



ATTORNEY GENERAL OF WASHINGTON

Solicitor General Division
PO Box 40100 • Olympia WA 98504-0100 • (360) 753-6200

March 6, 2020

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

RE: *States of Montana and Wyoming v. State of Washington*, No. 22O152

Dear Mr. Harris:

I am counsel of record for defendant State of Washington in this case. A response to the Motion for Leave to File Bill of Complaint, Bill of Complaint, and Brief in Support currently is due on March 24, 2020.

Pursuant to Rule 30.4, the State of Washington requests a 45-day extension to file a brief in opposition, to May 8, 2020. Counsel for plaintiffs Montana and Wyoming has informed us that they do not object to the extension.

This request for additional time is made to accommodate other concurrent deadlines, particularly briefing and oral argument in *Chiafalo v. Washington*, No. 19-465 (U.S.), in which the State's merits brief is due April 1, 2020, with oral argument April 28, 2020. The State's small team of attorneys that work on U.S. Supreme Court matters will be extremely busy with that case through the argument, and will also be filing a brief in opposition in *Living Essentials, LLC v. Washington*, No. 19-988 (U.S.), currently due March 30, 2020, and a brief in opposition in *Njonge v. Gilbert*, No. 19-7426 (U.S.), currently due April 1, 2020. The State is requesting extensions in those cases as well. We will also be briefing and arguing several pending cases in the Washington Supreme Court in the meantime. We anticipate that the requested extension will allow sufficient time to provide the Court with a more thorough and helpful response.

Thank you for your consideration of this request.

Sincerely,

Noah Guzzo Purcell
Solicitor General
(360) 753-6200

wro

cc: Dale Schowengerdt, Counsel of Record for Plaintiffs Montana and Wyoming