

FREEDOM *of* CONSCIENCE

DEFENSE FUND

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January 31, 2019

Scott S. Harris, Clerk
Supreme Court of the United States
One First Street, NE
Washington, D.C. 20543

**Re: *Center for Medical Progress v. Planned Parenthood Federation of America*
No. 18-696**

Dear Mr. Harris:

Petitioners the Center for Medical Progress, David Daleiden, Gerardo Adrian Lopez, and BioMax Procurement Services, LLC take no position as to the request of Respondents Planned Parenthood Federation of America, Inc., et al., for an extension of time to respond to their Petition for Certiorari. However, if the Court is inclined to grant Respondents' request for an extension, Petitioners respectfully request that this be the only extension permitted because of the harm that the subject strategic lawsuit against public participation is causing. Petitioners' request is necessitated by the following circumstances:

(1) Petitioners' First Amendment right to free speech is being infringed while the subject strategic lawsuit against public participation remains pending;

(2) Petitioners' state law right to immunity from a frivolous lawsuit aimed at chilling First Amendment activity is being infringed while the subject lawsuit remains pending, especially in light of the District Court's order directing the parties to engage in a highly accelerated discovery schedule; and

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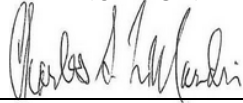
January 31, 2019

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(3) the pending strategic lawsuit against public participation is prejudicing Petitioner Daleiden's ability to fully and effectively defend himself against state court criminal charges premised on recordings at issue in this lawsuit.

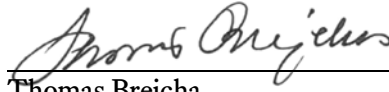
Respectfully submitted,

FREEDOM OF CONSCIENCE
DEFENSE FUND



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Daleiden, Lopez, and BioMax

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Thomas Brejcha
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cc: Counsel of Record for Respondents