

# HARMON, CURRAN, SPIELBERG & EISENBERG, LLP

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October 20, 2006

VIA FIRST-CLASS MAIL AND FAX: (202) 479-3268

Mr. Christopher Vasil  
Deputy Clerk  
Supreme Court of the United States  
One First Street, NE  
Washington, DC 20543

Re: *Pacific Gas & Electric Company v. San Luis Obispo Mothers-for-Peace, et al, U.S. Supreme Court Docket No. 06-466*

Dear Mr. Vasil:

We are writing to request a 29-day extension of the time for filing an opposition to the petition for certiorari filed by Pacific Gas & Electric Company ("PG&E") in the above-referenced case, up to and including December 1, 2006. PG&E's petition for certiorari was docketed on October 3, 2006, and respondents' opposition brief is now due on November 2, 2006.

We have diligently attempted to meet the Court's deadline for filing an opposition to PG&E's petition, but need an extension in order to provide sufficient time to prepare an opposition while also meeting other obligations during the next two weeks. Diane Curran, who is primarily responsible for the brief in opposition to the petition for certiorari, has a deadline of October 31 for an appellate brief to the U.S. Nuclear Regulatory Commission ("NRC") in *Entergy Nuclear Operations, Inc. (Pilgrim Nuclear Power Station)*, Docket No. 50-293. In addition, Ms. Curran and Ruth Eisenberg, counsel of record, have a number of pressing obligations to other clients which pre-date the filing of PG&E's petition for certiorari. An extension will allow us to meet these obligations and also to file a response that adequately addresses the points raised in the petition for certiorari.

We also note that the amount of time we are requesting is no longer than the extension the Court granted to PG&E on August 28, 2006, for filing its petition for certiorari.

We have contacted counsel for Petitioner, the Department of Justice, and the NRC regarding our request for an extension. Each has consented to the request for extension.