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April 16, 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 currently due May 2, 2018. We respectfully request, under Rule 30.4 of the rules of this Court, an extension of time to and including June 1, 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. The attorneys responsible for responding to the petition had a multi-week trial scheduled to begin April 10, 2018 and several other appeals in process. They are now working on the response but require additional time to complete the brief.

This is counsel's second request for an extension and is not being made for purposes of delay. Counsel for Petitioner Multnomah County has no objection to this extension and no prejudice 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