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February 27, 2024

Via Efile

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

Re: Travis Dwight Green v. Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division, No. 23-6451 (Capital Case)

Dear Mr. Harris:

In accordance with Supreme Court Rule 30.4, Respondent Bobby Lumpkin, Director, Texas Department of Criminal Justice, Correctional Institutions Division, respectfully moves for an extension of the time for filing the response to the petition for a writ of certiorari in this matter.

Petitioner filed a petition for a writ of certiorari on January 8, 2024. A response is presently due March 11. Respondent requests a 30-day extension of that deadline, creating a new filing date of Wednesday, April 10, 2024. This is Respondent's second request for an extension.

My staff reached out to counsel for Petitioner via e-mail to ask for Petitioner's position on this motion. Petitioner's counsel advised that the requested extension is unopposed.

The extension is necessary because counsel of record for Respondent and other attorneys staffed on this matter have numerous briefing and argument obligations. Such matters include:

- Appellant's Brief in *McClain v. Delgado*, No. 23-50879, filed in the United States Court of Appeals for the Fifth Circuit on February 22;

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- Presenting argument before this Court in No. 22-555, *NetChoice, LLC v. Paxton* on February 26, 2024;
- Appellant's Brief in *9000 Airport, L.L.C. v. Hegar*, No. 23-20568, due to be filed in the United States Court of Appeals for the Fifth Circuit on March 7;
- Appellees' Brief in *Texas v. Biden*, No. 23-40671, due to be filed in the United States Court of Appeals for the Fifth Circuit on March 22;
- Additionally, the primary attorney staffed on this matter is recovering from an injury that has limited his ability to timely draft pleadings.

For the foregoing reasons, Respondent respectfully requests a 30-day extension of the deadline to file the response to the petition for a writ of certiorari, creating a new deadline of Wednesday, April 10, 2024.

Respectfully submitted.

/s/ Aaron L. Nielson

Aaron L. Nielson
Solicitor General

cc: Tivon Schardl and James Rytting (via e-mail)