SCOT G. DOYEN* WILLIAM T. SEBESTA RANDALL J. POELMA, JR. ANGELA M. HAHN



TAMARA R. CRAWFORD TERENCE (TERRY) C. MCCARTHY TAYLOR P. FRANKS

DOYEN SEBESTA & POELMA

*Board Certified – Civil Trial Law Texas Board of Legal Specialization

ATTORNEYS AT LAW

WRITER'S DIRECT: sdoyen@ds-lawyers.com 713.580.8902

October 4, 2019

The Hon. Scott S. Harris, Clerk Supreme Court of the United States 1 First Street, N.E. Washington, D.C. 20543 Via FEDEX and EFILE

Re: Ali Ekhlassi v. National Lloyds Insurance Company (No. 19-312)

Dear Mr. Harris:

I am counsel of record for National Lloyds Insurance Company ("National Lloyds"), Respondent in the above referenced matter. The petition for writ of certiorari was filed on September 3, 2019, and placed on the docket September 6, 2019. The brief in opposition thereto is required to be filed on October 7, 2019, unless such a filing is waived or the time for filing is extended.

Pursuant to U.S. Supreme Court Rule 30.4, National Lloyds requests an extension of time of fifty-six (56) days to file a brief in opposition to the petition for certiorari filed in this case. National Lloyds has consented to the Texas Association of Public Insurance Adjusters ("TAPIA") filing an *amicus curiae* brief supporting the petition for certiorari. National Lloyds would appreciate the opportunity to review and respond to the filing in its brief in opposition to the petition.

For the foregoing reasons, Respondent National Lloyds respectfully requests an extension of 56 days through Monday, December 2, 2019, to file its brief in opposition. I have conferred with Dan Geyser, counsel of record for Petitioner Ali Ekhlassi, who stated Petitioner does not oppose this requested extension.

Respectfully submitted,

Scot G. Doyen Doyen Sebesta & Poelma, LLLP 450 Gears Rd., Ste. 350 Houston, TX 77067 (713) 580-8902 sdoyen@ds-lawyers.com Ali Ekhlassi

Daniel L. Geyser Geyser P.C. One Energy Square 4925 Greenville Ave., Ste 200 Dallas, Texas 75206 (214) 800-2660 <u>daniel.geyser@geyserpc.com</u>

Todd Lipscomb Loree & Lipscomb The Terrace at Concord Park 777 E. Sonterra Blvd., Ste 320 San Antonio, Texas 78258

cc: