

October 5, 2020
Via electronic filing and email

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

RE: ***Shinn v. Jensen (No. 20-360)***



National Prison Project
915 15th Street, NW
7th floor
Washington, DC 20005
(202) 393-4930
aclu.org

David C. Fathi
Director
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*Not admitted in DC;
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Dear Mr. Harris:

Respondents in the above-captioned matter write to request a 60-day extension of Respondents' time to file a brief in opposition to the petition for writ of certiorari, from October 19 to December 18, 2020. The petition for a writ of certiorari was submitted on September 14, 2020 and docketed on September 17, 2020.

Respondents seek this extension in light of counsel's competing personal and professional obligations. First and foremost, the current public health emergency related to COVID-19 has forced the closure of and/or significant restrictions on capacity at each of the offices where Respondents' counsel normally work. The public health emergency and the natural disasters in Northern California of wildfire smoke and electrical outages have also forced closures of schools and child care facilities, which requires Respondents' counsel to either care for minor children during this time or cover for colleagues with child care responsibilities. Meanwhile, in this context of reduced capacity, counsel for Respondents remain committed to other upcoming filings.

Previously scheduled personal and professional commitments, as well as challenges resulting from the COVID-19 public health emergency, the wildfires in Northern California, and resulting disruptions to professional and personal life during the initial 30-day response period would make it difficult for counsel to prepare the response in this case.

Petitioners through counsel have indicated that they object to a 60-day extension, but do not object to a 30-day extension.

Thank you for your attention to this matter.

Respectfully,

/s/ David C. Fathi

Counsel for Respondents

Shawn Jensen; Stephen Swartz; Sonia Rodriguez; Christina Verduzco; Jackie Thomas; Jeremy Smith; Robert Gamez; Maryanne Chisholm; Desiree Licci; Joseph Hefner; Joshua Polson; and Charlotte Wells, on behalf of themselves and all others similarly situated

cc: Nicholas D. Acedo, Counsel for Petitioners
Jeffrey Atkins, Deputy Clerk
Danny Bickell, Deputy Clerk



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