

SHER EDLING LLP

PROTECTING PEOPLE AND THE PLANET

November 4, 2022

Via EFS and FedEx

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

Re: *BP p.l.c., et al., v. Mayor and City Council of Baltimore*, No. 22-361
Motion to Extend Time to File Response to Petition for Writ of Certiorari

Dear Mr. Harris,

The undersigned is counsel of record for Respondent, Mayor & City Council of Baltimore (“City”), in the above-referenced matter. The Petition for a Writ of Certiorari was docketed on October 18, 2022, and the City’s response is currently due November 17, 2022. Pursuant to Rule 30.4 of this Court, the City respectfully requests an extension of thirty (30) days. A thirty-day extension would expire Saturday, December 17, and under Rule 30.1 the response would then become due December 19, 2022.

The City requests an extension because of counsel’s significant professional commitments in November. For instance, during the week the response is currently due, the undersigned counsel will be travelling from California to Rhode Island to present oral argument at a hearing scheduled for November 18. Other counsel within my firm with responsibility over this matter will be traveling for another hearing in Los Angeles on November 14, and another has a medical obligation that will occupy the entirety of November 17. An extension would allow the City’s counsel adequate time to address the Petition and prepare a response that is helpful to the Court.

The requested extension is reasonable in light of the proceedings to date and would not prejudice Petitioners. Petitioners previously applied to The Chief Justice for a sixty-day extension of the deadline to file a Petition for a Writ of Certiorari, which The Chief Justice granted. In their application, Petitioners asserted that this matter presents “weighty and complex issues” justifying an extension of the deadline to file a Petition. Petitioners used the full sixty-day extension and filed their Petition on October 14, the date of the extended deadline. The City has not previously sought any extensions of time in this matter.

Thank you for your consideration.

Respectfully submitted,

/s/ Victor M. Sher

Victor M. Sher
Sher Edling LLP

*Counsel of Record for Respondent
Mayor and City Council of Baltimore*

cc: All Counsel of Record