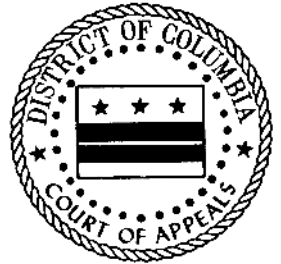


No. 22-TX-820



Clerk of the Court
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IN THE DISTRICT OF COLUMBIA COURT OF APPEALS

LHL REALTY COMPANY DC, LLC, *et al.*,
APPELLANTS,

v.

DISTRICT OF COLUMBIA,
APPELLEE.

ON APPEAL FROM A JUDGMENT OF THE
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

**CONSENT MOTION OF APPELLEE THE DISTRICT OF COLUMBIA
FOR A 60-DAY EXTENSION OF TIME TO FILE ITS SUPPLEMENTAL BRIEF**

The supplemental brief of appellee the District of Columbia is currently due on July 24, 2025. The District requests a 60-day extension of time, until September 22, to file its brief. Appellants consent to this motion.

There is good cause for the requested extension. On May 9, this Court ordered the parties to file supplemental briefs “addressing whether, in light of *Loper Bright* and the ensuing D.C. Council legislation, this [C]ourt continues to owe deference to administrative agencies’ interpretations of statutes and regulations.” 5/9/25 Order. The Court also invited the United States, the Legal Aid Society of the District of Columbia, and the Chamber of Commerce of the United States to file amicus briefs. *Id.* The supplemental brief filed by appellant LHL Realty and the amici briefs by The Chamber of Commerce, The New Civil Liberties Alliance, and The Goldwater Institute raise several new constitutional and Home

Rule Act arguments about the validity of the Council legislation and this Court's continued deference to agency interpretations. Additional time is necessary to respond to the breadth of these arguments.

In addition, the Office of the Solicitor General continues to have a heavy workload, and the undersigned counsel has been engaged in the press of other matters before this Court and other courts, including in *United States v. Richardson*, No. 24-3151 (D.C. Cir.) (amicus brief filed July 7); *Perez v. D.C. Metropolitan Police Department*, No. 24-AA-601 (D.C.) (brief due July 23); *Mpoy v. Burst*, No. 24-7120 (D.C. Cir.) (brief due September 5); and *PChange, LLC v. D.C. Metropolitan Police Department*, No. 23-AA-858 (D.C.) (brief due September 5). The undersigned and the supervisor on this matter will be out of the office on scheduled leave from July 14-25 and August 1-11. Additional time is therefore necessary for the completion of the brief.

Accordingly, the Court should grant the District a 60-day extension of time, until September 22, 2025, to file its supplemental brief in this matter.