

August 2, 2023

Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
1 First Street NE  
Washington, D.C. 20543

**Re: Application for Extension of Time to File Brief in Opposition to Petition for Writ of Certiorari**  
*Jascha Chiaverini, et al. v. City of Napoleon, Ohio, et al.*, S. Ct. No. 23-50

Dear Mr. Harris:

I am counsel for Respondents in this case. Petitioners filed the petition for a writ of certiorari on July 14, 2023, and it was docketed on July 20, 2023. According to the online docket and pursuant to Rule 15.3 of the Rules of the Supreme Court of the United States, a response is due on August 21, 2023. Pursuant to Rule 30.4, Respondents respectfully request that the time for filing a response be extended by 30 days, to and including September 20, 2023.

This is Respondents' first request for an extension of time to file a response. Good causes exists for the requested extension. I have been and am continuing to prepare for trial in *In the Matter of Trust Created Under Article IV of the Last Will and Testament of Juanita Collier*, Case No. 20063002-A, Putnam County Probate Court. Additionally, I have a number of other upcoming professional deadlines: 76 Requests for Production of Documents due on August 1, 2023, in the matter of *John Doe I, et al. v. Ottawa Hills Local School District, et al.*, Case No. 3:22-cv-146, U.S. District Court for the Northern District of Ohio; an Answer due on August 8, 2023 in *Brewster v. Western Ohio Regional Treatment and Habilitation Center, et al.*, Case No. 3-23-cv-01188, U.S. District Court for the Northern District of Ohio; a deposition on August 10, 2023 in *Afjeh v. The Village of Ottawa Hills, et al.*, Case No. 3:21-cv-778, U.S. District Court for the Northern District of Ohio; a mediation on August 10, 2023 in *Trevino v. Gudakunst, et al.*, Case No. 2021CV0423, Wood County Common Pleas Court; and an Answer due on August 15 in *Brown, et al. v. Ringler, et al.*, Case No. CI0202302786, Lucas County Common Pleas Court. I will be on a previously scheduled personal vacation from August 19-26, 2023.

Accordingly, Respondents respectfully request that the time for filing a response to the petition for a writ of certiorari be extended by 30 days, to and including September 20, 2023.

Yours very truly,  
SPENGLER NATHANSON P.L.L.



Teresa L. Grigsby

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cc: Easha Anand, Esq. (via email and regular U.S. mail)  
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