

January 12, 2022

VIA FEDERAL EXPRESS

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

Re: Donald Burns v. Town of Palm Beach - Case No: 21-677

Dear Mr. Harris:

I represent Respondent Town of Palm Beach in the above-captioned case. The Petition for Writ of Certiorari in the above-captioned case was filed on November 3, 2021. The response to the Petition for Writ of Certiorari is now due, after one 30-day extension, on January 24, 2022. We respectfully request, under Rule 30.4 of the Rules of this Court, a further extension of time to and including February 7, 2022 within which to file a response.

This extension is necessary because the attorneys with principal responsibility for preparation of the Town's response have been heavily engaged with the press of previously assigned matters with proximate due dates and because of disruptions to attorney and staff schedules resulting from the current escalation of the Covid-19 pandemic.

Counsel for the Petitioner has no objection to the requested extension.

Should you need any additional information, please do not hesitate to let me know.

Respectfully submitted,

JONES FOSTER P.A.

By /s/ Joanne M. O'Connor

Joanne M. O'Connor

JMO:mtm

cc: All counsel on the attached service list (via email)

E S T .
1 9 2 4

joconnor@
jonesfoster.com
561-650-0498 T
561-650-5300 F

505 S. Flagler Drive
Suite 1100
West Palm Beach
Florida 33401

Donald Burns v. Town of Palm Beach
Case No: 21-677
SERVICE LIST

JENNIFER A. MANSFIELD
HOLLAND & KNIGHT LLP
50 North Laura Street
Suite 3900
Jacksonville, FL 32202
(904) 798-7297
jennifer.mansfield@hklaw.com
Attorney for Petitioner

AMIT AGARWAL
HOLLAND & KNIGHT LLP
315 South Calhoun Street
Suite 600
Tallahassee, FL 32301
(850) 224-7000
amit.agarwal@hklaw.com
Attorney for Petitioner

LAURIE WEBB DANIEL
PHILIP J. GEORGE
HOLLAND & KNIGHT LLP
1180 West Peachtree Street
Suite 1800
Atlanta, GA 30327
(404) 817-8500
laurie.daniel@hklaw.com
philip.george@hklaw.com
Attorney for Petitioner

ILYA SHAPIRO
TREVOR BURRUS
CATO INSTITUTE
1000 Mass. Ave. NW
Washington, DC 20001
(202) 842-0200
ishapiro@cato.org
Counsel for Amicus Curiae

TIMOTHY SANDEFUR
SCHARF-NORTON CENTER FOR
CONSTITUTIONAL LITIGATION
AT THE GOLDWATER INSTITUTE
500 E. Coronado Rd.
Phoenix, AZ 85004
(602) 462-5000
litigation@goldwaterinstitute.org
Counsel for Amicus Curiae

DEVALA A. JANARDAN
THOMAS J. WARD
NATIONAL ASSOCIATION OF HOME
BUILDERS OF THE U.S.
1201 15th Street
N.W. Washington, D.C. 20005
(202) 266-8335
djanardan@nahb.org
Counsel for Amicus Curiae