

FEDERAL PUBLIC DEFENDER

EASTERN DISTRICT OF VIRGINIA
1650 KING STREET, SUITE 500
ALEXANDRIA, VIRGINIA 22314
TEL: (703) 600-0800
FAX: (703) 600-0880

Jeremy C. Kamens
Federal Public Defender

Ms. Frances H. Pratt
Assistant Federal Public Defender
Direct Dial: (703) 600-0815
Email: Fran_Pratt@fd.org

April 30, 2021

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

Re: *United States v. Justin Eugene Taylor*, S. Ct. No. 20-1459

Dear Mr. Harris:

I write on behalf of respondent to request an extension of time of four days under Rule 30.4 to respond to the petition for a writ of certiorari in *United States v. Justin Eugene Taylor*, No. 20-1459. Our brief in opposition is currently due on May 17; an extension of four days would make it due on May 21. The Office of the Solicitor General consented to this request by email on April 29.

Undersigned counsel is collaborating on this case with *pro bono* counsel Michael R. Dreeben and Kendall Turner, of O'Melveny & Myers, LLP. We request this extension because of challenges stemming from the ongoing COVID-19 pandemic. The pandemic has complicated our ability to communicate with our client, who is in prison. It has also yielded many competing deadlines as courts begin to schedule long-delayed proceedings.

In the next two weeks, undersigned counsel has due on May 3 the opening brief in *United States v. Thomas*, No. 20-6234 (4th Cir.); on May 13, the reply brief in *United States v. Sanjurjo*, No. 20-7845 (4th Cir.); on May 17, the reply brief in *United States v. Davis*, No. 20-4535 (4th Cir.); and two First Step Act § 404 motions in district court cases.

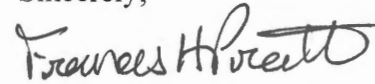
Mr. Dreeben's and Ms. Turner's other deadlines and commitments include a merits-stage amicus brief due May 10 in *Wooden v. United States*, No. 20-5279 (U.S.); a merits brief due June 22 in *Hemphill v. United States*, No. 20-637 (U.S.); and several depositions and briefing deadlines in *SmileDirectClub, Inc. v. NBCUniversal Media, LLC*, No. 20-C-1054 (Tenn. Cir. Ct.), and *Gottwald v. Sebert*, No. 653118/2014 (N.Y. Sup. Ct.).

Given these overlapping demands, we will not be able to communicate adequately with our client and prepare a brief in opposition without the requested extension.

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Thank you for your understanding and your attention to this request.

Sincerely,

A handwritten signature in black ink that reads "Frances H. Pratt". The signature is written in a cursive, slightly slanted style.

Frances H. Pratt

cc: Edwin S. Kneedler
Deputy Solicitor General
Counsel of Record for Petitioner
Office of the Solicitor General
950 Pennsylvania Ave., NW
Washington, DC 20530-0001
(202) 514-2203 (main)
(202) 514-2217 (case management)
SupremeCtBriefs@usdoj.gov