

June 24, 2024

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Via Electronic Filing

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

Re: No. 23-1155, Priscilla Villarreal v. Isidro R. Alaniz, et al.

Dear Mr. Harris:

In accordance with Supreme Court Rule 30.4, Respondents Claudio Trevino, Jr., Juan L. Ruiz, Deyanira Villarreal, and Does 1-2 jointly with Respondents Isidro R. Alaniz, and Marisela Jacaman (collectively "Respondents"), move for an extension of time to file a response to the petition for writ of certiorari in this matter.

Petitioner filed a petition for writ of certiorari on April 22, 2024. The Court requested a response on June 5, 2024, creating the deadline for the response on July 5, 2024. Respondents jointly request a thirty-day extension of that deadline, creating a new filing date of August 5, 2024. This is Respondents' first request for an extension.

Respondents just recently arranged for the assistance of experienced Supreme Court counsel to participate in preparing the response. Additionally, Respondents are exploring the possibility of filing a joint response and need additional time for coordination of a joint response.

Counsel for Respondents have a number of hearings deadlines prior to the July 5, 2024 deadline, including the following:

- Condemnation hearing on June 24, 2024 in *City of Mansfield v. Arbors of Creekwood-Gated Community Homeowners Association, Inc.*, Cause No. 2024-000267-2, filed in Tarrant County, Texas Court at Law Number 2;
- *Rincon v. Elizondo*, Case No. 24-40168, Appellant's opening brief due to the Fifth Circuit Court of Appeals June 27, 2024, and Appellee's response brief due within 30 days of that certificate of service;
- Texas Tribune, Mano Amiga, and Caldwell/Hays Examiner v. Caldwell County, Texas, et al; Civil Action No. 1:23-Cv-910 in the United States District Court for the Western District of Texas, Austin Division, Appellant's Reply Brief due to the Fifth Circuit Court of Appeals June 27, 2024;
- Pressley et al v. Nelson et al, Civil Action No. 1:24-cv-00318-DII in the Western District Court of Texas, Austin Division, Defendant's answer to Amended Complaint due June 28, 2024;
- Depositions on June 28, 2024 in *Rincon v. Ibarra*, No. 5:23-CV-17, filed in the United States District Court for the Southern District of Texas;
- Depositions on July 8-9, 2024 in *Gabriel Miranda v. Kendall County, Texas*, Civil Action No. 5:23-cv-683-FB filed in the in the Western District Court of Texas, San Antonio Division;
- Motion to Transfer Hearing on July 12, 2024, in *Savering v. City of Mansfield*, Cause No. 348-270155-14, in the 348th Judicial District Court of Tarrant County, Texas;

Furthermore, the response deadline of July 5, 2024, falls one day after the Independence Day holiday. Counsel for Respondents have travel and family obligations for the holiday.

Respondents believe it is necessary to digest the Court's recent decision in *Gonzalez v. Trevino*, 602 U.S. ___ (2024), issued on June 20, 2024, and address how the decision may impact in this case. Respondents request additional time to fully analyze that decision.

Finally, Respondents note that the Court granted the extension request filed by the Office of the Texas Attorney General, making their response due on August 5, 2024. Granting this request would align the response deadlines for all Respondents.

For the foregoing reasons, Respondents respectfully request a thirty-day extension of the deadline to file response to the petition for writ of certiorari creating a new deadline of August 5, 2024.

Respectfully submitted,

/s/ William M. McKamie

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/s/ J. Eric Magee, with permission

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cc: JT Morris (via e-mail) Counsel of Record for Petitioner