

JJS
Janet, Janet & Suggs, LLC
Attorneys at Law

Howard A. Janet, P.C.¹ | Kenneth M. Suggs² | Adam P. Janet^{1,3,6} ☆
Giles H. Manley, M.D.¹ | Gerald D. Jowers, Jr.² | Patrick A. Thronson^{1,6,7} | Andrew S. Janet^{1,6,10}
Matthew M. White^{1,2,3,5,9} | Natalie C. D'Antonio^{1,4} | Brenda A. Harkavy^{1,10,11}
Stephen C. Rigg¹ | Roxanne L. Ward^{1,3} | Paige A. Neville¹

OF COUNSEL

Richard M. Serbin^{4,9} | John C. Hensley, Jr.⁹ | Steven J. German^{3,10,11} | Joel M. Rubenstein^{10,11}
Frederick W. James⁸ | Brian D. Ketterer⁴ | Justin A. Browne¹

IN MEMORIAM

☆ Adam P. Janet, Esq. | 1989-2019

February 28, 2022

VIA OVERNIGHT MAIL

Danny Bickell
Deputy Clerk for Practice and Procedure
Supreme Court of the United States
One First Street NE
Washington, DC 20543

Re: No. 21-948, *Educational Commission for Foreign Medical Graduates v. Monique Russell, et al.*

Dear Mr. Bickell:

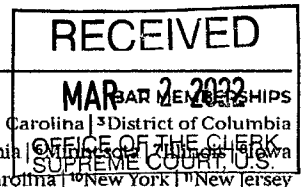
I am one of the counsel for the Respondents in the above-referenced case. On December 29, 2021, a petition for writ of certiorari was docketed in this case. On February 7, 2022, the Court requested that a response be filed. Unless extended by the Court, the response would be due on March 9, 2022. For the reasons that follow, and pursuant to Rule 30.4, I respectfully request an extension of 30 days, to and including Friday, April 8, 2022, to file Respondents' brief.

I co-authored the brief and argued the appeal for the Respondents before the Third Circuit in this matter, and will be co-authoring the brief requested of Respondents by this Court. An extension is necessary because of my obligations over the next two weeks, including preparing and finalizing *Daubert* motions in a long-running toxic tort class action pending in the Southern District of Ohio (due March 11, 2022); finalizing a complaint in a complex medical malpractice case that must be filed in Maryland by March 11, 2022; preparing a response to a discovery motion in a complex medical malpractice case pending in Nevada (due March 3, 2022); and preparing for expert depositions in that same matter that will begin in the next two weeks.

Additionally, co-counsel in this case, who will be substantially involved in preparation of the brief, is currently preparing a merits brief for filing in the Court in another matter, which is due on March 2, 2022.

MARYLAND OFFICE
Executive Centre at Hooks Lane
4 Reservoir Circle, Suite 200 | Baltimore, Maryland 21208
410-653-3200 | Fax 410-653-9030 | 1-877-692-3862
info@JJSjustice.com | JJSjustice.com

¹Maryland | ²South Carolina | ³District of Columbia
⁴Pennsylvania | ⁵Virginia | ⁶Iowa
⁷North Carolina | ⁸New York | ⁹New Jersey



Danny Bickell
Deputy Clerk for Practice and Procedure
February 28, 2022
Page 2

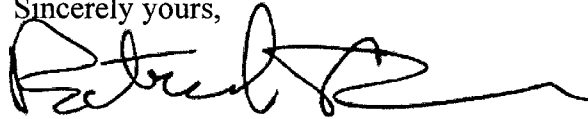
An extension will allow co-counsel and I to meet our obligations, as well as meaningfully confer with respect to this matter and file a response that adequately addresses the points raised in the Petition.

Petitioner's counsel has indicated to me by email that Petitioner does not object to this request for an extension.

For these reasons, Respondents respectfully request that a 30-day extension, to and including April 8, 2022, for the filing of a response to the Petition be granted.

Thank you in advance for your attention to this matter, and please let me know if you need any additional information to be able to evaluate this request.

Sincerely yours,



Patrick A. Thronson
One of the counsel for Respondents

cc: William R. Peterson, Esq., Counsel for Petitioner
Brian W. Shaffer, Esq., Counsel for Petitioner
Elisa P. McEnroe, Esq., Counsel for Petitioner
Matthew D. Klayman, Esq., Counsel for Petitioner