

December 20, 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: *Shell Oil Products Co., LLC, et al., v. State of Rhode Island.*, No. 22-524  
Motion to Extend Time to File Response to Petition for Writ of Certiorari

Dear Mr. Harris,

The undersigned is counsel of record for Respondent, State of Rhode Island (“State”), in the above-captioned case. The Petition for a Writ of Certiorari was docketed on December 2, 2022, and the State’s response is currently due January 5, 2023. Pursuant to Rule 30.4 of this Court, the State respectfully requests an extension of thirty (30) days in which to respond to the petition. A thirty-day extension would expire Saturday, February 4, 2023, and under Rule 30.1 the response would then become due February 6, 2023.

The State requests an extension because the current January 5 deadline falls among multiple national and religious holidays that will strain counsel’s ability to dedicate sufficient resources to prepare the State’s response. The offices of the undersigned counsel’s firm will also close from December 22–27 and again from December 30–January 2. Several counsel within the firm with responsibility over this case also will be out of the office for much of the holiday period, as will support staff. An extension would allow the State’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 nearly the full sixty-day extension and filed their Petition on December 2, two days before the date of the extended deadline. The State 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  
State of Rhode Island*

cc: All Counsel of Record