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**Via Electronic Filing**

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

**Re: No. 23-1004 (Capital Case), *Moises Sandoval Mendoza v. Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division***

Dear Mr. Harris:

Under Supreme Court Rule 30.4, respondent Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division, respectfully moves for an extension of time to file his response to the petition for a writ of certiorari in this matter.

The response is currently due April 12, 2024. Respondent requests a thirty-day extension of time to file his response, which results in a new filing date of May 13, 2024. This is respondent's first request for an extension. My office conferred with petitioner's counsel on March 21, 2024, and counsel indicated that petitioner does not oppose the requested extension.

The extension is necessary because counsel for respondent has faced numerous briefing and argument obligations since the petition was filed. The press of business from those numerous, complex matters with deadlines overlapping with the current deadline has required, and will require, significant time and attention from the undersigned counsel and other counsel assisting with this matter. Such matters include:

- Oral argument in this Court on March 20 in *Texas v. New Mexico*, No. 220141;

- Oral argument in the United States Court of Appeals for the Fifth Circuit on March 20 regarding the motion for a stay pending appeal in *United States v. Texas*, No. 24-50149;
- Appellees' brief in *Texas v. Biden*, No. 23-40671, due in the Fifth Circuit on March 22;
- Appellants' reply brief on the merits in *United States v. Texas*, No. 24-50149, due in the Fifth Circuit on March 26;
- Oral argument in the Fifth Circuit on April 3 regarding the merits in *United States v. Texas*, No. 24-50149; and
- Appellees' response brief in *Yelp v. Paxton*, No. 24-581, due in the United States Court of Appeals for the Ninth Circuit on April 12.

For these reasons, respondent respectfully requests a thirty-day extension of the deadline to file a response to the petition for a writ of certiorari, creating a new deadline of May 13, 2024.

Respectfully submitted.

/s/ Aaron L. Nielson

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