

Issues & Appeals

March 24, 2023

Via Electronic Filing

Danny Bickell Clerk of the Court Supreme Court of the United States One First Street, NE Washington, DC 20543

Re: No. 22-704, Vidal v. Elster

Dear Mr. Bickell:

I write to seek a second extension of the time to file a response to the petition for certiorari in this case. On February 16, 2023, this Court granted a 30-day extension of time to file the response, which moved the deadline to Wednesday, March 29, 2023. I now request an additional extension of thirteen days, up to and including Tuesday, April 11, 2023. Petitioner's counsel has informed me that the government consents to this request.

I'm requesting this extension because my colleagues and I have numerous other pressing deadlines that, absent an extension, will prevent us from devoting adequate time to this brief. For example, I filed an opening brief in the Third Circuit yesterday in *Scanlan v. American Airlines*, No. 22-3294, and I have a reply brief due in this Court on or around March 29 in *Lombardo v. City of St. Louis*, No. 22-510. My colleagues and I also have several other deadlines over the next two weeks. These include the following: a brief due in the Tenth Circuit on March 24 in *Menocal v. The GEO Group*, No. 22-1409; a brief due in the Ninth Circuit on March 27 in *Bradford v. Cellco Partnerships*, No. 22-16020; a brief due in the Sixth Circuit on March 27 in *Bradford v. Team Pizza*, No. 22-3561; and a response to a stay motion due in the Third Circuit on March 28 in *In Re: LTL Management*, Nos. 22-2006, 22-2007, and 22-2008. In addition to these deadlines, my youngest child has had to stay home from daycare for most of the last three weeks with various illnesses, which has required me to spend more time than usual on childcare responsibilities.

A thirteen-day extension is necessary to enable us to balance these responsibilities with our obligations in this case. Thank you for your attention to this matter.

Sincerely, Jonathan E. Taylor

cc: Counsel of Record

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