

October 2, 2023

*Via Electronic Filing*

Danny Bickell  
Deputy Clerk of Court  
Supreme Court of the United States  
One First Street, NE  
Washington, DC 20543

Re: No. 23-232, *BASF Metals Limited, et al., v. KPFF Investment, Inc., et al.*

Dear Mr. Bickell:

I write to enter my appearance as counsel of record for the respondents and to request a thirty-day extension of the time to file a response to the petition for certiorari in this case. The response is currently due on October 13, 2023, and I respectfully request that the deadline be extended to, and include, November 13, 2023.

There is good cause for this request. My firm has just recently been retained in this case, and my colleagues and I have several deadlines in the upcoming weeks that would make it impossible to prepare a brief absent an extension, including an oral argument in this Court. These deadlines include a consolidated oral argument in the Eleventh Circuit in *Holden v. Holiday Inn* and *Mayer v. Holiday Inn* on October 3; a response brief in the California Court of Appeal in *Valdovinos v. Kia* on October 3; a reply in support of a motion for final approval in the District Court for the District of Columbia in *NVLSP v. United States* on October 3; an answering brief in the Ninth Circuit in *Johnson v. Nissan* on October 4; an oral argument in the Ninth Circuit in *Anderson v. Intel* on October 5; an oral argument in the Eleventh Circuit in *Louis v. Bluegreen* on October 6; a response brief in the Washington Court of Appeals in *Long v. Monsanto* on October 6; a reply brief in the Fifth Circuit in *Ethridge v. Samsung* on October 6; an answer to a petition for review in the California Supreme Court in *Kielar v. Superior Court* on October 11; an oral argument in the Washington Supreme Court in *Nwauzor v. GEO* on October 17; a consolidated oral argument in the Sixth Circuit in *Bradford v. Team Pizza* and *Parker v. Battle Creek Pizza* on October 18; an oral argument in the Fourth Circuit in *Mohamed v. Bank of America* on October 24; an oral argument in the Fourth Circuit in *Fernandez v. Rentgrow* on October 26; and an oral argument in this Court in *Vidal v. Elster* on November 1.

For these reasons, my colleagues and I will require additional time to prepare an adequate response to the petition. A thirty-day extension will allow us to balance these other responsibilities with our obligations in this case.

Thank you for your attention to this matter.

Sincerely,

cc: Counsel of Record

Jennifer D. Bennett