



## City of Cleveland

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August 10, 2026

Via electronic filing  
Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

Re: *Jennifer Kilnapp v. Baily Gannon*  
Case No. 26-58

Dear Clerk:

Pursuant to Supreme Court Rule 30.4, Respondent Baily Gannon respectfully moves for a 30 (thirty)-day extension of time to file his brief in opposition to the petition for a writ of certiorari, filed by Petitioner Jennifer Kilnapp. The petition was served on or about July 9, 2026, and docketed on July 9, 2026, thereby making briefs in opposition due on August 13, 2026. Respondent moves for an additional 30 (thirty) days or until Monday, September 14, 2026 (September 12, 2026, is a Saturday).

An extension is sought for the following reasons: (1) the 30-day period under Rule 15.3 to file a brief in opposition includes several pre-planned vacations for counsel; (2) the undersigned counsel has significant pre-existing personal and professional commitments; (3) additional time will permit Respondent to present a more focused and effective brief; (4) a period of 60 days (the 30 days permitted under Rule 15.3 plus a 30-day extension of time) would be sufficient time to complete the brief such that Respondent should not need to seek another extension; and (5) Petitioner's counsel has consented to a 30-day extension.

Accordingly, Respondent hereby moves the Court for a 30-day extension of time, until September 14, 2026, to file his brief in opposition to the petition for a writ of certiorari. A copy of this motion was served on all parties herein on August 10, 2026.

Respectfully submitted,

/s/ Elena N. Boop

Elena N. Boop  
Counsel of record for Respondent Baily Gannon

cc: E. Joshua Rosenkranz, counsel for Petitioner Jennifer Kilnapp  
Edward H. Williams, counsel for amicus Law Enforcement Action Partnership