

IN THE SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA)
)
v.)
)
EDWARD JAIMAAL PRICE)
)

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

Comes now your Appellant, Edward Jaimaal Price, by and through undersigned counsel, and respectfully requests an extension of time in which to file the. In support of this Motion, counsel presents the following:

1. The Petition for Writ of Certiorari and Appendix is currently due on May 9, 2018;
2. The Solicitor General's Office, who is the opposing counsel, does not object.
3. This is Appellant's first request for an extension of time.
4. The undersigned counsel received notice on May 1, 2018 from the United States Attorney's Office that a task force agent involved in Appellant's case, as well as fifty-five (55) other cases in the Western District of Virginia, may have had certain impeachment and investigative value, and such material should have been disclosed pursuant to Brady v. Maryland, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972);
5. Said task force agent then Moved to Intervene on May 3, 2018; and such Motion is pending in the United States District Court for the Western District of Virginia and set for a hearing on May 16, 2018, which matter should be concluded or substantially clarified before the substantive portion of Appellant's Petition is completed;

6. Counsel for the Appellant respectfully requests an additional sixty (60) days to investigate this new matter with the task force agent and undisclosed material and in order to get a ruling on whether or not said material will be disclosed to counsel;
7. This Motion is made in good faith and not for the purpose of delay.

In light of the foregoing, Appellant respectfully requests an extension of time in which to file his Petition for Writ of Certiorari.

This is the 7 day of May.

Edward Jaimaal Price

By: /s/ Joseph A. Sanzone
Joseph A. Sanzone

Joseph A. Sanzone
VSB No. 20577
SANZONE & BAKER, L.L.P.
1106 Commerce Street, P.O. Box 1078
Lynchburg, VA 24505
(434) 846-4691

CERTIFICATE OF SERVICE

I hereby certify that on this 7 day of May, a copy of the foregoing Application for Extension of Time to File Petition for Writ of Certiorari has been served upon Counsel for the Appellee via the Court's ECF System:

The United States Solicitor General's Office

United States Department of Justice

/s/ Joseph A. Sanzone
Joseph A. Sanzone

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