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July 23, 2025

Via Electronic Filing and Electronic Mailing

Hon. Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, NE
Washington, DC 20543-0001

**Re: Second request for extension of time to file brief in opposition
Atkins v. Bean, No. 24-7302 (Capital Case)**

Dear Mr. Harris:

I am counsel of record for the Respondents/Appellees in this matter. On June 23, 2025, Respondents filed a request to extend the deadline to file the brief in opposition by thirty-one (31) days, to and including July 28, 2025. This Court granted the extension. I now ask for a thirty (30) day extension, to and including August 27, 2025, within which to file my brief in opposition.

This is Respondents' second request for an extension of time to file the brief in opposition. Good cause for an extension exists because I have continued to work on the death penalty answering brief in the Ninth Circuit death penalty case *Blake v. Bean*, No. 23-99001 (9th Cir.), which must be completed by August 14, 2025, among other federal matters. I have also spent a great deal of time assisting in the preparation of a death penalty answering brief in *Williams v. Royal*, No. 23-99006 (9th Cir.), which spanned 164 pages, and the opening brief in *Sjoberg v. Henley*, No. 25-1565 (9th Cir.), which will be filed this week. I also provided a training on extraditions to local prosecutors and law enforcement on Friday, July 18, 2025, which required some advance preparation, and an internal death penalty training for deputies on July 1. In the coming month, beyond completing the *Blake* answering brief, I have several other matters that have been postponed, including an answer in the former capital case *Hill v. Gittere*, No. 2:98-cv-0194-KJD-DJA (U.S. Dist. Ct. of Nevada), which I have worked on intermittently, and will be out on vacation July 25-29, and working out of the office August 13-15. I will also provide a training on August 12, 2025, to a local prosecutor's office on the calculation of state inmate sentences by the Nevada Department of Corrections. Finally, I have continued to experience medical

difficulties stemming from allergy-related issues for over three months that at times limits my air intake and impacts my concentration.

Nevertheless, I have made significant progress on my brief in opposition but require additional time to complete my response. In light of the considerable time and attention required by other matters and this one, Respondents need additional time to complete the brief in opposition.

Counsel for Petitioner Atkins, A. Richard Ellis, informed me by electronic mail that he does not oppose this request for additional time.

Sincerely,

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