



Bob Ferguson

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March 10, 2020

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

RE: *Njonge v. Gilbert*, No. 19-7426

Dear Mr. Harris:

I am counsel of record for Respondent Margaret Gilbert in the above-captioned case. The Court has called for a response to the cert petition and set the deadline for the State's brief in opposition as April 1, 2020.

Pursuant to Rule 30.4, Washington requests a 44-day extension to file a brief in opposition, to May 15, 2020. Counsel for petitioner does not object to the extension.

This request for additional time is made to accommodate other concurrent deadlines, particularly briefing and oral argument in *Chiafalo v. Washington*, No. 19-465 (U.S.), in which the State's merits brief is due April 1, 2020, and oral argument will be April 28, 2020. The State's small team of attorneys that work on U.S. Supreme Court matters will be extremely busy with that case through the argument, and will also be filing a brief in response to the motion to file an original action by Montana and Wyoming against Washington, No. 220152, currently due March 24, 2020, and a brief in opposition in *Living Essentials v. Washington*, No. 19-988, currently due May 29, 2020. The State is requesting an extension in the original action as well. We will also be briefing and arguing several pending cases in the Washington Supreme Court in the meantime, including my argument in *SEIU 775 v. Department of Social and Health Services*, No. 97216-8, on March 17, 2020.

We do not believe that the extension will unduly delay consideration of the petition by the Court, as it may still be considered before the summer recess. We also respectfully submit that the requested extension will allow sufficient time for our office to provide a more thorough and helpful response to the Court.

Thank you for your consideration of this request.

Sincerely,

Peter Gonick  
Deputy Solicitor General  
(360) 753-6245

WRO

cc: Michael Filipovic, Counsel of Record for Petitioner