

Thomas A. Keenan †*
Ian C. Doris †

KEENAN & DORIS LLC

ATTORNEYS AT LAW

E-Mail: idoris@keenanddoris.com
Our File No.: 1003-24

71 Union Avenue, Suite 105
Rutherford, New Jersey 07070
Telephone (201) 355-8110
Facsimile (201) 355-8118

Erdal Turnacioglu
Joanne Venino

† Certified by the Supreme Court of
New Jersey as Civil Trial Attorney
* Also Admitted in DC

December 10, 2021

VIA ECF

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

RE: Sivella v. Giangeruso
No.: 21-716

Dear Mr. Harris:

The petition for a writ of certiorari in the above-referenced matter was docketed on November 15, 2021, and any response is due on December 15, 2021. Pursuant to Rule 30.4, Respondents Township of Lyndhurst and Lyndhurst Commissioner Robert Giangeruso respectfully request a 30-day extension of time up to and including Friday, January 14, 2022 within which to file a response to the petition.

We are requesting this extension due to the pressing needs of other clients, the holiday season, and the disruptions caused by the COVID-19 pandemic. This is Respondents' first request for an extension of time. Petitioner's counsel consents to Respondent's extension of time request.

Thank you for your consideration of this request.

Respectfully,
KEENAN & DORIS, LLC

/s/ Mary McDonnell
Mary McDonnell, of counsel and
Counsel of Record

C: Joel Silberman, Esq., Counsel of Record