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March 25, 2019

Danny Bickell, Esq.
Deputy Clerk for Practice and Procedure
Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543

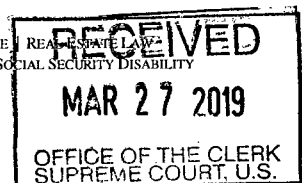
Re: *Les Schwab Tire Centers of Portland, Inc., an Oregon Corporation, et al. v Scott Wilcox, Individually and as the Personal Representative of the Estate of Jenna Wilcox,*
No. 18-1137

Dear Mr. Bickell,

I (along with Scott Duquin) am counsel for Respondent in the above-referenced case. On March 4, 2019, a certiorari petition was docketed in this case. Unless extended by the Court, the response would be due on April 3, 2019. For the reasons that follow, and pursuant to Rule 30.4, Respondent respectfully requests a thirty (30) day extension of time within which to file the brief in opposition to the petition for a writ of certiorari. Granting this request would extend the filing deadline to May 3, 2019.

In support thereof, Respondent submits: Counsel is, and has been, diligently working to provide the Court with a complete brief in opposition to the petition for a writ of certiorari. Counsel respectfully submits that Respondent cannot file an adequate brief in opposition in the time presently allowed due to counsel's competing obligations. As the sole member of the firm's appellate department, Counsel has been faced with numerous deadlines. In addition to preparing this brief in opposition, counsel is presently preparing appeals before New York's Appellate Division, Fourth Department (*Hoar v. Aiello, et al.*, Docket No. CA 19-00501, Erie County Index No. 2012-1030; *Wright v. Schickler, et al.*, Docket No. CA 18-02445, Erie County Index No. 2015-03867; *Magnano v. Allegany Co-op Ins. Co., et al.*, Erie County Index No. 2011-604337; and *Bauer v. County of Erie, et al.*, Erie County Index No. 2016-801582) and New York's Appellate Division, Third Department (*Robert Hansen*, Unemployment Appeal Board No. 602285). Counsel is also in the process of preparing a respondent's brief in a consolidated appeal from six different family court orders (*Zylinski v. DiNunzio*, Docket Nos. CAF 17-01976, 17-01977, 17-01978, 17-01979, 17-01980, and 18-00299). Counsel is also working on a motion for leave to appeal to the New York Court of Appeals (*Matter of HSBC [Knox]*, File No. DO-0659).

PERSONAL INJURY & MALPRACTICE | MATRIMONIAL & FAMILY LAW | LITIGATION | CORPORATE & BUSINESS LAW | CRIMINAL DEFENSE | REAL ESTATE LAW
ESTATE PLANNING, WILLS & TRUSTS | ESTATES | ELDER LAW | GUARDIANSHIPS | BANKRUPTCY & DEBT RELIEF | VEHICLE & TRAFFIC LAW | SOCIAL SECURITY DISABILITY

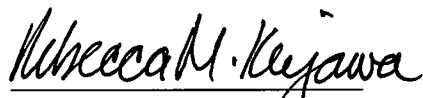


In addition to drafting appellate briefs and motions, Counsel is also responsible for the day-to-day management of the firm's appellate caseload, including but not limited to tracking appellate deadlines, analyzing the merits of potential appeals, preparing and reviewing notices of appeal, preparing and reviewing proposed tables of contents for records on appeal, preparing records on appeal, maintaining correspondence with appellate printers, maintaining correspondence with appellate clients, and reviewing and responding to additional correspondence from opposing counsel.

In addition to appellate work, Counsel is also a member of HoganWillig's litigation department and prepares motions as well as petitions in special proceedings. Counsel recently prepared a motion for leave to reargue (*Bauer v. County of Erie, et al.*, Erie County Index No. 2016-801582) and is preparing the opposition to a motion for set-off in a medical malpractice case (*Page v Niagara Falls Memorial Medical Center, et al.*, Niagara County Index No. 143268).

This request is not being made to cause undue delay or any other improper purpose. For the reasons above, counsel respectfully requests a thirty (30) day extension of time within which to file Respondent's Brief in Opposition.

Sincerely,


Rebecca M. Kujawa, Esq.

Enclosures

cc: Thomas H. Dupree, Jr., Esq.
John W. Kottnerus, Esq.

SUPREME COURT OF THE UNITED STATES

LES SCHWAB TIRE CENTERS OF PORTLAND, INC.
and TOYO TIRE HOLDINGS OF AMERICAS, INC.,

Petitioners,

v.

SCOTT WILCOX,

Respondent.

**AFFIDAVIT OF SERVICE
BY OVERNIGHT MAIL**

No. 18-1137

Rebecca M. Kujawa, Esq., being duly sworn, deposes and says, deponent is not a party to the action, is over 18 years of age, and resides in Amherst, New York.

On March 25, 2019, deponent served Respondent's request for an extension of time in which to serve and file his opposition to Petitioners' Petition for Writ of Certiorari on:


John W. Knottnerus, Esq.
MB Law Group LLP
117 S.W. Taylor Street
Suite 200
Portland, OR 97204

Thomas H. Dupree Jr., Esq.
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036

By depositing true copies of the same, in postpaid properly addressed wrappers, by overnight mail, in an official depository under the exclusive care and custody of the Federal Express Service.


REBECCA M. KUJAWA, ESQ.

Sworn to before me on the
25th day of March, 2019.


Notary Public
Joan Ruchalski
Notary Public, State of New York
Qualified in Erie County
My Commission Expires June 30, 2022