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December 18, 2017

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

Re: Motion to Extend Time to Respond to Petition in *United States v. Jason Daniel Sims*, United States Supreme Court Case No. 17-766

Dear Mr. Harris:

Counsel for Respondent, Jason Daniel Sims, pursuant to Rule 30.4, respectfully request a 30-day extension of time in which to respond to the petition for writ of certiorari in United States Supreme Court Case No. 17-766. Mr. Sims's Brief in Opposition is currently due Tuesday, December 26, 2017. If this request for an extension is granted, his brief will be due Thursday, January 25, 2018.

Counsel makes this request because of counsel's current workload. Counsel believes that in order to effectively represent Mr. Sims, additional time is needed to thoroughly research the issue and prepare the brief in conformity with this Court's standards. Further, the issue presented here is the same issue presented in the petition for writ of certiorari in *United States v. Victor Stitt*, United States Supreme Court Case No. 17-765 (filed Nov. 21, 2017). As the government recognizes, this Court's disposition of the petition in *Stitt* will have some bearing here. This is counsel's first request for an extension and is not being made for purposes of delay. Counsel also cannot perceive any prejudice that would occur to either party by the granting of this 30-day extension.

Thank you for considering this request.

Scott S. Harris, Clerk of Court
December 18, 2017

Sincerely,

Chris Tarver
Senior Litigator

cc: Noel J. Francisco, Solicitor General of the United States