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January 30, 2025

VIA E-FILING

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

Re: Request for Extension of Time to File Response to Petition
Mollie Slaybaugh, et al. v. Rutherford County, Tennessee, et al.
S. Ct. No. 24-755

Dear Mr. Harris:

I am counsel for Respondents Rutherford County, Tennessee and Rutherford County Sheriff's Department ("County Respondents") in this case. Petitioners filed their Petition for Writ of Certiorari in this case on January 14, 2025. Pursuant to Supreme Court Rule 15.3 and the online docket, a response is currently due on February 18, 2025. Pursuant to Supreme Court Rule 30.4, I write to respectfully request an extension **up to and including March 20, 2025** for the County Respondents to file a response to the Petition for Writ of Certiorari.

This is the County Respondents' first request for an extension in this case. Good cause exists for granting the requested extension, as the County Respondents' counsel had, and has ongoing, several pre-existing professional commitments prior to the current deadline, including, among others, required attendance at several meetings of various public bodies, including the Rutherford County Commission, Planning Commission, Board of Zoning Appeals, and other committee meetings, three (3) motion hearings in state court matters, a deadline to respond to written discovery requests in a federal case, a dispositive motion deadline in a state court matter, two (2) deadlines to file motions to dismiss in federal cases, deadlines to file responses in opposition to four (4) motions in federal cases, and a previously scheduled deposition in a state court matter. Moreover, attorney Jason N. King from our law firm has recently been engaged as co-counsel for the County Respondents to assist in this matter. Mr. King did not represent the County Respondents at the district court or circuit court of appeals levels and thus requires additional time to become familiar with the record in light of the issues presented. The requested extension will ensure that counsel for the County Respondents have enough time to meaningfully review and respond to the Petition in light of these circumstances and will ensure that the County Respondents can provide a thorough response that will be useful to the Court. In addition, there are no circumstances that necessitate a speedy ruling on the Petition.

Accordingly, the County Respondents respectfully request that their time for filing a response to the Petition for Writ of Certiorari be extended by thirty (30) days, **up to and including March 20, 2025.**

Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Nick C. Christiansen
Nick C. Christiansen

*Counsel for Respondents Rutherford County,
Tennessee and Rutherford County
Sheriff's Department*

cc: (see attached certificate of service)