

MILLER BARONDESS, LLP

ATTORNEYS AT LAW
1999 AVENUE OF THE STARS
SUITE 1000
LOS ANGELES, CALIFORNIA 90067
TEL: (310) 552-4400
FAX: (310) 552-8400
WWW.MILLERBARONDESS.COM

April 14, 2020

MIRA HASHMALL
DIRECT DIAL: (310) 552-7560
MHASHMALL@MILLERBARONDESS.COM

VIA ELECTRONIC FILING AND U.S. MAIL

Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543-0001

Re: *Neal N. Browder, et al. v. S.R. Nehad, et al.*, Case No. 19-1067

Dear Mr. Harris:

I am writing to request an extension of time for Respondents S.R. Nehad, K.R. Nehad, and the Estate of Fridoon Nehad to file an opposition to the petition for certiorari filed by Petitioners in the above-referenced case. Respondents' brief in opposition to certiorari is currently due on May 8, 2020. Pursuant to Rule 30.4 of the United States Supreme Court, Respondents request an extension of 60 days, up to and including July 7, 2020, to file this brief.

There is good cause for this extension. Respondents require sufficient time to respond to the issues presented by the Petition, as well as those presented by the amicus brief filed by third parties the California State Association of Counties and the League of California Cities. Respondents are working diligently to address these issues, but their efforts have been disrupted by the global crisis caused by the novel coronavirus, which has dislocated Respondents' counsel and rendered communication among them more difficult. Respondents therefore need additional time to adequately respond to the points raised in the Petition and the amicus brief.

Respondents' counsel also has significant other obligations to meet in unrelated cases over the next several weeks. This coming Friday, April 17, 2020, I will be making oral arguments before the California Court of Appeal in *Claggett v. County of Los Angeles et al.*, Case No. B295420, and I am currently drafting a brief due to the California Court of Appeal on Monday, April 20, 2020, in *Michael S. Yu, et al. v. Bank of the West*, Case No. B304011. Further, I have another brief due to the California Court of Appeal on May 10, 2020, in *Association for Los Angeles Deputy Sheriffs v. County of Los Angeles, et al.*, Case No. B296425,

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as well as multiple other obligations in various trial court matters. The requested extension would allow Respondents' counsel to meet these obligations while also granting this case the time and attention that it requires.

Granting this 60-day extension would also comport with considerations of fairness, as Petitioners applied for, and were granted, two separate 30-day extensions to file the Petition, matching the extension that Respondents seek here. Respondents' counsel has contacted Petitioners' counsel George F. Schaefer regarding this matter, and Mr. Schaefer answered that Petitioners do not object to Respondents' proposed 60-day extension.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mira Hashmall".

Mira Hashmall

cc: George F. Schaefer, Esq.