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February 2, 2021

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

**RE: Request for Extension of Time to File Response to Petition**  
*Royal Truck & Trailer Sales and Service, Inc. v. Mike Kraft, et. al.*  
S. Ct. Case No. 20-575

Dear Judge Harris:

I am counsel for the respondents in this case. Petitioner filed its petition for a writ of certiorari on July 29, 2020. According to the online docket and pursuant to Rule 15.3 of the Rules of the Supreme Court of the United States, a response is currently due on February 3, 2021. Pursuant to Rule 30.4, respondents respectfully request that the time for filing a response be extended by 30 days, to and including March 4, 2021. This is respondents' first request for an extension of time to file a response.

Good cause exists for the requested extension. Our firm was initially retained only to provide a waiver of respondent's right to respond to the petition and was not retained to respond to the petition until after the Court specifically requested a response. Apart from this case, we are retained as counsel in several other matters which have required substantial attention. Salvatore Vitale, who was lead counsel at the District and Circuit Court levels and is responsible for briefing, was preparing for trials in two matters prior to their respective last-minute adjournment and resolution (E.D. Mich Case No. 19-cv-11009; Wayne County Circuit Court Case No. 19-113371-DM). We have diligently attempted to meet the Court's deadline for filing an opposition to the petition. However, an extension of time would better enable preparation of a response that would be most helpful to the Court. It will also allow time for the Mr. Vitale's admission to the Supreme Court Bar. I am not aware of any circumstances necessitating a speedy ruling on the petition that may prevent the Clerk's Office from granting an initial extension as described in your February 2020 Memorandum Concerning the Deadlines for Cert Stage Pleadings and the Scheduling of Cases for Conference.

Accordingly, respondents respectfully request that the time for filing a response to the petition for writ of certiorari be extended by 30 days, to and including October 2, 2020. Counsel

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for the petitioner, Mr. Anthony Sciara, has informed me by email that petitioner does not object to this request. Please advise if you have any questions.

Sincerely,

**VARNUM**

A handwritten signature in blue ink, appearing to read "Rich Hewlett".

Richard T. Hewlett

RTH/tla