

January 27, 2025

Via Electronic Filing

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

Re: No. 24-630, *Union Pacific Railroad Company v. Nicholas DeFries, James Blankinship, Justin Donahue, et al.*

Dear Mr. Harris:

I write to request an unopposed five-day extension of the time to file a response to the petition for certiorari in this case. The response is currently due on February 7, 2025, and I respectfully request that the deadline be extended to, and include, February 12, 2025. This corresponds with the deadline to file a response to the petition for certiorari in a similar case, *Union Pacific Railroad Company v. Robert Anthony Zaragoza*. The petitioner consents to this request.

There is good cause for this request. My colleagues and I are heavily engaged with other appellate matters that would make it impossible to prepare a brief absent an extension. These deadlines include post-trial briefs due in *Williams v. Wabash National Corp.*, No. 2022-CCOO495, on January 30, 2025; an oral argument in the First Circuit in *Miller v. Roycroft*, No. 24-1351, on February 6, 2025; and an oral argument in the Western District of Pennsylvania in *Duncan v. PNC Bank*, No. 2:22-cv-01717.

For these reasons, my colleagues and I will require additional time to prepare an adequate response to the petition. A five-day extension will allow us to balance these other responsibilities with our obligations in this case.

Thank you for your attention to this matter.

Sincerely,

/s/ Matthew W.H. Wessler
Matthew W.H. Wessler

cc: Counsel of Record