



INSTITUTE FOR JUSTICE

November 6, 2019

**Via Overnight Delivery**

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

RE: *Douglas Brownback, et al. v. James King*, Docket No. 19-546

Dear Mr. Harris:

Respondent James King respectfully requests that the time to file a response to the Petition for a Writ of Certiorari in the above-referenced matter be extended for 56 days to and including January 22, 2020. The response is currently due on November 27, 2019. Respondent submits this request at least ten days before that date. *See* S. Ct. R. 13.5. Counsel for Respondent and Petitioners have conferred and concur in the requested extension and agree that the requested filing date will best accommodate their schedules.

The undersigned is lead counsel in this case. Respondent recently engaged my organization, the Institute for Justice (“IJ”), to represent him before this Court on October 29, 2019. Although I have represented Respondent in both the district and circuit courts below, I did so as an associate at my former law firm, and I was not lead counsel below. I have only recently assumed that responsibility as part of my move from the law firm to IJ. The process of transitioning the case, changing counsel of record, and entering into a substantially different attorney-client relationship has consumed a significant amount of time, during which I also moved my household from Michigan to Virginia.

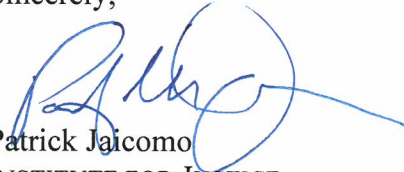
In addition to the response in this matter, I am also responsible for preparing a conditional cross-petition, and I will be engaged in work related to that document until it is filed, on or before November 27, 2019. Moreover, I am working on another petition for a writ of certiorari in an unrelated case to be filed with this Court in the next week, as well as a number of other cases and projects I have assumed upon joining IJ. My colleague at IJ, counsel Anya Bidwell, also will be working on the cross-petition in this matter, as well as two circuit court appeals and a number of other projects.

These commitments leave counsel with insufficient time to prepare a response by the current deadline. For the foregoing reasons, Respondent respectfully requests that the time to file a response to the Petition for a Writ of Certiorari in this matter be extended 56 days to and includ-

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ing January 22, 2020. Although I understand that 30 days is the customary length for an extension, we request a longer extension because a 30-day extension would require filing two days after Christmas, during which time counsel and Respondent have various family commitments.

Sincerely,



Patrick Jaicomo  
INSTITUTE FOR JUSTICE  
Counsel for Respondent

cc: Noel J. Francisco  
Michael Huston  
Counsel for Petitioners