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June 23, 2022

Scott S. Harris, Clerk
United States Supreme Court
One First Street, N.E.
Washington, DC 20543

Re: *Wilford, et al. v. National Education Association, et al.*, Case No. _____
Opposition to application for extension of time to file petition for writ
of certiorari

Dear Mr. Harris:

Respondents oppose petitioners' application for a 60-day extension of time. Counsel for petitioners recently filed two unsuccessful petitions for certiorari from unpublished Ninth Circuit decisions that addressed the same legal issue. *See Penning v. Service Employees International Union, Local 1021*, No. 20-15226; *Mark Gabriele v. Service Employees International Union, Local 1000*, No. 21-1300. Accordingly, petitioners' counsel does not need to conduct extensive research to file a petition for certiorari from the Ninth Circuit's January 26, 2022 unpublished decision here. Moreover, petitioners already extended their deadline for seeking certiorari in this case by filing an unsuccessful petition for rehearing. Respondents do not oppose a 30-day extension of time, which would allow the petition to be considered at the long conference.

Sincerely,



Scott A. Kronland

Counsel for Respondents National Education Association,
American Federation of Teachers, California Teachers
Association, California Federation of Teachers,
Community College Association, United Teachers Los
Angeles, Saddleback Valley Educators Association, Exeter
Teachers Association, Savanna District Teachers

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Association, Certificated Hourly Instructors, Long Beach
City College Chapter, Coast Federation of Teachers, Local
1911, South Orange County Community College District
Faculty Association, Sanger Unified Teachers Association,
Orange Unified Education Association, and Mt. San
Antonio College Faculty Association, Inc.

cc: (by e-mail and U.S. Mail)

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