

**FEDERAL COMMUNITY DEFENDER OFFICE
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Capital Habeas Unit

FEDERAL COURT DIVISION - DEFENDER ASSOCIATION OF PHILADELPHIA

SUITE 545 WEST – THE CURTIS
601 WALNUT STREET
PHILADELPHIA, PA 19106

PHONE NUMBER (215) 928-0520
FAX NUMBER (215) 928-0826
FAX NUMBER (215) 928-3508

HELEN A. MARINO
INTERIM CHIEF FEDERAL DEFENDER

December 21, 2022

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

Re: *Chestnut v. Allen*, No. 22-490

Dear Mr. Harris:

Petitioner Lydell Chestnut has filed a petition for a writ of certiorari in this capital habeas corpus case. Respondent Quincy Allen's brief in opposition is currently due on December 23, 2022. Respondent is unable to comply with the current due date because of counsel's heavy workload, which includes a case under an active execution warrant and an upcoming statute-of-limitations deadline in another capital habeas corpus case. Counsel represents numerous death-sentenced prisoners in capital habeas corpus proceedings and has had a heavy schedule of competing obligations in these other matters.

Counsel therefore respectfully requests, pursuant to Supreme Court Rule 30.4, a thirty (30) day extension of time within which to prepare and file the brief in opposition. Undersigned counsel has consulted with counsel for Petitioner, Melody J. Brown, who has indicated that she does not object to this request. Thank you for your consideration.

Respectfully,

/s/ Aren Adjoian

Aren Adjoian
Supervisory Assistant Federal Defender

Counsel for Respondent, Quincy Allen
Appointed pursuant to the Criminal Justice Act
Application for admission to the Bar of this Court forthcoming

CERTIFICATE OF SERVICE

I hereby certify that all parties required to be served have been served by first-class United States Mail and e-mail at the below-listed addresses:

Melody J. Brown
South Carolina Attorney General's Office
Post Office Box 11549
Columbia, SC 29211
MBrown@scag.gov

/s/ Aren Adjoian
Aren Adjoian
Supervisory Assistant Federal Defender
Federal Community Defender Office
for the Eastern District of Pennsylvania
601 Walnut St.
Curtis Center, Suite 545-W
Philadelphia, PA 19106
215-928-0520
aren_adjoian@fd.org

Dated: December 21, 2022