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August 14, 2024

File No. 3856.521

Via Electronic Service

Scott S. Harris Office of the Clerk Supreme Court of the United States Washington, DC 20543-0001

Re: Respondent Derrick Jaradi's **unopposed request for briefing extension** in Supreme Court of the United States No. 23-1257, *Argueta v. Jaradi*

Dear Clerk Harris:

Respondent respectfully requests an unopposed briefing extension of thirty (30) days, until and including September 20, 2024, for Respondent to file his response to the petition for writ of certiorari.

Respondent's counsel and Petitioner's counsel conferred, and **Petitioner does not oppose the requested extension.**

Counsel for Respondent requires additional time to complete his response due to prior professional commitments. The prior professional commitments of Respondent's counsel include the following:

- Prepare and file reply brief in support of Intertek's MSJ, in Case No. H-23-425, *Intertek Testing Services, Inc. v. Gregg Tiemann*, in the United States District Court for the Southern District of Texas, Houston Division, on July 26, 2024;
- Prepare and file 01-23-00863-CV Appellant's reply brief, in case no. 01-23-00863-CV, in the First Court of Appeals of Texas, on July 26, 2024;

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- Prepare Appellees' brief in Case No. 24-20015, *Rubin, Chelsie v. De La Cruz* in the Fifth Circuit Federal Court of Appeals, filed on August 1, 2024;
- Travel, prepare and attend oral argument in Case No. 23-20543, *Benfer v. City of Baytown* in the Fifth Circuit Federal Court of Appeals, August 5 and August 6, 2024;
- Prepare and attend oral hearing on privilege in Case No. 220905518, *Brent Tanner v. Deere Bennett Tueller Johnson, et al*, in the Third Judicial District – Salt Lake County District Court for Salt Lake County, State of Utah, August 9, 2024;
- Prepare and file Appellant's brief in Case No. 01-24-00327-CV, *Sepulveda, Azael v. City of Pasadena*, in the First Court of Appeals of Texas, filed on August 12, 2024; and
- Additionally, the aftermath of Hurricane Beryl has substantially disrupted scheduling and litigation activities in several other matters which has adversely impacted counsel's ability to prepare Respondent's brief by the current deadline of August 21, 2024.

For these reasons, Respondent seeks a 30-day extension of the deadline to file his brief in opposition to petition for writ of certiorari.

Respectfully,

<u>/s/William S. Helfand</u> William S. Helfand of Lewis Brisbois Bisgaard & Smith, LLP

cc: Martin Jonathan Siegel mjsiegel@central.uh.edu