



MICHAEL GARVIN  
CITY COUNSELOR

**CITY OF ST. LOUIS**  
**LAW DEPARTMENT**  
1200 MARKET STREET, ROOM 314  
ST. LOUIS, MO 63103-2864  
(314) 622-3361

CARA SPENCER  
MAYOR

October 2, 2025

Scott S. Harris  
Clerk's Office  
United States Supreme Court  
1 First Street NE  
Washington, DC 20543

Re: *Milton Green v. Christopher Tanner et al.* (25-267)

Dear Mr. Harris:

I am counsel for Respondents in the above-referenced case. Following an extension of time granted to Petitioner, a petition for certiorari was docketed on September 5, 2025. Unless extended by the Court, the deadline to file the response brief is October 9, 2025. Pursuant to Rule 30.4, I write to request a 30-day extension. With the requested extension, the response brief would be due on November 10, 2025.

This extension is necessary due to multiple intervening professional obligations and the demands of counsel's responsibility to manage and direct all litigation handled by the City of St. Louis Law Department. For example, since the petition for certiorari was docketed in this case, counsel for Respondents was unexpectedly required to work on a declaratory judgment action and motion for temporary restraining order filed against the City by its Sheriff in *Montgomery v. City of St. Louis* (2522-CC09342), briefed and argued complex questions regarding the transfer of liabilities following the State of Missouri's takeover of the City's Police Division in *Clark et al. v. City of St. Louis et al.* (21-cv-00788), and is preparing for oral argument scheduled to occur in the Missouri Court of Appeals on October 9, 2025, in *Lynch et al. v. City of St. Louis et al.* (ED112854).

For these reasons, and in order to accommodate a thorough response in opposition to the petition for certiorari, I ask that a 30-day extension be granted. Thank you for your attention to this matter.

Sincerely,



Andrew Wheaton  
Deputy City Counselor

cc: Deepak Gupta  
Jonathan Taylor  
Gupta Wessler LLP  
2001 K Street, NW  
Washington, DC 20006

Alicia Campbell  
John Campbell  
Campbell Law LLC  
202 S. Meramec Street, Suite 202  
St. Louis, MO 63105

Javad M. Khazaeli  
James R. Wyrsh  
John M. Waldron  
Khazaeli Wyrsh LLC  
9911 Washington Avenue, Suite 211  
St. Louis, MO 63101