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November 3, 2022

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

Re: *Anthony Novak v. The City of Parma, et al.*
U.S. Supreme Court Case No. 22-293

Dear Mr. Harris:

The petition for a writ of certiorari in the above-captioned case was filed on September 26, 2022, and placed on the docket on or about September 28, 2022. Respondents Kevin Riley, Thomas Connor, and the City of Parma, Ohio response to the petition is now due, after one 30 day extension, on November 28, 2022. Respondents respectfully request an additional 45 day extension under Rule 30.4, to and including January 11, 2023, in which to file their response.

Counsel on behalf of Respondents request an extension to allow them time to fully review and analyze the arguments and authorities presented in this case, including those cited in the four additional *amicus* briefs filed on October 28, 2022 by: (1) *The Babylon Bee* (composed of 19 pages of which 12 are text, excluding signature and conclusion page); (2) The Cato Institute (composed of 25 pages of which 18 are text, excluding signature and conclusion page); (3) The Foundation for Individual Rights and Expression (composed of 40 pages of which 28 are text); and (4) The Rutherford Institute (composed of 24 pages of which 17 are text, excluding signature and conclusion page). Thus, Respondents have only recently been presented with an additional 108 pages of briefing, 75 pages of which is composed of text with numerous citations to new outside authorities which their counsel must now analyze.

Further, the complex issues raised by the Petitioner require undersigned counsel to confer with the Respondents, carefully review this matter, and prepare the opposition.

Petitioner had a total of 150 days (60 days in addition to the 90 days originally permitted) to submit his petition. This second extension by Respondents for 45 days is appropriate given the

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five months Petitioner had to prepare his brief. (Counsel notes that while a thirty day extension was considered, that would place the new deadline between the Christmas and New Year's holidays, a period during which counsel have preexisting family commitments.)

Additionally, counsel for the Respondents have other pressing matters with imminent deadlines.

Counsel for Petitioner Novak, Mr. Patrick Jaicomo, was contacted on October 31, 2022, regarding this extension and responded: "We will not oppose your request."

For the foregoing reasons, we respectfully request that Respondents be given an additional 45 days, to and including January 11, 2023, to submit their brief.

Thank you.

Sincerely,

/s/Richard C.O. Rezie
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