Brown & Hofmeister, L.L.P.

EDWIN P. VOSS, JR.

Board Certified,

Civil Appellate Law

Texas Board of Legal Specialization

(214) 747-6135

evoss@bhlaw.net

740 East Campbell Road Suite 800 Richardson, Texas 75081

Telephone: (214) 747-6100 Telecopier: (214) 747-6111

www.bhlaw.net

July 19, 2024

Clerk's Office Supreme Court of the United States 1 First Street, NE Washington, D.C. 20543

Via electronic filing and First Class Mail

Re:

Vicki Baker v. City of McKinney, Texas

No. 23-1363

Respondent's Motion for Extension of Time to File Brief in Opposition

Dear Clerk of the Court:

In the above-referenced case, the Petition for Writ of Certiorari was filed on June 28, 2024, and placed on the Court's docket on July 2, 2024. Pursuant to Rule 15.3, the due date for Respondent's brief in opposition is Thursday, August 1, 2024. Respondent intends to timely file its brief in opposition pursuant to Rules 15.1 and 15.2.

Over the past several days, Respondent has received notices from counsel for several amici curiae that they intend to file amicus curiae briefs in support of the Petitioner. Respondent acknowledged receipt of said notices pursuant to Rule 37.2. Respondent therefore anticipates that the briefs of amici curiae will be timely filed by August 1, 2024, pursuant to Rule 37.2.

Pursuant to Rule 30.4, Respondent hereby moves for an extension of time to the time period in Rule 15.3 to respond to the petition in this case. This extension of time is sought by Respondent to enable Respondent to address in its opposition the arguments of *amici curiae* urged in support of the petition. Respondent requests an extension of time of twenty-nine (29) days to file its brief in opposition to and including August 30, 2024.

Clerk of the Court Supreme Court of the United States July 19, 2024 Page 2

This motion is not sought to prejudice any party, and Respondent does not believe that any party will be prejudiced by this extension of time. This motion is not sought to cause unnecessary delay in these proceedings, but is sought in the interest of justice so that Respondent may address and respond to all arguments presented by Petitioner and presented in support of Petitioner by *amici curiae*. By copy of this letter, counsel for Petitioner are being notified of this motion and request for extension of time.

Thank you for your attention to, and considerations in, this matter.

Respectfully submitted:

/s/ Edwin Armstrong Price Voss, Jr.
Edwin Armstrong Price Voss, Jr.
Counsel of Record
BROWN & HOFMEISTER, L.L.P.
740 East Campbell Road, Suite 800
Richardson, Texas 75081
(214) 747-6100
evoss@bhlaw.net

Counsel for Respondent City of McKinney, Texas

EPV:dl

cc:

Jeffrey H. Redfern, via electronic filing and First Class Mail Counsel of Record
Robert J. McNamara
Suranjan Sen
William Aronin
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203

Counsel for Petitioner