

LEO GOLD (1907 - 1987)
GEORGE B. HALL (1924 - 1971)
F. A. LITTLE, JR., (1936 - 2024)
PEGGY D. ST. JOHN (1953 - 2017)

CHARLES S. WEEMS, III
EUGENE J. SUES
EDWARD E. RUNDELL ²
RANDALL L. WILMORE
DORRELL J. BRISTER ^{1,2,3}
GREGORY B. UPTON
RANDALL M. SEESER
MICHAEL J. O'SHEE
BRANDON A. SUES
TREVOR S. FRY ^{2,5}
BRADLEY L. DRELL ⁴
STEVEN M. OXENHANDLER
STEPHEN A. LAFLEUR
HEATHER M. MATHEWS ²
B. GENE TAYLOR, III
LESLIE E. HALLE ³
EVELYN I. BREITHAUP ²



A Professional Law Corporation
2001 MacArthur Drive
Post Office Box 6118
Alexandria, Louisiana 71307-6118
Local (318) 445-6471 Fax: (318) 445-6476
Toll Free (866) 302-6283
bdrell@goldweems.com * www.goldweems.com

JOSHUA J. DARA, JR.
R. MORGAN BRIGGS
CONNOR C. HEADRICK
CONNER L. DILLON
DANIEL T. MARLER
JONATHAN M. BRANTON
CALEB J. O'CONNELL

OF COUNSEL:
CAMILLE F. GRAVEL (1915 - 2005)
HENRY B. BRUSER, III
ROBERT G. NIDA

¹ SPECIALIST IN TAXATION, CERTIFIED BY LA BOARD OF LEGAL SPECIALIZATION
² ALSO ADMITTED IN TEXAS
³ SPECIALIST IN ESTATE PLANNING ADMINISTRATION, CERTIFIED BY LA BOARD OF LEGAL SPECIALIZATION
⁴ SPECIALIST IN BUSINESS BANKRUPTCY, CERTIFIED BY LA BOARD OF LEGAL SPECIALIZATION

November 27, 2024

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

Re: Request for extension of time to file brief in opposition in
American Warrior, Inc., et al v. Foundation Energy Funds IV-A, L.P. et al., Case No. 24-494
Our File No. 30-21-0023

Dear Mr. Harris:

The Court docketed the petition for a writ of certiorari in the above captioned case on October 30, 2024. I, on behalf of Foundation Energy Fund IV-A, L.P., Foundation Energy Fund IV-B Holding, L.L.C., Dolores Jo Matson Trust, Roger Melvin Matson Trust, and the Estate of Wills J. Magathan filed a waiver on November 6, 2024, as did the other respondents. On November 26, 2024, the Court requested a response with a due date of December 26, 2024.

Pursuant to this Court's Rules 15.3, 30.1, and 30.4 and on behalf of my clients, I hereby request an additional 32 days to file a response, with a new deadline of January 27, 2025.

Respondent requires additional time to prepare a thorough and well-researched response to the petition as well as an amicus brief filed in support. This extension is not sought for purposes of delay but to ensure that the issues presented in the petition are fully and adequately addressed. Moreover, the undersigned counsel has an extremely busy December with a number of court appearances in Chapter 11 cases, depositions, and a presentation at a bank counsel conference.

Counsel for Petitioner and the other respondents have been contacted and has no objection to this extension.

Respectfully,

GOLD, WEEMS, BRUSER, SUES & RUNDELL

By: s/Brad Drell
Bradley L. Drell
Counsel for Foundation Energy Fund IV-A, L.P.,
Foundation Energy Fund IV-B Holding, L.L.C.,
Dolores Jo Matson Trust,
Roger Melvin Matson Trust,
and the Estate of Wills J. Magathan

BLD/sml

cc: G. Eric Brunstad (by email: eric.brunstad@dechert.com)
Sarah Kirkpatrick (by email: skirkpatrick@bradleyfirm.com)