JACOB C. COHN JCOHN@GRSM.COM DIRECT DIAL: (215) 717-4004

Admitted In: PA, NJ, NY



March 27, 2025

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

Re: Alejandro Martinez, Petitioner v. City of Rosenberg, Texas, et al.

No. 24-892

Dear Mr. Harris:

I am counsel for the respondents in this case. Petitioners filed their petition for a writ of certiorari on February 14, 2025. Respondents filed a waiver of the right to respond on March 14, 2025. On March 26, 2025, the Court requested that a response be filed by April 25, 2025.

Pursuant to Rule 30.4, respondents respectfully request that the time for filing a response be extended by 30 days, to and including May 27, 2025 (May 25 being a Sunday and May 26 being the Memorial Day holiday). This is respondents' first request for an extension of time to file a response. Good cause exists for the requested extension. I did not represent respondents in this case in the district court or court of appeals, and thus require sufficient time to familiarize myself with the relevant legal issues and record. Apart from this case, I represent clients in several other pending appellate matters in state and federal court that will require me to devote substantial amounts of time in the coming weeks. Furthermore, I will be traveling out of the country on a prepaid vacation from April 10-28, 2025. An extension of time would better enable preparation of a response that would be most helpful to the Court.

Accordingly, respondents respectfully request that the time for filing a response to the petition for writ of certiorari be extended by 30 days, to and including May 27, 2025. Counsel for the petitioners, Daniel Woofter, has informed me by email that petitioners do not object to this request.

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Respectfully submitted,

GORDON & REES

Jacob C. Cohn

cc: Daniel Hirotsu Woofter, Counsel of Record for Petitioner