## IN THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

DO NO HARM,	
Petitioner-Appellant,	
<b>v.</b>	
WILLIAM LEE,	
<b>Respondent-Appellee</b>	

No. 24-5937

## MOTION FOR EXTENSION OF TIME TO FILE BRIEF OF RESPONDENT-APPELLEE

The respondent-appellee, William Lee, in his official capacity as Governor, ("Respondent") respectfully requests an extension of time to file a response brief in this case in accordance with Fed. R. App. P. 26(b) and 6. Cir. R. 26. The Respondent's brief is due on November 27, 2024. [ECF No. 9]. However, Respondent's counsel will be unable to complete the brief by that date and requests an additional 60 days to do so. If this request is granted, the new due date for the brief would be January 26, 2025. The motion is not opposed.

Undersigned counsel will be unable to complete and file the brief within the time provided due to obligations in other matters. Namely, undersigned counsel is preparing for a jury trial in the Middle District of Tennessee scheduled for December 10-13<sup>th</sup>. The parties expect to call no less than ten witnesses. The pre-trail commitments are extensive and require travel between todays date and November 27<sup>th</sup>. The present case involves an important issue of standing that will necessitate substantial time for research and drafting. Additionally, undersigned counsel has pre-arranged travel plans for the Christmas holiday. Due to undersigned counsel's workload and scheduling restrictions, counsel would be grateful for a 60-day extension in this matter.

For the reasons stated, the Respondent respectfully requests an extension up to and including January 26, 2025 to complete and file Respondent's brief in this case. Undersigned counsel contacted the petitioner's appointed counsel regarding this request and has been advised that there is no objection.

Respectfully submitted,

JONATHAN SKRMETTI Attorney General and Reporter

/s/ Ryan Nicole Henry Ryan Nicole Henry (BPR #040028) Assistant Attorney General General Litigation Division Post Office Box 20207 Nashville, Tennessee 37202-0207 615.532.2935 Ryan.Henry@ag.tn.gov Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was filed and served by operation of the Court's ECF/PACER system on this the 18<sup>th</sup> day of November 2024, upon:

Anastasia P. Boden Joshua P. Thompson Pacific Legal Foundation 555 Capitol Mall, Suite 1290 Sacramento, CA 95814

> <u>s/Ryan N. Henry</u> Ryan N. Henry (BPR 19320)