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September 5, 2025

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

Re: *Sault Ste. Marie Tribe of Chippewa Indians v. State of Michigan, et al.*, Case No. 25-165

Dear Mr. Harris,

Pursuant to Supreme Court Rule 30.4, we write on behalf of the Bay Mills Indian Community, the Grand Traverse Band of Ottawa and Chippewa Indians, the Little River Band of Ottawa Indians, and the Little Traverse Bay Bands of Odawa Indians (collectively “Respondent Tribes”) to respectfully request a 60-day extension of time, to and including November 10, 2025, to file a joint brief in opposition to the petition for a writ of certiorari pending in *Sault Ste. Marie Tribe of Chippewa Indians v. State of Michigan, et al.*, Case No. 25-165. The Petitioner, the Sault Ste. Marie Tribe, consents to this requested extension.

Undersigned counsel represent the Little River Band of Ottawa Indians in this matter and will take the lead for the Respondent Tribes in drafting their joint brief in opposition. The Respondent Tribes are sovereign governments that enjoy government-to-government relationships with the United States and the State of Michigan, all of whom are party to the 2023 Great Lakes Fishing Decree upheld by the United States Court of Appeals for the Sixth Circuit on March 13, 2025. That Decree is the subject of the Sault Ste. Marie Tribe’s petition.

Good cause exists for this request. An extension is necessary to allow adequate time to prepare an opposition brief that explicates the matters at issue in a manner most useful to the Court, particularly in light of counsel’s preexisting commitments and conflicts.

Since the filing of the petition, these commitments have included substantial drafting, editing, and coordination responsibilities for briefs due on September 5th and 12th, 2025, in *Enbridge Energy, Limited Partnership v. Gretchen Whitmer*, Case No. 1:20-cv-1141 (W.D. Mich.), a highly significant matter involving the Government of Canada, the State of Michigan, multiple federally recognized tribes, private industry, and numerous environmental groups. Counsel also prepared and filed substantial administrative agency comments related to the same dispute on August 29, 2025, and have substantial commitments pertaining to those agency proceedings throughout September and October.

Separately, undersigned counsel serve as lead counsel for the Muscogee (Creek) Nation in connection with two preliminary injunction proceedings that will take place in September and October. The first of these is set for September 22, 2025, in *Muscogee (Creek) Nation v. City of Henryetta, Oklahoma*, Case No. 25-cv-00227-JAR (E.D. Okla.). In addition to intensive preparations for the hearing, counsel filed a reply brief in support of the Nation's motion for a preliminary injunction and a response to the City's motion to dismiss on August 28, 2025; prepared a response to a motion to stay proceedings in that same case, filed on September 3, 2025; and are filing today a response to yet another motion filed by the City. The second hearing is set for October 9, 2025, in *Muscogee (Creek) Nation v. Steve Kunzweiler*, Case No. 4:25-cv-00075-GKF-JFJ (N.D. Okla.). Briefing is now concluded in that case.

Undersigned counsel also serve as lead counsel for the Muscogee (Creek) Nation in a significant matter in which they will be preparing a brief amicus curiae in support of a petition for a writ of certiorari to be filed with this Court. The petition will be filed with this Court by September 29, 2025, and the amicus brief will be filed by October 29, 2025. Counsel will also have significant coordination responsibilities for other amicus briefs in support of the petition.

The petition filed by the Sault Ste. Marie Tribe in the instant case implicates the Respondent Tribes' treaty rights and sovereignty, and the related framework of cooperative governance and fishery management protocols embodied in the 2023 Great Lakes Fishing Decree that are designed to protect that sovereignty and those rights. As a result, leadership of the Respondent Tribes will need significant time to confer internally and to coordinate with each other regarding the substance of an opposition brief.

For the foregoing reasons, the Respondent Tribes respectfully request that the time for filing a brief in opposition in this case be extended to and including November 10, 2025.

Respectfully submitted,

/s/ Riyaz A. Kanji
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