

JOSH STEIN
ATTORNEY GENERAL



TERESA M. POSTELL
SPECIAL DEPUTY ATTORNEY GENERAL
APPELLATE & POST CONVICTION SECTION
(919) 716-6558
tpostell@ncdoj.gov

February 27, 2024

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 *Jonathan Douglas Richardson v. State of North Carolina*
No. 23-6804

Dear Mr. Harris:

I am counsel of record for Respondent in *Jonathan Douglas Richardson v. State of North Carolina*, No. 23-6804. 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 March 22, 2024. Respondent has not requested any previous extensions of time.

Pursuant to Supreme Court Rule 30(4), Respondent respectfully requests an extension of sixty days until May 21, 2024, to file the response. Undersigned counsel requests an extension of time to allow sufficient opportunity to draft the response. In addition to this matter, undersigned counsel has: just today, February 26, 2024, filed a response to a petition for writ of certiorari in the North Carolina Supreme Court in *State of North Carolina v. Eddie Taylor*, No. 718A05-2, a post-conviction first-degree murder death penalty case; has an upcoming status conference on March 5, 2024, in the Johnston County post-conviction first-degree murder death penalty case of *State of North Carolina v. Angel Guevara*, No. 95 CRS 12695-96; has two briefs due in the North Carolina Court of Appeals on 18 March, 2024, one for the case of *State of North Carolina v. Garry Gupton*, No. COA23-661, a first-degree murder and first-degree arson case, and another for the case of *State of North Carolina v. Betty Bryant*, No. COA23-988, a first-degree arson case; has three scheduled oral arguments in the North Carolina Supreme Court, two set for argument on April 9, 2024, one in *State of North Carolina v. Bryan Bell*, No. 86A02-2, a post-conviction first-degree murder death penalty case and another in *State of North Carolina v. Antwaun Sims*, No. 297PA18, a juvenile first-degree murder life without parole case, and one set for April 17, 2024, in *State of North Carolina v. Davenport*, No. 155PA22, a first-degree murder case; and has an answer due to a motion for appropriate relief in Rowan County Superior Court in *State of North Carolina v. William Barnes*, No. 92 CRS 11151-52, a post-conviction double first-degree murder case that was previously subject to two death verdicts that are now being served as life without parole, due May 6, 2024.

Thank you for your attention to this matter.

Sincerely,



Teresa M. Postell
Special Deputy Attorney General
*Counsel of Record

CERTIFICATE OF SERVICE

I, Teresa M. Postell, Special Deputy Attorney General for Respondent and a member of the bar of this Court, hereby certify that on February 27, 2024, 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, Glenn Gerding, James R. Grant, and Kathryn L. VandenBerg, Office of the Appellate Defender, 123 West Main Street, Suite 500, Durham, NC 27701, by first class mail, postage prepaid. I further certify that all parties required to be served have been served.

This the 27th day of February, 2024.



Teresa M. Postell
Special Deputy Attorney General

North Carolina Department of Justice
Post Office Box 629
Raleigh, North Carolina 27602
(919) 716-6558
tpostell@ncdoj.gov
*Counsel of Record

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