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January 15, 2021

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

RE: **Shane Davis v. Mike Carroll et al;**  
Supreme Court Case no. SC # 20-872  
Eleventh Circuit Case no. 18-14558  
U.S. District Court no. 8:16-cv-998 (M.D.Fla.)

Dear Mr. Harris:

Please note the undersigned counsel would note their appearances in the above case as attorneys for Respondents Mike Carroll, Wileen Weaver and Pauline Riley.

Pursuant to this Court's Rule 30.4, Respondents Mike Carroll, Wileen Weaver and Pauline Riley, by and through undersigned counsel, would hereby respectfully request a 30-day extension of time, up to and including March 3, 2021, to file their brief in opposition to the Petition for Writ of Certiorari ("Petition") as docketed in this Court on December 31, 2020. As grounds for extension, Respondents would state:

1. The Respondents in this case are former officials and employees of the Florida Department of Children and Family Services, a State of Florida agency, and being sued in their official and/or individual capacities.

2. In this case Petitioner challenges the decision of the U.S. Court of Appeal for the Eleventh Circuit rendered on July 28, 2020, affirming the U.S. District Court's final summary judgment entered in favor of the Respondents.

3. Presently the Respondents' brief in opposition is due for filing in this Court per this Court's Rule 15.3 on January 30, 2021.

4. However, Respondent's undersigned counsel also has a brief in opposition due around the same time period in another case before this Court: *Tran and Hazen v. City of Holmes Beach and Florida Department of Environmental Protection*, Supreme Court Case no. 20-881. In addition,

undersigned counsel is currently handling several appeals this month in the state appellate courts of Florida, and complicated dispositive motions in the U.S. District Court for the Middle District of Florida.

5. A proper brief in opposition to Petitioner's detailed Petition will take considerable time and effort. In light of the other briefs and complicated motions due within the same time period the brief in opposition is due, good cause exists for a 30-day extension of time.

6. Undersigned counsel has conferred with Petitioner's counsel Roberto D. Stanziale, Esq., who has no opposition to the relief requested herein.

For the reasons stated herein, Respondents respectfully request that the time to file their Response to the Petition in this case be extended by 30 days up to and including March 1, 2021.

Respectfully Submitted,

MANDELBAUM, FITZSIMMONS, HEWITT &  
CAIN, P.A.

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