

TAGLaw International Lawyers

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September 10, 2024

**BY FEDEX/
OVERNIGHT MAIL**

Clerk of Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

Re: *Pamela J. Antosh, et al. v. Village of Mount Pleasant, et al.*
U.S. Supreme Court Docket No. 24-186
**Request for Extension of Time to File A Response to Petition for a
Writ of Certiorari (“Petition”)**

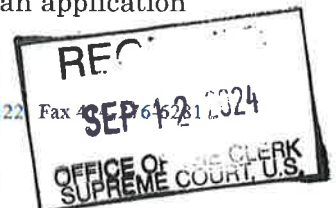
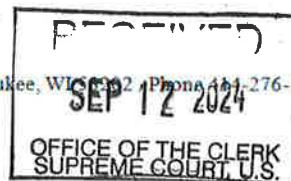
Dear Clerk:

I represent Respondents Village of Mount Pleasant, David DeGroot and Village of Mount Pleasant Community Development Authority (“Respondents”) in the above-referenced case.¹

Petitioners’ Petition was docketed on August 21, 2024. Absent an extension, Respondents’ response is due on September 20, 2024. Pursuant to Rule 30.4, Respondent respectfully requests that the time for filing a response be extended by forty-five days.

This request for an extension is Respondents’ first. Good cause exists for the requested extension. Respondents’ counsel has a trial from October 7-11, 2024. In addition to the extensive preparation needed for the trial, including pretrial filing deadlines, witness preparation, and other tasks, Respondents’ counsel is responsible for taking a number of depositions in other matters in the coming weeks.

¹ I am not currently a member of the Supreme Court of the United States Bar. Respondent understands that, at the time that the response is due, an attorney who is a member of Supreme Court of the United States Bar will need to file it. I am preparing an application for admission to be filed in advance of the response.



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The requested extension is necessary to ensure Respondents and their counsel have an adequate opportunity to review and respond to the Petition in light of these other commitments. The requested extension will also better enable preparation of a response that will be most helpful to the Court. Further, counsel is not aware of any circumstances that necessitate a speedy ruling on the Petition.

Accordingly, Respondent requests a forty-five-day extension of time, to and including November 4, 2024, to file its brief in opposition to the Petition for Writ of Certiorari.

Thank you for your attention to this matter.

Very truly yours,

von BRIESEN & ROPER, s.c.

s/ Christopher E. Avallone

Christopher E. Avallone
CEA /ks

cc (by first class mail): Erik S. Olsen, Esq.

AFFIDAVIT OF SERVICE

I, Christopher E. Avallone, of lawful age, being duly sworn, upon my oath state that I did, on the 10th day of September, 2024, send out from Milwaukee, Wisconsin, one FedEx envelope containing an original and two copies of a letter and this Affidavit of Service to the Clerk of the Court pursuant to Rule 30.4 in the above-captioned case. Parties required to be served have been served by First Class Mail. A package with one copy of the letter and this Affidavit of Service were placed in an envelope plainly addressed to the following:

Erik S. Olsen, Esq.
Eminent Domain Services, LLC
6515 Grand Teton Plaza I, Suite 241
Madison, WI 53719

Executed this 10th day of September, 2024, in Milwaukee, WI.

s/ Christopher E. Avallone
Christopher E. Avallone