

December 15, 2021

E-filed

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

Re: *Margaret Kinney v. HSBC Bank USA, N.A.*
S. Ct. No. 21-599
Request for Extension of Time to File Brief in Opposition

Dear Mr. Harris:

Respondent, HSBC Bank USA, N.A., as Trustee on Behalf of ACE Securities Corp. Home Equity Loan Trust and for the Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-HE3 (“HSBC”), through its undersigned counsel, respectfully requests a 30-day extension of time to respond to Petitioner Margaret Kinney’s (“Ms. Kinney”) Petition for Writ of Certiorari (the “Petition”), pursuant to Rule 30.4.

Ms. Kinney filed her Petition on October 20, 2021, and HSBC filed a waiver of response on November 19, 2021. We subsequently received your letter dated December 2, 2021, requesting that HSBC file a response to the Petition on or before January 3, 2022.

In light of the upcoming holidays and limited availability of counsel and others during this time, HSBC requires an extension of time to sufficiently address the issues relevant to the Court’s decision to grant or deny the Petition. HSBC therefore respectfully requests a 30-day extension of time, up to and including February 2, 2022, within which to file its Brief in Opposition to the Petition.

No party will be prejudiced by the extension requested herein, and counsel for Ms. Kinney, Mr. Stephen E. Berken, has confirmed that Ms. Kinney does not oppose this request.

Thank you.

Sincerely,

MURR SILER & ACCOMAZZO, P.C.



Jamie G. Siler

cc: Stephen E. Berken, *Counsel of Record for Petitioner*
HSBC