

STATE OF MICHIGAN  
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30212  
LANSING, MICHIGAN 48909

DANA NESSEL  
ATTORNEY GENERAL

November 4, 2024

Denise McNerney  
United States Supreme Court Merits Clerk  
One First Street, N.E.  
Washington, D.C. 20543

Re: *Thomas Perttu v. Kyle Brandon Richards*  
United States Supreme Court No. 23-1324

Dear Mr. Harris:

This letter is submitted in place of the parties' application for an extension of time, which was filed on October 31, 2024. Pursuant to Rule 25.3 of the Rules of this Court, applicants Thomas Perttu, Petitioner, and Kyle Brandon Richards, Respondent, respectfully request an extension of time for the filing of the merits briefs in this case. Each party requests a 13-day extension. The jurisdiction of this Court is based on 28 U.S.C. § 1254(1).

1. The date by which Petitioner Perttu's merits brief would be due, if not extended, is November 18, 2024.
2. An extra 13 days is Sunday, December 1, 2024, which would make Perttu's merits brief due on Monday, December 2, 2024.
3. If the proposed extension is granted, Respondent's merits brief would be due 30 days plus an additional 13 days from December 2, 2024, or by Tuesday, January 14, 2025.
4. Assuming an oral argument date of February 24, 2025, Petitioner's merits reply brief will default to Thursday, February 13, 2025.
5. Petitioner's merits reply brief will be at the Court on Friday, February 14, 2025—10 days before the assumed February 24, 2025 oral argument date.
6. These extensions are requested because of the press of counsel's other significant work obligations.

7. Michigan Solicitor General Ann Sherman, Counsel of record for Petitioner, has the management of all appellate cases for the state of Michigan, and work obligations including appellate work related to the upcoming presidential election on November 5, 2024; a reply brief due to this Court in No. 24-73 on November 8, 2024; a reply to a brief in opposition that is due in No. 24-198 by December 27, 2024; and a possible reply in a petition for certiorari filed in this Court on October 24, 2024 (*People v. Lucynski*).

8. Lori Alvino McGill, counsel of record for Respondent, is responsible for several appellate matters for the Appellate Litigation Clinic of the University of Virginia School of Law, including: an opening merits brief due in the Ninth Circuit in No. 23-2739 on November 8, 2024; an opening merits brief due in the Sixth Circuit in No. 24-1287 on November 12, 2024; an oral argument in the Ninth Circuit in No. 21-17098 on November 22, 2024; an oral argument in the Fourth Circuit in No. 22-7199 on December 12, 2024; and a reply brief in the Sixth Circuit in No. 24-1287 on January 13, 2025.

For the foregoing reasons, applicants hereby jointly request a 13-day reciprocal extension of time, to and including December 2, 2024, for Petitioner's merits brief, January 14, 2025, for Respondent's merits brief, and February 13, 2025, for Petitioner's reply.

Sincerely,

*Ann M. Sherman 11-4-2024*

Ann M. Sherman  
Michigan Solicitor General  
*Counsel of Record for Petitioner*  
P.O. Box 30212, Lansing, MI 48909  
ShermanA@michigan.gov  
(517) 335-7628

Lori Alvino McGill  
*Counsel of Record for Respondent*  
Appellate Litigation Clinic  
University of Virginia School of Law  
580 Massie Rd, Ste 251  
Charlottesville, VA 22903  
mxc6ab@virginia.edu  
(914) 646-9410

AMS:hlg  
Enclosure (Proof of Service)  
cc: Lori Alvino McGill