

August 21, 2018

Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543-0001

RE: *Kenneth Jerome Dawson v. Board of County Commissioners of Jefferson County, Colorado, et al.*, No. 18-177

Dear Mr. Harris:


Pursuant to Supreme Court Rule 30.4, we are writing to request an extension of time for filing a brief in opposition to the petition for certiorari filed by Kenneth Jerome Dawson. Dawson's petition for certiorari was docketed on August 9, 2018, and respondents' opposition brief is currently due on September 10, 2018. I request an extension of time through and including Friday, November 9, 2018, to file this brief.

We affirm that this request is justified and not for any improper purpose. We have diligently attempted to meet the Court's deadline for filing our brief in opposition to Mr. Dawson's petition but require an extension to prepare our brief while also meeting other obligations to our clients and office. Assistant County Attorney Rachel Bender and I are both in the process of applying to be admitted as members of the United States Supreme Court Bar. Additionally, we have been short a litigator since prior to the docketing of Mr. Dawson's petition and have been splitting that caseload until a new litigation attorney can begin work.

We have contacted counsel for Mr. Dawson regarding this request and can represent that it is unopposed. Nor will this request for an extension have an adverse effect on the Court's calendar. Under the present schedule, the petition would likely be considered no sooner than the Court's October 5, 2018 Conference. If our request for an extension of time were granted, the Court could consider the petition for certiorari no later than its November 16, 2018 Conference and could be fully briefed by mid-February, in time to be set at the end of the October Term 2018 docket for oral argument if so ordered.

Thank you for your kind consideration of our request.

Sincerely,



Rebecca P. Klymkowsky
Senior Assistant County Attorney
303.271.8932
rklymkow@jeffco.us

RECEIVED

AUG 28 2018

**OFFICE OF THE CLERK
SUPREME COURT, U.S.**

CERTIFICATE OF SERVICE

I, Briana McCarten, hereby certify that I served the following document on the individuals listed below by first-class mail and by electronic mail on August 21, 2018:

RESPONDENTS' REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE TO PETITION FOR CERTIORARI

F. Brittin Clayton III
Ryley Carlock & Applewhite
1700 Lincoln Street, Suite 3500
Denver, Colorado 80203
Email: bclayton@rcalaw.com



Briana McCarten, Paralegal