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November 13, 2020

**VIA ELECTRONIC FILING**

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

Re: James Anthony Martin v. Massachusetts, No. 20-6050

Dear Clerk Harris:

The Respondent has been asked by the Court to file a brief in response to the petition for certiorari by December 2, 2020. Pursuant to Supreme Court Rules 15.3, 30.2, and 30.4, I respectfully request that the Respondent's deadline be extended by sixty days, to February 1, 2021. My request is based on the nature of the matter, the need for thorough review within the Massachusetts Attorney General's Office, and the extent of my own professional commitments. Counsel for the Petitioner has consented to the extension.

The underlying state-court proceedings were not handled by me or by anyone in my office, but by a district attorney's office. Thus, becoming acquainted with all aspects of the proceedings will require a significant amount of time. Moreover, a Court-requested brief in response to a certiorari petition is rightfully given close scrutiny in my office. The brief in this case will be subjected to multiple rounds of thorough evaluation and revision by various attorneys at different levels. And while I will give this matter top priority, I am also responsible for handling a number of other matters, including federal habeas corpus actions with upcoming deadlines.

For the foregoing reasons, a sixty-day extension will enable my office to provide the Court with more thorough and helpful briefing. It will not prejudice any party. On behalf of the Respondent, I request that such an extension be allowed.

Thank you very much.

Very truly yours,



Anna E. Lumelsky  
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*Counsel of Record for the Respondent,  
the Commonwealth of Massachusetts*

### CERTIFICATE OF SERVICE

Pursuant to the Supreme Court's April 15, 2020 Order and agreement of the parties, I hereby certify that, on the date set forth below, a true copy of the accompanying document was served by electronic mail to the Counsel of Record for the one other party to the case:

Claudia Leis Bolgen, Esq.  
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*Counsel of Record for the Petitioner, James Anthony Martin*



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*Counsel of Record for the Respondent,  
the Commonwealth of Massachusetts*

Dated: November 13, 2020