John Kevin Crowley
Attorney at Law

125 South Market Street, Suite 1200
San Jose, California 95113-2288
Phone: 408.288.8100
Fax: 408.288.9409
Email : jkclaw@pacbell.net

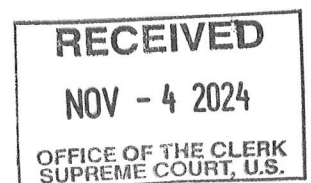*JOHN KEVIN CROWLEY*

TRIAL ATTORNEY

October 28, 2024

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

> Re: Request For Extension Of Time To File Response To Petition *Michael Pina, Petitioner, v. Estate of Jacob Dominguez, Respondent*, S. Ct. No. 24-152

Dear Mr. Harris:

I, together with co-counsel, Nevin C. Brownfield, are counsel for Respondents in the above-referenced case. On or about August 8, 2024, a certiorari petition was filed in this case. On September 4, 2024, the Respondents waived their right to reply to the petition. On October 7, 2024, the Court requested a response which, unless extended by the Court, is due by November 6, 2024. For the reasons that follow, and pursuant to Rule 30.4, I respectfully request a 30-day extension, which would result in a deadline of December 6, 2024.

This is the Respondents' first request for an extension of time to file a response and good cause exists for the extension. Respondents' counsel had, and has ongoing, numerous other professional commitments prior to the current deadline. These include post-arbitration motions on October 24, 2024, in the confidential matter of *Kinkade v. Pinto*, JAMS No. 1110027812; request for injunctive relief in the case of *Decarlo v. Enviroservices LLC,* San Benito County Superior Court, Case No. CU-23-00049, in the week of October 28, 2024. In addition, I have numerous discovery deadlines coinciding with the date to file our response. An extension will allow us to meet these obligations and also to file a response that adequately addresses the points raised in the petition.

Hon. Scott S. Harris
Clerk of the Court
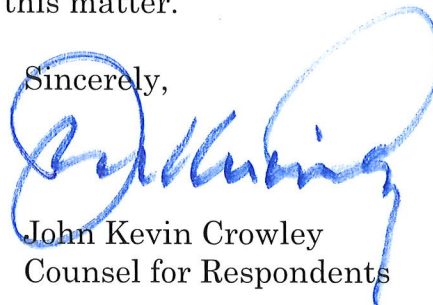Supreme Court of the United States
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Further, and critical to a thorough representation, co-counsel of record Nevin C. Brownfield, is presently unavailable due to multiple medical emergencies. Together with myself, Mr. Brownfield has represented the Respondents through trial and the appeal to the Ninth Circuit and is intricately familiar with the case. In October 2024, Mr. Brownfield became the primary caregiver on a temporary basis for both of his parents due to their unexpected incapacitation from a sudden diagnosis of a glioblastoma in his mother (October 19, 2024), and a heart valve surgery in his father (September 25, 2024). Mr. Brownfield's assistance in the preparation of the response is integral to an effective and thorough representation of the Respondents' interests in this matter, and the recent unforeseen medical emergencies suffered by his parents are unduly burdensome.

The requested extension is necessary to ensure Respondents, and both of its counsel of record, have an adequate opportunity to review and respond to the Petition for a Writ of Certiorari in light of these other commitments and issues. The requested extension will also enable preparation of a response that will be most helpful to the Court. I have notified opposing counsel of our intent to request an extension but have not received a response as of the service of this request. In addition, no other circumstances are present that necessitate a speedy ruling on the Petition.

Finally, I am not currently a member of the Bar of the Supreme Court of the United States, however my application is presently pending before the Court. Co-Counsel, Mr. Brownfield, will also submit an application for admission during the week of October 28, 2024. Further, I understand that if my and Mr. Brownfield's applications are still pending at the time the response is due, an attorney who is a member of the Supreme Court of the United States Bar will be required to file the response.

For all of the foregoing reasons, I respectfully request that a 30-day extension be granted. Thank you for your attention to this matter.

Sincerely,

John Kevin Crowley
Counsel for Respondents

cc: Nora Frimann, Maren Clouse, Counsel for Petitioner