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TISHAURA O. JONES
MAYOR

October 2, 2023

Scott S. Harris
Clerk's Office
United States Supreme Court
1 First Street NE
Washington, DC 20543

Re: Sarah Molina. v. Daniel Book, et al. (23-227)

Dear Mr. Harris:

I am co-counsel for Respondents in the above-referenced case. A petition for certiorari was docketed on September 12, 2023. Unless extended by the Court, the response brief is due on October 12, 2023. Pursuant to Rule 30.4, I am writing to request a 30-day extension. With the requested extension, the response brief would be due on November 13, 2023.

This extension is necessary because co-counsel have only been engaged with this case since the Petitioners filed their Petition. A 30-day is necessary to allow sufficient time to review the record below and to prepare a thoroughly researched response that will be helpful to the Court, while also attending to deadlines in other matters.

On top of the routine duties accompanying each of their caseloads, counsel preparing the response have had the following deadlines that all arose in the 30 days for response. Deputy City Counselor Andrew Wheaton prepared for and delivered oral argument in the United States Court of Appeals for the Eighth Circuit September 21, 2023. He also contributed to briefs for the Missouri Supreme Court in *Sender v. City of St. Louis* (NO. SC100110) and in *City of St. Louis, et al. v. State of Missouri, et al.* (SC99876). Deputy

City Counselor Wheaton is also working to prepare City litigators for a class action trial beginning October 3, 2023, in *Lynch et al. v. City of St. Louis* (1622-CC10805) in the 22nd Circuit Court for the State of Missouri.

Associate City Counselor Brandon Laird has filed two motions for summary judgment in *Gray v. City, et al*, (18-CV-1678) in the United States District Court for the Eastern District of Missouri, and a summary judgment motion in *Davis v. City of St. Louis* (2222-CC01841) in the 22nd Circuit Court for the State of Missouri. He also prepared for and delivered an oral argument in front of the Eighth Circuit Court of Appeals on September 20, 2023.

Assistant City Counselor Lucina Diaz will be assisting in the *Lynch et al. v. City of St. Louis* class action trial that is scheduled to begin on October 3; she will respond to a charge of discrimination by October 6, 2023, and filed a motion to dismiss in *Quinn v. City of St. Louis, et al*, (2322-CC02083) on September 25, 2023.

Counsel for the petition has been contacted and consents to this 30-day extension.

For these reasons, I ask that a 30-day extension be granted. Thank you for your attention to this matter.

Sincerely,



Brandon Laird
Associate City Counselor

cc: Anthony Rothert
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