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June 17, 2021

Via E-File

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

Re: *Robert Gene Will, II v. Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division, No. 20-1669*

Dear Mr. Harris:

In accordance with Supreme Court Rule 30.4, Respondent Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division, respectfully moves for an extension of the time for filing his response to the petition for a writ of certiorari in this matter.

Petitioner filed his petition for a writ of certiorari on May 27, 2021. It was docketed on June 1, creating a deadline for Respondent's brief in response of July 1, 2021. Respondent requests a 30-day extension of that deadline, creating a new filing date of August 2, 2021.¹ My office conferred with lead counsel for Petitioner on June 15; Petitioner does not oppose the requested extension.

The extension is necessary because lead counsel for Respondent has had numerous briefing and argument obligations since Petitioner filed his petition for certiorari on May 27. Lead counsel's obligations include:

- Oral argument in *Daves v. Dallas County*, No. 18-11368, before the en banc Fifth Circuit on May 26;

¹ Thirty days from July 1 is July 31, which is a Saturday; thus, the operative deadline would be Monday, August 2.

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- Filing an amicus brief in *Diocese of Albany v. Lacewell*, No. 20-1501, in this Court on June 3;
- Filing a reply in support of motion to intervene in *Mayorkas v. Innovation Law Lab*, No. 19-1212, in this Court on June 15;
- Oral argument in *Ex parte Stephens*, No. PD-1033-20, before the Texas Court of Criminal Appeals on June 16.

For the foregoing reasons, Respondent respectfully requests a 30-day extension of the deadline to file his response to the petition for a writ of certiorari, creating a new deadline of August 2, 2021.

Respectfully submitted.

/s/ Judd E. Stone II

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cc: Charles R. Flores (via e-mail)