

October 1, 2019

Via Electronic Filing and Regular Mail

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

Re: No. 19-368, *Ford Motor Company v. Montana Eighth Judicial District Court*

Dear Mr. Harris:

I hereby enter my appearance as counsel of record for respondent Charles Lucero, personal representative of the Estate of Markkaya Jean Gullett, and seek an extension of the time to file a response to the petition for certiorari. The response is currently due on October 21, 2019. For the following reasons, I request a 30-day extension to and including November 20, 2019. Petitioner Ford Motor Company consents to this request.

I will have principal responsibility for preparing the brief in opposition to the petition. Because our firm was not retained in this case until this week, my colleagues and I will require additional time to familiarize ourselves with the record and the legal issues in this case and prepare an adequate response to the petition. Furthermore, we have several upcoming deadlines and obligations that will prevent us from devoting adequate time to the response absent an extension. These include a petition for a writ of certiorari due in this Court on October 2; an amicus brief due in this Court on October 4 (in *DHS v. Regents*); a merits brief due in the Third Circuit on October 9; a brief in opposition due in this Court on October 10 (in *Fulton v. City of Philadelphia*); a merits brief due in the Eleventh Circuit on October 16; a merits brief due in this Court on October 21 (in *Intel v. Sulyma*); a merits brief due in the Fourth Circuit on October 22; a petition for a writ of certiorari due in this Court on November 4; and a merits brief due in the Montana Supreme Court on November 15. A 30-day extension will allow us to balance these other responsibilities with our obligations in this case.

Thank you for your attention to this matter.

Sincerely,



Deepak Gupta

cc: Counsel of Record