Dunne et al v. Elton Corp et al, No 23-1499. A copy of the opinion attached hereto as Exhibit A.
- b. October 30, 2024: Petitioner filed a petition for rehearing or rehearing en banc pursuant to Rule 34 and 40 of the Federal Rules of Appellate Procedure.
- c. December 4, 2024: Issuance of written order denying rehearing and hearing en banc. A copy of the order is attached hereto as Exhibit B
- d. February 22, 2025: Deadline for seeking extension of time within which to file a petition for writ of certiorari in the United Supreme Court.
- e. March 4, 2025: Expiration of time for filing a petition for writ of certiorari in the United States Supreme Court.

This is a complex ERISA case, additional time is needed to retain new counsel and to allow them to review the appellate court decision.



For the foregoing reason, the Petitioner respectfully prays that this Court grant an extension of sixty (60) days to and including May 3rd, 2025, within which to file my petition for writ of certiorari.

Respectfully submitted, this 22nd day of February 2025.

/s/ 

T. Kimberly Williams, Petitioner
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CERTIFICATE OF SERVICE

I, T. Kimberly Williams, certify that I have this day served the forgoing Motion for Extension of Time to file Petition for Writ of Certiorari by first class mail, postage prepaid, to the following parties listed below:

This the 22nd day of February 2025.

/s/ 

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