

DEPARTMENT OF LAW

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DANIEL HORRIGAN, MAYOR

January 5, 2023

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

**City of Akron's Request for extension of time to file brief in opposition to
Petitioner's writ of certiorari, per Rule 30.4**

Mr. Harris,

I am a member of the bar of the Supreme Court and represent Respondent Akron Board of Zoning Appeals in Case No. 22-545, *Sage Lewis, et al. v. Akron Board of Zoning Appeals*. Pursuant to Rule 30.4, the Respondent requests an extension of 60 days to file its brief in opposition to Petitioners' writ of certiorari. The writ was placed on the docket December 14, 2022, and Respondent's brief is currently due January 13, 2023. If this request for extension is granted, Respondent's brief will be due March 14, 2023. I have received confirmation from Petitioners' counsel, Jeffrey Rowes, that Petitioner consents to the extension.

As grounds, there were intervening holidays during this initial 30-day period, and Respondent intends to retain additional counsel, who will need time to familiarize themselves with the matter. Furthermore, Petitioners' writ included issues that were not briefed in the Ohio courts and requiring additional research by the City in order to respond to the writ, and to which the City may need to object pursuant to Rule 15. For these reasons, Respondent requests an extension be granted until March 14, 2023.

Respectfully submitted,

A handwritten signature in blue ink that reads "John R. York". The signature is fluid and cursive, with the first name "John" being the most prominent.

John R. York
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