



January 23, 2025

Honorable Scott Harris
Clerk of the Court
Supreme Court of the United States
Washington, DC 20543

VIA USPS FIRST-CLASS MAIL

Re: *Willie Cory Godbolt v. Mississippi, No. 24-6257*

Dear Mr. Harris,

I am counsel for the Respondent, the State of Mississippi ("the State"), in the above-referenced case. Willie Cory Godbolt, a Mississippi death row inmate, filed a Petition for Writ of Certiorari with the Court on August 21, 2024. His Petition was not docketed until January 10, 2025. Absent an extension, the State's response is due February 10, 2025. The State respectfully requests that the time for filing a response be extended by thirty days, making it due March 12, 2025.

The State needs more time to prepare an adequate response. This is the State's first request for more time. Good cause exists for granting this request. Undersigned counsel's competing obligations, deadlines, and assistance in other state and federal capital cases prevents her from completing the response before the current deadline. For example, undersigned counsel has pending motions to set execution and related pleadings in *Richard Gerald Jordan v. State*, No. 1998-DP-00901-SCT (Miss.), No. 2022-DR-01243-SCT (Miss.), No. 2024-DR-01272-SCT (Miss.) and *Willie Jerome Manning v. State*, 1995-DP-00066-SCT (Miss.), No. 2023-DR-01076-SCT (Miss.). Undersigned counsel is also preparing a Brief in Opposition to Successive Petition for Post-Conviction Relief in *Xavier Brown v. State*, 2017-DR-01317-SCT (Miss.). Counsel also represents the State in two capital cases pending before the Fifth Circuit—*Grayson v. Fitch*, No. 25-70001 (5th Cir.) and *Pitchford v. Cain*, No. 23-70009 (5th Cir.).

The requested extension is necessary to ensure the State has an adequate opportunity to review and respond to the Petition for Writ of Certiorari in light of counsel's other commitments. The requested extension will also better enable undersigned counsel to prepare a response that will be most helpful to the Court. Granting it will not prejudice Godbolt. And it is not made in bad faith, to create delay, or for any other improper purpose.



Lynn Fitch

ATTORNEY GENERAL

CRIMINAL LITIGATION

Accordingly, the State respectfully requests a thirty-day extension of time, until March 12, 2025, to file a response to Godbolt's Petition for Writ of Certiorari.

Sincerely,

Allison K Hartman

Allison Kay Hartman
Special Assistant Attorney General
Mississippi Attorney General's Office
Counsel for Respondent



Lynn Fitch

ATTORNEY GENERAL
CRIMINAL LITIGATION

CERTIFICATE OF SERVICE

Undersigned counsel certifies that one true copy of the foregoing letter motion for more time has been served on Willie Cory Godbolt, who filed the Petition for Writ of Certiorari *pro se*, and on Greg Spore, his appointed appellate counsel, by USPS first-class mail:

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This, the 23rd day of January, 2025.

LYNN FITCH
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