



Pierce County
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MARY E. ROBNETT
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January 3, 2022

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

RE: Request for extension of time to file response
Brian Green v Pierce County
S. Ct. No. 21-614

Dear Mr. Harris:

I am counsel for respondent Pierce County in the above-entitled case and request an extension under Rule 30 for filing the County's Rule 15 certiorari opposition brief per the Court's request. The specific reasons for the requested extension include:

- 1) On December 17, 2021, I for the first time received notice that the Supreme Court in this case had requested a response to the petition for certiorari and forty printed copies, together with proof of service, by January 14, 2022. *See* 12/17/21 Clerk's Letter.
- 2) I am the only counsel of record in the aforementioned case, was required by my employer to use or lose accumulated vacation leave after the next day through the New Years Day holiday, and had to use that day of December 17 and the remaining day of December 18 to complete – among other things before vacation began -- a Ninth Circuit Respondents brief in *Flarity v. Argonaut, et al* (No. 21-35580). Thus I could not be available again until Monday January 3, 2022.
- 3) As a result of an active municipal law litigation practice, upon my return today from that required vacation, I have preexisting obligations to file – among other things -- two separate briefs in the Washington State Court of Appeals case of *McCartney v. Pierce County* (No. 55663-4-II) due by the end of this week (January 7) and before the end of next week (January 13), as well as a Reply Brief by January 18 in that same appellate court in the separate case of *Gonzalez v. Pierce County* (No. 55120-9-II).
- 4) Though in order to file an opposition brief in the instant action I have obtained substitute counsel for some of my other pressing cases – *e.g.* appellate briefing due in the

Ninth Circuit case of *Flarity v. Kenneth Roberts, et al* (No. 21-35661) and in in *Flarity v. Argonaut, et al.*, before the Washington Supreme Court (No. 100504-1) and Washington Court of Appeals (82381-7-I) -- I have been informed by the commercial printer it will take approximately four working days to finalize the opposition brief in this case once it is received by it.

Accordingly, Respondent respectfully requests that the time for filing a response to the petition for writ of certiorari be extended by 30 days, to and including February 14, 2022.

Sincerely,

s/DANIEL R. HAMILTON

Daniel R. Hamilton
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DRH/jll