

FLOWERS ♦ DAVIS, P.L.L.C.

CELIA C. FLOWERS

MELANIE S. REYES
WILLIAM R. KNIGHT, JR.
J. SCOTT MILLER
CATHERINE CHESLEY GOODGION
COREY R. KELLAM
MAYA P. JEDLICKA
PAUL H. BROWN
LACI R. STOVALL
MICHAEL R. CARNEY
ALAN W. TOMME, OF COUNSEL
A. D. (DEAN) CHAPMAN, OF COUNSEL
THOMAS H. BUCHANAN, OF COUNSEL

1021 ESE LOOP 323, SUITE 200
TYLER, TEXAS 75701
MAIN TELEPHONE: (903) 534-8063
FACSIMILE: (903) 534-1650
WWW.FLOWERSDAVIS.COM

LONGVIEW OFFICE:
1516 JUDSON ROAD
LONGVIEW, TEXAS 75601
TELEPHONE: (903) 757-8900
FACSIMILE: (903) 757-8902

DALLAS OFFICE:
1200 MAIN ST., SUITE 208
DALLAS, TEXAS 75202
TELEPHONE: (214) 205-6146

ROBERT S. DAVIS

CHAD C. ROOK
LEE I. CORREA
PRESTON W. McGEE
ROBIN H. O'DONOGHUE
J. MITCHELL BEARD
JOHN "JACK" R. FULGHAM
R. CASEY O'NEILL
STEVE M. MASON, OF COUNSEL

IMMIGRATION:

VIRGINIA D. YOUNG
DANIEL C. ROSS
HA H. KUMMERFELD
TELEPHONE: (903) 592-8186

May 15, 2024

The Honorable Scott Harris
Clerk of Court
Supreme Court of the United States
1 First Street, NE
Washington, District of Columbia 20543

Via E-file

RE: Request for extension of time to file a response to the petition
Docket No. 23-972 *Angela Germaine Spencer, By and Through Next
Friend and Mother of A.S., a Minor, Petitioner v. Harrison County, Texas*

Dear Mr. Harris,

I am counsel for Respondent Harrison County, Texas ("Respondent"), in this case. Petitioners filed their Petition on March 1, 2024. On April 18, 2024, the Court requested a response. Absent an extension, Respondent's response is due on May 20, 2024. Pursuant to Rule 30.4, Respondent respectfully requests that the time for filing a response be extended twenty-three (23) days, making the due date June 12, 2024.

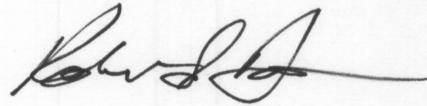
This request for an extension is Respondent's first. Good cause exists for the requested extension. Counsel for Respondent has been working diligently to prepare the response, but needs additional time to complete, print and file Respondent's Response. Counsel has been in trial prep for Cause No. 20-0054 in the 71st Judicial District Court of Harrison County, Texas and Cause No. 183-18 in the 115th Judicial District Court of Upshur County, Texas, in which jury selection for trial began on May 13, 2024 and is expected to continue all week. In addition, Counsel has had several overlapping deadlines in other professional matters during the existing time for preparation of Respondent's Response. Counsel also had to miss a week of work due to having a surgical procedure in Dallas, Texas that required recovery time.

The requested extension is necessary to ensure Respondent and Counsel have an adequate opportunity to review and respond to the Petition. Counsel has conferred with Petitioner on May 14, 2024, and Counsel for Petitioner is unopposed to this extension. Accordingly, Respondent requests a twenty-three (23) day extension of time to file their

Response, making the due date June 12, 2024.

Thank you for your attention to this matter,

Very truly yours,



Robert S. Davis
Flowers Davis, PLLC
1021 ESE Loop 323, Suite 200
Tyler, Texas 75701
(903) 534-8063
rsd@flowersdavis.com

RSD/lnr

cc: Martin J. Cirkiel
Cirkiel Law Group, PC
1901 East Palm Valley Boulevard
Round Rock, Texas 78664

Via CMRRR:

Robert A. Long
Covington & Burling, LLP
One City Center
850 Tenth Street, NW
Washington, District of Columbia 20001

Via CMRRR:

Xiao Wang, Counsel of Record
University of Virginia
School of Supreme Court Litigation Clinic
580 Massie Road
Charlottesville, Virginia 22903

Via CMRRR: