

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

IN RE: SAMUEL LEWIS SURLES, PETITIONER
VS.

_____ RESPONDENT

APPLICATION FOR LEAVE
TO EXCEED PAGE LIMIT

PETITIONER SAMUEL LEWIS SURLES, IN RE
AND PURSUANT TO SUPREME COURT RULE
33 (1) (d), IN THE INTEREST OF JUSTICE
PRAY THIS HONORABLE COURT WILL GRANT
LEAVE, APPLICATION FOR ON TO EXCEED
THE PAGE LIMIT FOR THE FOLLOWING:

1.) PETITIONER IS NOT ABLE TO MEET THE
REQUIREMENTS OF RULE 33 (1) (h) (b) OF

46 PAGE'S LIMITATION FOR THE REASON:

- (1) PRISON GUARDS BROKE PETITIONER'S WORD PROCESSOR, AND REFUSED TO REPLACE OR REPAIR IT;
 - (2) THE LIBRARIAN AT THE IONIA CORRECTIONS FACILITY LEVEL II REFUSED TO ALLOW PETITIONER USE OF TYPEWRITERS IN THE LAW LIBRARY PAID FOR WITH PRISONER'S FUNDING.
 - (3) AROUND FEBRUARY 21, 2019, PETITIONER WAS TRANSFERRED TO THE MTU OR THE RICHARD A. HANDLON CORRECTIONAL FACILITY, AT 1728 BLUEWATER HWY, IONIA, MICHIGAN 48846. THAT AT THIS FACILITY THE LAW LIBRARY DO NOT HAVE TYPEWRITERS FOR PRISONER'S USE.
 - (4) PETITIONER SUFFER FROM AN EXTREME CASE OF ARTHRITIS IN BOTH HIS RIGHT AND LEFT HANDS WHICH FORCES HIM TO USE A 12 INCH RULER TO PRINT UP THIS EXTRAORDINARY WRIT.
- 2.) AN APPLICATION FOR LEAVE TO EXCEED OR EXTEND THE PAGE LIMITS IS NOT FAVORABLE WITHOUT EXPLAINING WHAT EXTRAORDINARY

CIRCUMSTANCES EXIST. PETITIONER, PRAY
THIS HONORABLE COURT WILL GRANT THIS
APPLICATION BASED ON THE ABOVE REASONING;
AND FOR THE REASON THIS CASE OR ISSUES
OF INEFFECTIVE ASSISTANCE OF APPELLATE
AND TRIAL COUNSELS WILL BE AN AID OF
THE COURT'S APPELLATE JURISDICTION, ON HOW
FEDERAL COURTS SHOULD DEAL WITH A 50 YEAR
CASE WHERE PETITIONER WAS TOTALLY
DENIED HIS SIXTH AMENDMENT RIGHT TO
THE PRESENT AND ASSISTANCE OF COUNSEL
AT CRITICAL STAGES OF POLICE INTERROGATION,
SHOWUP/LINEUP AND ARRAIGNMENT ON THE
WARRANT.

THAT THE SUPREME COURT OF THE STATE OF
MICHIGAN SHALL ISSUE ITS DIRECTIVE TO ALL
LOWER STATE COURTS, THAT PETITIONER UNDER
THE FOURTH, FIFTH, SIXTH AND FOURTEENTH AMEND-
MENT ALWAYS HAVE A CONSTITUTIONAL RIGHT
TO RAISE A DUE PROCESS AND EQUAL PROTECTION
INEFFECTIVE ASSISTANCE OF APPELLATE AND TRIAL
COUNSEL CLAIM UNDER A COLLATERAL REVIEW
ON THE LAWS IN EXISTING AT THE TIME OF HIS
CONVICTION, ACCORDING TO THE LAW AND THE
PRECEDENTS OF THIS HONORABLE COURT.

WHEREFORE, PETITIONER PRAY THIS HONORABLE COURT
GRANT LEAVE OF THIS APPLICATION TO EXCEED THE
PAGE LIMITS.

April 3, 2019

Respectfully Submitted,
Samuel Lewis Surles
Samuel Lewis Surles,
IN RE:

Samuel Lewis Sunles #A122260
Richard A. Handlon Corr. Facility (MTU)
1728 W. Bluewater Hwy.
Ironing, Michigan 48846

April 3, 2019

Scott S. Harris, Clerk
Supreme Court of the United States
Washington, DC 20543-0001

Dear Clerk Harris:

Please take notice, that I am sending herewith this letter for filing my Extraordinary Writ of Habeas Corpus using the writ of Certiorari form as I was instructed.

In response to your response letter of March 11, 2019, please my Application for Leave to exceed the word/page limit.

Also please find for filing index of Appendices, an order from the lower Circuit Court denying motion for new trial the Michigan Court of Appeals and Michigan Supreme Court order of June 27, 2017 denying leave, etc. I am sending this court copies of exhibits from (A) to (Z-S) for filing with this Honorable Court.

Petitioner gave the Michigan Supreme Court the last opportunity to rule on structural errors that requires automatic reversal when petitioner is totally denied Sixth Amendment right to trial counsel at critical stages of police interrogation, showup/lineup and arraignment on arrest warrant contrary to the Fourth Amendment of no affidavit to establish probable cause.

I have been working diligently for many years to get Court records, documents, and DOILE AND PROSECUTOR'S FILES, records that have been denied me for over 40 years or so. Not being able to read and write and not knowing anything about Federal and State Law, forced me to file over the years many Court pleadings, that got me no results on my Constitutional issues.

Under Michigan Law, I was denied to raise my ineffective assistance of counsel during my first appeal of right, see PEOPLE v. SURLS, 29 Mich App. 132 (1970); and I have further been denied this right on collateral review for any State Court to rule on the merits of this claim.

Please see for Filing Petitioner's Motion to Transfer.

Respectfully

Samuel Lewis SURLS
SAMUEL LEWIS SURLS,
IN RE:

cc: file