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August 26, 2020

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

Re: *Pizzuto v. Yordy*, No. 19-8598

Dear Mr. Harris:

Pursuant to the Court's order dated March 19, 2020 modifying the Court's rules and practices in light of the COVID-19 pandemic, the undersigned counsel respectfully moves to delay distribution of Mr. Pizzuto's petition for certiorari for 28 days until October 8, 2020.

Mr. Pizzuto intends to submit a reply brief in support of his petition for certiorari, which is currently scheduled to be distributed on September 10, 2020. Undersigned counsel will continue to diligently prepare her reply to the State's brief in opposition, but continues to face increasing demands and difficulties due to the pandemic.

Counsel of record is a solo parent and has faced significant obstacles with the virtual nature of her elementary age child's return to school including the added burden of the school district's recommended four hours of parental supervision of the educational process. In addition, counsel's supervisory duties have increased exponentially with regard to maintaining contact with her staff and coordinating teleworking and COVID-19 policies within the office.

The two other undersigned counsel on the case also face substantial obstacles. Mr. Horwitz will be on maternity leave as of August 27, 2020 and will not return to the office until September 29, 2020. Mr. Livingston is currently teleworking, as the primary caretaker of a child attending school on-line due to Covid. For the past eight days, Mr. Livingston has been to two doctors and the Emergency Room regarding his daughter's sudden onset of a mysterious, ongoing and unresolved neurological problem. Her next appointment presumably will recommend testing for the corona virus. Mr. Livingston must telework in order to monitor his daughter's condition.

In addition, and further complicated by the pandemic, counsel have spent a considerable amount of time recently preparing a clemency petition for Mr. Pizzuto, as his case is in end-stage litigation. Relatedly, Mr. Pizzuto is on hospice care and suffering from several serious ailments, including advanced bladder cancer, heart disease, and Type 2 diabetes. To assist Mr. Pizzuto with his care, counsel have been regularly reviewing voluminous medical records and discussing the information with their client.

The office also experienced a significant loss two weeks ago, when a colleague took their own life in the office. This tragedy necessitated closing the office for a week and requires undersigned counsel to actively engage in trauma counseling with her staff.

Respondent's counsel does not oppose this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Deborah Anne Czuba', with a long horizontal flourish extending to the right.

Deborah Anne Czuba

cc: L. LaMont Anderson