# FEDERAL PUBLIC DEFENDER

## FOR THE NORTHERN DISTRICT OF TEXAS

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Via Electronic Filing and Federal Express

August 4, 2023

Denise McNerney Merits Cases Clerk United States Supreme Court 1 First Street, N.E. Washington, D.C. 20543

Re: *United States v. Zackey Rahimi*, No. 22-915: Request for Extension of Time to File Respondent's Merits Brief

Dear Ms. McNerney:

I write to request an extension of time to file Respondent's Brief on the Merits until September 27, 2023. I have conferred with opposing counsel who agreed to this request.

The Court granted the petition for certiorari on June 30, making Petitioner's Brief on the Merits due on or before August 14. S. Ct. R. 25.1. Respondent's brief would normally be due "within 30 days after" Petitioner's brief. R. 25.2. I am set to appear at oral argument in the Fifth Circuit on September 8 in *United States v. Kerstetter*, No. 22-10253, and at a re-sentencing hearing in the Northern District of Texas on September 12 in *United States v. Jimenez*, No. 2:16-cr-83. Both are complex cases, and it would be difficult or impossible for someone else in my office to take over as lead counsel.

Given my responsibilities in those two cases, I need additional time to prepare an adequate brief in this case.

## Respectfully submitted,

### /s/ J. Matthew Wright

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