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March 15, 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 second extension of 14 days to file the FDEP's brief in opposition, which was granted without opposition through March 19, 2021.

Pursuant to this Court's Rule 30.4, Respondents FDEP and its Department Officials, by and through undersigned counsel, would hereby respectfully request another extension of time for seven (7) days, up to and including March 26, 2021, to file their brief in opposition to the Petition for Writ of Certiorari ("Petition"). As grounds for the extension, Respondents would state:

1. Respondent's undersigned counsel received his second shot last week for the Covid vaccine, and experienced unwelcome side effects, lethargy and a fever for a couple of days. As a result, counsel found difficult to complete work and fell behind in some of his workload on this and other cases.

2. In addition, the FDEP's agency counsel in Tallahassee 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. Due to the undersigned's recent health issue with the vaccine, the preparation, transmission and finalization of said brief has been delayed.

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

4. Further, this month 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 seven (7) 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 the seven (7) 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 seven (7) days, up to and including March 26, 2021.

Respectfully Submitted,

/s/ Samuel R. Mandelbaum, Esq.
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