

December 1, 2021

Via Electronic Filing and First-Class Mail

Hon. Scott S. Harris, Clerk
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

**Re: North Carolina State Health Plan for Teachers and State Employees
v. Maxwell Kadel, et al., No. 21-674**

Dear Mr. Harris,

On behalf of Respondents Maxwell Kadel, Jason Fleck, Connor Thonen-Fleck, Julia McKeown, Michael D. Bunting, Jr., C.B., by and through his next friends and parents, and Sam Silvaine, I write pursuant to Rule 30.4 to respectfully request a 45-day extension of time in which to file a brief in opposition to the petition for writ of certiorari in the above captioned-matter.

The petition for certiorari in this case was submitted on November 2 and docketed on November 5, 2021, and the response is currently due on December 6, 2021. A 45-day extension would move the response deadline to January 20, 2022. This additional time is necessary in light of the undersigned counsel's competing professional obligations and in order to permit new counsel, who has recently joined respondents' legal team, to familiarize themselves with the facts and record of the case and to prepare the response.

In the context of reduced capacity, the undersigned counsel for Respondents has the following litigation deadlines that necessitate the request for an extension of time to file a brief in opposition to the petition for certiorari: motions for summary judgment and related filings in the district court proceedings in the U.S. District Court for the Middle District of North Carolina in the above-captioned matter, Case No. 1:19-cv-00272-LCB-LPA, which are due on November 30 and December 30, 2021, and January 13, 2022; an en banc brief to the U.S. Court of Appeals for the Eleventh Circuit in *Adams v. School Board of St. Johns County*, No. 18-13592, which was due on November 26, 2021; and a motion for class certification in the U.S. District Court

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in the Western District of Washington in *C.P. v. Blue Cross Blue Shield of Illinois*,
Case No. 3:20-cv-06145-RJB, which is due January 13, 2022; among others.

Thank you for your consideration of this request.

Sincerely,



Omar Gonzalez-Pagan
Counsel of Record for Respondents

cc: John G. Knepper, Counsel for Petitioner