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## VIA ELECTRONIC FILING & FEDERAL EXPRESS

October 26, 2020

Hon. Scott S. Harris, Clerk Supreme Court of the United States Office of the Clerk 1 First Street, N.E. Washington, D.C. 20543

RE: Aladdin Manufacturing Corporation, et al. v. The Water Works and Sewer Board of the Town of Centre, et al.; (No. 20-231)
Rule 30.4 Motion to Extend Time to File Brief in Opposition

Dear Mr. Harris:

I represent the Respondents, the Water Works and Sewer Board of the Town of Centre and the Water Works and Sewer Board of the City of Gadsden, in the above referenced case. I am writing in response to your letter dated October 15, 2020 which requests that the Respondents file a response to the petition for writ of certiorari by November 16, 2020.

Pursuant to Rule 30.4, Respondents respectfully request an extension of thirty (30) days, up to and including December 16, 2020, within which to file its brief in opposition. Counsel of record for the Petitioners stated that Petitioners have no objection to the requested extension. Respondents submit this request for two reasons.

First, Respondents are currently communicating with organizations interested in filing an *amicus curiae* brief in support of Respondents pursuant to Rule 37. Rule 37.2(a) requires that any *amicus curiae* brief be submitted within the same deadline as Respondents' brief in opposition which is November 16, 2020. A Motion for Leave to file an *amicus curiae* brief was jointly filed by the Chamber of Commerce of the United States, the Georgia Chamber of Commerce, and the National Federal of Independent Businesses on September 28, 2020 and is currently pending before the Court. Respondents respectfully request an extension to ensure that the potential *amici* in support of Respondents have sufficient time for review and submittal before the deadline.

Second, I am counsel of record in this matter and am currently scheduled to be in several depositions from October 26<sup>th</sup> until November 19<sup>th</sup>. These depositions were scheduled after

conferring with multiple attorneys and state agencies to reach a mutually agreeable time that fit within a tight discovery schedule entered by the court.

The requested extension will not materially delay consideration of the petition, as the Court could still consider the petition at a conference during the current Term. Thank you for consideration of this request.

Respectfully Submitted,

RHON E. JONES

Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.

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Cc: Counsel of Record on attached service list

#### **Service List**

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