

October 18, 2022

*Via Electronic Filing*

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

Re: No. 22-288, *TD Bank, N.A. v. Pulliam*

Dear Mr. Harris:

I write to enter my appearance as counsel of record for the respondent and to request a thirty-day extension of the time to file a response to the petition for certiorari in this case. The response is currently due on October 27, 2022, and I respectfully request that the deadline be extended to and including November 28, 2022.

There is good cause for this request. My firm has just recently been retained in this case, and my colleagues and I have several deadlines in the upcoming weeks that would make it impossible to prepare a brief absent an extension. These deadlines include a response brief due in the District of Columbia Court of Appeals in *Awan v. The Daily Caller* on October 21; an oral argument in the Ninth Circuit in *Clarkson v. Alaska Airlines* on October 21; an oral argument in the Fourth Circuit in *Davidson v. United Auto Corp.* on October 26; an oral argument in the Fourth Circuit in *Williams v. Martorello* on October 28; a response brief due in the Fourth Circuit in *Fernandez v. Rentgrow* on October 31; an opening brief due in the Sixth Circuit in *Bradford v. Team Pizza* on October 31; a response brief due in the Third Circuit in *2012 Doris Behr Irrevocable Trust v. Johnson & Johnson* on November 2; a response brief due in the Eighth Circuit in *Kiel v. Bearden* on November 4; a response brief due in the Texas Supreme Court in *LG Chem v. Morgan* on November 7; an answering brief due in the Ninth Circuit in *Saucillo v. Swift* on November 10; an opening brief due in the Eleventh Circuit in *Louis v. Bluegreen* on November 14; an oral argument in the Eleventh Circuit in *Walters v. Fast AC* on November 15; a reply brief due in the Washington Supreme Court in *Spadoni v. Microsoft* on November 18; an oral argument in the Ninth Circuit in *Meeks v. Experian* on November 18; and a petition for writ of certiorari due in this Court in *Lombardo v. St. Louis* on November 26.

For these reasons, my colleagues and I will require additional time to prepare an adequate response to the petition. A thirty-day extension will allow us to balance these other responsibilities with our obligations in this case.

Thank you for your attention to this matter.

Gupta / Wessler

*Issues & Appeals*

Sincerely,

cc: Counsel of Record

Jennifer D. Bennett