



ATTORNEY GENERAL OF WASHINGTON

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July 24, 2026

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

RE: *The GEO Group, Inc. v. Ferguson, et al.*, No. 26-71

Dear Mr. Harris:

I am counsel of record for Respondents Washington State Governor Ferguson and Attorney General Brown in the above-captioned case. A response to the cert petition is currently due August 17, 2026.

Pursuant to Rule 30.4, Respondents request a 45-day extension to file a brief in opposition, to October 1, 2026.

This request for additional time is made due to numerous other responsibilities requiring attention by the State of Washington's small team of attorneys that work on U.S. Supreme Court matters. Specifically, attorneys on the U.S. Supreme Court team a Brief in Opposition in *Roberts v. Ferguson*, No. 25-1327, currently due August 13, 2026; an en banc oral argument at the Ninth Circuit on September 28, 2026; and other state and district court oral arguments in August and September plus numerous other trial court and appellate court filings in those months. Moreover, the lead attorneys below, who will have significant drafting responsibility for the Brief in Opposition are leading multiple ongoing matters in both state and federal court with deadlines in August and September, including responding to GEO's stay pending appeal in this case, which response is due to the Ninth Circuit on August 5, 2026, and an answering brief addressing GEO's appeal of the preliminary injunction, which is due to the Ninth Circuit on September 8, 2026.

The extension will allow for a more thorough presentation by Governor Ferguson and Attorney General Brown, which we believe will be helpful to the Court and not prejudice Petitioner.

Although counsel for Petitioner obtained two successive 30-day extensions to file their petition for certiorari in this case (from May 12 to July 10), counsel for Petitioner does not consent to the extension.

Thank you for your consideration of this request.

ATTORNEY GENERAL OF WASHINGTON

The Honorable Scott S. Harris

July 29, 2026

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Sincerely,

s/ Noah G. Purcell

Noah G. Purcell

Solicitor General

360-753-2963

cc: Paul D. Clement
Counsel for Petitioner