

THE STATE OF MISSISSIPPI



JIM HOOD, ATTORNEY GENERAL THE OFFICE OF THE ATTORNEY GENERAL CRIMINAL DIVISION

July 17, 2018

Danny Bickell, Esq.
Deputy Clerk for Practice and Procedure
Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543

**Re: *Curtis Giovanni Flowers v. Mississippi*, No. 17-9572
Unopposed Motion to Extend the Time to File Brief in Opposition**

Dear Sir:

The Brief in Opposition to the Petition for a Writ of Certiorari to the Mississippi Supreme Court is due to be filed in the above styled and numbered matter on July 26, 2018. Respondent, through undersigned, requests a thirty (30) day extension of time, to and until August 27, 2018, in which to the Brief in Opposition, and submits the following as grounds for granting this request.

Undersigned is, and has been, diligently working to complete the Brief in Opposition but cannot do so in the time presently allowed. Additional commitments and competing obligations prevent undersigned from completing the Brief in Opposition. On June 25, 2018, undersigned appeared on behalf of the State of Mississippi in the Lafayette County Circuit Court for a hearing in *Caleb Corrothers v. State of Mississippi*, No. 2014-DR-01689-SCT, 2017 WL 452912 (Miss. Feb. 2, 2017) (granting leave to file petition for post-conviction in circuit court). Undersigned took leave on July 2 to July 6, 2018, for a pre-planned family vacation. In addition to the Brief in Opposition, undersigned is preparing written objections, motions, and responses for filing in the Lafayette Circuit Court in *Corrothers v. State, supra*. Undersigned is preparing the State's response to a status report, motion for competency evaluation, and proposed order for filing on July 18, 2018 in the Lee County Circuit Court in *Derrick Demond Walker v. State of Mississippi*, No. 2005-DR-00788-SCT (Miss. Mar. 9, 2005) (granting stay of post-conviction proceedings and remanding for a determination of petitioner's competence). Undersigned is also preparing the State's response to the Motion for Leave to File Supplement to Reply in Support of Motion to Lift Stay of Post-Conviction Proceedings, which is due in the Mississippi Supreme Court on July 20, 2018, in *Curtis Giovanni Flowers v. State of Mississippi*, No. 2015-DR-00591-SCT (Miss. filed Mar. 17, 2016).

Undersigned has conferred with counsel for Petitioner. Petitioner has no objection to granting the requested extension. Therefore, undersigned respectfully requests an additional thirty (30) days, to and until August 27, 2018, in which to file the Brief in Opposition to the Petition for a Writ of Certiorari to the Mississippi Supreme Court in the above styled and numbered matter. This request is not being made for undue delay or any other improper purpose.

Respectfully submitted,

by: /s/ Brad A. Smith

BRAD A. SMITH
Special Assistant Attorney General

cc: Sheri Lynn Johnson
Keir M. Weyble
Alison Steiner