

# COVINGTON

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## Via Electronic Filing

March 14, 2025

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

**Re: *Winston Tyler Hencely v. Fluor Corporation, et al.*,  
No. 24-924**

Dear Mr. Harris:

We represent Respondents Fluor Corporation, et al., in the above-captioned case. The petition for writ of certiorari in this case was filed on February 24, 2025, and placed on the docket on February 26, 2025. Respondents' brief in opposition is currently due on March 28, 2025.

Pursuant to Rule 30.4 of the Rules of this Court, we respectfully request an extension of thirty days, to and including April 28, 2025, within which to file a response. This extension is requested in light of counsel's obligations on other matters and to allow Respondents to address any amicus briefs filed in support of the petition.

Since the petition was docketed, those obligations have included: (1) filing an opening brief in the Vermont Supreme Court in *State of Vermont v. Meta Platforms, Inc.*, No. 24-AP-25; (2) filing a reply brief in the United States Court of Appeals for the Ninth Circuit in *Mikulsky v. Bloomingdale's, LLC*, Nos. 23-3564 & 24-3837; and (3) presenting oral argument in the New York Appellate Division, First Department in *Century Indemnity Co. v. Brooklyn Union Gas*, No. 2024-6580. Before the current due date of Respondents' brief, counsel also has at least two substantial filings in confidential matters. Counsel has also received notice of an amicus brief that may be filed in support of the petition. This requested extension will enable counsel to complete work on this response while meeting other obligations.

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Sincerely,

/s/ Mark W. Mosier

Mark W. Mosier

cc: Attached Service List

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**Service List**

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