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September 12, 2022

Via E-File

Honorable Scott S. Harris Clerk of the Court Supreme Court of the United States One First Street, N.E. Washington, D.C. 20543

Re: Gabriel Paul Hall v. Texas, No. 22-5487 (Capital Case)

Dear Mr. Harris:

In accordance with Supreme Court Rule 30.4, Respondent the State of Texas respectfully moves for an extension of the time for filing the response to the petition for a writ of certiorari in this matter.

Petitioner filed a petition for a writ of certiorari on August 29, 2022. It was docketed on September 1, 2022, creating a deadline for Respondent's response of October 3, 2022. Respondent requests a 60-day extension of that deadline, creating a new filing date of December 2, 2022.

My staff reached out to counsel for Petitioner via email to ask for Petitioner's position on this motion. Petitioner's counsel advised that the requested extension is unopposed.

The extension is necessary because lead counsel for Respondent faces additional briefing and argument obligations. The press of business from numerous, complex matters with deadlines overlapping with the current deadline requires significant time and attention from undersigned counsel and counsel assisting with this matter:

• Texas v. Cook County, No. ____ (U.S.) (petition for a writ of certiorari filed Sept. 9, 2022)

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- Haaland v. Brackeen, No. 21-376 (U.S.) (reply brief due Oct. 3, 2022)
- Haaland v. Brackeen, No. 21-376 (U.S.) (oral argument on Nov. 9, 2022)
- Reed v. Goertz, No. 21-442 (U.S.) (oral argument on Oct. 11, 2022)
- McFarland v. Lumpkin, No. 22-5236 (U.S.) (brief in opposition due Sept. 30, 2022)
- Brooks v. Abbott, No. 22-136 (U.S.) (response to jurisdictional statement due Oct. 11, 2022)
- United States v. Texas, No. 22-58 (U.S.) (respondent's brief due Oct. 18, 2022)
- United States v. Texas, No. 22-58 (U.S.) (oral argument during week of Nov. 28, 2022)
- Office of the Attorney General v. Brickman, No. 21-1027 (Tex.) (reply brief on the merits due Sept. 30, 2022)
- Texas Tech University Health Sciences Center El Paso v. Niehay, No. 22-0179 (Tex.) (brief on the merits due Nov. 2, 2022)

For the foregoing reasons, Respondent respectfully requests a 60-day extension of the deadline to file the response to the petition for a writ of certiorari, creating a new deadline of December 2, 2022.

Respectfully submitted.

/s/ Judd E. Stone II

Judd E. Stone II Solicitor General Counsel of Record

cc: Robert C. Owen (via e-mail, robowenlaw@gmail.com)