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April 28, 2020

VIA ELECTRONIC FILING AND U.S. First Class MAIL
Clerk of the Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543

Dear Sir:

I am writing on behalf of the City of Pittsburgh and its named officials to respectfully request a ninety (90)-day extension of time to reply to the recently filed Petition for Writ of Certiorari in *Nikki Bruni, et al. v. City of Pittsburgh et al.*, 19-1184. The City of Pittsburgh requests this extension pursuant to United States Supreme Court Rules 30.4 and 15. The City of Pittsburgh plans to file a brief in opposition to the petition for a writ of certiorari, which is presently due on Wednesday, April 29, 2020. With the requested extension the City's Brief in Opposition to Petition for Writ of Certiorari will become due to the Court on Monday, July 26, 2020.

The City of Pittsburgh and its officials respectfully request this extension due to the current busy schedules of counsel, the need to admit another attorney(s) to this Court in order to properly and efficiently respond, and due to the complications arising due to the current global pandemic. Currently, I am working on very close deadlines in the following cases in the United States District Court for the Western District of Pennsylvania: *Souroth Chatterji v. City of Pittsburgh, et al.*, 2:18-cv-00199-CB, in which multiple 30(b)(6) depositions are being disputed and scheduled. I am also, recently catching up from dedicating a significant amount of time spent writing an amicus brief to the Pennsylvania Supreme Court regarding the current stay-at-home order issued by the Governor of Pennsylvania, *Friends of Danny Devito, et al., v. Tom Wolf, Governor, et al.*, No. 68 MM 2020. These cases are in addition to the many other cases ongoing in the United States District Court for the Western District of Pennsylvania.

My colleagues Yvonne S. Hilton and Julie E. Koren, who will serve as co-counsel in this case, are currently starting the process of becoming admitted to this Court. Attorney Hilton is the Solicitor for the City of Pittsburgh. Attorney Hilton is currently managing the abundant need for legal advice and action within the City of Pittsburgh during the ongoing global pandemic. Attorney Koren is also working through discovery in multiple cases in the United States District Court for the Western District of Pennsylvania including, *Marlon Jackson et al. v. Christopher Goetz, et al.*, at 2:18-cv-00258, *Kyle Sholtis v. City of Pittsburgh, et. Al.* 2:19-cv-00332, and

Bruni
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Kathy Butter v. City of Pittsburgh, 2:19-cv-0080. Attorney Koren is also preparing for oral argument in front of the United States Court of Appeals for the Third Circuit scheduled Friday, April 24, 2020.

Counsel for the Petitioner, John J. Bursch on behalf of Alliance Defending Freedom, consents only to a thirty (30) day extension due to concern over when the Court would be able to make a decision on certiorari. The City of Pittsburgh requests an extension of ninety (90) days to file a brief in opposition to the Writ in order to arrange our schedules to prioritize this case. The extension is sought in good faith and not to prejudice any party or to inconvenience or delay the Court.

Thank you for considering the City of Pittsburgh's request.

Respectfully,

/s/ Michael E. Kennedy
Michael E. Kennedy, Esquire
Associate City Solicitor
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