



OFFICE OF THE COUNTY COUNSEL

1221 Oak Street, Suite 450, Oakland, California 94612-4296
Telephone (510) 272-6700 Facsimile (510) 272-5020

DONNA R. ZIEGLER
COUNTY COUNSEL

December 16, 2020

Jeff Atkins
Deputy Clerk for Case Initiation
Supreme Court of the United States
1 First Street, N.E.
Washington , D.C. 20543

RE: J.P. v. Alameda County, California, et al., Docket No. 20-676

Dear Mr. Atkins:

A petition for a writ of certiorari in the above-entitled case was placed on the docket November 17, 2020. Pursuant to Rule 30.4 of the United States Supreme Court, I am writing on behalf of Respondents, County of Alameda, Diane Davis Maas (erroneously named as Diane Davis Mass), and Sue May, to request an extension of time through January 29, 2021, to file a brief in opposition to the petition for a writ of certiorari. Absent an extension, the opposition would be due on December 17, 2020.

The extension is requested because Respondents' outside counsel, Jody Struck of Haapala, Thompson & Abern, is awaiting the Court's consideration of her application for admission before this Court. Delays were encountered in preparing the application because of the complications of working remotely during the COVID-19 pandemic. Further delays are anticipated due to the upcoming holidays and current public health Stay-at-Home order, including additional time that may be required by the printer.

It is our understanding that a thirty-day extension would be routinely granted, but we respectfully request an additional thirteen days given the current complications. Counsel for Petitioner advised that they do not object to an extension of up to forty-five days.

Accordingly, Respondents respectfully request an extension through Friday, January 29, 2021, totaling forty-three (43) days, to file their opposition to the petition for a writ of certiorari.

Thank you very much for your time and consideration of this request.

Very truly yours,

DONNA R. ZIEGLER
County Counsel

By 
Kristy van Herick
Assistant County Counsel

cc: Counsel for Petitioner
Jody Struck

PROOF OF SERVICE

I, Frances Chen, declare:

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California, over the age of 18 years and not a party to the within case. My business address is 1221 Oak Street, Suite 450, Oakland, CA 94612-4296. My electronic service address is frances.chen@acgov.org.

On December 16, 2020, I served the foregoing document:

RESPONDENTS' REQUEST FOR EXTENSION OF TIME

I served the documents on the person(s) below, as follows:

Darren J. Kessler
Kessler Law Office
DarrenJKessler@gmail.com

Counsel for Petitioner

Ronald E. Enabnit
Matheny Sears
renabnit@mathenysears.com

Lizabeth N. de Vries
DeVries Law, P.C.
liza@devrieslawsf.com

The documents were served by the following means:

- ELECTRONIC SERVICE: I electronically served the above entitled documents to the electronic service addresses listed above, pursuant to a prior agreement to accept electronic service.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Oakland, California on December 16, 2020.


Frances Chen