



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

March 27, 2023

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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: *Jaime Piero Cole v. Bobby Lumpkin, Director of Texas Department of Criminal Justice—Criminal Institutions Division*, No. 22-6955

Dear Mr. Harris:

A responsive brief in this death penalty case is due April 6, 2023. Respondent respectfully requests a thirty-five-day extension of the present deadline, up to and including May 11, 2023. This is the first request for an extension in this case by counsel for Respondent. The extension request is not sought for an improper purpose, including harassment or unnecessary delay. Rather, counsel has recently filed responsive pleadings in *Edwards v. Lumpkin*, No. 3:23-cv-18 (S.D. Tex. Mar. 20, 2023) and *Sweeney v. Lumpkin*, No. 4:22-CV-893-O (N.D. Tex. Mar. 22, 2023.), and she is preparing a non-extendable responsive brief in *Polasek v. State of Texas*, No. 14-22-00302-CR (Tex. App.—Houston [14th Dist.]), due April 5, 2023. Counsel has also devoted a large amount of time in her supervisory role within her division. Consequently, counsel has been unable to complete her additional review of the record and researching the issues to draft a responsive brief in the instant case, and additional time is needed to do so. The undersigned conferred with Petitioner's counsel who stated he is not opposed to this requested extension. Thank you for your consideration.

Respectfully submitted,

s/ Cara Hanna
CARA HANNA
Assistant Attorney General

cc: Shawn Nolan
Shawn_Nolan@fd.org