



ATTORNEY GENERAL OF WASHINGTON

Solicitor General's Office
PO Box 40100 • Olympia WA 98504-0100 • (360) 753-6200

March 11, 2026

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

RE: ***International Partners for Ethical Care, Inc., et al. v. Ferguson, et al., No. 25-840***

Dear Mr. Harris:

I am counsel of record for Respondents Governor Robert W. Ferguson, Attorney General Nick Brown, and Secretary of the Department of Children, Youth, and Families Tana Senn in the above-captioned case. A response to the petition for writ of certiorari is currently due March 30, 2026.

Pursuant to Rule 30.4, Respondents request a 45-day extension to file a brief in opposition, to May 14, 2026. Counsel for Petitioners do not object to the extension.

This request for additional time is made due to numerous other responsibilities requiring attention by the State's small team of attorneys that work on U.S. Supreme Court matters. Specifically, attorneys on the U.S. Supreme Court team have two Briefs in Opposition due within two weeks of the current deadline, in *John Stockton, et al. v. Nick Brown, et al.*, No. 25-606, currently due April 3, 2026, and *The Geo Group, Inc. v. Ugochukwu Nwauzor, et al.*, No. 25-828, currently due April 10, 2026, several oral arguments at the Ninth Circuit scheduled for May, and numerous other trial court and appellate litigation matters, in addition to their regular work overseeing the office's appellate practice.

The extension will allow for a more thorough presentation by the State Respondents, which we believe will be helpful to the Court and not prejudice Petitioners.

Thank you for your consideration of this request.

Sincerely,

s/ Tera Heintz
Tera Heintz
Deputy Solicitor General
(360) 753-6245

cc: Gene Schaerr
Counsel for Petitioners