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February 17, 2022

**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: *William Speer v. Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division, No. 21-7082 (Capital Case)***

Dear Mr. Harris:

In accordance with 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 the response to the petition for a writ of certiorari in this matter.

Petitioner filed a petition for a writ of certiorari on February 4, 2022. It was docketed on February 9, creating a deadline for the response of March 11. Respondent requests a 30-day extension of that deadline, creating a new filing date of April 11, 2022.

My staff reached out to counsel for Petitioner via email to ask for Petitioner's position on this motion. Petitioner's counsel advised that the requested extension is unopposed.

The extension is necessary because counsel of record for Respondent faces additional briefing and argument obligations. The press of business from numerous, complex matters with deadlines overlapping with the current deadline requires significant time and attention from the undersigned counsel and other counsel

assisting with this matter:

- *Whole Woman's Health v. Jackson*, No. 22-0033 (Tex.) (response brief filed Feb. 11)
- *McNeely v. The University of Texas Health Science Center at Houston*, No. 21-1058 (Tex.) (response to petition for review due Feb. 22)
- *Whole Woman's Health v. Jackson*, No. 22-0033 (Tex.) (oral argument Feb. 24)
- *Texas Education Agency v. Houston Independent School District*, No. 21-0194 (Tex.) (reply brief due Feb. 28)
- *Texas Department of State Health Services v. Crown Distributing LLC*, No. 21-1045 (Tex.) (reply brief due Mar. 1)
- *Torres v. Texas DPS*, No. 20-603 (U.S.) (merits brief due Mar. 2)
- *Cook County v. Texas*, No. 21-2561 (7th Cir.) (reply brief due Mar. 10)
- *Torres v. Texas DPS*, No. 20-603 (U.S.) (oral argument Mar. 29)

For the foregoing reasons, Respondent respectfully requests a 30-day extension of the deadline to file the response to the petition for a writ of certiorari, creating a new deadline of April 11, 2022.

Respectfully submitted.

/s/ Judd E. Stone II

Judd E. Stone II  
Solicitor General  
*Counsel of Record*

cc: Joshua Freiman (via e-mail)