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August 15, 2024

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

Via electronic filing

Re: No. 23-1363; *Vicki Baker v. City of McKinney, Texas*
Respondent's Second 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 initial due date for Respondent's brief in opposition was Thursday, August 1, 2024. Respondent filed a motion for an extension of time to file its brief in opposition, in response to notices from several *amici curiae*, on July 19, 2024. That motion was granted, and the deadline for Respondent to file its brief in opposition was extended to and including August 30, 2024.

Recently, Respondent has retained additional appellate counsel and new counsel of record to represent Respondent in this case. Additional appellate counsel,

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Albany. Amsterdam. Atlanta. Austin. Berlin. Boston. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Houston. Las Vegas. London.[†] Los Angeles. Mexico City.[‡] Miami. Milan.[§] Minneapolis. Nashville. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Sacramento. Salt Lake City. San Francisco. Seoul.[¶] Shanghai. Silicon Valley. Tallahassee. Tampa. Tel Aviv.[‡] Tokyo.[‡] Warsaw.[‡] Washington, D.C. West Palm Beach. Westchester County.

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including new counsel of record, have now entered their appearances in this case on behalf of Respondent. Due to engagement of new appellate counsel who will serve as lead counsel representing Respondent in this matter, Respondent needs additional time to prepare and file its brief in opposition.

Pursuant to Rule 30.4, Respondent hereby moves for an extension of time to respond to the petition in this case. This extension of time is sought by Respondent to enable Respondent's new counsel of record to respond to the petition, and also to address in Respondent's opposition the arguments of *amici curiae* urged in support of the petition. Respondent requests an extension of time of thirty (30) days to file its brief in opposition to and including Monday, September 30, 2024. Co-counsel Ed Voss has conferred with counsel for Petitioner, who indicated Petitioner does not oppose the extension of time sought by this motion.

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's new counsel of record has sufficient time to prepare a cogent and helpful response to the petition and to the arguments presented by *amici curiae*.

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

Best regards,



Jesse W. (Dale) Wainwright
Shareholder

DWW:sas

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