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March 2, 2026

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

Re: *United States v. Shaheem Johnson*, No. 25-551

Dear Mr. Harris:

Counsel for the Respondent, Shaheem Johnson, respectfully request a further extension of time in which to file a response to the government's petition for a writ of certiorari. On January 27, the Court granted counsel's most recent request for an extension, making the current deadline for the response March 9, 2026.

Pursuant to Rules 15.3 and 30.4 of the Rules of this Court, the Respondent requests an additional 15-day extension of time, to and including March 24, 2026, in which to file a response to the petition.

The government has no objection to the requested extension. In fact, the government attorney assigned to this case encouraged us to seek an extension until at least March 24 because he has an oral argument that day, and an extension would allow him time after his argument to complete the government's reply.

In addition, this extension is necessary in light of counsel's other pending matters. In February, I filed two opening briefs, one reply brief, and three petitions for certiorari. I am also part of the team that wrote the merits brief in *Charrie v. United States*, No. 25-112, which was filed on February 23. Between now and March 18, I have five opening briefs due in the Fourth Circuit. Although I will seek an extension of some of those deadlines, each of those cases has required preliminary work, including review of the records, assembly of the appendix for each case, and communications with clients about potential issues for appeal. I also have a Fourth Circuit oral argument on March 17, and, as chief of appeals for my office, I will be preparing for and participating in moots for three colleagues' oral arguments that week. Finally, I am responsible for planning a statewide criminal defense training conference to be held April 9-10, including coordinating with speakers, preparing materials for my own session, and submitting the application for CLE credit.

For these reasons, counsel requires additional time to prepare the response in this case. Thank you for your consideration of this request.

Hon. Scott S. Harris
March 2, 2026
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Respectfully submitted,



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