



October 12, 2018

Via Electronic Filing

Hon. Scott Harris, Clerk
Supreme Court of the United States
One First Street, N.E.
Washington, DC 20543

Re: No. 17-1641; Barbara Ann Thomas, et al., v. J.J. Williams

Dear Mr. Harris:

Petitioners support granting a 14-day extension. A 21-day extension will make Respondent's brief in opposition due November 2, Petitioner expects to respond thereto, and the additional seven days prejudice Petitioners (or, alternatively, their counsel).

Petitioners' counsel of record is slated to be an election protection attorney during early voting (and on election day) and has scheduled a brief vacation beginning November 9 (based in part upon the calendar in this case). Additionally, Meagan Hassan (the undersigned's law partner) is a candidate for Texas' Fourteenth Court of Appeals (Houston), where early voting is scheduled to begin on October 22; she will become increasingly unavailable until November 6 and has calendared her early-to-mid November commitments (in part) relying upon the absence of foreseeable commitments herein. She also has travel plans beginning on November 9. Finally, Petitioners' co-counsel (Joe Crews) is scheduled for a trial beginning November 6 and will be largely unavailable from November 5-November 9.

As a result, the additional seven days prejudices Petitioners through no fault of their own because their counsel will be unavailable or away from their files; in order to eliminate the largest component of said prejudice, two of their attorneys would need to cancel pre-paid travel plans. While this would ordinarily be insufficient to deny Respondent's requested relief, I respectfully submit it is sufficient under the circumstances given the timing of this last-minute plea for relief and that part of Respondent's motivation for requesting an additional seven days is his own counsel's vacation plans.

Respectfully submitted,

/s/ William Pieratt Demond

William Pieratt Demond
DEMOND & HASSAN, PLLC
Tel: (713) 701-5240
william.demond@demondhassan.com

cc: Robert W. Higgason
Senior Assistant City Attorney
robert.higgason@houstontx.gov