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August 28, 2019  
**Via FedEx & Electronic Filing**

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

Att'n: Danny Bickell, Deputy Clerk

Re: Court of Common Pleas, Bucks County PA v. Piasecki  
No. 18-1490

Application for Further Extension of Time to File Brief in Opposition

Dear Mr. Harris and Mr. Bickell:

The petition in this case was filed on May 28, 2019, and docketed on May 30. Accordingly, the respondent's Brief in Opposition was initially due on July 1, 2019. By letter-order dated June 28, 2019, the Clerk granted a first extension until July 31 for the respondent's Brief in Opposition. A second extension was granted on July 29, until August 30, 2019. On account of family vacation schedules and my recovery from eye surgery, as well as ongoing litigation of a number of "compassionate release" motions for elderly and terminally-ill prisoners, and also to have the benefit of assistance from additional, expert co-counsel, I request a third 30-day extension of time to file the respondent's Brief in Opposition. On August 27, 2019, I sought consent to this request from Assistant District Attorney Jill M. Graziano, counsel of record for the petitioner, but received no response, perhaps due to her own vacation schedule. Ms. Graziano had previously authorized me to state that the petitioner consented to the prior extensions.

Respectfully,

  
PETER GOLDBERGER  
Attorney for the Respondent

cc: Jill M. Graziano, ADA (via electronic filing)