



**U.S. Department of Justice**

Civil Division

(202) 307-4293

---

*Washington, D.C. 20044*

March 9, 2017

Francis V. Kenneally, Esq.  
Supreme Judicial Court  
Clerk for the Commonwealth  
John Adams Courthouse  
One Pemberton Square  
Suite 1400  
Boston, MA 02108

Re: Commonwealth v. Lunn, SJC-12276

Dear Mr. Kenneally:

Undersigned counsel, on behalf of the United States Department of Justice, writes to inform the Court that the Department is considering whether to submit an amicus brief in response to the Court's request for such briefs, issued February 8, 2017. Per the Court's order, such briefs are due to be filed no later than March 20, 2017. However, given the various stakeholders the Department represents, the Department respectfully requests an enlargement of time up to March 27, 2017, to file such a brief, should the Department elect to do so.

Undersigned counsel also formally moves this Court to permit the Department of Justice to present oral argument in the event the Department does file an amicus brief.

Respectfully submitted,

By: /s/ Erez Reuveni

EREZ REUVENI

Senior Litigation Counsel

United States Department of Justice

P.O. Box 868, Ben Franklin Station

Washington, DC 20044

Phone: (202) 307-4293

Erez.r.reuveni@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on March 9, 2017, I served a copy of the foregoing on counsel of record and amici.

/s/ Erez Reuveni  
United States Department of Justice