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TISHAURA O. JONES
MAYOR

December 4, 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 currently due on December 13, 2023. Pursuant to Rule 30.4, I am writing to request a 14-day extension. With the requested extension, the response brief would be due on December 27, 2023.

This extension is necessary due to the press of business. One of the attorneys working on this brief has left the employ of the St. Louis City Counselor's Office. That has resulted in the undersigned counsel needing to cover a number of additional depositions and file a series of pleadings in new cases unexpectedly. Mr. Wheaton spent a significant amount of time researching and drafting a reply to a complex motion to dismiss to be filed in *Sack vs. City of St. Louis et al.*, (E.D. Mo. 4:23-cv-00952-RHH) on December 4, 2023. Mr. Wheaton has also been required to prepare for a class action trial now scheduled to begin on January 8, 2024. (*Lynch et al v. City of St. Louis et al.* (1622-CC10805, pending in the 22nd Circuit Court of Missouri)). Mr. Wheaton recently had to assist in complying with a court order to produce a large volume of documents and, due to a Law Department attorney being on medical leave, had to prepare for a declaratory judgment hearing which

occurred on November 29 ,2023.

Counsel for the petitioner has been contacted and consents to this 14-day extension.

For these reasons, I ask that a 14-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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