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March 28, 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.

The response is due on April 11, 2022. Respondent requests a 30-day extension of that deadline, creating a new filing date of May 11, 2022. This is Respondent's second request for an extension of time for this filing.

My staff reached out to counsel for Petitioner via e-mail 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:

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- *Torres v. Tex. DPS*, No. 20-603 (U.S.) (brief on the merits filed on March 2)
- *Oklahoma v. Castro-Heurta*, No. 21-429 (U.S.) (amicus brief filed on March 7)
- *Cook County v. Texas*, No. 21-2561 (7th Cir.) (reply brief filed on March 10)
- *Tex. Ent. Ass'n v. Hegar*, No. 21-1258 (U.S.) (petition for writ of certiorari filed on March 14)
- *Canales v. Paxton*, No. 21-658 (U.S.) (brief in opposition filed on March 21)
- *Tex. Educ. Agency v. Hous. ISD*, No. 21-0194 (Tex.) (reply brief filed on March 21)
- *Torres v. Tex. DPS*, No. 20-603 (U.S.) (oral argument on March 29)
- *Biden v. Texas*, No. 21-954 (U.S.) (brief on the merits due on April 7)
- *Biden v. Texas*, No. 21-954 (U.S.) (oral argument on April 26)
- *United States v. Texas*, No. 21-50949 (5th Cir.) (appellant's brief due on May 2)

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 May 11, 2022.

Respectfully submitted.

/s/ Judd E. Stone II

Judd E. Stone II  
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*Counsel of Record*

cc: Joshua Freiman (via e-mail)