

Office of the Los Angeles City Attorney Hydee Feldstein Soto

March 6, 2023

The Honorable Scott S. Harris Clerk of the Court Supreme Court of the United States One First Street, N.E. Washington, D.C., 20543-0001

Re: Kagan v. City of Los Angeles No. 22-739 Request for 30-Day Extension of Time

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, I write on behalf of respondent the City of Los Angeles to request a 30-day extension of time—from April 3, 2023 to May 3, 2023—to oppose the petition for a writ of certiorari in this matter.

I represented the City in this case in the United States Court of Appeals for the Ninth Circuit and I am the attorney principally responsible for the City's brief in opposition in this Court. In addition to preparing the City's brief, I am simultaneously involved in other matters, including:

- Preparing a petition to the California Court of Appeal for a writ of mandate, in coordination with both the County of Los Angeles and the State of California.
- In *Martinez v. Los Angeles Police Department*, No. 22-15509, preparing to present oral argument on March 10 in the United States Court of Appeals for the Ninth Circuit.
- In *Black Lives Matter Los Angeles v. City of Los Angeles*, No. 22-56161, preparing the appellants' opening brief, due April 19 in the United States Court of Appeals for the Ninth Circuit.

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• Aiding trial counsel with various evidentiary and instructional issues in *Borawick v. City of Los Angeles*, No. 2:17-cv-02036. That case is presently set for trial beginning on March 28 in the United States District Court for the Central District of California.

These commitments will make it difficult to prepare a response of the requisite quality by the Court's current deadline.

Thank you very much for your consideration.

Respectfully, Jonathan H. Eisenman Deputy City Attorney

cc: Frank Revere J. David Breemer Deborah J. La Fetra