

# VIADA & STRAYER

ATTORNEYS AT LAW  
17 Swallow Tail Court  
THE WOODLANDS, TEXAS 77381

## RAMON G. VIADA III

BOARD CERTIFIED CIVIL APPELLATE LAW  
TEXAS BOARD OF LEGAL SPECIALIZATION

TELEPHONE (281) 419-6338

TELECOPIER (281) 661-8887

E-MAIL: rayviada@viadastrayer.com

March 12, 2019

*Via Electronic Filing & Federal Express*

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

Re: *Alvarez v. City of Brownsville*  
Docket No. 18-854

Dear Mr. Harris:

This firm represents the Respondent in the above matter.

Pursuant to Rules 15.3 and 30.4, we herewith, on behalf of our client, request that the time to respond to the Petition for a Writ of Certiorari be extended an additional 27 days to, and including, May 1, 2019. The Petition was docketed December 14, 2018, and the Court requested a brief in opposition to be filed by March 4, 2019. On February 11, 2019, Respondent requested and received a 30 day-extension until April 4, 2019. This is Respondent's second request for an extension.

Counsel for the Respondent is preferentially set for trial on April 8 in No. 15-08-23293, *Michael Kelley v. City of Prairie View, Texas*, 506<sup>th</sup> Judicial District Court of Waller County. In addition, counsel is scheduled to take numerous depositions and will need to prepare dispositive motions to meet discovery cutoff and motions deadlines in several other cases: No. 3:18-CV-00047, *Jennifer Corder v. City of League City*, in the United States District Court for the Southern District of Texas, Galveston Division; No. 29,236, *Sergio Flores v. City of Somerville, et al*, in the 335<sup>th</sup> District Court of Burleson County; and No. 18-05-05882, *Carla Blasingame, et al v. The Woodlands Township*, in the 284<sup>th</sup> District Court of Montgomery County. Due to the trial setting and the press of these other business commitments, counsel respectfully requests additional time within which to prepare a responsive brief to properly address all of the issues raised in the petition. Counsel for Respondent is essentially functioning as a solo practitioner and cannot delegate these matters on short notice to other counsel.

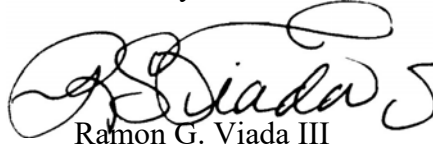
Counsel for Respondent has contacted Petitioner's counsel regarding this request, and counsel for Petitioner is opposed to the request.

As indicated by the certificate of service below, we have concurrently served a copy of this letter upon counsel for the Petitioner. In addition to sending the original overnight to the Court, we have also electronically filed a copy of this letter.

Scott S. Harris, Esq., Chief Clerk  
March 12, 2019  
Page 2

Thank you for your courtesy and prompt consideration of this request.

Sincerely,



Ramon G. Viada III

RGV/JRH

**CERTIFICATE OF SERVICE**

I hereby certify that on March 12, 2019, a copy of this letter request served by email this same date the required copies to the parties listed below:

Mr. Eduardo Lucio  
The Law Office of Eddie Lucio  
834 E. Tyler Street  
Brownsville, TX 78520



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Ramon G. Viada III