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March 23, 2021

**Via Electronic Filing System**

Mr. Scott S. Harris, Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20543

**Re: *Campbell v. Pennsylvania School Boards Assoc., et al.*, No. 20-1294**

Dear Mr. Harris:

On behalf of all Respondents, I am writing pursuant to Supreme Court Rule 30.4 to request a 30-day extension of time within which to file Respondents' brief in opposition to the petition for writ of certiorari in the above-captioned matter. If granted, the extension of time would change the due date for the brief from April 16, 2021 to May 17, 2021.<sup>1</sup>

Respondents seek this extension in light of competing professional and personal obligations for myself and lead counsel Michael I. Levin. Mr. Levin and I are working on significant briefs and discovery matters, including: (1) a Reply Brief in support of a motion for

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<sup>1</sup> The extension of time would extend to a 31<sup>st</sup> day because May 16, 2021 is a Sunday.

summary judgment in *Aspira v. School Dist. of Philadelphia*, No. 19-CV-04415-JS (E.D. Pa.), due March 26; (2) motions in limine and a pretrial memorandum in *Aspira, supra*, due March 26 and April 6, respectively, (3) a motion for summary judgment in *Montemuro v. Jim Thorpe Area School Dist.*, No. 320-CV-208-RDM (M.D. Pa.), due April 15; (4) objections to the Report and Recommendation of the Magistrate Judge in *Montemuro* due March 29; and (5) several depositions in the matter of *Cartee-Haring v. Central Bucks School Dist.*, No. 2:20-cv-01995 (E.D. Pa.). Furthermore, both Mr. Levin and I are preparing with arguing counsel, Ms. Lisa Blatt, for oral argument before this court on April 28 in *Mahanoy Area School Dist. v. B.L.*, No. 20-255. These and other previously scheduled engagements and personal and professional commitments, including the Easter and Passover holidays, during the initial 30-day response period would make it difficult for counsel to prepare the response in this case.

The petition for a writ of certiorari was filed on March 15, 2021 and placed on the docket on March 17, 2021, creating the current April 26 response date. I have communicated with Jacob Cohn, counsel for the Petitioners, regarding this request, and he has stated that he does not object.

Thank you for your attention to this matter. Please feel free to contact me with any questions regarding this request.

Respectfully submitted,  
LEVIN LEGAL GROUP, P.C.



David W. Brown, Esq.

cc: Jacob Cohn, Counsel for Petitioners (*via e-mail and U.S. mail*)  
Ilan Rosenberg, Counsel for Petitioners (*via e-mail and U.S. mail*)  
Michael I. Levin, Counsel for Respondents (*via e-mail*)