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By U.S. Mail – Express Delivery

Danny Bickell, Deputy Clerk for Practice and Procedure  
Supreme Court of the United States  
One First Street NE  
Washington, DC 20543

Re: No. No. 21-1246, *Postmates, LLC, fka Postmates, Inc. v. Melanie Winns, et al.*

Dear Mr. Bickell:

I am counsel for the respondent in the above-referenced case. On March 11, 2022, a petition for a writ of certiorari was docketed in this case, and on April 27, 2022, the Court requested that a response be filed. Unless extended by the Court, the response would be due on May 27, 2022. For the reasons that follow, and pursuant to Rule 30.4, I respectfully request an extension of 60 days, to and including Tuesday, July 26, 2022.

Following the Court's request for a response, I submitted an application for admission to practice before this Court. I have not received the notification of acceptance and issuance of a certificate of admission. I learned today that my application is still pending. Since e-filing requires admission to the bar of this Court, based on our telephonic conversation this morning, I am submitting this letter by overnight mail.

The request for extension is warranted because a hearing has been scheduled for June 22, 2022, for the final approval of the settlement and judgment on this matter at the Dept. 303 of the Superior Court of San Francisco. Moreover, I need to associate new co-counsel to provide substantial assistance in its preparation. In addition, I have other significant obligations in other matters, including trials starting on June 2, 2022, June 9, 2022, and had also planned to be out of the office from June 13, 2022, to June 20, 2022. An extension will allow me to meet these obligations while preparing a response that adequately addresses the points raised in the petition.

For these reasons, I ask that an extension be granted to and including July 26, 2022.

Thank you for your attention to this matter.

Sincerely yours,

*Amir Mostafavi*

Counsel for Respondent  
Amir Mostafavi

Cc: Theane Evangelis, Counsel for Petitioner

