

JEFF JACKSON
ATTORNEY GENERAL



HEIDI M. WILLIAMS
SPECIAL DEPUTY ATTORNEY GENERAL
APPELLATE & POST CONVICTION SECTION
(919) 716-6582
hwilliams@ncdoj.gov

June 17, 2025

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

Re: Application for Extension of Time to File Response to Petition for Writ of
Certiorari in *Seaga Edward Gillard v. State of North Carolina*, No. 24-7346

Dear Mr. Harris:

I am counsel of record for Respondent in *Seaga Edward Gillard v. State of North Carolina*, No. 24-7346. The response in this capital case is due on or before July 3, 2025. Respondent has not requested any previous extensions of time.

Pursuant to Supreme Court Rule 30(4), Respondent respectfully requests an extension of sixty days until Monday, September 1, 2025, to file the State's response. The basis for this request is that undersigned counsel is currently handling a substantial caseload and anticipates being out of the office on medical leave for most of July. In the past month, undersigned counsel has filed briefs on behalf of the State of North Carolina in *State v. Walker*, COA25-732 (juvenile homicide offender sentenced to life without parole); *State v. Tello*, COA24-670 (sex offenses against children); and *State v. Benton*, COA25-92 (child abuse). In addition to the brief in opposition in this case, undersigned counsel also has appellate briefs due in the North Carolina Court of Appeals on July 7, 2025, in *State v. Villareal*, COA25-219; on July 11, 2025, in *State v. Madsen*, COA25-52; and on July 14, 2025, in *State v. Rogers*, COA25-337. Undersigned counsel has a surgery scheduled for July 7, 2025, and anticipates being out of the office on medical leave for most of the remainder of the month. Undersigned counsel has spoken to Petitioner's Counsel of Record, Amanda S. Zimmer, about this request, and Ms. Zimmer has indicated that Petitioner does not oppose Respondent's request for a sixty-day extension of time.

Thank you for your attention to this matter.

Sincerely,

Heidi M. Williams
Special Deputy Attorney General
*Counsel of Record

CERTIFICATE OF SERVICE

I, Heidi M. Williams, Special Deputy Attorney General for Respondent and a member of the bar of this Court, hereby certify that on June 17, 2025, a copy of the State of North Carolina's LETTER OF MOTION REQUESTING AN EXTENSION OF TIME TO FILE RESPONSE TO PETITION FOR WRIT OF CERTIORARI, was served on Petitioner's Counsel of Record, Amanda S. Zimmer, Office of the Appellate Defender, 123 West Main Street, Suite 500, Durham, NC 27701, by first class mail, postage prepaid. I further certify that all parties required to be served have been served.

This the 17th day of June, 2025.



Heidi M. Williams
Special Deputy Attorney General

North Carolina Department of Justice
Post Office Box 629
Raleigh, North Carolina 27602
(919) 716-6582
hwilliams@ncdoj.gov
*Counsel of Record

HMW/sna