



Lynn Fitch
ATTORNEY GENERAL
CRIMINAL LITIGATION

February 25, 2026

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

Via: USPS Priority Mail

Re: Request for extension of time to file a response to petition for certiorari, *Martez Abram v. Mississippi*, Cause No. 25-6862

Dear Mr. Harris,

I am counsel for Respondent, the State of Mississippi (“Respondent”), in this case. Petitioner filed his Petition for Certiorari on February 20, 2026. Absent an extension, Respondent’s response is due March 23, 2026. Pursuant to Rule 30.4, Respondent respectfully requests that the time for filing a response be extended by thirty days. Respondent respectfully requests a due date of April 22, 2026.

This request for an extension is Respondent’s first. Good cause exists for the requested extension. Respondent’s counsel has numerous other professional commitments prior to the current deadline. Counsel currently has a motion to set execution pending before the Mississippi Supreme Court in *Simon v. State of Mississippi*, Cause No. 91-DP-00353. Counsel is also responsible for responding to a successive petition for post-conviction relief in another capital case, *Bennett v. State*, No. 2025-DR-01074-SCT. Counsel also has a capital habeas corpus Memorandum of Law due, *Galloway v. State of Mississippi*, 1:24-CV-121-CWR.

The requested extension is necessary to ensure Respondent has an adequate opportunity to review and respond to the Petition for Writ of Certiorari in light of counsel's other commitments. The requested extension will also better enable preparation of a response that will be most helpful to the Court. Further, there are no circumstances that necessitate a speedy ruling on the Petition.

Accordingly, Respondent request a thirty-day extension of time, to and including April 22, 2026, to file its brief in opposition to the Petition for Writ of Certiorari. Before mailing this letter, I informed Petitioner's counsel—Stacy Ferraro—of Respondent's intent to request a thirty-day extension. Petitioner's counsel informed me by e-mail that the Petitioner does not object to the requested 30-day extension.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Parker Proctor Jr. _____

Parker A. Proctor Jr. (Bar #321272) (MSB #105091)
Special Assistant Attorney General
Mississippi Attorney General's Office
P.O. Box 220
Jackson, MS 39205
Office: (601) 359-3747
Parker.Proctor@ago.ms.gov

CERTIFICATE OF SERVICE

I, Parker A. Proctor Jr., certify that on February 25, 2026, I have mailed a copy of this document via USPS first class mail to all parties required to be served. This letter was mailed to following address:

Stacy Ferraro
Office of the State Public Defender
239 N. Lamar Street, 7th Floor
Jackson, MS 39201

THIS, the 25th day of February, 2026.

LYNN FITCH
Attorney General of Mississippi

/s/ Parker Proctor Jr.
Parker A. Proctor Jr. (Bar #321272) (MSB #105091)

Special Assistant Attorney General
Counsel for Respondent