

June 2, 2022

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

Re: *James K. Collins v. Michell R. Zolnier*, No. 21-1430

Dear Mr. Harris:

I am counsel for Respondent Michell Zolnier in the above-captioned case¹. The petition for a writ of certiorari in this case was docketed on May 6, 2022, and Respondent's response to the petition is currently due on June 9, 2022.

Pursuant to Rule 30.4, Respondent Michell Zolnier respectfully requests that the Court extend her deadline to respond to the petition by sixty (60) days until Monday, August 8, 2022. The requested extension is necessary because the time period to file the response has overlapped with other pre-existing commitments and obligations, as well having learned on May 22, 2022, of the unexpected passing of the spouse of my mentor (of 18 years) and senior member of the firm, where the undersigned is assisting with their affairs. As such, counsel for Respondent requires additional time to draft and file the response.

In addition to daily deadlines, some of Respondent's counsel's pre-existing commitments and obligations include as follows:

- Vacation letter on file with the courts of the State of Texas for June 6-10 and June 13-17.
- Appellee's Responsive Brief, *Twee Vu Sosa, et. al. v. Jeffrey Miller*; Cause No. 09-22-00004-CV; in the Ninth Court of Appeals; due on June 22, 2022;
- All-day Court-Ordered Mediation on June 22, 2022, with Judge Kathleen Stone, in *Zurich American Insurance Company, as subrogee of Tenaris Global Services (U.S.A.) Corporation v. Coastal Cargo of Texas, Inc.*; Cause No. 2015-48186; in the 151st Judicial Court of Harris County, Texas
- A Petition for Review, *Magnum Air, Inc. et. al. v. Maven Mechanical, LLC*, Cause No. 22-0343; in the Supreme Court of Texas; due on July 1, 2022;
- Trial, *AXA Seguros, S.A. de C.V. v. Samy Ibrahim-Hakim, et al.*; Cause No. 19-07-

¹ Mr. Kirby D. Hopkins' admission into the Supreme Court Bar is pending and will be approved on June 6, 2022. Therefore, Alexis L. Espejel, as co-counsel for Respondent is filing this letter on Mr. Hopkins' behalf.

09268; in the 457th Judicial District Court, Montgomery County, Texas; on July 18, 2022

- Pre-existing out-of-state family and child care obligations in the month of July.

For these reasons, I respectfully request a sixty (60) day extension of time, until August 8, 2022, to file a response to the petition. Thank you for your time, attention, and consideration.

Respectfully submitted,

/s/ Kirby D. Hopkins
Kirby D. Hopkins
Counsel for Respondent

Cc: Toni L. Sharretts Collins (via e-mail)
Petitioner's Counsel of Record