

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

DESHAWN TERRELL,

Petitioner,

v.

THE STATE OF OHIO

Respondent.

On Petition for Writ of Certiorari to the Supreme Court of Ohio

APPLICATION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI

ERIKA B. CUNLIFFE*
JEFFREY M. GAMSO
310 Lakeside Avenue, Suite 200
Cleveland, OH 44113
(216) 443-7583
ecunliffe@cuyahogacounty.us

Counsel for Petitioner Deshawn Terrell

**Counsel of Record*

To the Honorable Justice Elena Kagan, Associate Justice of the Supreme Court and Circuit Justice for the United States Court of Appeals for the Sixth Circuit.

Petitioner Deshawn Terrell respectfully asks for an extension of time in which to file a petition for writ of certiorari. The Petition is currently due on April 30, 2018. Petitioner requests a 60-day extension, until June 29, 2018.

The decision of the Supreme Court of Ohio declining jurisdiction and refusing to hear Mr. Terrell's appeal from Ohio's intermediate appellate court was entered January 30, 2018. A copy of the entry is attached.

Mr. Terrell is a juvenile serving a life sentence for murder even though he did not pull the trigger of the weapon that killed the victim. As he argued in the Ohio courts, the mandatory sentencing provision for murder, as set forth under R.C. 2929.02(B)(1) is unconstitutional as it applies juveniles because it requires the trial court to impose a sentence of 15 years to life imprisonment and does not allow the court to consider the offender's juvenile status and his tangential role in the underlying misconduct.

Good cause exists for this requested extension. Counsel are engaged in the litigation of numerous other matters in the State Courts of Ohio as well at the Federal District Court that require them to request additional time to effectively pursue the certiorari petition in this case.

For these reasons, Deshawn Terrell requests a 60-day extension of time in which to file his petition for a writ of certiorari.

Respectfully submitted,

Erika B. Cunliffe

ERIKA B. CUNLIFFE*

JEFFREY M. GAMSO

310 Lakeside Avenue, Suite 200

Cleveland, OH 44113

(216) 443-7583

Counsel for Petitioner Deshawn Terrell

**Counsel of Record*