



Jenice C. Mitchell Ford
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March 14, 2023

Via Electronic
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20002

Re: Second Request for Extension of Time to File Response to Petitioner's Petition For
A Writ of Certiorari in *Kola Hasanaj v Detroit Public Schools Community District*
et al S Ct No. 22-654

Dear Sir or Madame:

I, Jenice Mitchell Ford, serve as General Counsel for Detroit Public Schools Community District in the Office of the General Counsel ("OGC"). The OGC represents all of the respondents in this matter ("Respondents"). To date, Petitioner has filed a petition for a writ of certiorari ("Writ").

Respondents' response to the Writ was initially due on Thursday, February 16, 2023. On February 8, 2023, Respondents requested a 30-day extension which was granted. March 20, 2023 is the current due date. However, Respondents require a second extension of time within which to file their response.

Accordingly, pursuant to S. Ct. Rule 30.4, Respondents herewith respectfully request a second 30-day extension of time to respond to the Writ, with a new due date of no later than 11:59 p.m. on April 19, 2023. Good cause exists for the requested extension as the OGC attorney who represented Respondents in this case at both the district and appellate levels is no longer working in the OGC. As such, additional time is necessary for OGC to become familiar with the relevant legal issues and the record. A second extension of time will better enable preparation of a response that will be most helpful to the Court. Based on the above, Respondents respectfully request a second 30-day extension of time to file a response to the Writ, making the response due by no later than 11:59 p.m. on April 19, 2023.

Petitioner's consent to this request has been sought. Associate General Counsel Theophilus E. Clemons sought consent from Petitioner's counsel by telephone message on March 7, 2023. To date Petitioner's counsel has not responded.



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Should you have any questions, please feel free to contact me at (313) 873-4528 or jenice.mitchellford@detroitk12.org. Thank you for your consideration and have a great day.

Sincerely,

A handwritten signature in black ink that reads "Jenice C. Mitchell Ford".

Jenice C. Mitchell Ford, General Counsel

JCMF/db

cc: Shanta Driver (shanta.driver@ueaa.net)
Theophilus E. Clemons (theophilus.clemons@detroitk12.org)

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