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September 13, 2021

VIA ELECTRONIC FILING ONLY

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

Re: Motion to Extend Time to Respond to Petition for Writ of Certiorari
Shantubhai N. Shah v. Meier Enterprises, Inc.
Docket No. 21-214

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondent Meier Enterprises, Inc. moves for a thirty-day extension of time for filing its brief in opposition to the Petition for Writ of Certiorari in the captioned matter.

Petitioner filed a Petition for Writ of Certirari on August 7, 2021, and served Respondent via US Mail. Petitioner did not notify Respondent when the case had been placed on docket; however, Respondent received electronic notification of your August 13, 2021 letter to the Ninth Circuit via the electronic filing system. Based on that letter, Respondent has calculated its deadline to file a response to the petition as September 13, 2021.

Petitioner, who is no longer represented by counsel, submitted a petition along with an appendix of over 170 pages of assorted documents. Respondent believes the petition and appendix contain mischaracterizations of the record that add to the complexity of a response. In addition, counsel's application for admission was just approved last Friday, on September 10, 2021, and counsel was unable to submit a brief for printing in conformance with Rule 33 before being admitted. Due to these issues, Respondent requests additional time to complete, print and file its objection to the Petition for Writ.

Respondent respectfully asks for a thirty-day extension of time to submit its response to the Writ for Certiorari.

Sincerely,

/s/ Rebecca A. Watkins

Rebecca A. Watkins
Counsel of Record for Respondent

RW:tab

cc: Mr. Shantubhai Shah, via email and US Mail