

February 4, 2025

BY ELECTRONIC FILING

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

Re: *Stephen B. Grant, on Behalf of the United States and the State of Iowa v. Steven Zorn, et al.*, No. 24-549

Dear Mr. Harris:

We represent Respondents, Steven Zorn, Iowa Sleep Disorders Center, P.C., and Iowa CPAP, L.L.C., in the above-captioned case. The response is currently due on March 12, 2025. For the reasons set forth below, we respectfully request the time to file a response be extended by 30 days, to and including April 11, 2025. Counsel for Petitioner has indicated that Petitioner does not oppose this request.

The Petition in this case is one of up to three petitions that may be filed from the same judgment. Respondents will separately file a petition by February 6, 2025, and the United States has twice sought an extension of time to file a petition in this matter. *See United States v. Zorn*, No. 24A627. To ensure that all three petitions can be considered at the same conference—and to permit Respondents to file a single response to the Petition and any petition filed by the government—this Court previously extended the time to file a response to March 12, 2025.

On January 23, 2025, the Court further extended the time for the United States to file a petition to March 7, 2025. A corresponding extension of the deadline to file a response to this Petition will allow counsel to file a single brief in opposition, should the United States petition from this case. In these circumstances, this Court's normal practice is to grant extensions to permit the respondents to avoid conflicting deadlines and file a single response to multiple petitions from the same judgment. *See, e.g., Busch v. Guertin*, No. 19-350 (U.S. Oct. 17, 2019). An extension would similarly continue to ensure all petitions from the same judgment below are conferenced together.

The extension is further warranted because counsel responsible for the brief recently has been and will be occupied with briefing deadlines and oral argument in a variety of matters. These include: oral argument before the Ninth Circuit in *Epic Games, Inc. v. Google LLC*, No. 24-6256

(9th Cir.), on February 3, 2025; oral argument before the Sixth Circuit in *Insight Terminal Solutions, LLC v. Cecelia Financial Management, LLC*, No. 24-05222 (6th Cir.), on February 6, 2025; petitions for rehearing and rehearing en banc in *CeramTec GmbH v. CoorsTek Bioceramics LLC*, No. 23-1502 (Fed. Cir.), due on February 24, 2025; an opening brief in *Ford Motor Company v. Hetsler*, 5D2024-2368 (Fla. 5th Dist. Ct. App.), due on February 24, 2025; an amicus brief in *Wyoming v. Johnson*, No. S-24-0326 (Wyo.), due on March 31, 2025; and a reply brief in *Ford Motor Company v. Hetsler*, 5D2024-2368 (Fla. 5th Dist. Ct. App.), due on April 25, 2025.

Given these considerations, an extension of time is warranted to permit counsel to prepare a single response that fully analyzes and responds to the arguments raised in Respondent's and the potential United States' petitions for certiorari, and to permit all petitions from the same judgment to be considered together.

Respectfully submitted,

/s/ Jessica L. Ellsworth
Jessica L. Ellsworth

Counsel for Respondents

cc: Adam D. Zenor, Zenor Law Firm, P.L.C.
Sarah M. Harris, Acting Solicitor General (by email)
Hon. Brenna Bird, Attorney General of Iowa (by email)