



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

December 28, 2021

**By Electronic Filing and Overnight Delivery**

Scott Harris, Clerk of the Court  
Supreme Court of the United States  
Office of the Clerk  
1 First Street, N.E.  
Washington, D.C. 20543

Re: *Reed v. Goertz*, No. 21-442

Dear Mr. Harris:

A response in this death penalty case is due January 5, 2022. The respondent respectfully requests a fourteen-day extension of the present deadline. If granted, the response will be due January 19, 2022. The undersigned requests this extension for several reasons. First, the undersigned was out of the country for a month after the petition was filed. Second, the work that accumulated during that out-of-office period prevented the undersigned from devoting sufficient time to this case (thus necessitating the prior extension request). Third, the undersigned was promoted earlier this year, adding assistance to trial prosecutors and state appeals in addition to a capital habeas caseload, and with in-person trials restarting, the undersigned's new duties have kept him from completing the response in this case. Fourth, the response period has fallen during the Thanksgiving, Christmas, and New Year holidays. Fifth, the undersigned's brief must be reviewed by other attorneys with full practices.

The respondent has previously requested two extensions in this case. In the undersigned's decade-plus practice before the Court, primarily as a capital habeas litigator, the undersigned has never requested a third extension, which is why the extension request is modest in length, and it will be the undersigned's last. This request is not sought for an improper purpose, including delay. The undersigned has conferred with the petitioner's counsel, Mr. Parker Rider-Longmaid, who is not opposed to the requested extension. A copy of this letter will be sent to Mr. Rider-Longmaid. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Ottoway", written over a horizontal line.

Matthew Ottoway  
Assistant Attorney General

Cc: Mr. Parker Rider-Longmaid  
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