



Civil Rights Division

Appellate Section  
Ben Franklin Station  
P.O. Box 14403  
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September 8, 2022

Mr. Lyle W. Cayce, Clerk  
United States Court of Appeals  
for the Fifth Circuit  
F. Edward Hebert Building  
600 S. Maestri Place, Suite 115  
New Orleans, LA 70130-3408

Re: Unopposed Level 1, 30-day extension of time to file brief as appellee in  
*Chisom, et al. v. State of Louisiana*, No. 22-30320

Dear Mr. Cayce:

The United States respectfully requests a Level 1, 30-day extension of time to file its brief as appellee in the above-referenced case. This request is unopposed.

The State of Louisiana filed its opening brief as defendant-appellant on August 24, 2022, after having sought and received an unopposed 30-day extension. The United States' brief is currently due September 23, 2022. If the requested extension is granted, the United States' brief would be due October 24, 2022.

Undersigned counsel is an attorney in the Appellate Section of the Civil Rights Division and did not handle this case in the district court. Although counsel has worked diligently to review the record, research the relevant legal issues, and consult with members of the United States' trial team while working on other matters, an extension of time is necessary because of the complexity and importance of the issues on appeal. The requested extension also is necessary to permit sufficient time for the government's multi-layered internal review process.

Sincerely,

Erin H. Flynn  
Special Litigation Counsel

s/ Yael Bortnick  
Yael Bortnick  
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Civil Rights Division  
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