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February 24, 2020

VIA E-FILE AND FEDERAL EXPRESS

Scott S. Harris, Clerk
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543
sharris@supremecourt.gov

Re: *Zadeh v. Robinson*, No. 19-676
Motion to Extend Time to File Response to Petition for Writ of
Certiorari

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondents respectfully request a second extension of the time for filing a response to the petition for writ of certiorari in *Zadeh v. Robinson*, No. 19-676.

The response is currently due on March 9, 2020. A 30-day extension is needed because of the press of business from numerous complex matters with deadlines near the current deadline, which require significant time and attention from the undersigned counsel and other counsel assisting with this matter. Those matters include an amicus brief in *Jacobson v. Florida Secretary of State*, No. 19-14552, filed in the Eleventh Circuit on January 14, 2020; respondent's brief on the merits in *Torres v. Texas Department of Public Safety*, No. 19-0107, filed in the Supreme Court of Texas on January 21, 2020; en banc oral argument in *Thomas v. Reeves*, No. 19-60133, in the Fifth Circuit on January 22, 2020; respondent's brief on the merits in *City of Austin v. Texas Association of Business*, No. 19-0025, filed in the Supreme Court of Texas on January 22, 2020; respondent's brief in opposition to the petition for a writ of certiorari in *Jones v. Davis*, No. 19-6465, filed in this Court on January 28, 2020; oral argument in *Thomas v. Davis*, No. 17-70002, in the Fifth Circuit on February 5, 2020; oral argument in *LULAC v. Abbott*, No. 19-50214, in the Fifth Circuit on February

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6, 2020; a motion for leave to file a bill of complaint in *Texas v. California*, No. 153, filed in this Court on February 10, 2020; a response opposing the motion to stay in *Audi Aktiengesellschaft v. State of Texas*, No. 03-20-00022-CV, filed in the Texas Third Court of Appeals on February 14, 2020; respondent's brief in opposition to the petition for a writ of certiorari in *California v. Texas*, Nos. 19-840 and 19-841, filed in this Court on February 14, 2020; oral argument in *Wardrip v. Davis*, No. 18-70016, in the Fifth Circuit on February 19, 2020; oral argument in *Wooten v. Roach*, No. 19-40315, in the Fifth Circuit scheduled for March 3, 2020; an amicus brief in *In re the Commitment of Jeffrey Lee Stoddard*, No. 19-0561, to be filed in the Texas Supreme Court on March 3, 2020; an amicus brief in *Little Sisters of the Poor Saints Peter and Paul Home v. Pennsylvania*, Nos. 19-431 and 19-454, to be filed in this Court on March 4, 2020; and oral argument in *Amawi v. Paxton*, No. 19-50384, in the Fifth Circuit scheduled for March 31, 2020.

No prejudice would arise from the requested extension.

For the foregoing reasons, Respondents respectfully request an extension of the deadline for filing a response to the petition for writ of certiorari, creating a new deadline of April 8, 2020, in accordance with Supreme Court Rule 30.1.

Sincerely,

/s/ Kyle D. Hawkins

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