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Our attorneys are admitted to practice law only in New York, New Jersey, and India.
We collaborate with other attorneys throughout the U.S. and globally.

July 21, 2025

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

RE: Request for extension of time to file response to Petition for Certiorari
Andrew Charles Nisbet v. Spirit Rose Bridger
S. Ct. No. 24-1119

Dear Mr. Harris,

I am counsel for Petitioner, Andrew Nisbet, in the above-entitled matter. I oppose the request of counsel for the Respondent made by letter dated July 15, 2025, for an extension of time within which to file a response to the Petition for Certiorari.

There is a treaty-based duty on the part of the Supreme Court to expedite proceedings brought under the Hague Convention on the Civil Aspects of International Child Abduction. Article 11 of the Convention provides that, “The judicial or administrative authorities of Contracting States shall act expeditiously in proceedings for the return of children.” The same Article provides that if a case has not been concluded within “six weeks of the date of commencement of the proceeding,” applicant may demand a statement of the reasons for such delay. The pending case commenced on June 12, 2023, more than two years ago. It should not now be further delayed merely for reasons of counsel’s convenience.

Sincerely,

Jeremy D. Morley
Jeremy D. Morley

cc: Katrina Seipel, Counsel for Respondent
Katelyn D. Skinner, Counsel for Respondent
Edwin Freedman, Amicus Counsel