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A Professional Corporation



Mark A. Russell
Esquire
Also admitted in MT

September 20, 2024

Michelle M. Pignone Paralegal

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

RE: Request for extension of time to file response to petition

Jennifer Root Bannon, as the Special Personal Representative of the Estate of Justin Root

v. David Godin, Boston Police Officer, et al.

S. Ct. No. 24-287

I am counsel for the Respondent, Paul Conneely, in this case. Petitioner filed its petition for a writ of certiorari on September 9, 2024. According to the online docket and pursuant to Rule 15.3 of the Rules of the Supreme Court of the United States, a response is currently due on October 15, 2024. Pursuant to Rule 30.4, Respondent Conneely respectfully requests that the time for filing a response be extended by 30 days, to and including November 15, 2024. This is Respondent's first request for an extension of time to file a response.

I have contacted Attorney Edward F. Whitesell, Jr. and Attorney Bridget Davidson, of the City of Boston Law Department, Counsel for the remaining Respondents, and they join in this request.

Counsel for the Petitioner has been contacted and does not object to this request.

Thank you for your consideration.

Sincerely,

Daniel J. Moynihan

Cc: Mark Berthiaume, Esq. Alison Holdway, Esq. Edward Whitesell, Esq. Bridget Davidson, Esq.

SEP 2 4 2024 OFFICE OF THE CLERK SUPPREME COURT, U.S.