

December 2, 2022

By eFile and Federal Express

Scott S. Harris
Clerk of Court
Supreme Court of the United States
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Washington, DC 20543

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Re: Pedro Pierluisi, et al. v. Financial Oversight and Management Board for Puerto Rico, No. 22-484

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, I write on behalf of Respondent the Financial Oversight and Management Board for Puerto Rico (the “Board”) to request a 60-day extension of time to respond to the petition for a writ of certiorari in the above-captioned matter. The petition was docketed on November 22, 2022, and the response is currently due on December 22, 2022. The requested extension would move the due date to February 20, 2023. Counsel for Petitioners consents to this request.

Congress established the Board to restructure Puerto Rico’s massive public debt—the largest municipal-debt restructuring in American history. *See* 48 U.S.C. § 2121(b). The Board is presently engaged in numerous litigations at this Court, at the First Circuit, and before the Title III court overseeing the debt-restructuring cases. Among other things, the Board’s reply brief on the merits in Case No. 22-096 is due to this Court on December 30, 2022, and oral argument in that case is scheduled for January 11, 2023. In late December, the Board also must respond to briefs in opposition to the petition for certiorari in Case No. 22-367. In addition, the Board will argue two appeals (Nos. 21-1581 and 22-1062) at the First Circuit on December 5 and 6. At the same time, the Board is litigating several adversary proceedings within the Title III restructuring cases. The Board respectfully submits that the requested extension is necessary to allow it to give proper attention to its brief in opposition to the petition in this case as well as all of its other litigations. Petitioners previously sought and received a 60-day extension of time to file their petition. The Board requests that it be given the same extension to file a response.

Thank you for your consideration.

Sincerely,

Martin J. Bienenstock

cc: William J. Sushon, Counsel of Record for Petitioners