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December 27, 2017

Via ECF and  
Federal Express Overnight

Scott S. Harris  
Clerk of the Supreme Court of the United States  
**Office of the Clerk**  
1 First Street, NE  
Washington, DC 20543-0001

Re: Crane Co., Petitioner, versus Jeanette G. Poage, Respondent, No. 17-900, On  
Petition for a Writ of Certiorari to the Missouri Court of Appeals, Eastern District

Dear Mr. Harris:

I am lead counsel for the Respondent regarding the above-referenced Petition for a Writ of Certiorari. Under Supreme Court Rule 30.4, I write to request a 30-day extension of time to respond to the Petition for a Writ of Certiorari filed by Petitioner Crane Co. on December 20, 2017.

On October 26, 2017, upon Petitioner's Application to the Court, Justice Gorsuch previously extended by 30 days Crane Co.'s original time to file its Petition. Ms. Poage's Response to Crane Co.'s Petition is currently due on January 19, 2018. During the time before the Response is due, in addition to the intervening Christmas holiday, I am committed to several day-long events related to my son's wedding on December 30, 2017. Thereafter, I am required to travel out of state on January 4-5, 2018 for a deposition in *Jim Hood ex rel. State of Mississippi v. Bristol-Myers Squibb Co., et al.*, No. 2014-2124 DWC, pending in the Circuit Court for Chickasaw County, Mississippi, as well as January 7-11 for a court-related ceremony in the United States District Court for the District of Columbia and a three-day settlement conference/mediation in New York City in *Blackmon v. Michael Stapleton Associates, Inc.*, No. 17-1362, pending in the United States District Court for the Northern District of Texas. I am lead counsel for all the foregoing matters.

My office has planned to work with our state appellate court co-counsel in Missouri after the completion of an initial draft of the response. In view of the time that I believe will be necessary for completion of that initial draft due to the scheduling matters set forth in this letter, the relief I am requesting would facilitate our completion of a final draft with the benefit of work from the attorneys who have assisted us throughout the appellate process.

Ms. Poage requests this extension of time—i.e., until February 19, 2018 (pursuant to Rule 30.1, as February 18, 2018 falls on a Sunday)—to ensure that her counsel has the time that will be necessary to research and brief the issues raised in Crane Co.'s Petition. Thus, Respondent respectfully requests that her time to respond to Crane Co.'s Petition be extended until and including February 19, 2018.

Respectfully,

A handwritten signature in black ink, appearing to read "R. Cowan", with a long horizontal flourish extending to the right.

Robert W. Cowan  
Counsel for Respondent Jeanette G. Poage

RC:jlw

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IN THE  
**Supreme Court of the United States**

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CRANE CO.,

*Applicant,*

v.

JEANETTE G. POAGE,

*Respondent.*

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**CERTIFICATE OF SERVICE**

Pursuant to Supreme Court Rules 29.3 and 29.5(b), I, Robert W. Cowan, a member of the Bar of this Court, hereby certify that on this 27th day of December, 2017, copies of the foregoing Request for Extension of Time to Respond to the Petition for a Writ of Certiorari were served via first class U.S. mail, postage prepaid, to:

Nicholas P. Vari Michael J. Ross K&L GATES LLP 210 Sixth Avenue Pittsburgh, PA 15222	Neal K. Katyal Colleen E. Roh Sinzdak Allison K. Turbiville HOGAN LOVELLS US LLP 555 Thirteenth Street, NW Washington, D.C. 20004
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*Counsel for Applicant*

I further certify that all parties required to be served have been served.



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Robert W. Cowan