

# Cooper & Kirk

Lawyers

A Professional Limited Liability Company

David H. Thompson  
dthompson@cooperkirk.com

1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

(202) 220-9600  
Fax (202) 220-9601

July 18, 2025

## **By Electronic & U.S. Mail**

Honorable Scott S. Harris  
Clerk of the Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

RE: *Paris v. Lara*, No. 24-1329

Dear Mr. Harris,

I represent Respondents in the above-captioned matter. Pursuant to Rule 15.3 and Rule 30.4, I write to request a 14-day extension, from July 30, 2025 to August 13, 2025, for Respondents to file a response to the petition. Petitioner consents to this request.

There is good cause for the extension in light of a press of other professional obligations that counsel for Respondents face in other matters. Such commitments include briefing deadlines in other courts, including filing an appellant's brief in *Calce v. City of New York*, No. 25-861 (2d Cir.) on July 18, 2025, oral argument in *Rhythm Health Tennessee, Inc. v. State Protest Committee*, No. 22-1214-III (Tenn. Ch. Ct.) on July 28, 2025, and a summary judgment hearing in *AmBase Corp. v. 111 West 57th Sponsor LLC*, No. 652301/2016 (N.Y. Sup. Ct. N.Y. Cnty.) and *111 West 57th Investment LLC v. 111W57 Mezz Investor LLC*, No. 655031/2017 (N.Y. Sup. Ct. N.Y. Cnty.) on July 28, 2025 as well. Counsel also has a variety of other discovery and mediation deadlines in other district court cases between now and the end of the month.

In light of these other commitments, a 14-day extension until August 13, 2025, is necessary to permit Respondents adequate time to address the pending petition.

Sincerely,

s/David H. Thompson  
David H. Thompson  
COOPER & KIRK, PLLC  
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Washington, DC 20036

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*Counsel for Plaintiffs-Appellants*