



**JOHN CREUZOT**  
CRIMINAL DISTRICT ATTORNEY  
DALLAS COUNTY, TEXAS

March 3, 2026

Honorable Danny Bickell, Deputy Clerk  
Supreme Court of the United States  
Office of the Clerk  
1 First Street, N.E.  
Washington, D.C. 20543

Re: *James Garfield Broadnax v. Texas*, No. 25-938

Dear Mr. Bickell:

This letter is to request a three-week extension of time to March 30, 2026, in which to file Respondent Texas's Brief in Opposition in the above-styled case. The Court docketed Petitioner James Broadnax's petition for writ of certiorari on February 6, 2026. Respondent's deadline to file a response is currently March 9, 2026.

This is an appeal from the lower court's denial of Petitioner's motion for rehearing [in Texas, called a "suggestion the Court of Criminal Appeals reconsider on its own motion"] the 2023 dismissal of his first subsequent state habeas application. On June 24, 2024, this Court denied Broadnax's petition for certiorari (no. 23-248) on the first subsequent state habeas application. Because this is an appeal from the denial of a motion for rehearing, this Court lacks jurisdiction. Respondent will include its jurisdictional arguments in its Brief.

Respondent seeks this extension due to undersigned counsel's capital habeas and direct appeal dockets, supervisory duties, and other work-related obligations. Broadnax has a separate petition for certiorari pending in case no. 29-939. Texas's Brief in Opposition to that petition will be filed on the March 9, 2026 deadline. Last week on February 26, 2026, undersigned counsel also underwent ankle surgery for fracture, tendon, and ligament repairs, which has slowed completion of these two briefs.

Petitioner has an execution date of April 30, 2026. He has two applications for a stay of execution pending in this Court, associated with his two petitions, in nos. 25A899 (25-938) and 25A900 (25-939).

Thank you for your consideration of this request.

Sincerely,

/s/ Michele “Shelly” O’Brien Yeatts

Michele “Shelly” O’Brien Yeatts  
Assistant District Attorney, Appellate Division  
Dallas County District Attorney’s Office  
(214) 653-3630 (Direct)  
(214) 653-3625 (Appellate Division)  
shelly.yeatts@dallascounty.org

cc: Steven Herzog, Counsel of Record for James Broadnax  
sherzog@paulweiss.com