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November 18, 2025

Honorable Scott Harris  
Clerk of Court  
Supreme Court of the United States  
1 First Street NE  
Washington, D.C. 20543

Re: *State of Florida v. State of California and State of Washington*  
U.S. Supreme Court Docket No. 22O162

Dear Mr. Harris:

I am counsel of record for Respondent State of Washington in the above-captioned case, which involves a motion for leave to file a bill of complaint as an original action. I am writing to request a 30-day extension of the deadline for respondents to file a response, to January 27, 2026.

Pursuant to Rule 17(5), my understanding is that the deadline for filing a brief in opposition to the motion is “[n]o more than 60 days after receiving the motion for leave to file and the initial pleading.” Although the certificate of service Plaintiff Florida filed with its complaint indicated that the complaint and motion had already been emailed and mailed to me as of October 15, 2025, that was not accurate. Through an apparent oversight, Florida did not email me a copy of the motion and initial pleading until October 29, 2025. Additionally, my office did not receive hard copies of the motion and initial pleading via mail until November 3, 2025, although the package containing them appears to have been postmarked on October 16. Applying a generous reading of “receiving” in the Rule, we have calculated the original deadline for submitting the brief in opposition as 60 days from when Florida sent the documents to me via email, which would be December 29, 2025, accounting for the 60th day falling on a Sunday.

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In any event, we are now requesting an extension of the deadline per Rule 30(4), to January 27, 2026. Plaintiff does not object to the extension. Respondent State of California also does not oppose the extension and requests that the same deadline apply to its response.

This request for additional time is made due to numerous other responsibilities requiring attention by the State's small team of attorneys that work on U.S. Supreme Court matters and to accommodate holiday leaves.

Sincerely,



Noah G. Purcell  
Solicitor General  
360-753-6200

cc: Jeffrey Paul DeSousa, Counsel for Plaintiff Florida  
Samuel Harbourt, Counsel for co-Respondent California