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October 27, 2021

Scott S. Harris
Clerk of the Court
Supreme Court of the United States
Washington, DC 20543-0001

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondent Raymond Twyford respectfully moves for an extension of time for filing his response to Petitioner Warden Tim Shoop's Petition for Writ of Certiorari in *Shoop v. Twyford*, Docket No. 21-511, until Monday, December 6, 2020.

Warden Shoop's Petition for Writ of Certiorari was docketed on October 6, 2021. The original deadline for Mr. Twyford to file his Brief in Opposition to the Petition for Writ of Certiorari is November 5, 2021. Mr. Twyford requests a 31 day (30 days would put the filing due on Sunday, December 5, 2021) until December 6, 2021.

Review of Warden Shoop's Petition for Writ of Certiorari presents numerous factual and legal arguments directly implicating the jurisdiction of the federal courts to control the course and scope of litigation, the ability of appointed habeas counsel to investigate a capital habeas cases, and the intersection of Suspension of the Writ with the standard of review of 28 U.S.C. § 2254 petitions.

Counsel currently has a full docket of ongoing capital habeas cases with a current filing deadline on November 3, 2021, in the Southern District of Indiana, and ongoing factual/legal investigations under Ohio's new death penalty exclusion for those with serious mental illness. In order to give this Court a full and detailed analysis of the facts and law necessary to make a reasoned decision regarding the denial of the Petition for Writ of Certiorari, counsel requests this 31-day extension of time.

Counsel for Warden Shoop have been consulted and do not oppose this request for an extension of time.

Sincerely,

/s/ Michael J. Benza
Michael J. Benza
Counsel of Record for Raymond Twyford

cc: Benjamin Flowers (Counsel for Petitioner)
Joshua Richardson (Counsel for Petitioner)