

LOURDES A. LEON GUERRERO  
GOVERNOR



JOSHUA F. TENORIO  
LT. GOVERNOR

UFISINAN I MAGA'HÅGAN GUÅHAN  
OFFICE OF THE GOVERNOR OF GUAM

February 13, 2024

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

Via USPS Express Mail

**Re: *Moylan v. Leon Guerrero*, No. 23-828**

Dear Mr. Harris:

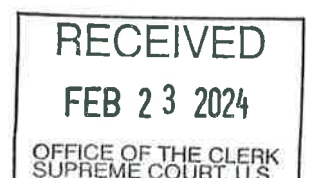
I am counsel for Respondent Lourdes A. Leon Guerrero, Governor of Guam, in the above-captioned matter.<sup>1</sup> Petitioner Douglas B. Moylan, Attorney General of Guam, filed his Petition for a Writ of Certiorari on February 1, 2024. Governor Leon Guerrero's response is presently due on March 4, 2024. On behalf of Governor Leon Guerrero, and pursuant to Rule 30.4 of the Rules of this Court, I request that the deadline to file Governor Leon Guerrero's response to the Petition be extended for a period of thirty (30) days, through and including April 3, 2024. This is Governor Leon Guerrero's first request for an extension of time to file a response.

Good cause exists for the requested extension. My office serves as in-house litigation counsel for the Office of the Governor in all matters in which Attorney General Moylan appears as an opposing party. In addition to serving as advisor to the Office of the Governor on all legal issues, I represent Governor Leon Guerrero in several matters, apart from this case, that require a substantial dedication of resources in the coming weeks, including an appeal before the Supreme Court of Guam, for which I am drafting an opening brief due on March 5, 2024.

The Petition in this matter raises issues Attorney General Moylan did not raise in the underlying Supreme Court of Guam action, and which, consequently, Governor Leon Guerrero did not have an opportunity to review or brief previously. The extension, if granted, would better enable Governor Leon Guerrero to prepare a response that would be helpful to the Court. The requested extension should not significantly delay the Court's consideration of the petition, and Attorney General Moylan has not requested expedited resolution of the Petition.

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<sup>1</sup> I am in the process of preparing my application for admission to the Supreme Court of the United States Bar, and will ensure it is timely filed prior to filing the response.



To: Hon. Scott S. Harris, *Clerk of the Court*, Supreme Court of the United States  
Fr: Leslie A. Travis, *Legal Counsel*, Office of the Governor of Guam  
Date: February 13, 2024  
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On February 12, 2024, I informed Tyler R. Green of Consovoy McCarthy PLLC, counsel for Attorney General Moylan, of Governor Leon Guerrero's intent to request this extension. Mr. Green has indicated that Attorney General Moylan consents to the requested extension. On February 12, 2024, I also notified Michael F. Phillips, counsel for the 37th Guam Legislature, of the request for extension, by email. As noted in the Petition, the Legislature appeared as a respondent in the underlying matter before the Supreme Court of Guam. Mr. Phillips has not responded as of the time of this submission.

For the foregoing reasons, Governor Leon Guerrero requests a 30-day extension of the time to file her response to the Petition for Writ of Certiorari, through and including April 3, 2024.

*Senseramente,*



**LESLIE A. TRAVIS**

*Legal Counsel*

Office of the Governor of Guam

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**CERTIFICATE OF SERVICE**

I, Leslie A. Travis, counsel for Respondent Lourdes A. Leon Guerrero, Governor of Guam, hereby certify that I caused the following document to be served on February 13, 2024:

**RESPONDENT'S REQUEST FO EXTENSION OF TIME TO FILE RESPONSE  
TO PETITION FOR A WRIT OF CERTIORARI**

The following party was served by United States Postal Service Express Mail:

Tyler R. Green  
CONSOVOY MCCARTHY PLLC  
222 S. Main St., 5<sup>th</sup> Fl.  
Salt Lake City, Utah 84101  
tyler@consovoymccarthy.com

*Counsel for Petitioner*

The following party was personally served:

Michael F. Phillips  
PHILLIPS & BORDALLO, P.C.  
410 West O'Brien Drive  
Hagåtña, Guam 96910  
advice@phillipsbordallo.law

*Counsel for 37th Guam Legislature*

Executed February 13, 2024, in Hagåtña, Guam.

  
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Leslie A. Travis