



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

STEPHEN HOFFMAN
ASSISTANT ATTORNEY GENERAL

(512) 936-1400
STEPHEN.HOFFMAN@OAG.TEXAS.GOV

February 8, 2022

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

**Re: *Juan Jose Reynoso v. Bobby Lumpkin*, No. 21-6846;
Request for Extension of Time to File Brief in Opposition**

Dear Hon. Harris:

The Director's brief in opposition to Petitioner's petition for writ of certiorari is presently due on February 14, 2022. Pursuant to Rule 30.4, this is a request for a **30-day** extension of time, up to and including **Wednesday, March 16, 2022**, in which to file that brief.

Undersigned counsel-of-record supervises the attorney assigned to this case. Assigned counsel was not involved in the district court briefing below. As a result, the assigned attorney has not yet had sufficient time to examine the record below as it relates to Petitioner's challenge. And absent such review, assigned counsel is not yet able to determine the appropriate responses to the Questions Presented in the petition. In addition, an extension of time is needed because the attorney's previous commitments in other cases, including: (1) preparation of an appellate brief in the Eleventh District Court of Appeals of Texas in *State v. Burnett*, No. 11-21-00038-CR, submitted on February 2, 2022; (2) preparation of an answer in *Harris v. Lumpkin*, No. 3:20-CV-3702-C (N.D. Tex.), due on March 14, 2022; (3) preparation of an answer in *Ricks v. Lumpkin*, No. 4:20-CV-1299-O (N.D. Tex.), currently due 90 days after amended petition is submitted; and (4) preparation for a Continuing Legal Education presentation on March 23, 2022. Finally, the assigned counsel is required to submit the response for internal review before filing with the Court.

Richard Burr, counsel of record for Mr. Reynoso, was contacted on February 4, 2022, and Mr. Burr confirmed that he is ***not*** opposed to this requested extension. A copy of this letter will also be emailed and mailed to Mr. Burr.

Thank you for your consideration of this matter.

Sincerely,

s/ Stephen Hoffman
STEPHEN HOFFMAN
Assistant Attorney General
Counsel of record

s/ Eran Sharon
ERAN SHARON
Assistant Attorney General

P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
Telephone: (512) 936-1400
Facsimile: (512) 936-1280

cc: Richard Burr
P.O. Box 525
Leggett, TX 77350
Email: dick.burrandwelch@gmail.com