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August 7, 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 entered an appearance on behalf of Respondent Andre Ralph Haymond. The United States has petitioned the Court for certiorari in Mr. Haymond's case out of the Tenth Circuit Court. I am writing pursuant to Rule 30.4 to request a second 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 brief is currently due on August 15, 2018. This case arises from a judgment first entered by the Tenth Circuit Court of Appeals on August 31, 2017. 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 second request for an extension of time, and if the requested extension of time is granted, the Respondent brief in opposition will be due on September 14, 2018. The Respondent is not in custody.

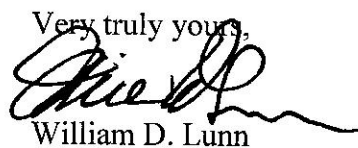
Respondent requests this extension of time because of the extensive research required to prepare an appropriate response to the well-drafted petition filed by the United States and because of the need to obtain review of Respondent's proposed draft with other attorneys experienced in Supreme Court practice. Respondent's counsel is a solo practitioner. Although he has submitted petitions for certiorari on behalf of other clients to the Court, he has not responded to a petition filed by the United States in any previous case. Since the petition was filed, counsel has spent substantial research time reviewing all the pertinent cases and has prepared an initial draft. He has conversed with two

attorneys in Washington, D.C. with substantial Supreme Court experience to review his work. Unfortunately, scheduling conflicts in the summer months have prevented either of those attorneys to have the opportunity to address Respondent's case as the current August 15, 2018 deadline nears.

Respondent's counsel maintains an active practice. During July, he has appeared in federal court in three separate cases, and in state court in four different counties in multiple cases. Respondent's counsel has a brief due this month in a Tenth Circuit case. He continues to have cases scheduled in federal and state courts locally in the coming weeks. While Respondent's counsel has devoted by far the largest part of his time in July to research and preparation of the response in this case, these other cases have made it more difficult to get a draft to the Washington, D.C. lawyers earlier to review.

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. This letter has been sent by over-night mail with the United States Post Office on the above date.

Very truly yours,

A handwritten signature in black ink, appearing to read "W. D. Lunn", written over the typed name.

William D. Lunn

PROOF OF SERVICE

STATE OF OKLAHOMA)
) ss:
COUNTY OF TULSA)

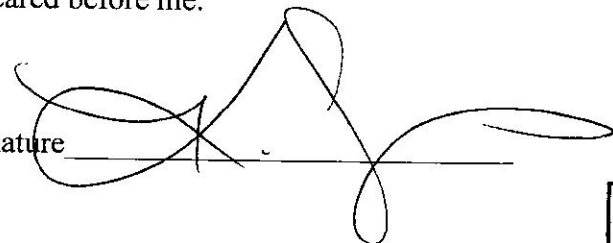
WILLIAM D. LUNN, being first duly sworn, deposes and states: That pursuant to Rule 29.4(a) of this Court, he served the above REQUEST FOR EXTENSION TO FILE RESPONDENT'S BRIEF IN OPPOSITION TO CERTIORARI on the counsel by enclosing a copy thereof in an envelope, First Class Postage Prepaid, addressed 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 August 7, 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 August 7, 2018, by William D. Lunn, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature 

(seal)

