

DOCKET NO. _____

IN THE SUPEREME COURT OF THE UNITED STATES
OCTOBER TERM, 2018

PERRY ALEXANDER TAYLOR

Petitioner,

vs.

STATE OF FLORIDA,

Respondent.

**APPLICATION FOR SIXTY (60) DAY EXTENSION OF TIME IN WHICH TO FILE
PETITION FOR WRIT OF CERTIORARI TO THE FLORIDA SUPREME COURT**

COMES NOW the Petitioner, PERRY ALEXANDER TAYLOR, by and through the undersigned counsel, and pursuant to Supreme Court Rule 13-5, and respectfully requests as extension of sixty (60) days within which to file his Petition for Writ of Certiorari to the Florida Supreme Court. In support of his request, Petitioner, through counsel, states the following:

1. Petitioner is an indigent death-sentenced inmate in the custody of the State of Florida. Undersigned counsel has represented Petitioner in collateral proceedings in state court for nearly two years along with attorney James Driscoll while employed by the Law Offices of Capital Collateral Regional Counsel - Middle Region (CCRC-M).

2. This case follows from the decision of the Florida Supreme Court affirming the trial court's denial of Mr. Taylor's successive motion for postconviction relief filed under Florida Rule of Criminal Procedure 3.851.

3. This Court has certiorari jurisdiction under 28 U.S.C. § 1257.

4. The Florida Supreme Court issued the opinion affirming the trial court's denial on May 3, 2018. (Attachment A). A motion for rehearing was filed, which was denied July 5, 2018 (Attachment B). Petitioner's current due date for the petition is Wednesday, October 3, 2018.

5. Petitioner shows the following good cause in support of this request:

A. Legal team member James Driscoll underwent emergency surgery on August 6, 2018. He spent nearly a week in the hospital, and has been out of the office ever since. He will likely be returning to the office by the end of September. Legal team member attorney Gregory Brown left the Office of the CCRC-M on July 31 and took new employment. The undersigned has been conducting interviews this week and hopes to have a new attorney join the legal team by October 1, 2018.

B. Undersigned counsel is left with a number of very active cases that require considerable work and attention to provide the representation necessary in capital cases.

C. Undersigned counsel currently has a complex brief due to be filed in the Florida Supreme Court on November 21, 2018 (Appellee / Cross-Appellant Mark Anthony Poole, FSC No. 18-245). In addition to this certiorari petition, counsel currently has 2 separate certiorari petitions due in this Court in less than 93 days: due date of November 23 (Petitioner Duane Owen, Application 18A186) and December 2 (Petitioner Scott Mansfield, Application 18A181).

D. As a result of the forgoing, counsel respectfully requests a 60-day extension of time (from the current October 3, 2018 due date) to submit a petition for writ of certiorari.

WHEREFORE, Petitioner, through undersigned counsel, respectfully requests an extension of sixty (60) days from the October 3, 2018 date to file the Petition for Writ of Certiorari on behalf of Petitioner.

/s/ David D.Hendry

David D. Hendry
Florida Bar No. 0160016
Office of the Capital Collateral Regional Counsel -
Middle Region
12973 N. Telecom Parkway
Temple Terrace, FL 33637
Telephone (813) 558-1600
Fax: (813) 558-1601

Attorney of Record for the Petitioner