

## Curtis, Mallet-Prevost, Colt & Mosle LLP

Almaty Beijing Bogotá Buenos Aires Dubai Frankfurt

Geneva

Houston

London Mexico City Milan Muscat Nur-Sultan Paris

Paris
Rome
Washington, D.C.

101 Park Avenue New York, New York 10178-0061 Telephone +1 212 696 6000 Facsimile +1 212 697 1559 www.curtis.com

Hermann Ferré Tel; +1 212 696 8871 Fax: +1 917 368 8871 E-Mail: hferre@curtis.com

September 11, 2020

Clerk of Court Supreme Court of the United States 1 First Street NE Washington, DC 20543 (202) 479-3011

> Re: United States of America v. Jose Luis Vaello Madero No. 20-303

## Dear Clerk of Court:

I represent Respondent José Luis Vaello-Madero in the above-captioned matter. Pursuant to Supreme Court Rule 30.4, I respectfully submit this unopposed request for an extension of time to submit Respondent's Brief in Opposition to the Petition for a Writ of Certiorari filed by the United States on September 4, 2020 in the above-captioned matter. The Brief in Opposition to the Petition for a Writ of Certiorari is currently due on or before October 9, 2020. I respectfully seek a 30-day extension of this deadline. Because 30 days from October 9, 2020, is a Sunday, I respectfully seek leave to file Respondent's brief on or before November 9, 2020.

In support of this request, I note that counsel for Respondent is based in New York, where its offices remain closed and where attorneys and staff continue to work remotely due to the Covid-19 pandemic. In light of the delays associated with remote work, as well as upcoming deadlines in various confidential arbitration proceedings in which Respondent's counsel is engaged, Respondent seeks the aforementioned extension. Counsel for Petitioner has indicated that it consents to this extension.

Sincerely,

Hermann Ferré

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, being duly sworn, that on this date, I caused to be served the foregoing letter pursuant to Rule 30.4 to all parties required to be served, upon their consent to electronic service, by e-mailing filing the foregoing document to counsel for Petitioner at the following e-mail addresses:

SupremeCtBriefs@USDOJ.gov United States Department of Justice Washington, DC 20530-0001 202-514-2217

Vivek Suri
Assistant to the Solicitor General
Vivek.Suri@USDOJ.Gov
United States Department of Justice
Washington, DC 20530-0001
202-514-2217

In New York, New York, this 11th day of September, 2020.

/s/ Hermann Ferré

Hermann Ferré Supreme Court Bar No. 279715 hferre@gmail.com