

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General

ATTORNEY GENERAL
BRIAN L. SCHWALB



Office of the Solicitor General

October 16, 2025

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

Re: *Leyton Picon v. United States*, No. 25-5713

Dear Mr. Harris:

The Court docketed the petition in the above-referenced case on September 23, 2025. The response is currently due on October 24, 2025.

I respectfully request, under Rule 30.4 of the rules of this Court, an extension of time to and including November 24, 2025, for the District of Columbia to file its response.

This extension is necessary because Assistant Attorney General Tessa Gellerson, who is assigned to draft the response, requires additional time to draft the brief. Ms. Gellerson has an upcoming argument on October 28 in *Peterson v. United States*, No. 24-CF-430 (D.C.). Ms. Gellerson is also the principal author of the District's brief in *In re S.M.*, No. 25-FS-517 (D.C.) (supplemental briefing due October 31), and is responsible for numerous time-sensitive internal matters. Finally, after Ms. Gellerson completes her draft, I and other supervisors in the Office of the Attorney General will need to review and edit the brief, necessitating the requested extension.

This is the District's first request for an extension of time. It is made in good faith and solely to prepare the District's response. The United States has informed the undersigned that it also intends to seek a 30-day extension. The requested extension will not result in undue delay, as the Court could still grant certiorari (should it decide to do so) in time to hear and decide the case this Term. Counsel for Petitioner does not consent to this request. Thank you for your attention to this matter.

Respectfully submitted,

Caroline S. Van Zile
Solicitor General
Office of the Attorney General for the District of Columbia

Cc: Matthew B. Kaplan
Counsel of Record for Petitioner (by first class mail)

D. John Sauer
Counsel of Record for Respondent (by first class mail)