

**FEDERAL COMMUNITY DEFENDER OFFICE
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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FEDERAL COURT DIVISION
CAPITAL HABEAS UNIT

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October 18, 2024

Ms. Denise McNerney
Merits Clerk
United States Supreme Court
One First Street, N.E.
Washington, DC 20543

Re: *Gutierrez v. Saenz*, No. 23-7809 (S. Ct.)

Dear Ms. McNerney:

I am writing in conjunction with opposing counsel, Aaron Nielson, Esq., to jointly request a fifteen-day extension of time for each of our merits briefs. The parties need the extra time to fully complete the research and drafting of their respective briefs, to allow sufficient time to fully prepare for oral argument, and to manage their respective caseloads during this time.

Mr. Nielson and I have agreed on the following proposed schedule: Petitioner's Brief would be due on December 3, 2024; Respondent's Brief would be due on January 17, 2025; Petitioner's Reply Brief would be due no later than 2pm on Friday, February 14, 2025. Petitioner recognizes this would provide less than the default 30 day time frame for a reply brief and this does not pose a problem for Petitioner.

Both Mr. Nielson and I thank you in advance for your consideration of this request.

Respectfully,

/s/ Shawn Nolan

Shawn Nolan
Annie Fisher
Counsel of Record for Petitioner, Ruben Gutierrez

cc: Aaron Nielson, Esq.
Jay Clendenin, Esq.
Lanora Pettit, Esq.