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April 23, 2024

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

Re: *Gonzalez v. Shahin, et al.*  
S. Ct. No. 23-797  
Request for extension of time to file a response to the petition

Dear Mr. Harris:

I am counsel of record for respondents Carol Gilmore, MD; Richard Martin, MD; Paul Andelin, MD; and Mercy Medical Center, who comprise one of four separately represented groups of respondents in the above-captioned appeal. Respondents Jeffrey Adams, PA-C; Salem Shahin, MD; and McKenzie County Healthcare Systems, Inc. have separate counsel as indicated below.

The petition for writ of certiorari in the above-styled case was filed on January 19, 2024, and respondents filed a waiver of response on March 1, 2024. Respondents subsequently received your letter dated April 11, 2024, requesting that respondents file a response to the petition on or before May 13, 2024. Pursuant to Rule 30.4, I am filing this letter on behalf of all respondents. Respondents respectfully request that the time for filing a response be extended by 45 days, making the deadline June 27, 2024.

Counsel for petitioner has agreed to a 30-day extension, but opposes the request for a 45-day extension. Consideration of the response 15 days beyond the agreed-to 30-day extension will not create prejudice for the petitioner. This request is not made for the purpose of delay. Rather, an extension is necessary to prepare a comprehensive and collaborative response on behalf of all respondents that sufficiently responds to the arguments raised and addresses the issues relevant to the Court's decision to grant or deny the petition for writ of certiorari. Additionally, counsel for two of the legal teams—respondent Salem Shahin, MD and respondents Carol Gilmore, MD; Richard Martin, MD; Paul Andelin, MD; and Mercy Medical Center—are set to be in trial in two

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different cases in Minnesota State Court from May 1–24, 2024 and May 20–June 3, 2024. In light of trial preparation and attendance, along with several other commitments among all legal teams into mid-June, a 45-day extension would better enable preparation of a response that would be most helpful to the Court.

We thank you for your time and attention to the foregoing.

Very truly yours,

/s/ Besse H. McDonald

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