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June 10, 2020

Via Electronic Filing

Hon. Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street N.E.
Washington, DC 20543-0001

Re: Signode Indus. Grp. LLC et al. v. Stone et al., No. 19-1334

Dear Mr. Harris:

We represent respondents Harold Stone, John Woestman, and United Steel, Paper, & Forestry, Rubber, Manufacturing, Energy, Allied Industrial & Service Workers International Union, AFL-CIO-CLC (“USW”) in the above-captioned matter, which was docketed June 2, 2020. We write, pursuant to Supreme Court Rule 30.4, to request a 29-day extension of time in which to file Respondents’ brief in opposition to the pending petition for certiorari. The brief in opposition is currently due on July 2, 2020.

This extension request is made in part because of the additional difficulties of preparing a brief while working from home as a result of the COVID-19 pandemic, and in part because undersigned counsel was only recently engaged in this matter. A 29-day extension to and including July 31, 2020 will ensure that we have sufficient time to fully analyze and respond to the arguments raised in the Petition.

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We have conferred with Joseph J. Torres, Counsel of Record for Petitioners, and have been advised that the request is not opposed.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/ Leon Dayan

Leon Dayan

Robert Alexander

Counsel for Respondents

cc: Counsel of Record
(via e-mail and Overnight Mail)

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CERTIFICATE OF SERVICE

I, Leon Dayan, hereby certify that on June 10, 2020, I caused to be served this letter motion for extension of time via electronic mail and overnight mail on the following counsel of record:

Joseph James Torres
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Dated: June 10, 2020

/s/ Leon Dayan
Leon Dayan