

UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

WILLIAM ANDREW WRIGHT,	)	CASE NO. 17-4257
	)	
Petitioner-Appellant,	)	
	)	
v.	)	APPELLEE’S MOTION FOR A
	)	30-DAY EXTENSION OF TIME
STEPHEN SPAULDING, Warden,	)	WITHIN WHICH TO FILE
	)	<u>SUPPLEMENTAL BRIEFS</u>
Respondent-Appellee,	)	
	)	

Respondent-Appellee, through undersigned counsel, respectfully moves this Court for a 30-day extension of time, until July 18, 2019, for the parties to file their supplemental briefs.

The requested extension is not for any purpose of delay, but to ensure a complete response to the issues this Court wished to be addressed. Given the potential implications of the resolution of those issues, the undersigned feels it is necessary to consult with attorneys at the Department of Justice headquarters, including possibly the Office of the Solicitor General. The length of the extension request is needed, in part, because the undersigned will be out of the country from June 23 through July 7, 2019. Appellant’s counsel indicated that she does not object to an extension.

For those reasons, the government respectfully requests that the Court grant a 30-day extension, until July 18, 2019, within which the parties may file their supplemental briefing.

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney  
Northern District of Ohio

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of June 2019, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Segev Phillips

Segev Phillips

Assistant U.S. Attorney