

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: Opposition to intervenor-respondents' request for 60-day extension of time to file response to petition  
*Apartment Association of Los Angeles County, Inc. v. City of Los Angeles*  
S. Ct. No. 21-788

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Dear Mr. Harris:

I am lead counsel for petitioner in the above referenced case and write to express petitioner's objection to intervenor-respondents' request for a 60-day extension on their response. The petition was filed on November 23, 2021 and docketed on November 29, 2021. On December 15, 2021, intervenor respondents waived their right to respond. On January 10, 2022, this Court requested a response to the petition, due within 30 days (*i.e.*, on or before February 9, 2022). Intervenors—who had the opportunity to respond, but chose not to—now ask the Court for a 60-day extension, for a total response time of 90 days from the date of the Court's January 10<sup>th</sup> order (and 132 days from the date on which the petition was docketed on November 29, 2021). We respectfully ask the Court to deny the requested extension.

Good cause does not exist for an extension of such length. This petition originated from a district court denial of a motion for preliminary injunction issued on November 13, 2020, seeking to enjoin respondent City of Los Angeles ("City") from continuing to enforce its COVID-19 eviction ban. The economic landscape for Angelenos has improved dramatically since that time, yet landlords throughout Los Angeles continue to suffer from the moratorium that is still in place today. While petitioner defers to the Court's discretion on this request, petitioners believe a 60-day extension is unreasonable under the circumstances. Intervenors-respondents express no aggravated or unavoidable reasons to effectively triple the response time that this Court has established as generally sufficient to respond to a petition. *See* Rule 15.3 (response time is 30 days absent the Court granting an extension of time). While petitioner appreciates that counsel for intervenor-respondents may have pre-existing professional obligations, the nature and gravity of this case and the venue in which it currently sits necessarily demands priority in both petitioner's and intervenor-respondents' work schedule. The proposed 60-day extension is an unreasonable request and petitioners request that it be denied accordingly.

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In the event the Court is inclined to extend the response date, petitioner requests the Court to extend the response date by no more than 15 days, for a total response time of 45 days from the date of this Court's January 10<sup>th</sup> request. This would provide intervenors with 50% more time than is typical for a response, which is no doubt more than enough to perform any additional research and drafting.

Respectfully submitted,

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