

U.S. Department of Justice

Office of the Solicitor General

Washington, D.C. 20530

March 16, 2018

Honorable Scott S. Harris Clerk Supreme Court of the United States Washington, D.C. 20543

Re: Susan Stanford v. United States, No. 17-809

Dear Mr. Harris:

The petition for a writ of certiorari in the above-captioned case was filed (following a 58day extension) on December 1, 2017. The petition seeks review of a decision of the United States Court of Appeals for the Federal Circuit summarily affirming a decision of the United States Court of Federal Claims that, <u>inter alia</u>, denied petitioner's "judicial takings" claim. See <u>Stanford</u> v. <u>United States</u>, 125 Fed. Cl. 570 (2016), aff'd, 693 Fed. Appx. 908 (Fed. Cir. 2017). The government waived its right to file a response on January 4, 2018. This Court requested a response on January 18, 2018, and the Court granted a 30-day extension for the government to file its response on February 13, 2018. The government's response is now due on March 22, 2018.

On February 1, 2018, a petition for a writ of certiorari was filed in <u>Petro-Hunt, L.L.C.</u> v. <u>United States</u>, No. 17-1090. That petition also seeks review of a Federal Circuit decision denying a "judicial takings" claim. See <u>Petro-Hunt, L.L.C.</u> v. <u>United States</u>, 862 F.3d 1370 (2017). The government's response to that petition is due, after one extension, on April 4, 2018.

We respectfully request, under Rule 30.4 of the Rules of this Court, a further extension of time, to and including April 4, 2018, for the government to file a response to the petition in the above-captioned case. The additional time is needed for the government to prepare its response to these two petitions addressing similar issues arising from the same court of appeals. Granting this extension would align the briefing schedules and facilitate the Court's consideration of the two petitions.

Counsel for petitioner does not consent to a further extension.

Sincerely,

Noel J. Francisco Solicitor General 17-0809 STANFORD, SUSAN USA

> MICHAEL D. SYDOW THE SYDOW FIRM 5020 MONTROSE BOULEVARD SUITE 450 HOUSTON, TX 77006 713-622-9700 MICHAEL.SYDOW@THESYDOWFIRM.COM