

September 18, 2020

Robert B Mitchell  
rob.mitchell@klgates.com

**Via U.S. mail and ECF Filing**

T +1 206 370 7640  
F +1 206 623 7022

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

**Re: Jeff Schulz, et al. v. Presbytery of Seattle, et al., Case No. 20-261**

Dear Mr. Harris:

I represent the respondents (The Presbytery of Seattle, The First Presbyterian Church of Seattle, Robert Wallace, and William Longbrake) in No. 20-261. Petitioners Jeff Schulz, et al. filed their petition for a writ of certiorari on August 28, 2020, and our response is due October 2, 2020.

In accordance with Rule 30.4, we respectfully request a 31-day extension of the current October 2 deadline, which would make our brief in opposition due on or before Monday, November 2, 2020. We have been asked for (and have granted) consent to the filing of an amicus curiae brief in support of petitioners. We inquired of counsel for the prospective amicus when we should expect to receive that brief, and we were told that it would be filed on or before October 2. We need an extension of the same October 2 deadline to address any arguments raised in the amicus brief(s) in our brief in opposition.

In addition to the need to respond to the arguments contained in amicus brief(s), both I and my co-counsel for respondents, while working diligently on our response to the petition, have had other obligations, including oral arguments for each of us this month.

If you have any questions, please let me know. Thank you very much.

Very truly yours,



Robert B Mitchell

cc: Peter A. Talevich

## CERTIFICATE OF SERVICE

As a member of the Supreme Court bar, and as required by Rules 29.5 and 30.4, I certify that I served copies of this letter by U.S. Mail on September 18, 2020, on the following:

Steffen N. Johnson  
Paul N. Harold  
Wilson Sonsini Goodrich & Rosati, PC  
1700 K Street, NW  
Washington, DC 20006  
(202) 973-8888

Michael W. McConnell  
Wilson Sonsini Goodrich & Rosati, PC  
650 Page Mill Road  
Palo Alto, CA 94304  
(650) 849-3135

Counsel for Petitioners

In addition, I sent electronic copies of this letter on September 18, 2020, to the following addresses:

sjohnson@wsgr.com  
pharold@wsgr.com  
MMcConnell@wsgr.com



Robert B. Mitchell  
K&L Gates LLP  
Counsel for Respondents

## **CORPORATE DISCLOSURE STATEMENT**

The Presbytery of Seattle and The First Presbyterian Church of Seattle, respondents before this Court, are Washington nonprofit corporations. They do not issue stock and have no parent corporations.