

PLEASE RESPOND TO CLEVELAND OFFICE

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May 9, 2024

Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
1 First Street NE  
Washington, DC 20543

Re: *First Floor Living, LLC, Petitioner v. City of Cleveland, Ohio, et al.*  
U.S. Supreme Court Case No. 23-1178

Dear Mr. Harris:

After apparently being initially rejected for technical reasons when originally tendered for filing on February 5, 2024, the petition for a writ of certiorari in the above-captioned case was served on April 29, 2024, and docketed by this Court on May 1, 2024. Thus, Defendant/Respondent Baumann Enterprises, Inc.'s response to the petition is currently due May 31, 2024.

Respondent Baumann Enterprises, Inc. respectfully requests a 30 day extension under Rule 30.4, to and including July 1, 2024 (June 30, 2024 is a Sunday) in which to file its response.

Counsel on behalf of Respondent Baumann Enterprises, Inc. requests an extension due to the complexity of the case and legal issues, other considerable preexisting matters, to confer with our clients, coordinate and prepare its opposition, and due to preexisting family and professional commitments. Additionally, counsel for the Respondent Baumann Enterprises, Inc. has other pressing matters with imminent deadlines and was not aware that the time for filing in this matter had been extended making pre-planning impossible.

Counsel for Petitioner First Floor Living, LLC, Mr. Justin D. Stevenson, was contacted on May 6, 2024, regarding this extension and responded: "I will not oppose any of the requests to extend for any parties here."

Additionally, pursuant to Rule 9, we ask that all counsel and the Clerk note that on November 17, 2022, I substituted for Mr. Robert P. Lynch, Jr. as counsel for Defendant/Respondent Baumann Enterprises, Inc. in both Sixth Circuit Appeals (6th Cr. App. No. 22-2316, Document 62, and 6th

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Cir. App. No. 22-3217 Document 56). Therefore, the correct counsel for Defendant/Respondent Baumann Enterprises, Inc. is:

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For the foregoing reasons, we respectfully request that Respondent Baumann Enterprises, Inc. be given an additional 30 days, to and including July 1, 2024, to submit its brief.

Sincerely,

/s/Richard C.O. Rezie  
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#### **CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 29.6, Baumann Enterprises, Inc. (“Baumann”) states that it has no parent corporation and no publicly held company owns 10% or more of Baumann’s stock.

/s/Richard C.O. Rezie  
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cc: (by email and U.S. Mail)

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pending appearance/substitution of new counsel*