



BRODY HARDOON PERKINS & KESTEN, LLP
265 Franklin Street
Boston, Massachusetts 02110

LEONARD H. KESTEN
lkest@bhpklaw.com

November 25, 2024

Hon. 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
Kari MacRae v. Matthew Mattos, et al
Supreme Court No.: 24-355

Dear Honorable Harris:

We are counsel for the Respondents in this matter. The Petitioner filed her Petition for a Writ of Certiorari on September 26, 2024, and it was docketed with the Supreme Court on September 30, 2024. Pursuant to Rule 15.3 of the Rules of the Supreme Court of the United States, a response was originally due on October 30, 2024. On October 28, 2024, we filed a request for a 30-day extension of time to file a response, which was allowed by this Court. Pursuant to Rule 30.4, the Respondents respectfully request that the time for filing a response be further extended by 30 days to and including December 30, 2024.

This is the Respondents' second request for extension of time to file a response, and good cause exists for the requested extension. We are counsel to Gloucester Massachusetts Public School District and on November 7, 2024, the Gloucester Public School teachers announced a strike. The teachers began their strike on November 8, 2024, and negotiations ended and strike resolved on November 22, 2024. The strike required our full attention during all hours of the day, and we needed to pivot and rearrange our litigation calendar to fulfill the needs of the Gloucester Public School District at that time due to the exigent circumstances. Additionally, on December 16, 2024, we are scheduled to begin a trial in the United States District Court for the District of Massachusetts in the matter of *Medico 140 LLC v. Town of Andover, et al.* A 30-day extension of time would allow us to adequately prepare a response that would be most helpful to the Court.

Accordingly, the 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 December 30, 2024. Counsel for the Petitioner, Michael Bekesha, has informed us that the Petitioner does not object to this request.

November 25, 2024
Page 2

Thank you for your consideration. Kindly advise.

Sincerely,

/s/ Leonard H. Kesten

Leonard H. Kesten, Esq.
Greg A. Pagnini, Esq.
Brody, Hardoon, Perkins & Kesten, LLP
265 Franklin Street, 12th Floor
Boston, MA 02110
(617) 880-7100
lkesten@bhpklaw.com
[Counsel for Respondents]

LHK/snm

cc: Michael Bekesha, Esq. (*via email - mbekesha@judicialwatch.org*)