



224 South Dawson Street, Raleigh, NC 27601

March 16, 2022

VIA FEDERAL EXPRESS AND E-FILING

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

Re: No. 21-1188, *Portfolio Recovery Associates, LLC v. Iris Pounds, et al.*

Dear Mr. Harris:

The North Carolina Justice Center represents Respondents in the above-referenced matter. Pursuant to Rule 30.4 of the Rules of this Court, I write to request an extension of time for Respondents to file a brief opposing Portfolio Recovery Associates, LLC's petition for writ of certiorari. The petition for certiorari was docketed on February 28, 2018, and Respondents' brief in opposition is currently due on March 30, 2022. Respondents request an extension of thirty (30) days to file the opposition brief, creating a new deadline of April 29, 2022.

The North Carolina Justice Center, lead counsel in this case, is a nonprofit organization that advocates to protect and expand the rights of workers, consumers, immigrants, and low-income families, including through litigation. While counsel has been working diligently to analyze the petition, the prior court rulings, and the voluminous briefing and record on appeal, the requested thirty-day extension would assist counsel in preparing a thorough and well-reasoned opposition. An extension of the deadline is justified to ensure that Respondents have sufficient time to address the points raised in the petition while also complying with counsels' other pending deadlines and obligations.

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Petitioner's counsel is being served with notice of this request by electronic mail and by copy of this letter. If you require any additional information, please contact me at (919) 856-3193. Thank you for your assistance.

Respectfully submitted,



Rick Glazier
Executive Director,
N.C. Justice Center
Counsel for Respondents