

May 19, 2023

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

**Re:** *ABKCO Music Inc., et al. v. William Sagan, et al.*, No. 22-1053  
Motion for Extension of Time for Brief in Opposition

Dear Mr. Harris:

I am counsel for Respondents William Sagan, et al. in the above-referenced case. Petitioners ABKCO Music Inc., et al. filed their petition for a writ of certiorari (the “Petition”) on April 27, 2023, which was docketed on the same day. Respondents’ brief in opposition to the Petition is due on or before May 31, 2023. Pursuant to Supreme Court Rule 30.4, Respondents respectfully request a fourteen (14) day extension of time until June 14, 2023, to file a brief in opposition to the Petition.

Counsel of record for Respondents have been notified by multiple nonparties of their intent to file *amicus curiae* briefs in support of the Petition on or before May 31, 2023. Respondents therefore believe a short extension is warranted so that they may respond in their opposition to the Petition to pertinent points (if any) raised in the *amicus* briefs.

For these reasons, Respondents request a fourteen (14) day extension to respond to the Petition, up to and including June 14, 2023, which is an extension less than that which was granted to Petitioners. Thank you for your consideration of this matter.

Respectfully,

/s Michael S. Elkin

Michael S. Elkin  
Winston & Strawn LLP

cc: All Counsel of Record

*Counsel for Respondents William Sagan, et al.*