

July 30, 2024

By FedEx and electronic filing

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

Re: *West Virginia et al., v. B.P.J., By Her Next Friend and Mother,  
Heather Jackson*, No. 24-43



National Office  
125 Broad Street  
18th Floor  
New York, NY 10004  
aclu.org

**Deborah N. Archer**  
President

**Anthony D. Romero**  
Executive Director

Dear Mr. Harris,

As counsel of record for Respondent, B.P.J., by her next friend and mother, Heather Jackson, I write pursuant to Supreme Court Rule 30.4 to request a 60-day extension of time to file a brief in opposition to the petition for a writ of certiorari in this matter. The petition was filed on July 11, 2024, and the opposition is currently due on August 15, 2024. If the request for a 60-day extension is granted, the opposition would be due on Monday, October 14, 2024.

The extension of time is necessary because counsel in this case from the American Civil Liberties Union (“ACLU”), Lambda Legal Defense and Education Fund (“Lambda Legal”), and Cooley LLP face competing deadlines in other pressing matters before this Court.

In *United States v. Skrmetti et al.*, No. 23-477, counsel from the ACLU and Lambda Legal represent L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, *et al.*, who will be filing a merits brief as Respondents in support of Petitioner. That brief is currently due on August 27, 2024.

In *Little et al. v. Hecox et al.*, No. 24-38, counsel from the ACLU and Cooley represent Respondent, Lindsay Hecox. The petition for a writ of certiorari in *Hecox* was filed by Idaho as a companion to West Virginia’s petition in *B.P.J.* The opposition brief in *Hecox* is currently due on August 14, 2024, and counsel in *Hecox* will be filing a request for a 60-day extension of time in that case as well.

In *Crouch v. Anderson*, No. 24-90, counsel from Cooley and Lambda Legal represent Respondent, Shauntae Anderson. A petition for a writ of certiorari in *Anderson* was filed on July 25, 2024. Respondent’s opposition brief is currently due on August 28, 2024.

In addition, lead counsel from Cooley is currently preparing a response to a petition for a writ of certiorari in *United Therapeutics Corp. v. Liquidia Techs., Inc.*, No. 23-1298, and will also be responding to another petition filed last week (but not yet docketed). Cooley counsel also just completed a one-week trial and is preparing post-trial briefing in that matter (*Ryanair DAC v. Booking.com BV*, No. 20-1191 (D.

Del.)), and has two hearings in the coming three weeks in *Brockman v. Kaiser Found. Hosps., Inc.*, No. STK-CV-UMM-2023-0001612 (Cal. Super. San Joaquin Cty.).

Respondent has contacted counsel of record for Petitioners for their position on this extension request, and Petitioners consent to the 60-day extension.

Respectfully submitted,



Joshua Block  
American Civil Liberties Union Foundation



National Office  
125 Broad Street  
18th Floor  
New York, NY 10004  
aclu.org

**Deborah N. Archer**  
President

**Anthony D. Romero**  
Executive Director