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

Re: No. 15-674, *United States et al. v. State of Texas et al.*

Dear Mr. Harris:

On behalf of the State respondents, I request a 30-day extension, to January 20, 2016, of the time to file a brief in opposition to the above-cited petition for a writ of certiorari. *See* Sup. Ct. R. 30.4. There is good cause for this extension in light of pressing deadlines in other cases handled by counsel for the State respondents. Petitioners oppose this request.

Counsel of record for the State respondents has numerous pressing deadlines in other cases that were pending in this Court before the above-cited petition for a writ of certiorari was filed:

- Oral argument for appellees in *Evenwel et al. v. Abbott et al.*, No. 14-940, on December 8, 2015;
- Response to the petition for a writ of certiorari in *Apple, Inc. v. United States and State of Texas et al.*, No. 15-565, due January 4, 2016 (after counsel obtained a 30-day extension);
- Response to the petition for a writ of certiorari in *Frew et al. v. Traylor et al.*, No. 15-483, due January 4, 2016 (after counsel obtained a 30-day extension);
- Reply brief supporting the petition for a writ of certiorari in *State of Texas v. Davis et al.*, No. 15-522, which is expected to be due January 6, 2016 (after certain respondents obtained a 30-day extension to file their response);
- Response to the petition for a writ of certiorari in *Ivy et al. v. Williams*, No. 15-486, currently due December 9, 2015—although counsel has requested a 30-day extension to January 8, 2016;

- Amicus brief supporting the petition for a writ of certiorari in *Sissel v. Department of Health & Human Services et al.*, No. 15-543, due November 27, 2015; and
- Amicus brief supporting petitioners in *Zubik et al. v. Burwell et al.*, No. 14-1418, due January 11, 2016.

Additionally, other counsel for the State respondents have multiple upcoming oral arguments, which were set before the filing of the petition for a writ of certiorari here:

- Oral argument in *Hartfield v. Osborne*, 5th Cir. No. 15-20275, on December 1, 2015;
- Oral argument in *Nazari et al. v. State of Texas*, Tex. App. No. 03-15-00252-CV, on December 16, 2015; and
- Oral argument in *Frew et al. v. Traylor et al.*, 5th Cir. No. 15-40229, on January 6, 2016.

Although petitioners have expressed opposition to the requested extension, the request rests on good cause arising from the deadlines recited above. If petitioners' opposition stems from concern about short-term consequences of the district court's preliminary injunction, petitioners could have sought a stay pending appeal. But after the district court and court of appeals months ago denied petitioners' motions to stay the preliminary injunction pending appeal, petitioners declined to seek a stay from this Court. And as the State respondents noted in opposing those stay motions, the preliminary injunction does not require the Executive to remove any alien, and it does not impair the Executive's ability to set priorities for determining which unauthorized aliens to remove.

Thank you for your consideration.

Sincerely,

*SK by CB*

Scott A. Keller

Solicitor General of Texas

*Counsel of Record for State Respondents*

cc: Donald B. Verrilli, Jr.  
Nina Perales