

**IN THE SUPERIOR COURT OF PENNSYLVANIA  
WESTERN DISTRICT**

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No. 377 WDA 2026

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NONHUMAN RIGHTS PROJECT, INC.,  
on behalf of Angeline, Savanna, Tasha, Victoria, and Zuri, individuals,

Appellant,

v.

ZOOLOGICAL SOCIETY OF PITTSBURGH,  
which owns and operates the Pittsburgh Zoo; and  
DR. JEREMY GOODMAN,  
the CEO and President of the Pittsburgh Zoo,

Appellees.

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**FIRST APPLICATION FOR CONTINUANCE OF ORAL ARGUMENT**

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On Appeal from the Final Order of February 12, 2026,  
Granting Motion to Dismiss the Petition for Writ of Habeas Corpus  
in the Allegheny County Court of Common Pleas, Docket No. GD-25-010963

The Honorable Mary C. McGinley, Judge Presiding.

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## **FIRST APPLICATION FOR CONTINUANCE OF ORAL ARGUMENT**

Pursuant to 210 Pa. Code Rule 2313, Appellant Nonhuman Rights Project, Inc. (“NhRP”), respectfully requests continuance of the October 27, 2026, 9:30 a.m. oral argument (Journal Number J-A26022-26) to the next Pittsburgh argument list after November 9, 2026. This is the NhRP’s first, and will be its only, request for a continuance of oral argument.

Jake Davis, undersigned counsel who is appearing pro hac vice in this matter, is presently responsible for preparing for oral argument in two significant and complex appellate matters scheduled less than two weeks apart.

On November 9, 2026, Mr. Davis will appear before the Supreme Court of Hawai‘i in separate litigation brought by the NhRP, following that Court’s grant of the NhRP’s application for certiorari. Preparation for such argument is substantial.

Preparation for argument in the present appeal is equally substantial. The issues before this Court are novel and nuanced, implicating the scope and development of Pennsylvania habeas corpus and common law. The briefing also presents substantial arguments advanced separately by Appellees and amici curiae that require careful preparation for questioning at oral argument. The NhRP does not seek a continuance for convenience, nor does it seek any substantial delay in resolution of this appeal. It seeks only to move argument to the next available Pittsburgh argument list after November 9 so that Mr. Davis can devote the focused

preparation necessary to address the distinct issues presented in each proceeding and provide both this Court and the Supreme Court of Hawai‘i with the quality of advocacy these matters warrant.

The circumstances giving rise to this request are exceptional. The NhRP has not previously sought a continuance or extension in this appeal, whether in connection with briefing or oral argument. Since Mr. Davis alone bears responsibility for presenting the NhRP’s appellate oral arguments, the proximity of these two significant proceedings cannot reasonably be addressed by assigning either argument to different counsel. The requested continuance is also narrowly tailored because the NhRP seeks only the next Pittsburgh argument list following its November 9 argument.

These reasons, including the combination of undersigned counsel’s unique responsibility within the NhRP, the exceptional and potentially singular nature of the November 9 appearance before the Supreme Court of Hawai‘i, the proximity of the two arguments, and the complexity and importance of the issues presented in this appeal, constitute the “compelling and persuasive reasons” contemplated by Rule 2313.

The NhRP respectfully requests that the Court continue oral argument from October 27, 2026, to the next available Pittsburgh argument list after November 9, 2026.

Respectfully submitted,  
/s/ Kenneth Cramer-Cohen  
Kenneth Cramer-Cohen  
—and—  
Jake Davis  
(Admitted *pro hac vice*)  
Attorneys for Appellant

## **PROOF OF SERVICE**

I hereby certify that I am this day serving the foregoing document upon the persons and in the manner indicated below, which satisfies the requirements of

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Date: September 22, 2026

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