

CITY AND COUNTY OF SAN FRANCISCO



DAVID CHIU  
City Attorney

OFFICE OF THE CITY ATTORNEY

TARA M. STEELEY  
Deputy City Attorney

Direct Dial: (415) 554-4655  
Email: tara.steeley@sfcityatty.org

August 25, 2023

**VIA OVERNIGHT MAIL**

Mr. Scott Harris  
Clerk  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

Re: City and County of San Francisco v. Kirola  
US Supreme Court Case No. 23-35

Dear Mr. Harris:

Petitioner City and County of San Francisco filed its Petition for a Writ of Certiorari on July 10, 2023. Pursuant to an extension granted by this Court, Respondents filed a Brief in Opposition on August 22, 2023. Petitioner respectfully requests, under Rule 30.4 of the Rules of this Court, a 30-day extension to and including October 2, 2023 within which to file a Reply to Opposition ("Reply"). This is Petitioner's first motion for an extension.

Undersigned counsel has begun preparation of the Reply and will continue to work on the Reply while simultaneously working on briefing in two appeals pending before the United States Court of Appeals for the Ninth Circuit, one appeal pending before the First District Court of Appeal in California, and two writ actions pending before the San Francisco Superior Court. It has become apparent that the requested extension is necessary to ensure an opportunity for Petitioner's counsel to adequately address Respondents' opposing views to granting certiorari while satisfying these other professional commitments.

Thank you for your assistance in this matter.

Very truly yours,

DAVID CHIU  
City Attorney

A handwritten signature in black ink, appearing to read "T-Steley".

TARA M. STEELEY  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2023 I caused this document to be electronically filed with the Clerk of the Supreme Court of the United States by using the Supreme Court's electronic filing system.

I certify that I served the same document via First Class Mail and Electronic Mail on counsel of record for Respondents, as follows:

Guy B. Wallace, Esq.  
Mark Johnson, Esq.  
SCHNEIDER WALLACE COTTRELL KONECKY, LLP  
2000 Powell Street, Suite 1400  
Emeryville, CA 94608  
Phone: (415) 421-7100  
Fax: (415) 421-7105  
Email: gwallace@schneiderwallace.com  
mjohnson@schneiderwallace.com

[Counsel of Record for Respondents]

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed this 25th day of August, at San Francisco, California.

/s/Pamela Cheeseborough  
\_\_\_\_\_  
PAMELA CHEESEBOROUGH