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TISHAURA O. JONES  
MAYOR

January 26, 2023

Scott S. Harris  
Clerk's Office  
United States Supreme Court  
1 First Street NE  
Washington, DC 20543

Re: *Jody Lombardo, et al. v. City of St. Louis, et al.* (22-510)

Dear Mr. Harris:

I am counsel for Respondents in the above-referenced case. A Petition for a Writ of Certiorari was docketed on November 28, 2022. On January 9, 2023, the Court requested a response brief be filed by the Respondents. Unless extended by the Court, the deadline to file the response brief is February 8, 2023. Pursuant to Rule 30.4, Respondents request a 60-day extension of this deadline. With the requested extension, the response brief would be due on April 10, 2023.

This extension is necessary for multiple reasons. First, none of the attorneys who worked on this case at any earlier stage are currently employed by the City of St. Louis Law Department. Particularly given the voluminous record in this case, a 60-day is necessary to allow sufficient time for counsel to review the record below and present a thorough and well-researched response to the Court. Second, the undersigned carries a full caseload while supervising the City of St. Louis Litigation Division, and has multiple intervening deadlines and professional obligations that also require his attention. For example, since this Court requested a response brief, counsel timely filed a brief in the United States Court of Appeals for the Eighth Circuit in *Washington v. City of St. Louis, et al.*, case no. 22-1843, prepared for a jury trial in Missouri state court, assisted in negotiating a class action settlement, and met multiple deadlines in the United States District Court for the Eastern District of Missouri.

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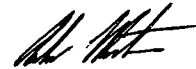
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Finally, counsel's Application for Admission to Practice in the Supreme Court of the United States in pending and additional time to allow for admission is required.

For these reasons, Respondents respectfully request that this Court grant Respondents a 60-day extension of time, up to and including April 10, 2023, within which to file their response to the pending Petition for Writ of Certiorari. Thank you for your attention to this matter.

Sincerely,



Andrew Wheaton  
Deputy City Counselor

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