

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

Capital Habeas Unit

FEDERAL COURT DIVISION - DEFENDER ASSOCIATION OF PHILADELPHIA

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HELEN A. MARINO
INTERIM CHIEF FEDERAL DEFENDER

February 22, 2023

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 February 22, 2023, following two prior extensions. Respondent has made substantial progress in drafting his brief in opposition but 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 included the investigation, research, and filing of a lengthy petition for writ of habeas corpus in another capital case that was due last month. 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 third and final thirty (30) day extension of time within which to prepare and file the brief in opposition. Counsel has no intention of requesting any further extensions. Undersigned counsel has reached out by email and telephone to consult with counsel for Petitioner, Melody J. Brown, as to Petitioner's position on this request, but has not yet heard back as of the filing of this motion.

Respectfully,

/s/ Aren Adjoian

Aren Adjoian
Supervisory Assistant Federal Defender

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

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
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/s/ Aren Adjoian
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Dated: February 22, 2023