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November 24, 2025

By Hand 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

Attn: Danny Bickell, Esq.

Re: *Shelby Cnty., Iowa, et al. v. Couser, et al.*, No. 25-419

Dear Mr. Harris:

I am counsel of record for petitioners in the above case. As respondents note in their request for a second extension of time to respond to the certiorari petition, petitioners consented to an eight-day extension, from December 8 to December 16, but opposed any extension beyond that date. I write to explain why.

Petitioners sought certiorari on October 3—using only 67 of the available 90 days—to ensure distribution by December 23 for the January 9, 2026 conference. A grant at that conference would allow the case to be briefed, argued, and decided within the 2025 Term. A further two-week extension to December 22 would shift distribution to January 7 for the January 23 conference—too late for resolution this Term.

This case involves important questions about local-government authority over the construction of the world's largest carbon-dioxide pipeline. Delayed resolution may mean that the pipeline will be laid without regard to the counties' zoning ordinances, which the Eighth Circuit held preempted, even if the Court reverses that erroneous ruling.

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If the Court grants the consented-to eight-day extension, petitioners intend to waive the 14-day distribution period and file their reply by December 23 to preserve distribution on that date for the January 9 conference.

Thank you for your assistance. If you have any questions, please call me at (202) 326-7926.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Derek C. Reinbold', with a stylized flourish at the end.

Derek C. Reinbold
Counsel of Record for Petitioners

cc: Counsel for Respondents