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March 7, 2019

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, N.E.
Washington, DC 20543

Re: Crespo v. New York, No. 18-7694

Mr. Harris:

I represent the respondent in the above-referenced matter, in which petitioner Raymond Crespo has filed a petition for a writ of certiorari. On March 4, 2019, the Court directed respondent to answer the petition by April 3, 2019. Pursuant to Rule 30.4, I am writing to request an extension of time to June 3, 2019, to file a brief in opposition to the petition. This is respondent's first request for an extension. Petitioner's counsel consents to this request.


The attorneys with primary responsibility for drafting this response, myself and Assistant District Attorney Stephen Kress, have numerous briefs due and arguments scheduled in state and federal courts through March and April 2019. Accordingly, we will simply be unable to devote appreciable attention to this matter before then. Significantly, ADA Kress and I were the attorneys assigned to petitioner's case during the direct appeal in state court. Thus, we are the attorneys in our Office most knowledgeable about the case. Moreover, our colleagues have caseloads similar to our own. Thus, reassigning the response to the petition is not a feasible option. Accordingly, we submit that an extension of time to June 3rd is reasonable so that we may prepare a proper response to the petition.

Thank you very much for your attention.

DISTRICT ATTORNEY COUNTY OF NEW YORK

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Respectfully submitted,



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