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April 8, 2026

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

**Re: *Trevino, et al. v. Hobbs, et al.*, No. 25-918  
*Garcia v. Hobbs, et al.*, No. 25-901**

Dear Mr. Harris:

I am counsel of record for Respondent State of Washington in the two related cases captioned above. The Court has called for a response to both cert petitions and set the deadline for Briefs in Opposition as April 24, 2026.

Pursuant to Rule 30.4, Washington requests a 60-day extension to file a brief in opposition to June 23, 2026. In each case, Petitioners sought and received a 60-day extension in which to file the petitions, which Respondents did not oppose. Counsel for co-Respondents in the Trevino case, Campaign Legal Center, joins in this request. Counsel for Petitioners in both cases agrees to 30-day extensions, but objects to 60-day extensions.

This request for additional time is made to accommodate other concurrent deadlines, including briefing before this Court in *The GEO Grp., Inc. v. Nwauzor*, No. 25-828 and *International Partners for Ethical Care (IPEC) v. Ferguson*, No. 25-840. The State's brief in opposition in *GEO* is due on April 10, 2026, and in *IPEC* on May 14, 2026. The State's small team of attorneys that work on U.S. Supreme Court matters will be extremely busy with those cases, as well as supervising and drafting briefing in several cases at the Washington Supreme Court and Washington Court of Appeals, supervising federal litigation, briefing several constitutional challenges to recently enacted Washington statutes, and handling other substantial day-to-day responsibilities.

Petitioners may argue in response that a 60-day extension will prevent distribution of the petition this term. But Petitioners put themselves in this position by requesting a 60-day extension for filing their petitions, on top of the 90 days already afforded to cert petitioners. It is only fair to allow

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Respondents the same latitude already provided to Petitioners. And given their requests for extensions, petitioners cannot reasonably argue that this Court's consideration of the petitions is urgent.

We respectfully submit that the requested extension will allow sufficient time for our office to provide a more thorough and helpful response to the Court.

Thank you for your consideration of this request.

Sincerely,

*s/Peter B. Gonick*

Peter B. Gonick

*Deputy Solicitor General*

cc: Jason Brett Torchinsky, *Counsel for Petitioners Jose Trevino and Benancio Garcia III*  
Mark Peter Gaber, *Counsel for Respondents Susan Soto Palmer, et al.*