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September 21, 2020

Via E-File

Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543

Re: *Planned Parenthood Center for Choice, et al. v. Greg Abbott, Governor of Texas, et al.*, No. 20-305

Dear Mr. Harris:

In accordance with Supreme Court Rule 30.4 and the Court's Order of March 19, 2020, Respondents Greg Abbott, Governor of Texas; Ken Paxton, Attorney General of Texas; Phil Wilson, Acting Executive Commissioner of the Texas Health and Human Services Commission; Stephen Brint Carlton, Executive Director of the Texas Medical Board; and Katherine A. Thomas, Executive Director of the Texas Board of Nursing, in their official capacities, respectfully move for an extension of the time for filing their response to the petition for a writ of certiorari in this matter.

Petitioners filed their petition for a writ of certiorari on September 3, 2020. It was docketed on September 9, creating a deadline for Respondents' brief in response of October 9, 2020. Respondents request a 30-day extension of that deadline, creating a new filing date of November 9, 2020.¹

My staff reached out to counsel for Petitioners via telephone and email to ask for their position on this motion. As of the time of this filing, we have not received a response.

¹ Thirty days from October 9 is November 8, which is a Sunday; thus, the operative deadline would be Monday, November 9.

The extension is necessary because lead counsel for Respondents has had numerous briefing and argument obligations since Petitioners filed their petition for certiorari on September 3. Lead counsel's caseload has significantly increased due to COVID-19-related litigation involving the State of Texas and its officials and, more recently, multiple emergency election-law matters that have required expedited briefing and argument. Lead counsel's obligations include:

- *Richardson v. Hughs*, No. 20-50774 (5th Cir.) (emergency stay motion filed September 11, 2020)
- *Lewis v. Hughs*, No. 20-50654 (5th Cir.) (motion to file en banc reply filed September 18, 2020)
- *Texas Democratic Party v. Hughs*, No. 20-50683 (5th Cir.) (response to emergency motion to summarily affirm filed September 18, 2020)
- *State of Texas v. Hollins*, No. 20-0729 (Tex.) (emergency briefing due September 22 & 28, 2020; oral argument September 30, 2020)
- *Texas v. New Mexico*, Orig. 65 (U.S.) (oral argument October 5, 2020)
- *In re Brown*, 19-0877 (Tex.) (oral argument October 29, 2020)
- *California v. Texas*, No. 18-840 (U.S.) (oral argument November 10, 2020)

For the foregoing reasons, Respondents respectfully request a 30-day extension of the deadline to file their response to the petition for a writ of certiorari, creating a new deadline of November 9, 2020.

Respectfully submitted.

/s/ Kyle D. Hawkins

Kyle D. Hawkins
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Counsel of Record

cc: Julie A. Murray (via e-mail)