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June 28, 2018

The Honorable Scott S. Harris, Clerk
Supreme Court of the United States
Office of the Clerk
One First Street, N. E.
Washington, D. C. 20543-0001

Re: United States v. Haymond,
U.S.S.C. No. 17-1672

Dear Mr. Harris,

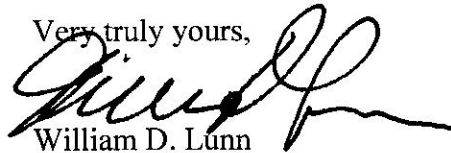
I have served as counsel of record for Respondent Andre Ralph Haymond in the Tenth Circuit Court of Appeals. I have submitted, contemporaneous with this letter, an entry of appearance in the above-styled case docketed with the Court. I am writing pursuant to Rule 30.4 to request a 30-day extension of time to file Respondent's brief in opposition to certiorari.

The petition for certiorari was docketed on June 15, 2018. Respondent's opposition is currently due on July 16, 2018. This case arises from a judgment first entered by the Tenth Circuit Court of Appeals on August 31, 2018. The United States initially sought a 30-day extension to file a petition for rehearing *en banc* with the circuit court, which was granted. The petition for rehearing was denied on January 16, 2018. The first deadline for the United States to file its petition for certiorari was April 16, 2018. This deadline was first extended 30 days at the request of the United States to May 16, 2018. A second extension of 30 days was sought by the United States to extend the filing deadline to June 15, 2018. This is Respondent's first request for an extension of time, and if the requested extension of time is granted, the Respondent brief in opposition will be due on August 15, 2018. The Respondent is not in custody.

Respondent requests this extension of time because of the extensive research required to respond to the petition filed by the United States and because of numerous prior obligations of Respondent's counsel. Respondent's counsel is a solo practitioner. Although he has submitted petitions for certiorari on behalf of other clients, he has not responded to a petition filed by the United States in any previous case. Because of the extensions requested by the United States, counsel was not certain a petition actually would be filed, and he maintained his practice. In the nine business days since the

petition was filed, counsel has appeared in five hearings in four different counties in northeastern Oklahoma as well as a hearing in federal court in a drug conspiracy case. He has also participated in two depositions in another county probate case. This previously-set schedule has impacted his ability to research cases cited in the certiorari petition. Respondent's counsel has briefs due within the next month in two Tenth Circuit cases. He continues to have cases scheduled in federal and state courts locally in the coming weeks. Respondent will nevertheless be able to clear his schedule in the coming weeks to prepare the certiorari response brief. Respondent's counsel has consulted with counsel in the Washington, D. C. area who may ultimately assist him in the preparation and presentation of the certiorari response brief and an answer brief, should certiorari be granted.

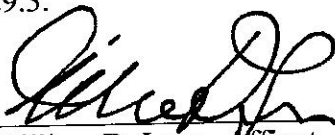
Mr. Christopher Michel with the Solicitor General's office has been informed of this request and has no opposition to the 30-day extension request. Thank you for your assistance in this matter.

Very truly yours,

William D. Lunn

PROOF OF SERVICE

STATE OF OKLAHOMA)
) ss:
COUNTY OF TULSA)

WILLIAM D. LUNN, being first duly sworn, deposes and states: That pursuant to Rule 29.4(a) of this Court, he served the above REQUEST FOR EXTENSION TO FILE RESPONDENT'S BRIEF IN OPPOSITION TO CERTIORARI on the counsel by enclosing a copy thereof in an envelope, First Class Postage Prepaid, addressed to Mr. Noel J. Francisco, Solicitor General and Counsel of Record, 950 Pennsylvania Avenue NW, Washington, D.C. 205-0001 and depositing same in the United States mails at Tulsa, Oklahoma on June 28, 2018, and an electronic version of the document was transmitted to Petitioner as required by Rule 29.3.



William D. Lunn, Affiant

State of Oklahoma
County of TULSA

Subscribed and sworn to (or affirmed) before me on this day of June 28, 2018, by William D. Lunn, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature 