

December 8, 2020

**BY ELECTRONIC FILING**

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

Re: *Concerned Citizens for Nuclear Safety, Inc. v. Environmental Protection Agency, et al.*,  
No. 20-717

Dear Mr. Harris:

I represent respondent Triad National Security, LLC in the above-referenced petition for certiorari. A response is currently due on December 28, 2020. Respondent respectfully requests that the time to file a response be extended by 30 days, to and including January 27, 2021.

The extension is warranted because the undersigned counsel, James T. Banks, has upcoming deadlines in other matters that will require his attention over the coming weeks, including consideration of the adequacy of two administrative records and preparation of any necessary motions to supplement those records in *Friends of the Boundary Waters Wilderness, et al. v. U.S. Army Corps of Engineers, et al.*, No. 0:19-cv-02493-PJS-LIB (D. Minn.), as well as the completion of detailed, multi-statute, environmental compliance audit reports for two chemical manufacturing facilities. In addition, Mr. Banks' ability to consult with Respondent staff members and lawyers is likely to be adversely affected by their absences during the upcoming holiday season. Given these commitments and circumstances, an extension of time is warranted to permit Mr. Banks to prepare a response that fully analyzes and responds to the arguments raised in the petition for certiorari.

Respectfully submitted,

/s/ James T. Banks  
James T. Banks

*Counsel of Record for Respondent  
Triad National Security, LLC*

cc: Lindsay A. Lovejoy, Jr., Law Office of Lindsay A. Lovejoy, Jr.  
Jeffrey B. Wall, Acting Solicitor General, U.S. Dep't of Justice