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September 16, 2022

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

RE: *Cleveland County, North Carolina v. Conner*, No. 21-1538

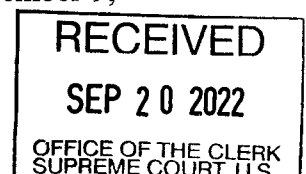
Dear Mr. Harris,

On June 3, 2022, Cleveland County, North Carolina (“Petitioner”) filed for a writ of certiorari in the above-captioned. On July 26, 2022, the Court ordered Ms. Conner to file a response to the writ of certiorari. Ms. Conner’s response is now due, after one thirty-day extension, on September 26, 2022. Pursuant to Rule 30.4 of the Rules of this Court, Ms. Conner respectfully requests, an additional forty-two day extension of time to and including November 7, 2022, within which to file her response.

Petitioner does not consent to Ms. Conner’s requested extension. However, Petitioner previously sought and was granted a sixty-day extension to file its writ of certiorari. There have been no material changes since Petitioner sought and received that extension that would justify treating Respondent’s request for an extension of time differently.

Moreover, good cause exists for granting the requested extension. Ms. Conner has partnered with Stanford Law School’s Supreme Court Litigation Clinic (“Clinic”) to prepare the response to the writ of certiorari. The Clinic, however, does not begin its 2022 Fall Semester until September 26, 2022, and students do not begin working on cases until October 4, 2022. Due to this academic schedule, Ms. Conner requires additional time to allow the Clinic law students to meaningfully participate in preparing the response.

Granting this extension will not prejudice Petitioner in any manner. Filing the response on November 7 will still give the Court ample time to decide whether to grant certiorari this Term. If Ms. Conner files her response on November 7, 2002, the petition for writ of certiorari will be distributed on November 22 for conference on December 9,



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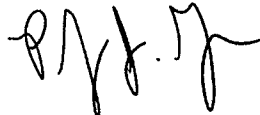
2022, which allows the case to be heard this Term. Moreover, proceedings at the district court remain preliminary; the court has not yet ruled on Ms. Conner's motion for class certification or set a schedule for discovery. An extension of time thus will not prejudice Petitioner before the district court, either.

To the extent the Court is not inclined to grant Ms. Conner's request for a forty-two day extension, Ms. Conner respectfully requests the Court permit an extension of thirty days, to and including October 26, 2022, which is equivalent to the extension received by Petitioner.

I am not currently a member of the Bar of the Supreme Court and I understand that the brief in opposition must be filed by a Bar member. I will be submitting my application to be admitted to the Bar of the Supreme Court in the next ten (10) days.

Thank you very much for your time and assistance in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "P. J. Gibbons, Jr.", written in a cursive style.

Philip J. Gibbons, Jr.
Counsel for Respondent

cc: All Counsel