

ROB BONTA
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DEPARTMENT OF JUSTICE



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July 27, 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: *Sanchez v. Broomfield*
Supreme Court of the United States, Case No. 22-5109 (capital case)
Request for Extension of Time to File Brief to a Response to Petition for Writ of
Certiorari

Dear Mr. Harris:

We are counsel for the respondent, Ron Broomfield, Warden. A petition for a writ of certiorari in this case was filed on July 11, 2022, and docketed on July 15. A response is currently due by August 15. 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 September 14, 2022. This is respondent's first request for an extension of time to file a response.

At the time the petition in this case was filed, Rachelle Newcomb was editing the interrogation law chapter of the California Peace Officers Legal Sourcebook. Rachelle was also, and still is, fulfilling her duties as a reviewer and advisor regarding all cases raising interrogation law issues and all California Supreme Court cases pending from the Sacramento and Fresno Appeals, Writs, and Trials Section of our office. Rachelle has not yet been able to devote significant time to the response in the instant case.

Since the petition in this case was filed, Jamie Scheidegger has filed briefs in the California Court of Appeal in *People v. Jorn* (No. C093823), *People v. Gooding* (No. C095700), *People v. Challe* (No. C095700), and *In re Eales* (C095965). In addition to her own cases, Jamie has been serving as the co-supervisor of the law student summer program. Part of her duties include assisting law students as they draft briefs in the California Court of Appeal. Like Rachelle, Jamie has not been able to devote adequate time to draft the response in the instant case.

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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.

Accordingly, we respectfully request that the existing due date for the response to the petition for writ of certiorari be extended to September 14, 2022. Counsel for petitioner, David Harshaw, has stated that he does not oppose this request.

Sincerely,

/s/ Rachelle A. Newcomb

RACHELLE A. NEWCOMB
Deputy Attorney General

/s/ Jamie A. Scheidegger

JAMIE A. SCHEIDEGGER
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