



THE PUBLIC INTEREST LAW OFFICE OF THE LOS ANGELES COUNTY AND BEVERLY HILLS BAR ASSOCIATIONS
The Southern California Affiliate of The Lawyers' Committee for Civil Rights Under Law

January 12, 2022

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

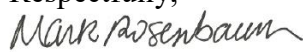
RE: Request for extension of time to file response to petition
Apartment Association of Los Angeles County, Inc., dba Apartment Association of Greater Los Angeles v. City of Los Angeles, California, et al., No. 21-788

Dear Mr. Harris:

I am counsel for the Intervenors in this case, Alliance of Californians for Community Empowerment Action and Strategic Actions for a Just Economy. Petitioners filed their petition for a writ of certiorari in the above case on November 23, 2021. According to the online docket, a response is currently due on February 9, 2022. Pursuant to Rule 30.4, Intervenors respectfully request that the time for filing a response be extended by 60 days, to and including April 10, 2022.

This is Intervenors' first request for an extension of time to file a response. This request is necessary for several reasons. First, the heavy press of litigation matters over the next month will interfere with counsel's ability to prepare an adequate response to the petition by the current date. These preexisting obligations include extensive work for two separate oral arguments in the Ninth Circuit on February 9, 2022; major briefs and oral arguments in cases nationwide; and extensive discovery obligations, including depositions, in other matters from January to March. Second, there has been attorney turnover at co-counsel's organizations and another attorney has recently returned from parental leave, and they need time to get fully up to speed on the matter. Third, our staff is currently working from home due to the COVID-19 pandemic, which makes the process of finalizing and filing a brief take longer than usual. A number of counsel additionally are facing unexpected childcare responsibilities due to the rise of the Omicron variant and the possibility of future school closures. Finally, a number of counsel for Intervenors currently have other preexisting professional and personal obligations.

The City of Los Angeles does not oppose the requested extension, while Petitioner opposes an extension of longer than 15 days. A 60-day extension will allow my office to meet our preexisting obligations while preparing a response that adequately addresses the points raised in the petition. For these reasons, I respectfully request that an extension be granted to and including April 10, 2022. Thank you for your consideration in this matter.

Respectfully,

Mark Rosenbaum

January 12, 2022

Page 2 of 3

cc:

MARK ROSENBAUM
KATHRYN EIDMANN
TARA FORD
FAIZAH MALIK
CARA NEWLON
ALISA RANDELL
610 S. Ardmore Avenue
Los Angeles, CA 90005
T: (213) 385-2977
mrosenbaum@publiccounsel.org
keidmann@publiccounsel.org
tford@publiccounsel.org
fmalik@publiccounsel.org
cnewlon@publiccounsel.org
arandell@publiccounsel.org

Counsel for Intervenors

ROHIT D. NATH
MARC SELTZER
KRYSTA KAUBLE PACHMAN
Susman Godfrey LLP
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
T: (310) 789-3100
rath@susmangodfrey.com
mseltzer@susmangodfrey.com
kpachman@susmangodfrey.com

NISHA N. VYAS
RICHARD ROTHSCHILD
Western Center on Law and Poverty
3701 Wilshire Blvd, #208
Los Angeles, CA 90010
T: (213) 235-2624
nvyas@wclp.org
rrothschild@wclp.org

CRAIG DAVID CASTELLANET
MICHAEL RAWSON
Public Interest Law Project
449 15th St. Suite 301
Oakland, CA 94612
T: (510) 891-9794
ccastellanet@pilpca.org
mrawson@pilpca.org

January 12, 2022

Page 3 of 3

DOUG J. DENNINGTON
JAYSON A. PARSONS
Rutan & Tucker LLP
18575 Jamboree Rd, 9th floor
Irvine, CA 92612
T: (714) 641-5100
ddennington@rutan.com
jramirez@rutan.com

Counsel for Petitioner

JONATHAN H. EISENMAN
DEBORAH BREITHAUPT
ELAINE ZHONG
Office of the City Attorney
City Hall East, Suite 800
Los Angeles, CA 90012
T: (213) 978-2212
jonathan.eisenman@lacity.org
deborah.breithaupt@lacity.org
elaine.zhong@lacity.org

Counsel for Defendants