

# BakerHostetler

Baker&Hostetler LLP

Washington Square, Suite 1100  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5403

T 202.861.1500  
F 202.861.1783  
www.bakerlaw.com

Mark W. DeLaquil  
direct dial: 202.861.1527  
mdelaquil@bakerlaw.com

January 25, 2024

## ***By Electronic Filing***

Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, DC 20543-0001

*Re: Robert Bartlett, et al. v. Muhammad Baasiri, et al. (No. 23-568)*

I represent respondents in the above-captioned case. The Court requested a response to the petition for certiorari on January 17, 2024, and it is currently due on February 16, 2024. I write to seek a 45-day extension of time to file the requested response. Petitioner's counsel has informed me that they consent to the extension.

I am requesting this extension because I am currently lead counsel in an ongoing jury trial in *Mann v. Competitive Enterprise Institute* (D.C. Superior Court Case No. 2012-CA-8263-B). The jury trial began on January 16, 2024, and is scheduled to last nearly four weeks. As Justice Alito previously acknowledged in his dissent from the denial of certiorari in *Mann*, the trial raises pressing questions "that go to the very heart of the constitutional guarantee of freedom of speech and freedom of the press: the protection afforded to journalists and others who use harsh language in criticizing opposing advocacy on one of the most important public issues of the day." *Nat'l Rev., Inc. v. Mann*, 140 S. Ct. 344 (2019) (Alito, J., dissenting). Following this trial, I expect that there will be substantial post-trial briefing obligations. Absent an extension, the *Mann* trial will prevent me from devoting adequate time to preparing a response to the petition for certiorari.

A 45-day extension of time, to and including April 1, 2024, is necessary to enable me to prepare a response to the petition for certiorari in this matter. Thank you for your assistance with this matter.

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Sincerely,

/s/ Mark. W. DeLaquil

Mark W. DeLaquil

cc: All Counsel of Record