

## PHIL SORRELLS

Criminal District Attorney Tarrant County

November 13, 2024

## By Electronic Filing and Certified Mail

Scott Harris, Clerk of the Court Supreme Court of the United States Office of the Clerk 1 First Street, N.E. Washington, D.C. 20543

Re: Paul Storey v. State of Texas, No. 24-5791

Dear Mr. Harris,

A response in this death penalty case is due November 20, 2024. Respondent respectfully requests a thirty-day extension of that deadline, up to and including Friday, December 20, 2024. This is Respondent's first request for an extension in this case. The extension request is not sought for any improper purpose, harassment, or unnecessary delay. Rather, the undersigned requires additional time because she is currently appellate support for a capital murder trial in which the State is seeking the death penalty, *State of Texas v. Jason Thornburg*, Cause No. 1702735. In the that role, she has participated in pre-trial hearings, filed written responses to numerous motions, attended several days of trial, and is currently drafting findings of fact and conclusions of law regarding the trial court's denial of Defendant's motions to suppress (due November 19th). Additionally, she has a brief due in the Second Court of Appeals in *Ex parte William Lamar Smith*, Cause No. 02-24-00322-CR (due November 21st). The undersigned has conferred with Petitioner's counsel, Keith Hampton, who stated that he was not opposed to this requested extension. A copy of this letter will be sent to counsel. Thank you for your consideration.

Respectfully submitted,

Fredericka Sargent Assistant Criminal District Attorney <u>fsargent@tarrantcountytx.gov</u>

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cc: Keith Hampton Attorney at Law P.O. Box 66488 Austin, TX 78766 <u>Keithshampton@gmail.com</u>