

IN THE SUPREME COURT OF THE UNITED STATES

MICHAEL BUSH,
Petitioner,

RECEPTION AND MEDICAL CENTER
DATE 7-20-18
INMATE INITIALS MB

V

CASE NO.: _____

SEC. FLA. DEPT. OF
CORRECTIONS,
Respondent.

_____ /

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

To the Hon. Justice Clarence Thomas:

The Petitioner, Michael Bush, files this application for extension of 60-days to file a petition for a writ of certiorari due to exceptional circumstances pursuant to Rule 13.5. In support of the application, the Petitioner states:

1. The Petitioner intends to file a petition for writ of certiorari requesting this Court to review the decision of the United States Court of Appeals for the Eleventh Circuit in *Bush v. Sec. Florida Department of Corrections*, Case No.: 14-12532. Attached as exhibit "A" is a copy of the opinion of the United States Court of Appeals for the Eleventh Circuit.
2. The United States Court of Appeals for the Eleventh Circuit issued the opinion on April 25, 2018. The Petitioner did not file a motion for rehearing.

3. The 90-day period in Rule 13.1 to file the petition for writ of certiorari expires on July 24, 2018.
4. The Petitioner is an inmate in the Florida Department of Corrections at Reception and Medical Center-Main Unit where prison medical staff is providing medical treating him on an ongoing basis.
5. The Petitioner's legal work was stored in the Reception and Medical Center-Main Unit law library.
6. Due to security reasons, prison officials at Reception and Medical Center-Main Unit do not allow the Petitioner access to the law library unless he has a registered deadline. Under Fla. Admin. C. 33-501.301 (f) (1) a registered deadline does not begin to run until 20-days prior to the date a pleading is due to be filed in court.
7. The Petitioner's access to the law library at Reception and Medical Center-Main Unit started on July 4, 2018.
8. Due to security concerns, security officials placed the Reception and Medical Center-Main Unit on an institutional-wide lockdown from July 2, 2018 through July 9, 2018. During this period, security did not allow the Petitioner access to the Reception and Medical Center-Main Unit law library.
9. Because the petitioner is untrained in the law and does not know how to conduct legal research, the Reception and Medical Center-Main Unit law

library staff assigned an inmate law clerk to assist him in drafting and filing a petition for a writ of certiorari. The law library staff did not assign the inmate law clerk to work with the Petitioner until after security lockdown expired on July 9, 2018.

10. The first time the Petitioner had an opportunity to meet with the inmate law clerk was on July 19, 2018.

11. The Petitioner's lack of access to the law library and to a law clerk constitute extraordinary circumstances that excuses the Petitioner from the requirement that this motion be filed 10-days before the date the petition for a writ of certiorari was due.

Wherefore the Petitioner moves this Court to grant him a 60-day extension to file a petition for writ of certiorari.

Respectfully submitted

A handwritten signature in black ink, appearing to read "M. Bush", is written over a horizontal line.

Michael Bush, *pro se*

DC# 069831

Petitioner

Reception and Medical Center - Main Unit

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