

THE STATE OF MISSISSIPPI



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

August 20, 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

Dear Mr. Bickle:

Respondent respectfully requests a second extension of time within which to file the brief in opposition in the above-captioned matter. The brief in opposition is currently due on August 27, 2018. Granting this request would extend the filing deadline to September 26, 2018.

The requested extension is necessary for several reasons. First, undersigned faces deadlines in several other cases. The most imminent dates are August 27, 2018 (completion of discovery) and August 31, 2018 (filing all motions). *Caleb Corrothers v. State of Mississippi*, No. LK17-309 (Miss. Cir. Ct. Jul. 19, 2017), *remanded by* No. 2014-DR-01689-SCT (Miss. Feb. 2, 1017). Second, counsel has drafted and filed several motions and responses this month. *See e.g., Curtis Giovanni Flowers v. State of Mississippi*, No. 2015-DR-00591-SCT (Miss. Apr. 13, 2015) and *Derrick Demond Walker v. State of Mississippi*, No. CR01-693-PF-L (Miss. Cir. Ct. Mar. 9, 2006), *remanded by* No. 2005-DR-00788-SCT (Miss. Apr. 18, 2005); *Corrothers, supra*. Third, counsel appeared in the Oktibbeha County Circuit Court on July 27, 2018, for a post-conviction hearing in *Bobby Batiste v. State of Mississippi*, No. 2015-0133-CVK (Miss. Cir. Ct. Mar. 17, 2016), *remanded by* No. 2013-DR-01624-SCT (Miss. Feb. 11, 2016). Counsel also traveled to Washington, D.C. on August 7th, for a 4-day capital litigation conference. Fourth, the requested extension is unopposed. Undersigned has conferred with Petitioner's counsel. Petitioner's counsel has no objection to this request. Finally, and of more impact, undersigned's grandmother passed away earlier this month.

Very truly yours,

by: /s/ Brad A. Smith
BRAD A. SMITH
Special Assistant Attorney General