



THE CITY OF NEW YORK  
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September 15, 2022

Hon. Scott S. Harris, Clerk of the Court  
Supreme Court of the United States  
Office of the Clerk  
One First Street, N.E.  
Washington, DC 20543-0001

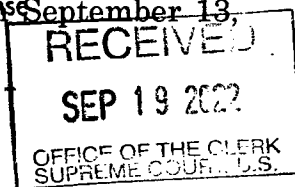
Re: *Baldea v. City of New York License Division of the NYPD*,  
Docket No. ~~18-280~~ 21-1495

Dear Mr. Harris:

By letter dated August 1, 2022, the Court directed this office to file a response to the petition for a writ of certiorari in the above case by August 31, 2022. We subsequently received a 30-day extension of time to file a response until September 30. I now request a second 30-day extension of time, up to and including October 31, 2022, to file the City's response.

I make this request for three reasons. First, this office's time to evaluate and respond to the petition for certiorari was curtailed by petitioner's failure to serve the petition on this office. Although the Court docketed the petition on May 30, this office first became aware of it when we received the Court's letter of August 1 directing a response. The letter states that the Court's records reflect that Baldea served me with a copy of his petition, but the affidavit of service on the Court's website indicates that he served the petition on the Solicitor General of the United States, not this office. Further, this office did not actually receive a copy of the petition.

Second, my deadlines since August 1 have prevented me from immediately completing a responsive submission. As of August 1, I was already involved in a matter seeking to invalidate a substantial portion of the City of New York's adopted budget for the upcoming fiscal year, which involved extensive appellate motion practice and a highly expedited appeal. We completed briefing of the appeal on September 8. In addition, I filed a brief in a related matter on September 13, 2022.



and must file briefs in other matters on September 21 and October 3, and review briefs drafted by colleagues that are due on September 26 and September 28. An additional 30 days would greatly assist in managing this substantial docket of appeals.

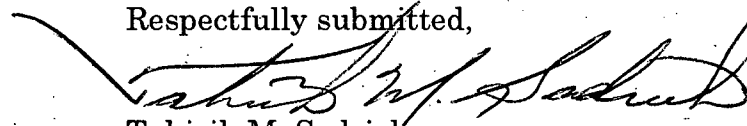
Third, completing our response will require significant time for internal review. Because this case involves an application for a license to carry a concealed weapon, and the requirements for issuance of such licenses have changed substantially since this Court's decision in *New York State Pistol and Rifle Assoc., Inc. v. Bruen*, 142 S.Ct. 2111 (2022), we must allow adequate time for agency review of our response to ensure that any representations we make to the Court regarding the License Division's current practices are accurate.

I am not a member of the Supreme Court Bar. I acknowledge that a member of the Court's Bar must file the brief in response to the petition for certiorari. Nonetheless, as the attorney responsible for handling this case in the New York appellate courts, I would be responsible for a large portion of the drafting of any response.

I have reached out to pro se petitioner Jimmy Baldea regarding the requested extension, and he does not consent to this application. Simultaneous with the mailing of this letter to the Court, I am mailing a copy of this letter to Baldea, at 2905 160th Street, Flushing, NY 11358, the address noted on the petition.

Thank you very much for your consideration.

Respectfully submitted,



Tahirih M. Sadrieh

*Assistant Corporation Counsel*

cc: Jimmy Baldea  
2905 160th Street  
Flushing, NY 11358