

June 3, 2021

By eFile

Scott S. Harris
Clerk of Court
Supreme Court of the United States
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Washington, DC 20543

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Re: *Hermanidad de Empleados del Fondo del Seguro del Estado, Inc., et al. v. Commonwealth of Puerto Rico, et al., No. 20-1466*


Dear Mr. Harris:

On behalf of the Financial Oversight and Management Board for Puerto Rico (the “Board”), I write pursuant to Supreme Court Rule 30.4 to request a 30-day extension of time to respond to the petition for a writ of certiorari in the above-captioned matter. On June 1, the Court requested that the Board respond to the petition by July 1. The requested 30-day extension would move the due date to August 2.¹ Counsel for Petitioners has indicated that she does not oppose this request.

Congress established the Board to oversee the restructuring of Puerto Rico’s massive public debt—the largest municipal-debt restructuring in American history. *See* 48 U.S.C. § 2121(b). At present, the Board is litigating numerous adversary proceedings within the bankruptcy-like cases it has filed on behalf of the Commonwealth and its municipal entities. The Board is also litigating several appeals before the First Circuit, as well as opposing a petition for certiorari to this Court in Case No. 20-1400. In light of the significant number of matters the Board is currently handling, we respectfully submit that the requested extension is necessary to provide sufficient time to properly respond to the petition.

Thank you for your consideration.

Sincerely,

Martin J. Bienenstock
Martin J. Bienenstock 

¹ A 30-day extension would move the deadline to Saturday, July 31. Pursuant to Supreme Court Rule 30, the deadline is moved to the following Monday, August 2.



Scott S. Harris

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cc: Jessica Esther Mendez, Counsel of Record for Petitioners
William J. Sushon
Luis C. Marini-Biaggi