

December 18, 2018

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

Re: *The American Legion, et al. v. American Humanist Association, et al.* and
*Maryland-National Capital Park and Planning Commission v. American
Humanist Association, et al.* Nos. 17-1717 and 18-18 consolidated;
**Respondents' Unopposed Application for an Extension of Time to File
Brief on the Merits**

Dear Mr. Harris,

1. Pursuant to Supreme Court Rule 30(4), Respondents respectfully request an extension of time to file their brief on the merits.
2. On December 17, 2018, Petitioner The American Legion, et al. and Petitioner Maryland-National Capital Park and Planning Commission separately filed a brief on the merits. In light of the volume of amicus briefs filed at the certiorari stage, Respondents anticipate an equal or greater number of amicus briefs will be filed at this stage.
3. Respondents' brief(s) on the merits¹ are currently due January 16, 2019.

¹ Respondents have filed an application for leave to file a consolidated brief on the merits in excess of the word limit for a single brief.

4. Additional time is necessary for Respondents' counsel to adequately respond to each brief on the merits and the amicus briefs. The undersigned is solely responsible for researching, drafting, and editing Respondents' brief(s) on the merits.

5. In addition to working full time at the American Humanist Association as senior counsel, the undersigned is also a part-time lawyer for the Nonhuman Rights Project and has litigation obligations to fulfill for that position over the next month. Moreover, several holidays fall between now and the January 16, 2019 deadline including Christmas (the undersigned observes this holiday) and New Year's Day.

6. Respondents seek a three-week (21-day) extension of time to file their brief(s) on the merits, up to and including February 6, 2019.

7. Petitioners consent to a 7-day extension of time up to and including January 23, 2019. Petitioners are aware that the Court intends to schedule oral argument in February and they understandably wish to have adequate time to file their reply briefs. Should oral argument be scheduled at a later date, it is Respondents' understanding that Petitioners would be open to longer reciprocal extensions of time.

8. This extension of time is sought in the interest of justice, not for delay, and no party will be prejudiced if an extension is granted.

Respectfully submitted,

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