

AARON D. FORD
Attorney General

KYLE E.N. GEORGE
First Assistant Attorney General

CHRISTINE JONES BRADY
Second Assistant Attorney General



JESSICA L. ADAIR
Chief of Staff

RACHEL J. ANDERSON
General Counsel

HEIDI PARRY STERN
Solicitor General

STATE OF NEVADA
OFFICE OF THE ATTORNEY GENERAL

100 North Carson Street
Carson City, Nevada 89701-4717

August 3, 2020

Honorable Scott Harris
Clerk of the Court
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543-0001

Re: *Zane Floyd v. William Gittere, Warden, et al.*
Case No. 19-8921

Dear Mr. Harris:

I am writing to request an extension of time under Sup. Ct. R. 30.4 for Respondents to file the brief in opposition in the above-captioned case. The brief in opposition is currently due August 7, 2020. Respondents request an extension of 28 days, making the brief in opposition due on or before September 4, 2020. I contacted Mr. Floyd's attorneys, and they indicated they do not oppose this request.

An extension of time is needed to complete the brief in opposition due to the weight of my current workload, which has been compounded by complications of dealing with the COVID-19 outbreak. In particular, I appeared in two Ninth Circuit arguments on July 8, 2020. The first case, *Centofanti v. Neven*, No. 20-16039 (9th Cir.), was an emergency writ proceeding filed by a Nevada inmate asserting that COVID-19 creates extraordinary circumstances warranting his release pending resolution of his petition for writ of habeas corpus in the federal district court. And the second case, *Snow v. Baker*, No. 15-99012 (9th Cir.), is a long-standing capital habeas proceeding that had originally been set for argument in March but was postponed until summertime in response to concerns about COVID-19.

Floyd v. Gittere, et al.,
Page 2
August 3, 2020

In light of the considerable amount of time spent preparing for those arguments, I spent the remainder of July catching up on other pending deadlines, including assisting with preparation of the petition for writ of certiorari in *Hutchings v. Ross*, No. 20-86 (U.S). Accordingly, Respondents request that this Court issue an order granting them an extension of time to file the brief in opposition on or before September 4, 2020.

Respectfully,

/s/ Jeffrey M. Conner
Jeffrey M. Conner
Deputy Solicitor General

cc: Eric Schnapper*
David Anthony
Brad D. Levenson
Ellesse Henderson

*Counsel of Record