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January 27, 2021

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

RE: **Huong L. Tran v. City of Holmes Beach et al;**
Supreme Court Case no. SC # 20-881
Eleventh Circuit Appeal no. 19-13470
U.S. District Court no. 8:19-cv-534 (M.D.Fla.)

Dear Mr. Harris:

Please note the undersigned counsel would note their appearances in the above case as attorneys for Respondents Florida Department of Environmental Protection and the Department Officials.

Pursuant to this Court's Rule 30.4, Respondents Florida Department of Environmental Protection and its Department Officials, by and through undersigned counsel, would hereby respectfully request a 30-day extension of time, up to and including March 5, 2021, to file their brief in opposition to the Petition for Writ of Certiorari ("Petition") as docketed in this Court on January 4, 2021. As grounds for extension, Respondents would state:

1. The Respondents in this case, Florida Department of Environmental Protection and its Department Officials, are a government agency of the State of Florida and the agency's officials

2. In this case Petitioner challenges the decision of the U.S. Court of Appeal for the Eleventh Circuit rendered on September 24, 2020, affirming the U.S. District Court's final order dismissing the Petitioner's Third Amended Complaint with Prejudice.

3. Presently the Respondents' brief in opposition is due for filing in this Court per this Court's Rule 15.3 on February 3, 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: *Shane Davis v. Mike Carroll et al*, Supreme Court Case no. 20-872. 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 communicated with the *pro se* Petitioner, Huong L. Tran, who has no opposition to this 30-day extension requested by the Florida Department of Environmental Protection and its Department Officials.

7. However, the *pro se* Petitioner requested that the undersigned notes in this motion that she would oppose any request for extension that may be made by the co-Respondent City of Holmes Beach (the Florida Department of Environmental Protection and City of Holmes Beach are separate parties with separate counsel).

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 5, 2021.

Respectfully Submitted,

/s/ Samuel R. Mandelbaum, Esq.

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Member of this Court's Bar

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