

March 15, 2018

Scott S. Harris, Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20543

Via electronic filing

Re: *IQ Products Co., Petitioner v. WD-40 Company*, No. 17-986, in the Supreme Court of the United States, on petition for writ of certiorari to the United States Court of Appeals for the Fifth Circuit, No. 16-20595; **Motion to Extend Time for Opposition to Petition under Rule 30.4**

Dear Mr. Harris:

The Supreme Court has requested that Respondent WD-40 file a response to the petition for writ of certiorari filed in the above-referenced case. The response is currently due April 6, 2018. Respondent WD-40 seeks an extension of 28 days, to and including May 4, 2018, to file its response. Sup. Ct. R. 30.4.

Petitioner IQ Products Co. does not oppose the grant of this 28-day extension.

This extension is necessary and justified due to prior business and vacation commitments of WD-40's counsel, Dave Noonan and Ethan Boyer, during the current 30-day response period. Among other conflicts, Respondent's lead counsel, David J Noonan, is preparing for and set to start trial in San Diego County Superior Court starting on March 16, 2018, in *Lenhart v. San Diego City Employees Retirement System*, SDSC Case No. 37-2011-00096587-CU-BC-CTL. The trial is expected to last 1½ to 2 weeks. Respondent's attorney, Ethan T. Boyer, likewise has commitments in other cases as well as a pre-paid vacation with his family planned from March 29 through April 4, 2018. These conflicts will prevent Mr. Noonan and Mr. Boyer from devoting sufficient time to preparing the opposition to WD-40's petition for writ of certiorari.

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Accordingly, Respondent WD-40 respectfully requests a 28-day extension, until May 4, 2018, to file its response to IQ Products Co.'s petition for writ of certiorari.

Respectfully submitted,



David J. Noonan  
Counsel for Respondent, WD-40 Company

cc: Nicholas A. Gravante Jr.