

February 3, 2022

*Via electronic filing*

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

Re: *Boyd & Associates v. Bryan K. White, et al.*, No. 21-626

Dear Mr. Harris:

I am counsel of record for a group of respondents in the above-captioned case: Goodwin Hospice, LLC; Phoenix Hospice, Inc.; International Tutoring Services, LLC; Curo Health Services, LLC; and Hospice Plus, LP. This case is currently pending before the Court on a petition for a writ of certiorari, which was filed on October 13, 2021 and placed on the docket on October 29, 2021. The response to the petition, after one extension, is currently due on February 18, 2022.

In accordance with this Court's Rule 30.4, I respectfully request an additional 14-day extension of time for all respondents to file a response, to and including March 4, 2022. The other respondents join in this request. This modest extension will not delay the ultimate timing of the case's disposition, and it is necessary due to the heavy press of other matters. It will also permit necessary coordination between respondents' counsel in this case and a related case, *Marchand & Rossi LLP v. Bryan K. White*, No. 21-796, which arise out of the same judgment. The Court requested a response to that petition on January 19 (currently due February 18), and it is likely that respondents will file a single response to both petitions. Finally, petitioner in this case submitted a supplemental brief on January 31, and this extension will further permit respondents to address the new arguments in that filing. Counsel for petitioner does not oppose this requested extension. I appreciate your attention to this matter.

Respectfully,

/s/ Andrew W. Guthrie

Andrew W. Guthrie  
**HAYNES AND BOONE, LLP**  
2323 Victory Avenue, Suite 700  
Dallas, Texas 75219  
andrew.guthrie@haynesboone.com

*Counsel of Record for Respondents International  
Tutoring Services LLC; Goodwin Hospice, LLC;  
Phoenix Hospice, L.P.; Hospice Plus, L.P.; and  
Curo Health Services, LLC*

/s/ Dan Calvin Guthrie, Jr.

Dan Calvin Guthrie, Jr.  
**LAW OFFICES OF DAN C. GUTHRIE, JR.**  
4131 N. Central Expressway, Suite 900  
Dallas, Texas 75204  
danguthrie@whitecollardefense.com

*Counsel of Record for Respondent Suresh Kumar,  
R.N.*

/s/ Michael Emory Clark

Michael Emory Clark  
**BAKER, DONELSON, BEARMAN, CALDWELL  
& BERKOWITZ, P.C.**  
1301 McKinney Street, Suite 3700  
Houston, Texas 77010  
mclark@bakerdonelson.com

*Counsel of Record for Respondents North Texas  
Best Home Healthcare, Inc.; Vinayaka  
Associates, LLC; Goodwin Home Healthcare  
Services, Inc.; One Point Health Services, LLC*

/s/ S. Michael McColloch

S. Michael McColloch  
**S. MICHAEL MCCOLLOCH, P.L.L.C**  
3131 McKinney Ave., Suite 600  
Dallas, Texas 75204  
smm@mccolloch-law.com

*Counsel of Record for Respondent Bryan K.  
White, M.D.*

/s/ Jeffrey T. Hall

Jeffrey T. Hall  
1700 Pacific Avenue, Suite 4750  
Dallas, Texas 75201  
jthallesq@gmail.com

*Counsel of Record for Respondent Be Gentle Home  
Health, Inc.*

/s/ Lurese A. Terrell

Lurese A. Terrell  
**KENNEDY ATTORNEYS & COUNSELORS  
AT LAW**  
12222 Merit Drive, Suite 1750  
Dallas, Texas 75251  
lurese@markkennedylaw.com

*Counsel of Record for Respondent Excel Plus  
Home Health, Inc.*

cc: Counsel for petitioner (see attached service list)

## SERVICE LIST:

*Boyd & Associates v. Bryan K. White, et. al.*, No. 21-626

Samuel L. Boyd

Catherine Jobe

**BOYD AND ASSOCIATES**

6440 North Central Expressway, Suite 600

Dallas, TX 75206

sboyd@boydfirm.com

cjobe@boydfirm.com

*Counsel for Petitioner*