



U.S. Department of Justice

Office of the Solicitor General

Washington, D.C. 20530

June 20, 2025

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
Washington, D.C. 20543

Re: Joe Fernandez v. United States, No. 24-556
Daniel Rutherford v. United States, No. 24-820
Johnnie Markel Carter v. United States, No. 24-860

Dear Mr. Harris:

All three of the above-captioned cases concern the interpretation of the phrase “extraordinary and compelling reasons” in 18 U.S.C. 3582(c)(1)(A)(i). Because of the press of other matters, and with the understanding that the cases may be calendared for oral argument in the Court’s November sitting, the parties in each of these cases respectfully request the following extensions of time within which to file their principal merits briefs.

In No. 24-556, the petition for a writ of certiorari was granted on May 27, 2025, and petitioner’s opening brief is currently due on July 11, 2025. The parties in No. 24-556 respectfully request, under this Court’s Rule 30.4, that the time within which to file petitioner’s brief (and the joint appendix) be extended to and including August 4, 2025, and that the time within which to file respondent’s brief be extended to and including September 25, 2025. The parties in No. 24-556 consent to this briefing schedule.

In Nos. 24-820 and 24-860, which have been consolidated, the petitions for writs of certiorari were granted on June 6, 2025, and petitioners’ opening briefs are currently due on July 21, 2025. The parties in Nos. 24-820 and 24-860 respectfully request, under this Court’s Rule 30.4, that the time within which to file petitioner’s brief (and the joint appendix) in each of the two consolidated cases be extended to and including August 8, 2025, and that the time within which to file respondent’s brief in each of the two consolidated cases be extended to and including September 25, 2025. All parties in Nos. 24-820 and 24-860 consent to this briefing schedule.

Sincerely,

D. John Sauer
Solicitor General

cc: See Attached Service List

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