

EDWIN P. VOSS, JR.
Board Certified,
Civil Appellate Law
Texas Board of Legal Specialization
(214) 747-6135
evoss@bhlaw.net

Telephone: (214) 747-6100
Telecopier: (214) 747-6111
www.bhlaw.net

December 16, 2021

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

*Via electronic filing and
First Class Mail*

Re: *Selina Marie Ramirez, et al. v. Jeremias Guadarrama, et al.*
No. 21-778
Respondents' Joint Motion for Extension of Time to File Briefs in Opposition

Dear Clerk:

In the above-referenced case, the Petition for Writ of Certiorari was filed on November 22, 2021, and placed on the Court's docket on November 24, 2021. Pursuant to Rule 15.3, the due date for Respondents' briefs in opposition is Monday, December 27, 2021. Respondents intend to timely file briefs in opposition pursuant to Rules 15.1 and 15.2.

Yesterday, Respondents received notice from counsel for two or more *amici curiae* that they intend to file an *amicus curiae* brief in support of the Petitioners. See attached correspondence. Respondents granted consent to the filing of said brief, pursuant to Rule 37.2. *Id.* Respondents therefore anticipate that the brief of *amici curiae* will be timely filed by December 27, 2021, pursuant to Rule 37.2.

Respondents hereby jointly move for an extension of time to the time period in Rule 15.3 to respond to the petition in this case. This extension of time is sought by Respondents to enable Respondents to address in their opposition the arguments of *amici curiae* urged in support of the

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petition. Respondents request an extension of time of thirty (30) days to file their briefs in opposition, pursuant Rule 30.4, to and including January 26, 2022.

This motion is not sought to prejudice any party, and Respondents do not believe that any party will be prejudiced by this extension of time. This motion is not sought to cause unnecessary delay in these proceedings, but is sought in the interest of justice so that Respondents may address and respond to all arguments presented by Petitioners and presented in support of Petitioners by *amici curiae*.

Thank you for your attention to, and considerations in, this matter.

Respectfully submitted:

/s/ Edwin Armstrong Price Voss, Jr.

Edwin Armstrong Price Voss, Jr.
Counsel of Record
BROWN & HOFMEISTER, L.L.P.
740 East Campbell Road, Suite 800
Richardson, Texas 75081
(214) 747-6100
evoss@bhlaw.net

Counsel for Respondent Jeremias Guadarrama

/s/ Scott D. Levine

Scott D. Levine
Counsel of Record
BANOWSKY & LEVINE, P.C.
12801 N. Central Expy., Suite 1700
Dallas, Texas 75243
(214) 871-1300
sdl@banowsky.com

Counsel for Respondent Ebony N. Jefferson

EPV:dl

Ed Voss

From: Ed Voss
Sent: Wednesday, December 15, 2021 3:57 PM
To: 'David Oyer'; michael.west@hoganlovells.com; cate.stetson@hoganlovells.com; sdl@banowsky.com
Cc: Daniel Greenfield; Rosalind Dillon; Jay Schweikert
Subject: RE: Consent to Amicus Briefing in 21-778, Ramirez v. Guadarrama?

Mr. Oyer,

As counsel for Respondent Guadarrama, yes, I consent. I have discussed this matter with Mr. Levine, counsel for Respondent Jefferson, and he has authorized me to respond to you on his behalf to report that he consents, as well. Mr. Levine is copied on this message, as well.

Regards,

Edwin P. Voss, Jr.
Brown & Hofmeister, L.L.P.
740 East Campbell Road, Suite 800
Richardson, Texas 75081
(214) 747-6135 (direct office)
(214) 747-6111 (fax)
evoss@bhlaw.net

From: David Oyer <David.Oyer@macarthurjustice.org>
Sent: Wednesday, December 15, 2021 12:36 PM
To: michael.west@hoganlovells.com; cate.stetson@hoganlovells.com; Ed Voss <evoss@bhlaw.net>; sdl@banowsky.com
Cc: Daniel Greenfield <daniel.greenfield@macarthurjustice.org>; Rosalind Dillon <Rosalind.Dillon@macarthurjustice.org>; Jay Schweikert <JSchweikert@cato.org>
Subject: Consent to Amicus Briefing in 21-778, Ramirez v. Guadarrama?

Dear Counsel:

The MacArthur Justice Center and the Cato Institute, with the possible but as-yet unconfirmed participation of other non-profit organizations, intend to file an amicus brief on behalf of a cross-ideological coalition of organizations in support of petitioner in *Ramirez v. Guadarrama*. We ask for the parties' consent to our filing of the brief. Do counsel consent? Thank you.

Sincerely,
David Oyer
Legal Fellow | MacArthur Justice Center

Please be aware.

This email originated from a mailbox outside of your organization.
