

May 14, 2018

Honorable John G. Roberts, Jr., Chief Justice Supreme Court of the United States 1 First Street, N.E. Washington, D.C. 20543

RE:

Corvain Cooper v. United States of America

Court Below:

United States Court of Appeals for the Fourth Circuit

Case #:

17-7359

Dear Chief Justice Roberts:

I have been representing Mr. Corvain Cooper <u>pro</u> <u>bono</u> for the last several years in his various challenges to his conviction entered in the United States District Court for the Western District of North Carolina. On March 8, 2018, the United States Court of Appeals for the Fourth Circuit denied our application for a Certificate of Appealability upon his appeal from the denial of his 28 U.S.C. § 2255 petition. Accordingly, his petition for a writ of certiorari would be due on June 8, 2018.

I write to respectfully request an additional 30 days to file the petition for a writ of certiorari to July 8, 2018. I make this request because my primary office is in Florida and my client is currently incarcerated in California and I have just been retained in this case. I have begun researching and preparing to draft the Petition but it is unlikely I would have sufficient time to complete the Petition and conference with my client. There are some anticipated issues to be raised in this Petition that require extensive research. In addition, my primary office is moving one week from today, which will result in some disruption of normal business activities while my staff and I get our new office up and running.

I am making this request in good faith and not for the purpose of undue delay. I hereby certify that a copy of the foregoing has been furnished to the Solicitor General of the United States.

In addition, I am respectfully submitting the attached motion to proceed *in forma pauperis*. Mr. Cooper has been incarcerated for approximately 5 years, has no income or assets at all. His family does not have any funds to pay for any legal expenses. I have promised Mr. Cooper I will continue to represent him for free in this Court, and respectfully request that all costs and fees be waived.



If the Court has any additional questions I am available at the Court's convenience. Thank you.

Please note that my firm's address will change on May 21, 2018 to 1300 North Semoran Boulevard, Suite # 195, Orlando, Florida 32807. The telephone number, fax number, and email addresses will remain the same

Respectfully Submitted,

Patrick Michael Megaro, Esq.

CERTIFICATE OF SERVICE

Pursuant to Rule 29.5 of the Supreme Court of the United of America, the following parties have been served via USPS mail on May 14, 2018

Solicitor General of the United States Room 5616 Department of Justice, 950 Pennsylvania Avenue, N. W. Washington, DC 20530-0001

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