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March 19, 2018

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

Re: Multnomah County, Oregon v. David Updike, et al.
United States Supreme Court Case No. 17-1222
Motion to Extend Time to Respond to Petition

Dear Mr. Harris:

The petition for a writ of certiorari in the above entitled case was filed on February 26, 2018 and placed on the docket March 2, 2018 as No. 17-1222. Mr. Updike's response is due April 2, 2018. We respectfully request, under Rule 30.4 of the rules of this Court, an extension of time to and including May 2, 2018, within which to file Mr. Updike's response.

This extension is requested to complete preparation of Mr. Updike's response, which was delayed because of the heavy press of other assigned cases to the attorneys handling this matter. Additionally, Mr. Updike's attorneys are currently preparing for a multi-week trial scheduled to begin April 10, 2018.

This is counsel's first request for an extension and is not being made for purposes of delay. Counsel also cannot perceive any prejudice that would occur to either party by the granting of this 30-day extension. Thank you for considering this request

Sincerely,

/s/ Daniel Snyder

Daniel Snyder

cc: Jacqueline Kamins
Multnomah County Attorney
501 S.E. Hawthorne Blvd., Suite 500
Portland, OR 97214