



In re:

DOCKET NO: 20-1402  
IN THE SUPREME COURT OF THE UNITED STATES  
STEPHEN HAMMONDS, *Petitioner* v. ROBERT THEAKSTON, *ET AL.*,  
*Respondents*  
ON PETITION FOR WRIT OF CERTIORARI TO THE SUPREME COURT OF  
ALABAMA  
RESPONDENTS' MOTION FOR EXTENSION OF TIME

Counsel of Record: Jamie Helen Kidd<sup>1</sup>

*Counsel for Respondent Robert Theakston and Matthew Martin*  
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May 4, 2021

Clerk of Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

To the Clerk of the Supreme Court of the United States:

Please allow this letter to serve as a Motion pursuant to Rule 30.4 for a thirty (30) day extension of time to file a Response to the Petition for Writ of Certiorari by Respondents Robert Theakston and Matthew Martin, from May 7, 2021, up to and including June 6, 2021. The Petition was filed on April 1, 2021, and docketed on April 7, 2021. Preparation of the Response has been delayed due to counsels' heavy

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<sup>1</sup> The undersigned has submitted a letter to this Court notifying it of a change in her name due to marriage from "Jamie Helen Kidd" to "Jamie Helen Kidd Frawley." Because the letter has not had time to arrive, this Motion is being filed under Counsel's name as currently reflected in the records of the Bar of the United States Supreme Court.

caseloads, including, but not limited to, trial and other long-standing commitments. In addition, the undersigned is representing the Defendants in *Highway 29 LLC v. Lee County Commission, et al.*, Civil Action No. 3:21-cv-00300-ECM-KFP, which was filed in the United States District Court for the Middle District of Alabama on April 22, 2021, seeking a temporary restraining order/preliminary injunction that would block a special election. The nature of that case and the tight deadlines necessarily associated with the request for emergency relief is the primary reason for this request for extension. An extension will not prejudice any person or party, but will instead ensure that the issues are presented to this Court concisely and efficiently. Counsel for Petitioners have indicated via email that they do not oppose this Motion.

Thank you in advance for your consideration.

Very truly yours,



Jamie Helen Kidd

*Counsel of Record,  
Robert Theakston and Matthew Martin*

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