

LAW OFFICES OF
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August 6, 2021

VIA FEDERAL EXPRESS

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

Re: Request for extension of time to respond to
Petition for Writ of Certiorari in *James H. Fischer*
v. Sandra F. Forrest et al., No. 20-1648

Dear Mr. Harris:

This firm and its principal attorney, Daniel Cahn, along with co-counsel Seth Hudson of Nexsen Pruet PLLC, represent the Respondents, Sandra F. Forrest, Shane R. Gebauer, Brushy Mountain Bee Farm, Inc., and Stephen T. Forrest, Jr. ("Respondents"), in connection with the above-referenced appeal. I have been Counsel to the firm since 2013.

I am a member of the Bar of the Court since approximately 1960.

Pursuant to Rule 30(4), I write to respectfully request a thirty-day extension of time, from September 1, 2021 to October 1, 2021, for Respondents to comply with the Court's directive to file their brief in response to the pending Petition for Certiorari.

We make this application partly because significant time will be needed to research and prepare that brief, and the firm already has a current substantial caseload. More significantly, the clients desire that Daniel Cahn, who argued the appeal in the Second Circuit and who has served as principal New York counsel on this case since its inception, continue to do so. Daniel Cahn is not a member of the bar of this Court, and accordingly, he is now preparing his application for Admission to the Bar of the Court so that he may continue to serve as desired by the clients. It is possible that his application for admission may not be ruled upon by the Court prior to the current deadline of September 1, 2021.

LAW OFFICES OF
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Scott S. Harris, Clerk
August 6, 2021
Page 2

Counsel of record for the Petitioner has consented to this request.

Respectfully,

/s/ Richard C. Cahn
Richard C. Cahn

RCC/

SERVICE LIST

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Scott S. Harris, Clerk
August 6, 2021
Page 3

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Portland, OR 97207

Counsel for Amici Curiae

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Counsel for Respondents



TRACK ANOTHER SHIPMENT

774470489346


[ADD NICKNAME](#)

Delivered
Monday, August 9, 2021 at 11:20 am

**DELIVERED**

Signature not required

[GET STATUS UPDATES](#)
[OBTAIN PROOF OF DELIVERY](#)
FROM

Law Offices of Cahn & Cahn, P.C.
Daniel K. Cahn, Esq.

105 Maxess Road
Suite 124
Melville, NY US 11747
631-752-1600

TO

Andrew Grimm, Esq.
Digital Justice Foundation

15287 Pepperwood Drive
OMAHA, NE US 68154
631-752-1600

Travel History

TIME ZONE

Local Scan Time



Monday, August 9, 2021

11:20 AM	OMAHA, NE	Delivered Package delivered to recipient address - release authorized
7:23 AM	OMAHA, NE	On FedEx vehicle for delivery
6:54 AM	OMAHA, NE	At local FedEx facility

Sunday, August 8, 2021

7:08 PM	OMAHA, NE	At destination sort facility
5:42 PM	MEMPHIS, TN	Departed FedEx hub

Saturday, August 7, 2021

9:45 AM	MEMPHIS, TN	Arrived at FedEx hub
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Friday, August 6, 2021

8:11 PM	MELVILLE, NY	Left FedEx origin facility
6:25 PM	MELVILLE, NY	Picked up
12:19 PM		Shipment information sent to FedEx

Shipment Facts

TRACKING NUMBER

774470489346

SERVICE

FedEx Priority Overnight

WEIGHT

0.5 lbs / 0.23 kgs

DELIVERY ATTEMPTS

1

DELIVERED TO

Residence

TOTAL PIECES

1

TOTAL SHIPMENT WEIGHT

0.5 lbs / 0.23 kgs

TERMS

Shipper

SHIPPER REFERENCE

Forrest

PACKAGING

FedEx Envelope

SPECIAL HANDLING SECTION

Deliver Weekday, Residential Delivery

SHIP DATE8/6/21 [?](#)**STANDARD TRANSIT**8/9/21 before 12:00 pm [?](#)**ACTUAL DELIVERY**

8/9/21 at 11:20 am



TRACK ANOTHER SHIPMENT

774470537098


[ADD NICKNAME](#)

Delivered
Monday, August 9, 2021 at 10:01 am

**DELIVERED**

Signature not required

[GET STATUS UPDATES](#)
[OBTAIN PROOF OF DELIVERY](#)
FROM

Law Offices of Cahn & Cahn, P.C.
Daniel K. Cahn, Esq.

105 Maxess Road
Suite 124
Melville, NY US 11747
631-752-1600

TO

Edward F. Cunningham, Esq.
w Offices of Edward F. Cunningham

62 Cambridge Avenue
GARDEN CITY, NY US 11530
631-752-1600

Travel History

TIME ZONE

Local Scan Time



Monday, August 9, 2021

10:01 AM	GARDEN CITY, NY	Delivered Package delivered to recipient address - release authorized
6:59 AM	GARDEN CITY, NY	On FedEx vehicle for delivery
6:01 AM	GARDEN CITY, NY	At local FedEx facility

Saturday, August 7, 2021

9:05 AM	GARDEN CITY, NY	At local FedEx facility Package not due for delivery
9:05 AM	GARDEN CITY, NY	At local FedEx facility

Friday, August 6, 2021

9:04 PM	JAMAICA, NY	At destination sort facility
8:11 PM	MELVILLE, NY	Left FedEx origin facility

6:25 PM	MELVILLE, NY	Picked up
12:22 PM		Shipment information sent to FedEx

Shipment Facts

TRACKING NUMBER 774470537098	SERVICE FedEx Priority Overnight	WEIGHT 0.5 lbs / 0.23 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Residence	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs	TERMS Shipper	SHIPPER REFERENCE Forrest
PACKAGING FedEx Envelope	SPECIAL HANDLING SECTION Deliver Weekday, Residential Delivery	SHIP DATE 8/6/21 ?
STANDARD TRANSIT 8/9/21 before 12:00 pm ?	ACTUAL DELIVERY 8/9/21 at 10:01 am ?	