

IN THE SUPREME COURT
OF THE UNITED STATES

JAVIER SOLIS,
Petitioner,

v.

JULIE JONES, SEC'Y FLA. DEPT.
OF CORRECTIONS,
Respondent.

LEGAL MAIL PROVIDED TO
NEW RIVER C.I.

AUG 13 2018

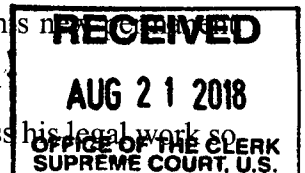
FOR MAILING
INITIALS

Case No.: _____
Ref. 11th Cir. # 17-12054-FF

MOTION FOR ENLARGMENT OF TIME
TO FILE CERTIORARI PETITION


Petitioner, Javier Solis, proceeding under Rules 13 and 30 of the Rules of the Supreme Court, respectfully requests a 60 day enlargement of time in which to file a Petition for Writ of Certiorari. As detailed below, although this present request is being filed less than 10 days before the Petition is due, extraordinary circumstances are present.

1. The Eleventh Circuit Court of Appeals denied Petitioner's appeal on March 1, 2018. (Attachment "A").
2. Petitioner's rehearing request was denied on May 18, 2018. (Attachment "B").
3. Petitioner's Petition for Writ of Certiorari is presently due no later than August 16, 2018.
4. This present request is being filed (Mail Box Rule) on August 13, 2018.
5. Under Rule (30) 2., a request for enlargement of time must have been filed by August 6, 2018 (At least 10 days in advance).
6. Due to circumstances beyond Petitioner's control, this was not possible.
7. It was Petitioner's plan to mail his application to this Court on or about August 4, 2018, but was unable to do so.
8. On August 2, 2018, Petitioner Solis was abruptly transferred from his permanent institution (South Bay Correctional Institution) without any advance warning.
9. He remained in transit from one reception center to another until arrival at his new reception facility (New River Correctional Institution).
10. During this 9 day period (August 2 – August 9), Petitioner was unable to access his legal work so he could not mail out his Motion for Enlargement of Time.



11. Upon arrival at New River Correctional Institution on Thursday August 9, 2018, Petitioner made arrangements to go to the law library the following day.
12. Petitioner learned on Friday August 10, 2018, that he could not simply mail out the previously prepared Motion for Enlargement of Time as it had the wrong address listed and more importantly did not explain why the request was not timely filed.
13. This present Motion was prepared and typed in one day (Saturday August 11, 2018) and is being filed at the first opportunity. (Mail Box Rule)(Monday August 13, 2018)(No legal mail pickup on weekends).
14. While Petitioner obviously could have filed his Motion for Enlargement of Time prior to his move by the Florida Department of Corrections on August 2, 2018, he had no reason to do so as the Department's action was unexpected.
15. Under these unique circumstances, Petitioner Solis should be granted a 60 day enlargement of time.

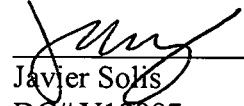
WHEREFORE, Petitioner, Javier Solis, respectfully requests a 60 day enlargement of time.



Javier Solis
DC# Y12987

OATH


Under the penalties of perjury, I hereby declare that the foregoing is true and correct.



Javier Solis
DC# Y12987

CERTIFICATE OF MAILING

Under the provisions of 28 U.S.C. §1746 and the penalties of perjury, I HEREBY CERTIFY that a true copy was provided, via pre-paid first class mail to: Respondents – Sec'y Fla. D.O.C. - The Capitol, PL-01, Tallahassee, FL. 32399 with the original provided to the Clerk of the U.S. Supreme Court, Washington, D.C., by entrusting them to prison officials for mailing on this 13th day of August, 2018.



Javier Solis
DC# Y12987
New River C.I.
P.O. Box 900
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