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June 15, 2023

Mr. Scott S. Harris, Clerk  
Supreme Court of the United States  
One First Street, NE  
Washington, DC 20543

Re: Application for Extension of Time to File Response to Petition for Writ of Certiorari in *Lamont McKoy v. Todd Ishee, Secretary, North Carolina Department of Adult Correction*, No. 22-7270

Dear Mr. Harris:

I am counsel of record for Respondent in *Lamont McKoy v. Todd Ishee, Secretary, North Carolina Department of Adult Correction*, No. 22-7270. This Court has requested that Respondent file a response to the petition for writ of certiorari in this case. The response is due on or before July 7, 2023. Respondent has requested one previous extension of time.

Pursuant to Supreme Court Rule 30(4), Respondent respectfully requests an extension of thirty days until August 7, 2023, to file the response. The basis for this request is that undersigned counsel was assigned this week to handle the response after a conflict arose for prior counsel of record Special Deputy Attorney General Kimberly N. Callahan. Undersigned counsel requests an extension of time to allow sufficient opportunity to review the case materials and draft the response. In addition to this matter, undersigned counsel also has a reply brief due June 19, 2023, in the North Carolina Supreme Court in *State of North Carolina v. Phillip Daw*, 174PA21; a record on appeal due July 3, 2023, in the North Carolina Court of Appeals in the State's appeal of *State of North Carolina v. Frederick Robinson*, 19CRS77972-73; a response to a federal petition for writ of habeas corpus due July 5, 2023, in the Eastern District of North Carolina in *Andre D. Vines v. Todd Ishee, Secretary, North Carolina Department of Adult Correction*, No. 5:23-hc-2031-BO; and a brief due July 14, 2023, in the North Carolina Court of Appeals in *State of North Carolina v. James Robinson*, COA23-365, involving a multi-week trial and multiple counts of first-degree murder.

Thank you for your attention to this matter.

Sincerely,

Heidi M. Williams  
Assistant Attorney General  
\*Counsel of Record

CERTIFICATE OF SERVICE

I, Heidi M. Williams, Assistant Attorney General for Respondent and a member of the bar of this Court, hereby certify that on June 15, 2023, a copy of the State of North Carolina's LETTER OF MOTION REQUESTING AN EXTENSION OF TIME TO FILE RESPONSE TO PETITION FOR WRIT OF CERTIORARI, was served on petitioner's counsel of record, Jamie T. Lau, Wrongful Convictions Clinic, Duke University School of Law, Box 90360, 210 Science Drive, Durham, North Carolina, 27708, by first class mail, postage prepaid. I further certify that all parties required to be served have been served.

This the 15th day of June, 2023.



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