



PACIFIC LEGAL FOUNDATION

April 1, 2025
VIA E-FILING & FIRST CLASS MAIL

Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543-0001

Re: *Kari Beeman, et al. v. Muskegon County Treasurer*, Case No. 24-858;
Response to Motion to Extend Time to Respond to Petition for Certiorari

Dear Mr. Harris:

Yesterday, Respondent Muskegon County requested a 60-day extension to the deadline for the County's response brief. Petitioners do not object to an extension, but ask the Court to extend the deadline by no more than 37 days, to May 21, 2025. This would allow Petitioners the opportunity to submit their reply in time for a June 3 distribution and a June 18 conference, setting up the case to be granted or denied by the end of this term.

The Respondent's reasons for its request do not support a 60-day extension. The Michigan Supreme Court might issue a potentially relevant opinion in *Jackson v. Southfield Neighborhood Revitalization Initiative* (Docket No. 166320). But that court's session ends at the end of July, and it has not yet held oral argument in *Jackson*. Moreover, the Michigan Supreme Court recently dismissed takings claims because of the statute at issue in this case, relying in part on the same Michigan Court of Appeals decision for which the Petitioners here seek certiorari. *See Hathon v. State*, No. 168233, 2025 WL 884108, at *1 (Mich. Mar. 20, 2025) (citing *In re Petition of Muskegon County Treasurer*, __ Mich App __, 2023 WL 7093961 (Oct. 26, 2023)).

Additionally, although the Respondent in *Tyler v. Hennepin County*, No. 22-166, 598 U.S. 631 (2023), requested a 60-day extension, the Court granted only 46 days.

The constitutional rights of thousands of Michiganders are at stake, and millions of dollars that the government may or may not be able to retain. It is in all parties' interest to obtain a ruling on the Petition for Writ of Certiorari sooner rather than later.

Sincerely,

CHRISTINA M. MARTIN
Counsel of Record for Petitioners

cc: All Counsel of Record (Via E-Filing)