

September 6, 2023

**Via electronic filing and U.S. mail:**

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

**Re: Application for Extension of Time to File Brief in Opposition to Petition for Writ of Certiorari  
*Jascha Chiaverini, et al. v. City of Napoleon, Ohio, et al.*, No. 23-50**

Dear Mr. Harris:

I am counsel for Respondents in the above-mentioned case. This is Respondents' second request for an extension of time to file a response. Petitioners filed the petition for a writ of certiorari on July 14, 2023, and it was docketed on July 20, 2023. A response would have been due on August 21, 2023, but pursuant to Rule 30.4 of the Rules of the Supreme Court of the United States, Respondents sought and received a 30-day extension to September 20, 2023. Respondents now ask, pursuant to Rule 30.4, for an additional 30-day extension of the time for filing a response. If granted, a response would be due October 20, 2023.

Good cause exists for this request, including counsel's multiple other deadlines and professional obligations during the current response period.

Additionally, Megan M. Wold is serving as newly retained counsel in this matter, and an extension is required for her to comprehensively understand the case history. One amicus brief has already been filed in support of the petition for certiorari, and an extension is necessary to respond to the views of the amici. Ms. Wold is also working on three other pre-litigation matters, which have been consuming a substantial amount of her time and will continue to do so.

Accordingly, Respondents respectfully request that the time for filing a response to the petition for a writ of certiorari be extended by 30 days, to and including October 20, 2023. Counsel for Petitioners are aware of this request and consent to the additional extension.

Yours very truly,

SPENGLER NATHANSON P.L.L.



Teresa L. Grigsby

cc: Easha Anand, Esq. (via email and regular U.S. mail)  
Megan M. Wold (via email and regular U.S. mail)

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