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February 19, 2021

Scott S. Harris, Esq., Chief Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

Re: Dantzler, Inc. et al. v. S2 Services Puerto Rico, LLC, et al.  
Docket No. 20-1061

Dear Mr. Harris:

This firm represents Respondents S2 Services Puerto Rico, LLC and Rapiscan Systems, Inc. in the above matter.

Pursuant to Rules 15.3 and 30.4, we request, on behalf of our client, that the time to respond to the Petition for a Writ of Certiorari be extended 30 days to, and including, April 5, 2021. The Petition was docketed on February 3, 2021. Consequently, the Brief in Opposition must currently be filed by March 5, 2021. We have not previously requested an extension to file a Brief in Opposition.

Counsel who will be preparing the brief are working remotely due to the COVID-19 pandemic. Remote work has imposed a number of constraints on counsel, including limited access to support staff and other resources, and challenges accessing case files and documents, and consulting and coordinating with co-counsel in Puerto Rico and our client in California. In addition, counsel have conflicting briefing deadlines in other matters that will impede our ability to fully and meaningfully review and respond to issues raised in the Petition within the current deadline. For these reasons, and because Petitioners were afforded 150 days to prepare the Petition, we respectfully request additional time to prepare a Brief in Opposition which adequately addresses all of the issues raised in the Petition.

On February 17, 2021, we communicated with Petitioners' counsel, who advised us they do not oppose this request. We also have been informed by counsel for the other Respondent, the Puerto Rico Ports Authority, that they

intend to jointly request a 30-day extension to file a Brief in Opposition to the Petition.

As indicated by the enclosed certificate of service, we have concurrently served a copy of this letter upon counsel for the Petitioners, as well as counsel for the other Respondent. We have electronically filed a copy of this letter with the Court.

Thank you for your courtesy and prompt consideration of this request.

Sincerely,

/s/ Philip S. Goldberg  
Philip S. Goldberg

For respondents S2 Services Puerto Rico, LLC  
and Rapiscan Systems, Inc.