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April 7, 2021

Via Overnight Mail

Danny Bickell
Deputy Clerk for Practice and Procedure
Supreme Court of the United States
One First Street NE
Washington, DC 20543

Re: 6th Circuit Case No. 20-1305; *Eberline, et al. v. Douglas J. Holdings, Inc., et al.*

Dear Mr. Bickell:

I am counsel for Respondents in the above-referenced case. On March 19, 2021, a certiorari petition was docketed in this case. Unless extended by the Court, the response would be due on April 19, 2021. For the following reasons, and pursuant to Rule 30.4, I respectfully request an extension of 14 days, to and including May 3, 2021.

I have had several pressing obligations in recent weeks, with more in the upcoming weeks, including but not limited to:

- Personal obligations throughout this time period related to a family member's medical care;
- An all-day budget workshop on March 27, as part of my duties as a Councilmember for the City of Ferndale, Michigan;
- Meetings, research, and drafting a COVID-19 Preparedness & Response Plan the week of March 29, a mandatory requirement for reopening our office in the State of Michigan;
- Preparation for an appearance at a status conference following the Sixth Circuit's mandate in the instant matter, *Eberline v. Douglas Holdings*, Case No. 14-10887, before Judge Judith Levy in the Eastern District of Michigan on April 1;
- My family is at home for spring break April 2 through April 11;
- Meetings on April 9 and April 14 for the Metro Detroit Chapter of Advocates and Leaders for Police and Community Trust, of which I am a Facilitator for the organization's Steering Committee;
- Two dental appointments on April 12 and April 19, to finish a lengthy tooth extraction, implant, and crown procedure;
- Two Reply Briefs due on April 19 in *Ray Ahmed Fayad v James McMahon, et al.*, U.S. District Court, Eastern District of Michigan;
- Plaintiff-Appellant's Brief is due on April 26 in *S. Baxter Jones v City of Detroit*, Case No. 21-1055, Sixth Circuit Court of Appeals, for which I am lead counsel for the plaintiff; and
- My co-counsel also has similar obligations, including deadlines or/or court appearances on April 15 for *Wetzel v EMH*, Macomb County Circuit Court, April 16 for *Delgado v Servpro*, Midland County Circuit Court, and April 19 again for *Wetzel*.

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An extension will allow me and my co-council to meet our upcoming obligations and also to file a response that adequately addresses the points raised in the petition.

For these reasons, I ask that a 14-day extension to May 3, 2021 be granted. Thank you for your attention to this matter.

A copy of this letter will be e-filed upon my admission.

Sincerely,

Goodman Hurwitz & James, P.C.



Kathryn Bruner James
Counsel for Respondent

KBJ:los

cc via email only:

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