



November 12, 2024

VIA ELECTRONIC FILING:

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

RE: *Michelle R. Gilbank v. Wood County Department of Human Services, et al.*
S. Ct. No. 24-470
Respondents' Joint Request for Extension of Time to File Response to Petition for Writ of Certiorari

Dear Mr. Harris:

Our office represents Respondents Marshfield Police Department and Derek Iverson (together, the "Marshfield Police Respondents") in regard to the above-referenced matter. Attorney Aneet Kaur of Axley Brynelson, LLP represents Respondents Wood County Department of Human Services, Theresa Heinzen-Janz, Mary Christensen, and Mary Solheim (collectively, the "Wood County Respondents").¹ The Marshfield Police Respondents and the Wood County Respondents (together, "Respondents") were the only defendants to proceed before the Seventh Circuit and we believe we will be the only parties to respond to Ms. Gilbank's Petition.

Petitioner Michelle R. Gilbank filed her Petition for Writ of Certiorari on October 23, 2024, which was docketed with the Supreme Court on October 28, 2024. Absent an extension, Respondents' briefs in opposition are due November 27, 2024.

Pursuant to Rule 30.4, Respondents respectfully jointly request that the time for filing a response be extended by forty (40) days to January 6, 2025. Petitioner's counsel, Joseph S. Diedrich, has agreed to an extension and suggested that the extension be extended to allow all parties to clear the holidays and any holiday-related closures. A thirty-day extension would result in briefs in opposition to be due on December 27th. A forty-day extension would result in deadlines after the holidays and is more amenable to all parties, including Ms. Gilbank's counsel.

Respondents' request for an extension is a first request. Good cause exists for the requested extension. Counsel has prior personal and professional commitments established before the current deadline. Additionally, the Wood County Respondents and the Marshfield Police Respondents

¹ The Wood County Respondents' primary counsel, Atty. Aneet Kaur, has applied for admission to the Supreme Court of the United States, which is currently pending. Atty. Kaur has consented to our filing of this request on behalf of Respondents. Atty. Kaur understands that any response must be filed by a member of the bar.

currently intend to file a joint brief in opposition, rather than individual briefs. The extension of time allows for parties to better coordinate joint briefing. Finally, there are no circumstances requiring a speedy ruling on the Petition.

Therefore, the Marshfield Police Respondents and the Wood County Respondents request a forty (40) day extension of time to January 6, 2025, to file their brief in opposition to the Petition for Writ of Certiorari.

Thank you for your time and attention to this matter.

Very truly yours,

Amundsen Davis, LLC



Jason R. Just

Amundsen Davis, LLC



Tiffany E. Woelfel

AFFIDAVIT OF SERVICE

I Jason R. Just, of lawful age, being duly sworn, upon my oath state that I did, on the 12th day of November, 2024, send out from Green Bay, Wisconsin, one package containing one letter to the Clerk of Court pursuant to Rule 30.4 in the above-captioned case. All parties required to be served have been served by Priority Mail. Packages were plainly addressed to the following:

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Executed on this 12th day of November, 2024 in Green Bay, Wisconsin.

/s/ Jason R. Just
Jason R. Just