



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

JUDD E. STONE II  
Solicitor General

(512) 936-1700  
Judd.Stone@oag.texas.gov

November 12, 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: *Andre Lee Thomas v. Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division*, No. 21-444

Dear Mr. Harris:

Under 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.

This is a capital case. The response is currently due on November 22, 2021. This is Respondent's second request for an extension. The Court granted Respondent's first request, which was for a 30-day extension. Respondent now requests a 15-day extension, which would create a new filing date of December 7, 2021. My office conferred with counsel for Petitioner on November 11, and Petitioner does not oppose the requested extension.

The extension is needed because the undersigned counsel and other counsel assisting with this matter have numerous briefing and argument obligations, including:

- *Whole Woman’s Health, v. Jackson*, No. 21-463, and *United States v. Texas, et al.*, No. 21A85, in the Supreme Court of the United States (opening briefs filed October 27; reply briefs filed October 29; oral argument presented November 1);
- *Ramirez v. Collier, et al.*, No. 21-5592, in the Supreme Court of the United States (oral argument presented November 9);
- *Broadnax v. Lumpkin*, No. 21-267, in the Supreme Court of the United States (brief in opposition filed November 9);
- *Luna v. Lumpkin*, No. 21-5460, in the Supreme Court of the United States (brief in opposition filed November 9);
- *Wardrip v. Lumpkin*, No. 21-5226, in the Supreme Court of the United States (brief in opposition due November 12);
- *Fears v. Lumpkin*, No. 20-40563, in the U.S. Court of Appeals for the Fifth Circuit (appellee’s brief filed November 8);
- *Texas v. Biden*, No. 21-10806, in the U.S. Court of Appeals for the Fifth Circuit (oral argument presented on November 2);
- *Cook County v. Mayorkas*, No. 21-2561, in the U.S. Court of Appeals for the Seventh Circuit (appellants’ brief filed November 3); and
- *Grassroots Leadership, Inc., et al. v. Masters, et al.*, No. 19-0092, in the Supreme Court of Texas (response brief on the merits due December 1).

For the foregoing reasons, Respondent respectfully requests a 15-day extension of the deadline for filing a response to the petition for a writ of certiorari, creating a new deadline of December 7, 2021.

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Sincerely,

/s/ Judd E. Stone II

JUDD E. STONE II

Solicitor General

*Counsel of Record*

OFFICE OF THE ATTORNEY GENERAL

P.O. Box 12548 (MC 059)

Austin, Texas 78711-2548

Tel.: (512) 936-1700

Fax: (512) 474-2697

Judd.Stone@oag.texas.gov

cc: Maurie Levin (Counsel for Petitioner)