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January 24, 2022

**VIA E-FILING AND FEDERAL EXPRESS PRIORITY OVERNIGHT**

Scott S. Harris, Clerk  
Supreme Court of the United States  
Office of the Clerk  
1 First Street, N.E.  
Washington, D.C. 20543

Re: *Persephone Johnson Shon v. Bogdan Radu*  
No. 21-825

Dear Mr. Harris:

Please consider this letter to constitute the Petitioner's response in opposition to the Respondent's letter request for an extension of the deadline for submission of the Respondent's response to the Petition for a Writ of Certiorari.

The Petitioner opposes the Respondent's request. The first question presented in this case is the same as the question in *Golan v. Saada*, No. 20-1544, in which merits briefing is already underway. The second question presented in the Petition for a Writ of Certiorari in this case—namely which party has the burden to prove ameliorative measures if such measures are considered—is not presented in *Golan*. The second question is the important companion issue to the first issue. If the Court decides that consideration of ameliorative measures is either discretionary or mandatory, litigants and courts need direction on which party has the burden of proof.

The symbiotic nature of the two cases weighs in favor of moving this case forward expeditiously, rather than extending the deadlines. Such an approach is supported by the Hague Convention, and by this Court's Hague Convention jurisprudence. *See, e.g.,* Convention, art. 11; *Monasky v. Taglieri*, 140 S. Ct. 719, 724 (2020) (Contracting States to the Convention must “use the most expeditious procedures available”); *Chafin v. Chafin*, 568 U.S. 165, 182 (2013) (Ginsburg, J. concurring) (emphasizing “the need for both speed and certainty in Convention decision-making”).

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The Petitioner therefore respectfully requests that the Respondent's letter request be denied.

Twelve courtesy copies of this letter are enclosed, along with an addressed and metered envelope. Please file stamp the additional copy and return it to me by U.S. Mail.

Thank you very much.

Very truly yours,

A handwritten signature in blue ink that reads 'Stephen J. Cullen'.

Stephen J. Cullen

SJC/kap  
Enclosures (as stated)

cc: As stated in Certificate of Service