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March 7, 2022

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

RE: *Washington Bankers Association, et al. v. Washington, et al.*, No. 21-1066

Dear Mr. Harris:

I am counsel of record for respondents State of Washington, Washington Department of Revenue, and Director of the Washington Department of Revenue Vikki Smith. The Court has called for a response to the petition, which is currently due April 4, 2022.

Pursuant to Rule 30.4, Washington requests a 30-day extension to file a brief in opposition, to May 4, 2022. I have communicated with counsel for petitioners and they do not object to the extension.

The primary reason for this request is to accommodate other concurrent deadlines, particularly oral argument and briefing in a pending matter in this Court as well as significant ongoing state litigation. Our Office has a small team that works on U.S. Supreme Court matters, and we are all currently focused on *United States v. Washington*, No. 21-404, which has been accepted for review by the Court and in which I am counsel of record. Washington's response brief is due March 25, 2022, with argument presumably in the Court's April sitting. This case will thus consume much of our time over the next six weeks. In addition, my co-counsel for this matter and I anticipate significant briefing responsibilities for other matters in Washington courts in March and April.

Thank you for your consideration of this request.

Sincerely,

*s/ Noah Purcell*  
Noah Purcell  
Solicitor General  
(360) 753-6245

cc: Eric A. Shumsky, Counsel for Petitioners