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July 5, 2018

Via Federal Express

Scott Harris, Clerk of the Court
United States Supreme Court
One First Street, N.E.
Washington, D.C. 20543

Re: *Richard Harley Greenway v. State of Arizona*, U.S. Supreme Court No.17-9474.

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondent, the State of Arizona, respectfully requests a 60-day extension of time in which to file its brief in opposition to Richard Greenway's petition for certiorari in this Court, to and including September 18, 2018. The current deadline to file the brief in opposition is July 20, 2018.

Respondent's counsel of record has been delayed in drafting the brief in opposition in this matter due to her caseload and personal obligations. In particular, counsel of record has taken over the drafting of a response to the capital petition for state post-conviction relief in *State v. Rose*, Maricopa County Superior Court Case No. CR2007-149013, from an attorney who has left the office of the Arizona Attorney General. The 156-page petition raises 26 claims and subclaims for relief, including 11 claims of ineffective assistance of counsel. That response is due August 6, 2018, and the superior court has ordered no further extensions absent extraordinary circumstances. Significant portions of the response remain to be drafted, and undersigned counsel is working diligently to complete the response by the deadline. Undersigned counsel also must prepare a response to a petition for review of the denial of post-conviction relief in the capital case, *State v. Payne*, Arizona Supreme Court Case No. CR-18-0230-PC. That response is due September 4, 2018. In addition, undersigned counsel has recently moved her mother into an assisted living facility and anticipates further demands on her time in preparing her mother's house for sale.

Therefore, Respondent respectfully requests that this Court grant an extension of time to and including September 18, 2018, in which to complete and file the brief in opposition. Counsel of record has contacted opposing counsel, Jonathan Young and Erin Carrillo, who have indicated they do not oppose this request.

Thank you for your attention to this matter.

Sincerely yours,

MARK BRNOVICH
Attorney General

A handwritten signature in cursive script, reading "Laura Chiasson".

LAURA P. CHIASSON
Assistant Attorney General
(Counsel of Record)

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