



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

March 23, 2021

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

RE: *Coddington v. Farris*, Case No. 20-7341

Dear Mr. Harris:

Pursuant to Rule 30.4 of the Rules of the Supreme Court, undersigned counsel hereby requests an extension of time in which to respond to the petition for writ of certiorari filed in the above-captioned case. The extension is justified for the following reasons.

The petition was filed on February 26, 2021. The brief in opposition is due on April 5, 2021. Counsel for the State will not be able to complete the brief by the filing deadline for the following reasons. Since this Court's decision in *McGirt v. Oklahoma*, 140 S. Ct. 2452 (2020), holding that, for purposes of the Major Crimes Act, the Creek Nation's Reservation has not been disestablished, the undersigned has been part of the team managing the state-wide response to the decision. Since the decision in July 2020, the OCCA has ordered evidentiary hearings based on *McGirt* in eighty-two (82) cases that had previously been abated based on the pending *McGirt* litigation or have been filed since the decision. The undersigned has been a point person being consulted as to preparations by other attorneys in these *McGirt* evidentiary hearings, which involve allegations as to the existence of several reservations beyond the Creek Nation's Reservation. She is also lead counsel in a number of these *McGirt* cases, handling recent matters including a March 2, 2021, *McGirt* hearing in the capital case of *Ronson Kyle Bush v. State of Oklahoma*, Case

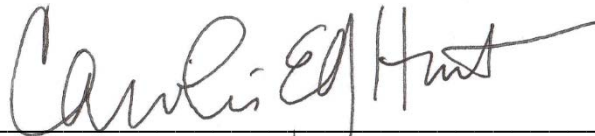
No. CF-2008-371 (Grady County District Court); filing the State's *Proposed Findings of Fact and Conclusions of Law* on March 12, 2021, in *Patrick Joseph Terry v. State of Oklahoma*, Case No. CF-2012-242 (Ottawa County District Court), seeking a holding that the Ottawa Reservation has been disestablished; drafting the State's *Petition for Rehearing* in *Shaun Michael Bosse v. State of Oklahoma*, Case No. PCD-2019-124 (Oklahoma Court of Criminal Appeals), in which Oklahoma's court of last resort on criminal matters recently held that the Chickasaw Nation's Reservation is intact and procedural bars do not apply to *McGirt* claims, due April 2, 2021; and assisting the Muskogee County District Attorney's Office in *State of Oklahoma v. Kayla Ann Jones*, Case No. CF-2016-34 (Muskogee County District Court), in which a defendant who has obtained relief under *McGirt* is seeking the refund of fines, costs, and fees.

The undersigned also has a number of recent filing and upcoming deadlines in non-*McGirt* cases: 64-page Response in Opposition to Writ of Habeas Corpus filed March 5, 2021, in *Robinson v. Bragg*, Case No. 20-CV-0086-GKF-FHM (N.D. Okla.), 86-page Response in Opposition to Writ of Habeas Corpus filed March 22, 2021, in *Zilm v. Crow*, Case No. 20-CV-0509-CVE-JFJ (N.D. Okla.); and Objections to 91-page Report and Recommendation recommending the grant of habeas relief in *Moore v. Embry*, Case No. 5: 09-cv-00985-G (W.D. Okla.), due April 12, 2021.

Finally, the undersigned is a reviewer of the work of three other attorneys in the criminal appeals unit of the Oklahoma Attorney General's Office, and in that capacity reviews all pleadings filed by those individuals. The undersigned is also chief of the federal habeas unit within the division, and in so doing is in charge of federal habeas training. These responsibilities consume a significant amount of the undersigned's time.

For all of the foregoing reasons, the State respectfully requests an additional thirty days, or until May 5, 2021, in which to file its brief in opposition.

MIKE HUNTER
ATTORNEY GENERAL OF OKLAHOMA

A handwritten signature in black ink, appearing to read "Caroline E.J. Hunt", written over a horizontal line.

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