



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

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March 8, 2021

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

Re: *Next Energy, LLC v. Ill. Dep't of Nat. Res.*, No. 20-885

Dear Mr. Harris:

On February 19, 2021, this Court directed Respondent Illinois Department of Natural Resources to respond to the petition for a writ of certiorari in the above-captioned case by March 22, 2021. Pursuant to Supreme Court Rule 30.4, respondent respectfully requests a 30-day extension of time to April 21, 2021, to file its response. Counsel for petitioner has authorized us to state that this request is unopposed.

The extension requested by respondent is necessary due to work responsibilities held by Assistant Attorney General Jonathan J. Sheffield, who will draft respondent's brief in opposition under my supervision. Specifically, Mr. Sheffield is responsible for filing an opening brief in *People v. Evelyn Hoing*, No. 3-20-0062, which is due to the Illinois Appellate Court on March 23, 2021. In addition, he is preparing for oral arguments in the Seventh Circuit Court of Appeals in *Reyes v. Fishel*, Nos. 19-1082 & 19-1084, and *Stennis v. Berry*, No. 19-2616, on March 30 and April 14, 2021, respectively.

Moreover, my work responsibilities and personal schedule also merit an extension. As the Solicitor General of Illinois, I devote substantial time to performing supervisory and administrative duties, including editing briefs in numerous appeals and helping attorneys prepare for oral argument. Additionally, I will be preparing for oral argument in the Seventh Circuit Court of Appeals on April 1, 2021 in *Ross v. Gossett*, No. 20-1992.

This is respondent's first request for an extension of time. It is not made for purposes of delay, but solely to ensure that respondent's interests are adequately protected. Thank you in advance for your attention to this matter.

Sincerely,

/s/ Jane Elinor Notz

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cc: Rodney V. Taylor, Counsel for Petitioner