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FELLOW

March 8, 2018

Scott S. Harris, Clerk  
United States Supreme Court  
One First Street, N.E.  
Washington, DC 20543

Re: *Riffey v. Rauner*, No. 17-981

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondent SEIU Healthcare Illinois, Indiana, Missouri, Kansas (“SEIU”) respectfully requests a 45-day extension of time to May 3, 2018, to file a response to the petition for writ of certiorari to the United States Court of Appeals for the Seventh Circuit filed with this Court. On February 15, 2018, this Court ordered that a response be filed on or before March 19, 2018. This request is being filed more than 10 days before that date.

Petitioners do not oppose this request for an extension. Petitioners have requested that their petition be held and considered after the Court issues its decision in *Janus v. AFSCME, Council 31*, No. 16-1466 (oral argument held on February 26, 2018). See Petition at 18-19. Therefore, the extension should not delay consideration of the petition.

Respondent SEIU requests this extension to have adequate time to prepare a response to the petition. I am the attorney who represented SEIU throughout the lower court proceedings, and I will be the attorney responsible for preparing its response to the petition for writ of certiorari. At the time the Court requested a response to the petition, I was engaged in preparing for an oral argument in the Ninth Circuit in *Allied Concrete v. Baker*, 9th Cir. No. 16-56546 (consolidated with Nos. 17-55343, 17-55503), and could not turn my attention to this case. I then have prior commitments to represent clients in other cases between now and when a response to the petition would be due. A substantial part of my practice includes representing clients with respect to matters pending before the California Legislature, and now that the Legislature is back in session for committee hearings, these matters cannot be postponed. I then have a previously scheduled vacation out of the country that would prevent me from working on

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a response to the petition. As such, the requested extension is necessary to allow me sufficient time to prepare an adequate response to the petition in this case.

Respondent SEIU therefore respectfully requests that an order be entered extending the time to file a response to the certiorari petition to and including May 3, 2018.

Sincerely,



Scott A. Kronland

*Counsel for Respondent SEIU Healthcare  
Illinois, Indiana, Missouri, Kansas*

cc: William L. Messenger  
David L. Franklin  
Frank H. Bieszczat

**CERTIFICATE OF SERVICE**

I, SCOTT A. KRONLAND, a member of the Bar of this Court, pursuant to Supreme Court Rule 29.5(b), hereby certify that on March 8, 2018, a copy of the attached Letter requesting an Extension of Time to File a Response to the Petition for Writ of Certiorari to the United States Court of Appeals for the Seventh Circuit in *Riffey v. Rauner*, No. 17-981, was sent, via U.S. mail and electronic mail, to:

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c/o NATIONAL RIGHT TO  
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*Attorneys for Respondent Bruce Rauner, Governor of Illinois*

I further certify that all parties required to be served have been served.



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