



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

June 24, 2024

Mr. Scott S. Harris, Clerk  
The Supreme Court of the United States  
One First Street, NE  
Washington, D.C. 20543

RE: *Wade Lay v. Christe Quick, Warden*, Case No. 23-7612

Dear Mr. Harris,

Pursuant to Rule 30.4 of the Rules of the Supreme Court, undersigned counsel hereby requests an extension of time in which to respond to the petition for writ of certiorari in the above-captioned case. This extension is justified for the following reasons.

The petition was filed in this Court on March 26, 2024. The brief in opposition is due on July 3, 2024. Counsel for Ms. Quick will not be able to complete the brief in opposition by the filing deadline. Undersigned counsel is an attorney on the Capital Appeals team within the Criminal Appeals Unit of the Oklahoma Attorney General's Office, and as such, undersigned is assigned co-counsel in upcoming clemency and execution proceedings for death row inmate Emmanuel Antonia Littlejohn, *see Emmanuel A. Littlejohn v. The State of Oklahoma*, Okla. Crim. App. Case No. D-2000-1609. Although Mr. Littlejohn's execution is not yet scheduled, the State anticipates his execution to be set for the autumn of 2024, with his clemency hearing to be held in the first week of August, 2024, and the State's clemency packet to be due the last week of July, 2024. Preparation for this case will consume much of the undersigned's time over the coming weeks.

Furthermore, since the petition for writ of certiorari was filed in this case, the undersigned filed the Brief of Appellee in *Marquillion Quamay Hogan v. The State of Oklahoma*, Okla. Crim. App. Case No. F-2023-658, on May 22, 2024. Undersigned counsel is also assigned and working on the Response to Petition for Writ of Habeas Corpus in *Erich Dwayne Colliver v. David Rogers, Warden*, United States District Court for the

Northern District of Oklahoma Case No. 24-cv-198-CVE-SH, which the undersigned intends to file on or before July 1, 2024. Undersigned counsel is also assigned and working on the Brief of Appellee in *Trevynn Conley v. The State of Oklahoma*, Okla. Crim. App. Case No. F-2022-1023, which the undersigned intends to file on or before July 10, 2024.

Moreover, on May 6, 2024, the undersigned appeared as lead counsel for the State of Oklahoma before the Oklahoma Pardon and Parole Board to protest the Stage II parole request of Thomas Jesse Ward, a state prisoner serving a life sentence for the 1984 robbery, abduction, and murder of a store clerk in Ada, Oklahoma. *See Thomas Jesse Ward v. The State of Oklahoma*, Okla. Crim. App. Case No. F-1990-17. This also included submitting a written protest letter to the Pardon and Parole Board on April 30, 2024. On May 7, 2024, the Board voted 3-1 to deny Mr. Ward's bid for parole.

Additionally, undersigned counsel serves as the coordinator for the officewide intern program at the Oklahoma Attorney General's Office. The summer program officially began at the start of June, and as such, the undersigned's day-to-day responsibilities as the program coordinator have increased and will continue to remain at a higher-than-normal level until the beginning of August.

For all of the foregoing reasons, Ms. Quick respectfully requests an additional thirty (30) days, or until August 2, 2024, within which to file the brief in opposition. This request is made in good faith and not for the purpose of any delay.

Respectfully submitted,

**GENTNER F. DRUMMOND**  
**ATTORNEY GENERAL OF OKLAHOMA**

**s/ JOSHUA R. FANELLI\***  
**JOSHUA R. FANELLI, OBA #33503**  
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