



City of Boston
Mayor Martin J. Walsh
Law

September 28, 2020

VIA E-MAIL & PRIORITY MAIL EXPRESS

Clerk's Office
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543
Attn: dbickell@supremecourt.gov

Re: Christopher Castagna, et al. v. Harry Jean, et al.
Supreme Court of the United States No. 20-253

Dear Clerk:

Pursuant to Supreme Court Rule 30.4, please let this letter serve as a motion for an extension of time for the Respondents, Harry Jean, Keith Kaplan, and Daran Edwards, to file a Brief in Opposition in this matter. The Respondents respectfully request an additional 30 days, up to and including November 2, 2020, to file their Brief In Opposition. In support of this motion, the Respondents state as follows:

1. The Brief in Opposition in this matter is currently due on October 1, 2020.
2. Undersigned counsel, Nicole M. O'Connor, of the City of Boston Law Department, is representing the Respondents in this matter. Ms. O'Connor is not currently a member of the bar of this Court, though she has applied for admission. Ms. O'Connor is scheduled to be admitted to this Court on October 5, 2020.
3. Additionally, due to Ms. O'Connor's current case load and work from home status, an additional 30 days is necessary to draft a thoughtful response on behalf of the Respondents.

Accordingly, for these reasons, the Respondents request an additional 30 days, up to and including November 2, 2020, to file their Brief in Opposition in this matter. A certificate of service is enclosed herewith.

Very truly yours,

Nicole M. O'Connor
Senior Assistant Corporation Counsel
City of Boston Law Department
City Hall, Room 615
Boston, MA 02201
617-635-4039
nicole.oconnor@boston.gov

Enclosure

cc: Paul J. Klehm, Esq.

James B. Krasnoo, Esq.

Benjamin L. Falkner, Esq.

No. 20-253

In the
Supreme Court of the United States

CHRISTOPHER CASTAGNA; GAVIN CASTAGNA
Petitioners,

v.

HARRY JEAN; KEITH KAPLAN; DARAN EDWARDS,

Respondents.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the First Circuit

PROOF OF SERVICE

I, Nicole M. O'Connor, counsel for Respondents, Harry Jean, Keith Kaplan, and Daran Edwards, hereby certify that on the 28th day of September, 2020, I caused to be served one (1) copy of the Respondents' Letter for Enlargement of Time to File Brief In Opposition in the above referenced case by United States Postal Service, Priority Mail Express Overnight, upon the counsel for the Petitioners as listed below:

Paul J. Klehm, Esq.
James B. Krasnoo, Esq.
Benjamin L. Falkner, Esq.
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(978) 475-9955
pklehm@kff-attorneys.com

Counsel for Petitioners

Additionally, an electronic version was transmitted to counsel for Petitioners at the following email address:

pklehm@kff-attorneys.com

I further certify that all parties required to be served have been served.

By



Nicole M. O'Connor
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*Counsel for Respondents
Harry Jean, Keith Kaplan, and
Daran Edwards*