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February 25, 2021

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

RE: Application for Extension to File Brief in Opposition (Unopposed)
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:

This law firm has previously noted our appearance in the above case as attorneys for Respondents Florida Department of Environmental Protection (FDEP) and its Department Officials. FDEP is a State of Florida government agency. Previously we had moved for a 30-day extension to file the FDEP's brief in opposition, which was granted without opposition through March 5, 2021.

Pursuant to this Court's Rule 30.4, Respondents FDEP and its Department Officials, by and through undersigned counsel, would hereby respectfully request a second extension of time for 14 days, up to and including March 19, 2021, to file their brief in opposition to the Petition for Writ of Certiorari ("Petition"). As grounds for the extension, Respondents would state:

1. Subsequent to the filing of the Respondent's initial request for an extension, Respondent's undersigned counsel learned that the FDEP's agency counsel has requested that their in-house agency attorneys participate in the preparation of the brief in opposition, and be provided with a draft of the proposed brief in advance of filing. With the involvement of agency attorneys—who are approximately 250 miles to the north in Tallahassee Florida—delays can be anticipated with the finalization of the brief in opposition.

2. Respondent's undersigned counsel also has a brief in opposition due just two days before the present deadline in another case before this Court: *Shane Davis v. Mike Carroll et al*, Supreme Court Case no. 20-872.

3. In addition, undersigned counsel is currently handling several appeals in the state appellate courts of Florida.

4. Further, in early March, Respondent's counsel also has deadlines for complicated dispositive motions and other pleadings in the U.S. District Court for the Middle District of Florida.

5. A proper brief in opposition to Petitioner's lengthy and detailed petition will take considerable time and effort. In light of the other briefs and complicated motions due within the same approximate time period the brief in opposition is due, good cause exists for a 14-day extension of time.

6. Undersigned counsel has communicated with the *pro se* Petitioner, Huong L. Tran, who has indicated that Petitioners have no opposition to this 14-day extension of time requested by the Florida Department of Environmental Protection and its Department Officials.

For the reasons stated herein, Respondents respectfully request that the time to file their Response to the Petition in this case be extended by 14 days, up to and including March 19, 2021.

Respectfully Submitted,

/s/ Samuel R. Mandelbaum, Esq.
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