

August 16, 2024

Via Federal Express and electronic filing

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

RE: Folwell, et al. v. Kadel, et al., No. 24-99

Dear Mr. Harris,

As counsel of record for Respondents, Maxwell Kadel, et al., I write pursuant to Supreme Court Rule 30.4 to request a 60-day extension of time to file a brief in opposition to the petition for a writ of certiorari in this matter. The petition was filed on July 26, 2024, and the opposition is currently due on August 29, 2024. If the request for a 60-day extension is granted, the opposition would be due on Monday, October 28, 2024.

The extension of time is necessary because counsel in this case from Lambda Legal Defense and Education Fund, Inc. ("Lambda Legal") and Cooley LLP face competing deadlines in other pressing matters before this and other courts.

In *United States v. Skrmetti*, et al., No. 23-477, counsel from Lambda Legal and the American Civil Liberties Union ("ACLU") represent L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, et al., and will be filing a merits brief in support of Petitioner. That brief is currently due on August 27, 2024.

In *Crouch, et al. v. Anderson*, No. 24-90, counsel from Lambda Legal and Cooley LLP represent Respondent, Shauntae Anderson. A petition for a writ of certiorari in *Anderson* was filed on July 25, 2024. Respondent's opposition brief is currently due on October 28, 2024.

In *West Virginia, et al. v. B.P.J.*, By Her Next Friend and Mother, Heather Jackson, No. 24-43, counsel from Lambda Legal, the ACLU, and Cooley LLP represent Respondent, B.P.J. The opposition to the petition for a writ of certiorari in that matter is due on October 15, 2024.



In addition, lead counsel from Cooley is currently preparing a response to a petition for a writ of certiorari in *United Therapeutics Corp. v. Liquidia Techs., Inc.*, No. 23-1298, currently due on August 28, 2024. Cooley counsel also recently completed a one-week trial and is preparing post-trial briefing in that matter (*Ryanair DAC v. Booking.com BV*, No. 20-1191 (D. Del.)).

Counsel with Lambda Legal have approximately a dozen depositions to complete by mid-September and a summary judgment deadline two weeks later.

Respondent has contacted counsel of record for Petitioners for their position on this extension request, and Petitioners consent to the 60-day extension.

Respectfully submitted,

LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.

Tara L. Borelli
Senior Counsel