

March 31, 2021

VIA ELECTRONIC FILING SYSTEM

Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543-0001
sharris@supremecourt.gov

**Re: *Dimitri Shivkov, et al. v. Artex Risk Solutions, Inc., et al.*;
No. 20-1313**

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, all Respondents respectfully move for a thirty (30) day extension of time for filing their brief in opposition to the Petition for Writ of Certiorari filed in *Dimitri Shivkov, et al. v. Artex Risk Solutions, Inc., et al.*, Docket No. 20-1313 on March 17, 2021.

The United States Court of Appeals for the Ninth Circuit issued its opinion on September 9, 2020. App. 1-40. Petitioners filed a Petition for Rehearing En Banc, which the Ninth Circuit denied on October 28, 2020. App. 83-91. Petitioners filed their Petition in this Court on March 17, 2021, 189 days after the Ninth Circuit issued its opinion, and 140 days after the Ninth Circuit denied the Petition for Rehearing En Banc. This Petition was placed on the Supreme Court docket on March 22, 2021. Respondents' deadline to file their brief in opposition to the Petition is April 21, 2021.

Respondents consist of fourteen individuals and entities represented by five different law firms. Respondents request thirty (30) additional days to allow them to adequately coordinate a response among all attorneys and clients to the arguments raised by the Petition. The need for an extension is also based on difficulties relating to COVID-19, such as the need to work remotely. Petitioners will suffer no prejudice from the requested extension, as they filed this Petition 140 days after the Ninth Circuit denied their Petition for Rehearing En Banc.

For the foregoing reasons, Respondents respectfully request an extension of the deadline for filing their response to Petitioners' Petition for Writ of Certiorari from April 21, 2021 to May 21, 2021.

Respectfully submitted,

s/ Linda T. Coberly
Stephen V. D'Amore
Linda T. Coberly
Scott P. Glauberman
Michael A. Skokna
Reid F. Smith
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601
(312) 558-5600
Attorneys for Respondents
Artex Risk Solutions, Inc.
Arthur J. Gallagher & Co.
Debbie Inman

cc:

Karl M. Tilleman
Erin Bradham
DENTONS
2398 Camelback Road, #850
Phoenix, AZ 85016
(602) 508-3960
Attorneys for Respondents
TSA Holdings, LLC
TBS, LLC
Karl Huish
Jeremy Huish
Jim Tehero
Provincial Insurance, PCC
Tribeca Strategic Accountants, LLC

Michael S. Rubin
DICKINSON WRIGHT PLLC
1850 N. Central Avenue, #1400
Phoenix, AZ 85004
(602) 285-5000
Attorneys for Respondents
Tribeca Strategic Accountants, PLC

J. Steven Sparks
Vincent Miner
SANDERS & PARKS
3030 N. 3rd Str., #1300
Phoenix, AZ 85012
(602) 532-5600
Attorneys for Respondents
Epsilon Actuarial Solutions LLC
Julie Ekdorn

J. Michael Low
Paul Gerding, Jr.
KUTAK ROCK
8601 N. Scottsdale Road, #300
Scottsdale, AZ 85253-2738
(480) 429-5000
Attorneys for Respondents
AmeRisk Consulting, LLC

CERTIFICATE OF SERVICE

I hereby certify as a member of the Bar of this Court representing the party on whose behalf service is made that on March 31, 2021, I filed via the Supreme Court's Electronic Filing System this motion pursuant to Supreme Court Rule 30.4 to extend the time to file Respondents' brief in opposition to Petitioners' Petition for Writ of Certiorari and served the same via electronic mail by agreement of the parties on the following:

David R. Deary
LOEWINSOHN FLEGLE DEARY SIMON, LLP
12377 Merit Drive
Suite 900
Dallas, TX 75251
(214) 572-1700
Attorneys for Petitioners

s/ Linda T. Coberly _____
Linda T. Coberly
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601
(312) 558-5600
Attorneys for Respondents
Artex Risk Solutions, Inc.
Arthur J. Gallagher & Co.
Debbie Inman