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September 14, 2026

VIA U.S. MAIL & E-FILING

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

Re: *Douglas B. Moylan, Attorney General of Guam, Petitioner v. Guam Society of Obstetrician and Gynecologists, et al.*
No. 26-22

Dear Mr. Harris,

Pursuant to Rule 30.4 of the rules of this Court Respondent Dr. William Freeman¹ respectfully requests a 60-day extension of the time to respond to Petitioners' petition for a writ of certiorari. Petitioner does not oppose this request.

Respondent's current deadline for responding to the petition for writ of certiorari is September 25, 2026, and a 60-day extension of this deadline would fall on November 24, 2026.

This is the first request for an extension of time to file a response by Respondent.

Respondent requests the extension because of their counsel's significant obligations in other matters over the next two months. In this Court, attorneys representing Respondent in this appeal have numerous other briefing deadlines, including a response to appellant's jurisdictional statement in *Allen v. Milligan*, No. 26-117; a response to the petition for a writ of certiorari in *Mullin v. Refugee and Immigrant Center for Education and Legal Services*, No. 26-239; and a response to the petition for a writ of certiorari in *Brumley v. Roake*, No. 25-1360. Additionally, Respondent's counsel have numerous obligations and deadlines in other cases in active litigation over the next few months. This includes: an oral argument scheduled for September 23 in *Demster v. Blanche*, No. 26-cv-2546 (W.D. Tenn.); a summary judgment brief due September 30 in *Planned Parenthood Southwest Ohio Region, et*

¹ Of the original plaintiffs in this action, which was commenced in 1990, Dr. Freeman is the sole party that participated in the proceedings on Petitioner's Rule 60(b) motion below.



al. v. Ohio Department of Health, et al., No. A 2101148 (Hamilton Cnty. Court of Common Pleas); active discovery with 8 expert depositions and 2 party depositions anticipated to occur throughout the rest of September, October, and November in *Greta Gill, et al. v. State of Arizona, et al.*, No. CV2026-005011 (Maricopa Cnty. Super. Ct.); jury selection and a jury trial scheduled in four cases between September 30 and October 24 (*People v. Lonnie Ambai Iyar*, No. CF0412-26 (Guam Super. Ct.); *People v. Anne Julia Aglubat*, No. CM0329-26 (Guam Super. Ct.); *People v. Diomendes Nuqui* No. CF0869-25 (Guam Super. Ct.); *People v. Tommy Junior Puas*, No. CF0420-26 (Guam Super. Ct.)); and an appellate brief due on September 21 in *People of Guam v. S.A., K.M., V.M.*, No. CVA26-022 (Guam Sup. Ct.). Lead counsel for Respondent will also be on leave from October 5, 2026 through November 27, 2026.

Respectfully submitted,

A handwritten signature in black ink that reads "Meagan Burrows". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Meagan Burrows
Counsel of Record for Respondent
Dr. William Freeman

Cc: Gonzalo Alberto Gayoso
Counsel of Record for Petitioner

Leslie Travis
Counsel of Record for Respondent Governor of Guam Government Entities