

STATE OF MISSISSIPPI



JIM HOOD
ATTORNEY GENERAL
CRIMINAL DIVISION

August 21, 2019

Danny Bickell, Esq.
Deputy Clerk for Practice and Procedure
Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543

Re: *Jonsha Bell v. Mississippi*, No. 18-1500

Dear Sir:

The Brief in Opposition to the Petition for Certiorari in the above styled and numbered cause is presently due on September 4, 2019. Counsel respectfully requests a thirty (30) day extension of time, to and including October 4, 2019, in which to file Respondent's Brief in Opposition. In support, Respondent submits the following:

Counsel is, and has been, diligently working to provide the Court with a complete Brief in Opposition. Counsel respectfully submits that Respondent cannot file an adequate response in the time presently allowed due to counsel's competing obligations. In addition to preparing the Brief in Opposition, counsel is presently preparing briefs in the Court of Appeals for the State of Mississippi in *Tasha Mercedes Shelby v. State of Mississippi*, No. 2019-CA-00034-COA and *Matthew Jonathan Moberg v. State of Mississippi*, No. 2018-KA-01726-COA. Most recently, counsel prepared the Appellee's Brief in the case of *Ashton Myota Thompson v. State of Mississippi*, No. 2019-KA-00652-COA. The brief was filed August 16, 2019.

This request is not being made to cause undue delay or for any other improper purpose. For the reasons above, counsel respectfully requests a thirty (30) day extension of time, to and including October 4, 2019, within which to file the Respondent's Brief in Opposition.

Sincerely,

A handwritten signature in cursive script, appearing to read "Abbie Eason Koonce".

Abbie Eason Koonce
Special Assistant Attorney General