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March 14, 2024

Via: Email and USPS Certified Mail

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

RE: Moylan v. Leon Guerrero, No. 23-828 - Rule 30.4 Motion to Extend Time

Dear Mr. Harris:

I represented Respondents, *I Mina'trentai Siette Na Liheslaturan Guahan* (The 37th Guam Legislature) before the Supreme Court of Guam in *In Re: Request of Lourdes A. Leon Guerrero, I Maga'Hagan Guahan, Relative to the Validity and Enforceability of Public Law No. 20-134, CRQ2023-001* (Guam)¹. On behalf of the Guam Legislature, I respectfully request an extension of time in which to file a response to the Petition for Writ of Certiorari in the above captioned case.

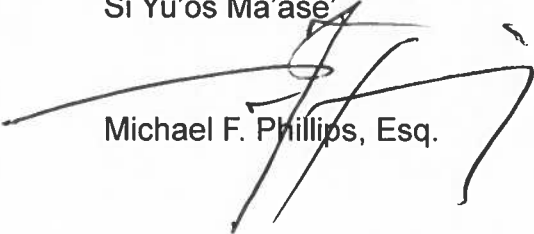
My understanding is April 3, 2024, is the current deadline to respond to the Petition. Unfortunately, in this matter, the Guam Legislature may only act collectively and through resolution requiring both statutory public notice and time to convene its Committee on Rules. The Guam Legislature played a significant role in the Supreme Court of Guam's October 31, 2023 Opinion. I anticipate the Guam Legislature will also want to participate and provide the Court with its position on the current Petition. Petitioner raises as his sole ground for granting certiorari an issue not raised before the Supreme Court of Guam. In addition, Respondent Governor Lourdes A. Leon Guerrero, waived filing her response in this matter. These facts constitute good cause for an extension and I ask that you grant the Guam Legislature an additional sixty (60) days from April 3, 2024, in which to file its response.

¹ The Supreme Court of the United States admitted me to practice before it on August 5, 2002.
" I Erensia, Lina'Ia', Espiritu-ta "

Please contact me should you have questions or wish to further discuss this matter.
I look forward to receiving your response.

Si Yu'os Ma'ase'

Michael F. Phillips, Esq.

A handwritten signature in black ink, appearing to be 'M. F. Phillips', is written over the printed name. The signature is stylized with a large, sweeping initial 'M' and a long horizontal stroke extending to the left.

CERTIFICATE OF SERVICE

I, Michael F. Phillips, counsel for Respondent *I Mina'trentai Siette Na Liheslaturan Guahan* (The 37th Guam Legislature), hereby certify that I caused the following document to be served on March 14, 2024:

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

The following party was served by email and United States Postal Service Certified Mail:

Tyler R. Green
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Counsel for Petitioner

The following party was personally served:

Leslie A. Travis
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Hagatna, Guam 96910

Counsel for Respondent, *I Maga'Hagan Guahan*

Executed March 14, 2024, in Hagatna, Guam.


Michael F. Phillips