



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 29, 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. Following one 30-day extension granted to Respondents, the deadline for Respondents to file their brief in opposition is November 10, 2025. Pursuant to Rule 30.4, I write to request a second extension of 29 days. With the requested extension, Respondents' brief in opposition would be due on December 9, 2025.

This extension is necessary due to multiple unanticipated 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, after Respondents' first request for an extension was submitted, counsel for Respondents devoted significant time to preparing and filing a Petition for Permission to Appeal pursuant to 28 U.S.C. § 1292(b) in the United States Court of Appeals for the Eighth Circuit in *Clark et al. v. City of St. Louis et al.* (25-8011), filed and worked on an interlocutory qualified immunity appeal in *Sack v. City of St. Louis et al.* (25-3044), and must unexpectedly prepare for oral argument scheduled for November 17, 2025, in the United States Court of Appeals for the Eighth Circuit in *Woods v. City of St. Louis et al.* (24-2689) – which is a matter that counsel is newly entered on and will therefore require substantial time to adequately prepare for. In addition, counsel has been required to attend to multiple personnel matters and other

intervening deadlines.

For these reasons, and in order to accommodate a thorough response in opposition to the petition for certiorari, I ask that a second extension of 29 days be granted. Counsel for Petitioner has been contacted and Petitioner has no objection. 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