

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General



ATTORNEY GENERAL
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Office of the Solicitor General

April 25, 2024

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

Re: *Davis v. District of Columbia*, No. 23-936

Dear Mr. Harris:

The Court docketed the petition in the above-referenced case on February 22, 2024. The brief in opposition is currently due on May 17, 2024.

I respectfully request, under Rule 30.4 of the rules of this Court, an extension of time to and including July 1, 2024, for the District of Columbia to file its response.

This extension is necessary because Deputy Solicitor General Graham E. Phillips, who is assigned to draft the brief in opposition, requires additional time to draft the brief. As Deputy Solicitor General, Mr. Phillips is responsible for editing briefs in numerous cases, helping attorneys prepare for argument, and drafting his own briefs. He is the principal author of the District's brief in *Doe v. District of Columbia*, No. 23-7135 (D.C. Cir.) (due May 2), and he is the principal editor of briefs in *Russell v. D.C. Department of Public Works*, No. 23-CV-552 (D.C.) (due May 2), *B.D. v. District of Columbia*, No. 23-7132 (D.C. Cir.) (due May 6), *Gamble v. D.C. Metropolitan Police Department*, No. 23-CV-557 (D.C.) (due May 10), and *In re Ja. W.*, No. 24-FS-67 (D.C.) (due May 13). During this time, he is also supervising argument preparation in *D.C. Department of Human Services v. Butler*, Nos. 23-AA-363 *et al.* (D.C.) (argument May 23), and *Jefferson-11th Street, LLC v. District of Columbia*, No. 21-CV-762 (D.C.) (argument May 29). In addition, throughout June, similar work on other pending appeals will limit Mr. Phillips's time to draft the brief in opposition here. Finally, after Mr. Phillips completes his draft, I and other supervisors in the Office of the Attorney General will need to review and edit the brief, as will our client, necessitating the requested extension.

This is respondent's first request for an extension of time. It is made in good faith and solely to prepare the District's response. Petitioner sought a 59-day extension of time within which to file the certiorari petition, and the requested extension will not result in undue delay, as the Court could

still grant certiorari (should it decide to do so) in time to hear and decide the case next Term. Counsel for petitioner opposes this request. Thank you for your attention to this matter.

Respectfully submitted,

Caroline S. Van Zile
Solicitor General
Office of the Attorney General for the District of Columbia

cc: Roman Martinez
Counsel of Record for Petitioner (by first class mail)