

OFFICE OF THE ATTORNEY GENERAL STATE OF ILLINOIS

KWAME RAOUL ATTORNEY GENERAL

December 2, 2020

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

Re: Taylor v. Illinois, No. 20-5344

Dear Mr. Harris:

This letter is sent as a request by respondent, the State of Illinois, for a 24-day extension of time, to and including January 7, 2021, to file its brief in opposition to the petition for a writ of certiorari in *Taylor v. Illinois*, 20-5344,. Currently, the State's response is due on December 14, 2020, following one extension of time. My office has contacted petitioner's counsel, who indicated that he has no objection to this request.

I request this extension because Assistant Attorney General (AAG) Erin O'Connell, assigned to represent the State in this matter, has been diligently working on the brief in opposition, has had to attend to additional matters, including preparing for and presenting oral arguments in the Illinois Appellate Court, Third District, in *People v. Rish*, No. 3-19-0446, on December 2, 2020; and in the United States Court of Appeals for the Seventh Circuit in *Cal v. Garnett*, No. 20-1047, on December 16, 2020. And in her role as a Supervising Attorney, AAG O'Connell has taken on additional work reviewing pleadings while other supervisors have been unavailable over the Thanksgiving holiday.

After AAG O'Connell completes a draft of the response, supervisors in the Office of the Illinois Attorney General will need to review it. To avoid any conflict with the out-of-office plans of supervisors around the Christmas holiday, I request that the deadline for the response be extended into January.



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This is respondent's second request for an extension of time. It is not made for the purpose of delay, but to ensure that respondent's interests are fully protected. Thank you for your attention to this matter.

Sincerely,

Michael M. Glick

Michal W. Slick

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