

**ROB BONTA**  
**Attorney General**

**State of California**  
**DEPARTMENT OF JUSTICE**



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May 24, 2022

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

RE: *Bolin v. Broomfield*  
Supreme Court of the United States, Case No. 21-7794 (capital case)  
REQUEST FOR EXTENSION OF TIME TO FILE BRIEF TO A RESPONSE TO  
PETITION FOR WRIT OF CERTIORARI

Dear Mr. Harris:

I am counsel for the respondent, Ron Broomfield, Warden. A petition for a writ of certiorari in this case was filed on May 6, 2022. A response is currently due by June 6, 2022. Pursuant to Rule 30.4 of the Rules of the Supreme Court of the United States, respondent respectfully requests that the time for filing a response be extended by 30 days, up to and including July 6, 2022.

This is respondent's first request for an extension of time to file a response. When this case was docketed on May 6, 2022, I was preparing a supplemental respondent's brief in *People v. Krater*, California Court of Appeal, Third District, Case No. C093982, which I filed on May 17. I have also been fulfilling my other duties as a reviewer and advisor regarding all California Supreme Court cases pending from the Sacramento and Fresno Appeals, Writs, and Trials Section of our office. I have not yet been able to devote significant time to the response in the instant case. Additionally, the response must be reviewed by multiple attorneys within the California Department of Justice, including attorneys in the Criminal Division and the Office of the Solicitor General. An extension of time would better enable preparation of a response that would be most helpful to the Court.

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Accordingly, I respectfully request that the existing due date for the response to the petition for writ of certiorari be extended to July 6, 2022. Counsel for petitioner, Brian Abbington and Robert D. Bacon, have stated that they do not oppose this request.

Sincerely,

*/s/ Rachelle A. Newcomb*

RACHELLE A. NEWCOMB  
Deputy Attorney General

For ROB BONTA  
Attorney General

RAN:drb

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**DECLARATION OF SERVICE BY U.S. MAIL**

Case Name: **In re Paul C. Bolin**  
No.: **21-7794**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On May 24, 2022, I served the attached **REQUEST FOR EXTENSION OF TIME TO FILE BRIEF TO A RESPONSE TO PETITION FOR WRIT OF CERTIORARI** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Heather E. Williams  
Federal Defender  
Brian Abbington  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814

Robert D. Bacon  
484 Lake Park Avenue, PMB 110  
Oakland, CA 94610

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on May 24, 2022, at Sacramento, California.

*/s/ D. Boggess*

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Declarant