

HUSCH BLACKWELL

Jeff Nobles
Senior Counsel

600 Travis Street, Suite 2350
Houston, TX 77002
Direct: 713.525.6239
Fax: 713.647.6884
jeff.nobles@huschblackwell.com

October 10, 2023

VIA E-FILE

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

Re: *Shannon Daves et. al., v. Dallas County, Texas, et. al.*, No. 23-97

Dear Mr. Harris:

As counsel of record for respondents Dallas County, Texas and the Dallas County Criminal Court Judges in the above-captioned case, I am writing pursuant to Supreme Court Rule 30.4 to request an extension of time to file a response to the petition for writ of certiorari in this case. Petitioner filed a petition for writ of certiorari on July 29, 2023. It was docketed on July 31, 2023. This Court requested a response on September 25, 2023, setting a due date for the response of October 25, 2023.

Respondents respectfully a 30-day extension of time, creating a new filing date of November 24, 2023. This is Respondents' first request for an extension. An extension is necessary because I have been engaged with the press of previously assigned matters with proximate due dates, including the following:

- Counsel prepared and filed a reply in the Supreme Court of Texas on October 9, 2023.
- Counsel has filed a motion for the entry of a final judgment following a jury trial in the 281st District Court of Harris County, which is set for oral hearing on October 17, 2023.
- Counsel has a motion for rehearing due in the Supreme Court of Texas on October 9, 2023, for which he has requested an extension until October 19, 2023.

HUSCH BLACKWELL

October 10, 2023

Page 2

- Counsel has a reply brief due in the United States Court of Appeals for the Fifth Circuit on October 16, 2023.
- Counsel has a reply due in the Supreme Court of Texas on October 16, 2023.

My colleague reached out to counsel for Petitioner via e-mail to ask for Petitioner's position on this motion. Petitioner's counsel advised that he consents to the requested extension.

For the foregoing reasons, Respondents respectfully request a thirty-day extension up to, and including, November 24, 2023.

Respectfully submitted,

/s/ Jeff Nobles

Jeff Nobles

Texas Bar No. 15053050

jeff.nobles@huschblackwell.com

600 Travis Street, Suite 2350

Houston, Texas 77002

Tel: 713-525-6200

Fax: 713-647-6884

Counsel for Dallas County, Texas and the
Dallas County Criminal Judges

Cc: See Attached Service List

October 10, 2023

Page 3

23-97

Shannon Daves, et al. v. Dallas County, Texas, et al.

Daniel Stephen Volchok
Counsel of Record for Petitioners
Wilmer Cutler Pickering Hale and Dorr LLP
2100 Pennsylvania Avenue, NW
Washington, DC 20037
daniel.Volchok@wilmerhale.com

Lanora Christine Pettit
Counsel of Record for Respondents Judge Ernest White, et al.
Office of the Texas Attorney General
P.O. Box 12548 (MC059)
Austin, TX 78701-2548
lanora.pettit@oag.texas.gov