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March 24, 2026

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

Re: *Natural Lands, LLC v. City of Boca Raton, Fla., et al.*, No. 25-1078 Request for Extension of Time to File Response to Petition for Writ of Certiorari

Dear Mr. Harris:

I am counsel of record for respondent City of Boca Raton in this matter. Petitioner filed its petition for a writ of certiorari on March 10, 2026, and it was placed on the Court's docket on March 12, 2026. Pursuant to Rule 15.3, the current deadline to file a brief in opposition is April 13, 2026. Pursuant to Rule 30.4, respondent respectfully requests that the time for filing a response be extended by 30 days, to and including May 13, 2026.

This is respondent's first request for an extension of time to file a response. Good cause exists for the requested extension. Earlier this month, I experienced the unexpected death of an immediate family member. I have been out of the office since before March 10, 2026, and I am returning to my office and practice only this week.

In addition, I have primary responsibility in several other appellate and trial matters that will require me to devote substantial amounts of time in the coming weeks. These include deadlines throughout April to:

- Respond to eight dispositive motions filed against my client in *Raymond Gaylord Williams, Jr., as Trustee of the Irrevocable Inter Vivos Trust Agreement of Raymond Gaylord Williams v. City of North Miami Beach*, Case No. 18-020299 CA 01, in the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida; and
 - Complete appellate briefs in the following matters:
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- *Julia Hebding v. Hebding Properties, LLC*, Case No. 4D25-1676, in the District Court of Appeal, Fourth District of Florida;
- *City of Homestead v. Khristian Mairena*, Case No. 3D25-2406, in the District Court of Appeal, Third District of Florida; and
- *Rodney Mandelstam et al. v. City of Homestead et al.*, Case No. 3D25-2406, in the District Court of Appeal, Third District of Florida.

An extension of time would better enable preparation of a response that would be most helpful to the Court.

Counsel for petitioner has been contacted regarding this request and does not oppose the requested extension. Accordingly, respondent respectfully requests that the time to file a response to the petition for a writ of certiorari be extended by 30 days, to and including May 13, 2026.

Respectfully submitted,



Laura K. Wendell, Esq.
Counsel of Record
Respondent City of Boca Raton

cc: Counsel of Record for Petitioner

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