

February 21, 2020

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

RE: Bush v. Sharp, Case No. 19-7455

Dear Mr. Harris:

Pursuant to Rule 30.4 of the Rules of the Supreme Court, undersigned counsel hereby requests an extension of time in which to respond to the petition for writ of certiorari filed in the above-captioned case. The extension is justified for the following reasons.

The petition was filed on January 24, 2020. The brief in opposition is due on February 27, 2020. Counsel for the State will not be able to complete the brief by the filing deadline for the following reasons. The undersigned is currently completing the Petition for Writ of Certiorari in *Tommy Sharp v. Roderick Smith*, to request the Supreme Court's review of the Tenth Circuit's grant of habeas relief in *Smith v. Sharp*, 935 F.3d 1064 (10th Cir. 2019). The Petition is due March 1, 2020.

On February 14, 2020, the undersigned filed the Brief of Appellee in *Thomas Lawrence Calloway v. The State of Oklahoma*, Oklahoma Court of Criminal Appeals Case No. F-2019-391. The undersigned is co-counsel in *Mica Alexander Martinez v. Terry Royal*, United States District Court for the Western District of Oklahoma Case No. CIV-16-1278-D, a capital habeas case in which the parties are in the process of completing a discovery plan ahead of an evidentiary hearing.

In addition, the undersigned is a reviewer of the work of four other attorneys in the criminal appeals unit of the Office of the Attorney General of Oklahoma, and in that capacity reviews all pleadings filed by those individuals. The undersigned is also in charge of habeas training. These responsibilities consume a significant amount of the undersigned's time.

For all of the foregoing reasons, the State respectfully requests an additional thirty days, or until March 28, 2020, in which to file its brief in opposition.

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