



**OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS**

KWAME RAOUL
ATTORNEY GENERAL

September 3, 2019

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, NE
Washington, DC 20543-0001

Re: *Givens v. Illinois*, No. 18-9761

Dear Mr. Harris:

This letter is sent as a request by respondent, the State of Illinois, for a second extension of time to file a response to the petition for a writ of certiorari in the above-captioned case. Currently, the response is due on September 18, 2019, with one prior 30-day extension of time having been granted. I request a further extension of 30 days to file the response, until October 18, 2019. My office has contacted petitioner's counsel, who indicated that petitioner does not object to this request.

I request this extension because Assistant Attorney General (AAG) Erin O'Connell, who has been assigned to represent the State in this matter, did not handle the case in the Illinois Appellate Court and must familiarize herself with the history of the case and the issue presented before beginning to draft the response. Although AAG O'Connell promptly requested the record on appeal, she has not yet received it. She anticipates obtaining the record and beginning her review by September 6, 2019.

In addition, AAG O'Connell has been responsible for (1) drafting an cross-appellee and reply brief in United States Court of Appeals for the Seventh Circuit in *Winfield v. Dorothy*, Nos. 19-1441 & 19-1547 (cons.) (due on September 27, 2019); (2) filing an appellee's brief in the Illinois Supreme Court in *People v. Swenson*, No. 124688 (due on October 9, 2019, following one extension of time); and (3) filing an

appellee's brief in the Illinois Supreme Court in *People v. Robinson*, No. 123849 (due on September 25, 2019, with a motion for sixty-day extension of time pending).

Finally, once AAG O'Connell has completed a draft of the response, it must be reviewed by three of our office's supervising attorneys before it is filed. This extension of time will enable AAG O'Connell to complete her draft of the response and allow adequate time for its review.

This is respondent's second request for an extension of time. It is not made for the purpose of delay, but solely to insure that respondent's interests are adequately protected.

Thank you in advance for your attention to this matter.

Sincerely,



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