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November 10, 2020

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

*Re: Jack Daniel's Properties, Inc. v. VIP Products LLC*, No. 20-365:  
Request for Further Extension of Time for Opposition to Petition for Certiorari

Dear Sir:

Respondent VIP Products LLC, by its undersigned counsel, respectfully requests a thirty-day extension of time to December 18, 2020, to file its response to the Petition for a Writ of Certiorari filed by petitioner Jack Daniel's Properties, Inc. The petition was filed on September 15, 2020, and docketed on September 18, 2020, and, as a result of a prior extension granted by the Court, VIP Products' response is currently due on November 18, 2020.

VIP Products respectfully submits that good cause exists for its requested extension. The two principal attorneys who have represented VIP Products in this action suffered deaths of close relatives in November 2020, in each case requiring travel and impeding their participation in the preparation of VIP Products' response.

In addition, as the result of the coronavirus pandemic and the recent spike of COVID-19 cases in Arizona, its counsel's access to their law offices still remains highly restricted, and counsel and staff are in most cases working remotely; one principal attorney for VIP Products is working remotely from a residence in another state. Among other things, this has precluded counsel from working together and hindered the preparation of VIP Products' response.

Finally, counsel has conflicting briefing schedules in several other matters, including a motion to dismiss an appeal on jurisdictional grounds in a school-desegregation case pending before the U.S. Court of Appeals for the Ninth Circuit; briefing of federal Indian tax preemption issues in the Arizona Court of Appeals; as well as extensive remand and dispositive motion practice in fast-moving COVID-19 insurance coverage actions pending in state and federal courts around the country, including in California, Texas, Florida, New Hampshire, and New Jersey. VIP Products' counsel is exercising diligence in the preparation of the response, and this extension is not sought for purposes of delay.

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Respectfully submitted,



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Copy served by email this 10th day of  
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