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July 11, 2024

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

RE: Request for extension of briefing deadlines in *Republic of Hungary, et al. v. Rosalie Simon, et al.*, No. 23-867

Dear Mr. Harris:

I write on behalf of all parties to request an extension of the briefing deadlines in this case. The Court granted the petition for a writ of certiorari on June 24, 2024. I understand that the case is likely to be argued during the Court's December 2024 sitting. Petitioners' opening merits brief is currently due August 8, 2024, and Respondents' brief is currently due September 9, 2024. On behalf of all parties, we respectfully request, under this Court's Rule 30.4, that Petitioners' time to file their opening brief and the joint appendix be extended to and including August 26, 2024, and that Respondents' time to file their brief be extended to and including October 11, 2024. Under this Court's rules, Petitioners' reply brief would be due 30 days later, which is more than 10 days before the earliest possible argument during the December 2024 sitting.

Counsel seek the proposed extension given the press of other matters. Petitioners' counsel must attend to the following deadlines between now and August:

- July 15, 2024: Oral argument on a motion to dismiss in *Hedman Resources Ltd. v. Occidental Chemical Corp.*, No. E182634/2024 (N.Y. Sup. Ct., Niagara Cnty.);
- July 22, 2024: Answers and returns to a petition due in *Clean Air Act Coalition of Western New York, Inc. v. N.Y. State Public Service*

Commission, Nos. 900457-23 & 910162-23 (N.Y. Sup. Ct., Albany Cnty.);

- July 24, 2024: Brief for Respondents due in *Atwal v. Semkiw*, No. CA 23-01829 (N.Y. App. Div. 4th Dep't); and
- August 1, 2024: Response to motion to dismiss due in *Advance2000, Inc. v. Hewlett Packard Enterprise Co.*, No. 1:24-cv-00503 (W.D.N.Y.).

Respondents' counsel must attend to the following matters before October 11:

- July 30, 2024: Reply to motion for authorization to file a successive habeas corpus petition due in *In re Reed*, No. 24-50529 (5th Cir.) (capital case), if respondent files court-requested opposition on July 23, 2024, deadline;
- July 31, 2024: Cert-stage reply brief due in *Love v. Neal*, No. 23-1034 (U.S.), if respondent files Court-requested response on July 16, 2024, deadline;
- August 1, 2024: Reply brief due in *Liberty Global, Inc. v. United States*, No. 23-1410 (10th Cir.) (on an extension);
- August 2, 2024: Response-and-reply brief due in *CRCM Institutional Master Fund (BVI) Ltd., et al. v. Getty Images Holdings, Inc.*, Nos. 23-7876, 23-7915 & 23-7983 (2d Cir.);
- August 6, 2024: Oral argument in *Reed v. Goertz*, No. 19-70022 (5th Cir) (capital case), on remand from this Court's decision in *Reed v. Goertz*, 598 U.S. 230 (2023);
- August 14, 2024: Cert-stage reply brief due in *Thomas v. United States*, No. 23-1168 (U.S.), if the government files on the current response deadline; and
- Week of September 24, 2024: Oral argument in *Martin v. Nines*, No. 24-6086 (4th Cir.).

Counsel for all parties request these extensions of time.

Respectfully submitted,



Shay Dvoretzky

Counsel for Respondents

*Rosalie Simon, Rosanna Weksberg
Finkelberg (as heir to Helena Weksberg),
Rose Miller & Thomas Schlanger (as
heir to Ella Feuerstein Schlanger)*

cc: see attached service list

Service List for *Republic of Hungary, et al. v. Rosalie Simon, et al.*, No. 23-867

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