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**VIA ELECTRONIC FILING AND CERTIFIED
MAILING**

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

Subject: Respondent Lane County's Motion to Extend Time to File a Brief in Opposition to
Petition for A Writ of Certiorari
*Estate of William Han Manstrom-Greening, Through Carol J. Manstrom, Personal
Representative v. Lane County, Oregon et al.,*
Case No. 23-616

Dear Clerk:

I am counsel for the Respondent Lane County in the above-referenced civil case. Petitioner *Estate of William Han Manstrom-Greening* filed its petition for a writ of certiorari on December 4, 2023, and the petition was docketed on December 7, 2023. Under Rule 15.3 of the Rules of the Supreme Court of the United States and according to the online docket, a brief in opposition or response to the petition is currently due by January 8, 2024. In accordance with Rule 30.4, Respondent Lane County respectfully request that the time for filing a response be extended by 30 days, up to and including February 7, 2024.

This motion is made in good faith and not for the purpose of delay. A 30-day extension is justified for the following reasons. First, appellate counsel was recently retained to represent the case before the Supreme Court, and did not represent Respondent Lane County in proceedings below in the U.S. District Court for the District of Oregon or the U.S. Court of Appeals for the Ninth Circuit. Therefore, counsel requires sufficient time to familiarize himself with the relevant legal issues and trial record. Second, because of the upcoming federal and state holidays, counsel has personal travel and family obligations that cannot be rescheduled. An extension of time would better enable preparation of a response that would be most helpful to the Court. Third, the availability of the commercial printer Respondent Lane County intends

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to use has limited availability that creates challenges for the Respondent Lane County's current deadline. Fourth, there are no circumstances of which the Respondent Lane County is aware that necessitate a speedy ruling on the petition.

This is Respondent Lane County's first request for an extension of time to file a response. Respondent Lane County does not anticipate needing any further extensions to the requested date.

Accordingly, Respondent Lane County respectfully requests that the time for filing a response to the petition for writ of certiorari be extended by 30 days, up to and including February 7, 2024.

Very truly yours,



Iván Resendiz Gutierrez

cc: Elizabeth Claire Savage – Appellate and Trial Counsel for Petitioner
Erin M. Pettigrew – Trial Counsel for Respondent Lane County
Bruce C. Moore - Trial Counsel for Respondent Glenn Greening

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