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April 28, 2020

VIA ELECTRONIC FILING

Clerk of the Court
Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543

Re: Reilly v. City of Harrisburg, et al. No. 19-983

Dear Sir/Madam:

We represent the City of Harrisburg, Harrisburg City Council, and Eric Papenfuse, in his official capacity as Mayor of Harrisburg, (collectively, “the City of Harrisburg”) with regard to the above-referenced matter. The Petition for a Writ of Certiorari was filed on February 3, 2020. By rule, the City of Harrisburg’s response to the Petition was due on or before March 6, 2020.

On or about February 25, 2020, the City of Harrisburg filed a letter request seeking an extension of time until April 6, 2020 to file a response to the Petition. On February 28, 2020, this Court entered an Order granting the extension requested and extending the time for filing from March 6, 2020 to April 6, 2020. Consistent with Rule 15 of this Court, on April 6, 2020, the City of Harrisburg filed a Waiver (the “Waiver”) indicating that it did not intend to file a response to the Petition. On April 17, 2020, the Court directed the City of Harrisburg to file a response (the “Response Order”).

Pursuant to Rule 30.4 of the United States Supreme Court, the City of Harrisburg respectfully requests a thirty (30) day extension of time to file a brief in opposition to the Petition for a Writ of Certiorari.

As set forth above, the City of Harrisburg did not intend to file a response to the Petition. As it was little more than ten days ago since the Court entered the Response Order, the City of Harrisburg has not yet completed the significant work that will be required to prepare the response in opposition to Petitioners’ Petition. Additionally, as with all cities and states, the intervening coronavirus crisis has caused significant disruption to the day-to-day operations of the City of Harrisburg.

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Moreover, the City of Harrisburg has recently retained the undersigned counsel who will need to spend significant time reviewing the file and preparing the response.

For the reasons stated above, the City of Harrisburg respectfully requests that the time to file a response to the Petition in this case be extended 30 days to and including June 17, 2020.

Thank you for your time and attention to the foregoing.

Respectfully submitted,
LAMB McERLANE PC

/s/ Maureen M. McBride

MMM/psk

cc: Matthew D. Staver, Esquire, E (*via* electronic mail to mat@lc.org)

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