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**VIA ELECTRONIC FILING**

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

Re: *Erwin v. Howell*, No. 23-260

Dear Mr. Harris,

The petition for writ of certiorari in this matter was filed on August 31, 2023. The Court requested a response on October 16, 2023. Respondent's brief in opposition is due on November 15, 2023.

Pursuant to Supreme Court Rule 30.4, Respondent respectfully requests a 30-day extension to file her response, up to and including December 15, 2023. The undersigned counsel requires additional time due to counsel's workload, pressing court deadlines in other matters, and teaching obligations at the UCLA School of Law. Respondent has not previously sought an extension.

Sincerely,

/s/ Megha Ram  
Megha Ram  
*Counsel of Record for Respondent Karla Howell*

cc: John Barry Welch (Counsel for Petitioner) (via email)