



THE COMMONWEALTH OF MASSACHUSETTS
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September 12, 2019

By Electronic Filing

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

Re: *Ben Branch et al. v. Massachusetts Department of Labor Relations et al.*, No. 19-51 — Request for an Extension of Time

Dear Clerk Harris:

The Respondents in the above-referenced case have been asked by the Court to file briefs in response to the petition for a writ of certiorari by September 23, 2019. Pursuant to Supreme Court Rule 30.4, we respectfully request that the time allowed for the Respondents to file their briefs be extended by 60 days, up to and including November 22, 2019. We have conferred with counsel for the Petitioners, who indicated that they assent to this request.

Counsel representing the Massachusetts state agency Respondents—the Massachusetts Department of Labor Relations and the Commonwealth Employment Relations Board (“Massachusetts Respondents”)—states that this request is based on the need for review within the Massachusetts Attorney General’s Office and the extent of other professional obligations. A Court-requested brief in response to a petition for a writ of certiorari is scrutinized closely in the Attorney General’s Office. The brief in this case will be subject to multiple rounds of evaluation and revision by various attorneys, all of which will require time. While counsel is giving this matter priority status, counsel also has several upcoming arguments and deadlines in other cases, and thus will need additional time to prepare the brief in response to the petition for writ of certiorari.

Counsel representing Respondents Massachusetts Society of Professors/MTA/NEA, Hanover Teachers Association/MTA/NEA, and Professional Staff Union/MTA/NEA (“MTA/NEA Respondents”) joins in this request. The

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MTA/NEA Respondents' counsel has prioritized this case, but nevertheless requires additional time to prepare the Court-requested brief and circulate it for review by other attorneys within the MTA and NEA. Moreover, the attorneys with primary responsibility for the brief have other obligations that have prevented them from turning their full attention to this matter, which include briefing deadlines and an oral argument in other cases, and a nationwide conference they are planning for lawyers representing education associations, which is scheduled for mid-October.

Thank you for your consideration of this request.

Sincerely,

/s/ Timothy J. Casey
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