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May 13, 2022

### ELECTRONIC SERVICE

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

RE: *John Charles Eichinger v. George Little, Acting Secretary,  
Pennsylvania Department of Corrections, et al.*, No. 21-7611

Dear Mr. Harris:

Petitioner, John Charles Eichinger, filed a petition for writ of certiorari in the above-captioned matter on April 8, 2022, which was docketed by this Court on April 13, 2022. Respondents' mandatory response, pursuant to Supreme Court Rule 14.1(a), is due today, May 13, 2022. Respondents, however, must respectfully request, under Supreme Court Rule 30.4, a 90-day extension of time, until August 11, 2022, to file a response to Petitioner's petition for writ of certiorari.

Respondents respectfully seek an extension of time due to several deadlines and commitments scheduled for the next three months. Specifically, undersigned counsel has been spending a majority of his time in recent weeks preparing for an upcoming 4-day Post-Conviction Relief Act hearing in *Commonwealth v. Christopher Johnson*, CP-01-CR-1180-2010 (Adams. Cty. Ct. Comm. Pls.), a capital case, on May 23-26, 2022. In addition, undersigned counsel has a response to an amended Post-Conviction Relief Act Petition in *Commonwealth v. Murray*, No. CP-46-CR-0005185-2005 (Mont. Cty. Ct. Comm. Pls.), a triple homicide case with a voluminous record, due May 31, 2022. He also has to prepare for an oral argument scheduled before the Pennsylvania Superior Court in *Commonwealth v. Hatfield*, No. 2359 EDA 2021 (Pa. Super.), a homicide case, on June 8, 2022. Additionally, the Appellate Division of this Office, which

comprises of a mere handful of attorneys, has more than a dozen briefs due in the Pennsylvania appellate courts over the course of the next two months, all of which undersigned counsel will need to edit, and some of which he will be drafting himself.

Based on the foregoing reasons, respondents respectfully request an extension of time – until August 11, 2022 – to respond to petitioner’s petition for writ of certiorari. Respondents have not previously sought any extensions in this matter.

Thank you for your consideration of this matter.

Respectfully submitted:

*/s/ Robert M. Falin*

Robert M. Falin  
Deputy District Attorney  
Chief, Appellate Division

RMF:jld

cc: Joseph W. Luby, Esq.  
Counsel of Record