

REBECCA M. KUJAWA  
ATTORNEY

DIRECT LINE: 716.932.6604  
DIRECT FAX: 716.932.6704  
RKUJAWA@HOGANWILLIG.COM



**HOGANWILLIG**  
ATTORNEYS AT LAW

ADDITIONAL OFFICES:  
155 SUMMER STREET  
BUFFALO, NY 14222

6133 ROUTE 219 S  
SUITE 1005  
ELLIOTTVILLE, NY 14731

MAIN OFFICE:  
2410 NORTH FOREST ROAD | SUITE 301 | AMHERST, NEW YORK 14068  
PHONE: 716.636.7600 | TOLL FREE: 800.636.5255 | FAX: 716.636.7606

WWW.HOGANWILLIG.COM  
SERVICE BY FAX AND EMAIL NOT ACCEPTED

43 CENTRAL AVENUE  
LANCASTER, NY 14086

770 DAVISON ROAD  
LOCKPORT, NY 14094

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

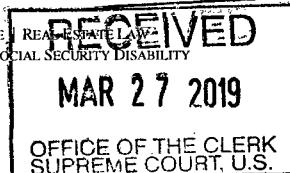
Re: *Les Schwab Tire Centers of Portland, Inc., an Oregon Corporation, et al. v Scott Wilcox, Individually and as the Personal Representative of the Estate of Jenna Wilcox,*  
No. 18-1137

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 PROPERTY  
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  
Rebecca M. Kujawa, Esq.

Enclosures

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

SUPREME COURT OF THE UNITED STATES

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

*Petitioners,*

v.

SCOTT WILCOX,

**AFFIDAVIT OF SERVICE  
BY OVERNIGHT MAIL**

No. 18-1137

*Respondent.*

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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