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November 25, 2024

Via electronic filing

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

RE: Extension to File Response to Petition for Writ of Certiorari in *Chiles v. Salazar*,
No. 24-539

Dear Mr. Harris:

I am counsel of record to all respondents in the above-captioned case. The petition for writ of certiorari in this case was filed on November 8, 2024, and was docketed on November 13, 2024. The response to the petition is currently due on Friday, December 13, 2024.

I, along with others on the team, have significant commitments and pre-planned travel through November and December, including ongoing case management and discovery obligations on behalf of a multi-state coalition, scheduled depositions and a preliminary injunction hearing for key team members, two additional briefs in opposition to petitions for certiorari in this Court (due December 23 and January 3), and oral argument in the Tenth Circuit on January 22, 2025. Additionally, one key member of the team will be leaving the office's employment, and their replacement requires additional time to familiarize themselves with the case.

Respondents have already received notice that five amicus briefs will be filed on behalf of petitioners and anticipate additional notices.

So that the response in opposition can address any issues raised by the amicus briefs while giving our office adequate time to prepare the response (and ensuring that the briefing deadlines do not disrupt Thanksgiving and December holidays for any party), I respectfully request a 60-day extension through and including Tuesday, February 11, 2025, to file a response to the petition.

Petitioner opposes the requested extension and requested that we state their position as follows: "Petitioner consents to a 17-day extension, with a filing deadline

of December 30th. That way, Petitioner can waive the right to file a reply brief before distribution, and the Court can consider the petition at its conferences on January 17 and 24 for a possible oral argument yet this Term. Petitioner opposes an extension that will result in the ongoing censorship of her and her clients' counseling conversations until the spring of 2026 at the earliest."

Respondents have not previously sought an extension regarding this petition. This case involves a state law that has been in operation since 2019, and which Petitioner did not challenge until late 2022.

Thank you for your consideration.

Sincerely,
/s/ Shannon Stevenson
Solicitor General of Colorado

cc: John Bursch (counsel for petitioners)